



CABINET

DYDD MERCHER, 19 EBRILL 2023

**CYFARFOD AR Y CYD Y CABINET/PWYLLGORAU
CRAFFU AR ADDYSG, SGILIAU A LLES**

***CYFARFOD AML-LEOLIAD –
SIAMBR Y CYNGOR PORT TALBOT A MICROSOFT TEAMS***

**RHAID GOSOD POB FFÔN SYMUDOL AR Y MODD DISTAW AR
GYFER PARHAD Y CYFARFOD**

Gweddarlledu/Cyfarfodydd Hybrid:

Gellir ffilmio'r cyfarfod hwn i'w ddarlledu'n fyw neu'n ddiweddarach drwy wefan y cyngor. Drwy gymryd rhan, rydych yn cytuno i gael eich ffilmio ac i'r delweddau a'r recordiadau sain hynny gael eu defnyddio at ddibenion gweddarlledu a/neu hyfforddiant o bosib.

Rhan 1

1. Penodi Cadeirydd
2. Cyhoeddiad(au) y Cadeirydd
3. Datganiadau o fuddiannau
4. Cwestiynau gan y cyhoedd
Mae'n rhaid cyflwyno cwestiynau'n ysgrifenedig i'r Gwasanaethau Democrataidd, democratic.services@npt.gov.uk erbyn ganol dydd fan bellaf ar y diwrnod gwaith cyn y cyfarfod. Mae'n rhaid i'r cwestiynau ymwneud ag eitemau ar yr agenda. Ymdrinnir â chwestiynau o fewn cyfnod o 10 munud.

5. Craffu Cyn Penderfynu – Rhaglen Strategol Gwella Ysgolion – Cynnig i Sefydlu Ysgol Cyfrwng Saesneg 3-11 oed i ddisodli Ysgolion Cynradd yr Alltwen, Godre'r Graig a Llangiwig (wedi'i amgáu o fewn papurau'r Cabinet) (*Tudalennau 3 - 196*)
6. Eitemau brys
Unrhyw eitemau brys (boed yn gyhoeddus neu wedi'u heithrio) yn ôl disgrisiwn y Cadeirydd yn unol ag Offeryn Statudol 2001 Rhif 2290 (fel y'i diwygiwyd.

K.Jones
Prif Weithredwr

Canolfan Ddinesig
Port Talbot

Dydd Mercher, 12th Ebrill 2023

Aelodau'r Y Cabinet:

Y Cynghorwyr S.K.Hunt, S.A.Knoyle, N.Jenkins, D.M.Peters,
J.Hurley, S.Harris, J.Hale, A.Llewelyn, W.F.Griffiths a/ac S.Jones

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Cabinet
19th April 2023

REPORT OF DIRECTOR OF EDUCATION, LEISURE AND LIFELONG LEARNING ANDREW THOMAS

MATTER FOR DECISION

WARDS AFFECTED: Alltwen, Godre'rgraig, Pontardawe, Rhos, Trebanos, Ystalyfera,

STRATEGIC SCHOOL IMPROVEMENT PROGRAMME - PROPOSAL TO ESTABLISH AN ENGLISH- MEDIUM 3-11 SCHOOL TO REPLACE ALLTWEN, GODRE'RGRAIG AND LLANGIWG PRIMARY SCHOOLS

Purpose of report

1. To seek approval to publish a proposal to establish an English-medium 3-11 school with a specialist Learning Support Centre (LSC) for 16 pupils with a statement of Autistic Spectrum Disorder (ASD), in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary, all of which will be discontinued ¹on 31st August 2025.
2. Publication of the proposal provides a 28-day period for the submission of objections. Following the period for submitting objections, Cabinet will need to meet to consider objections received before taking a decision as to whether or not the proposal should be implemented. The purpose of this report is therefore not to make a final decision of discontinuing Alltwen Primary, Godre'rgraig Primary

¹Discontinued is the term used in the School Standards and Organisation (Wales) Act 2013, section 40, to mean permanent closure of a school or schools

and Llangiwg Primary, but to decide whether to progress to the stage of statutory publication.

3. This Cabinet report needs to be read in conjunction with the consultation report (appendix A), the consultation documents and the Cabinet report of 30th November 2022 along with the various appendices to this report.
4. A draft statutory notice is included at Appendix E .

Executive summary

5. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. This will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities in order to ensure future provision is sustainable.
6. Neath Port Talbot 's 21st Century Schools Band B Strategic Outline Plan (in January 2022, Welsh Government renamed this programme to Sustainable Communities for Learning) included a proposal for a new build 3-16 middle school, however following informal discussions with stakeholders it was decided that the scheme should be amended.
7. It is proposed therefore to establish an English-medium 3-11 school with a specialist learning support centre, in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary, all of which will close on 31st August 2025.
8. It is proposed that the new school will be built on land in Council ownership at Parc Ynysderw, Pontardawe and that it will form part of a learning, health and wellbeing community campus made up of Cwmtawe Community School and Pontardawe Leisure Centre. The campus will be further enhanced by the addition of a new build swimming pool on the site to complement the current health and wellbeing offer for pupils and the wider community.
9. The new build will be funded jointly from Welsh Government Sustainable Communities for Learning Programme capital grant monies and from the Council's prudential borrowing capacity. Welsh Government Sustainable Communities for Learning Programme capital grant funding has been approved in principle.

10. At its meeting of 30th November 2022 Cabinet approved consultation on a proposal to establish an English-medium 3-11 school with a specialist LSC, in new build premises to accommodate pupils from the current catchment areas of Alltwn Primary, Godre'rgraig Primary and Llangiwg Primary, all of which would be discontinued on 31st August 2025. Members will of course note the reasoning for commencing this consultation, which is included in the aforementioned papers of the 30th November 2022 and explained further below.
11. The consultation document invited views and opinions to be submitted in respect of the proposal. The Welsh Government's School Organisation Code requires the Council to consult on its proposal and to publish a consultation report summarising any issues raised by consultees, the Council's response to those issues and Estyn's view of the overall merit of the proposal. This report was published on 4th April 2023.

Background

12. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools in the right place and ensuring that they are fit for the 21st century learner is the challenge facing the Council. Achieving this will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities.
13. Implementing the Council's Strategic School Improvement Programme (SSIP) involves reviewing existing provision and determining the number and type of schools needed to deliver education effectively and efficiently across the County Borough. It will most likely lead to substantial change involving opening new schools, closing existing schools, merging or amalgamating schools, federating schools and promoting new initiatives that support collaborative working between schools.
14. The Council has determined to review its provision on the basis of:
 - educational standards
 - the need for places and the accessibility of schools
 - the quality and suitability of school accommodation
 - effective financial management

15. Neath Port Talbot Council's 21st Century Schools Band B (now Sustainable Communities for Learning) proposal submitted to Welsh Government included a project for a new build school in the Swansea Valley. The initial plans were to establish an 'English-medium, 'all-through' 3-16 school with capacity for 1284 pupils aged 11-16 and 750 pupils aged 3-11 (incl. Nursery), and would require the closure of Alltwen, Godre'rgraig, Llangiwg and Rhydyfro primary schools with education for the pupils being provided at a whole new (primary phase) build on the site of the existing Cwmtawe Comprehensive school'.
16. Informal consultation took place in March 2019 with local ward Members for the Swansea Valley area along with the AM and MP for Neath Constituency, headteachers and Chairs of Governors for all of the Neath Port Talbot schools in the area - Welsh and English-medium, primary and secondary.
17. Additional scoping work was undertaken, alongside a review of the number of pupils residing in the Swansea Valley area which made it necessary to reconsider the original planned scheme.
18. As a result of the informal consultation and the scoping review, the original scheme was amended to become a new build English-medium school for 630 full time and 140 part time nursery pupils aged 3-11 with a specialist learning support centre, in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary.
19. On 20th October 2021, following a thorough consultation process in line with the Welsh Governments School Organisation Code 2018, the Council's Cabinet at that time approved the proposal to establish an English-medium 3-11 school with a specialist Learning Support Centre (LSC) for 16 pupils with a statement of special educational needs relating to Autistic Spectrum Disorder (ASD), in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary.
20. In January 2022, the Council received notification that the decision was to be challenged by a Welsh- medium education parents group. The challenge was brought on three grounds including that a Welsh Language Impact Assessment should have been consulted upon at the same time as the school consultation. The judgement was

received in October 2022 and the judge found in favour of the applicant on one of the three grounds.

21. Furthermore in June 2022 the new Rainbow Coalition administration at Neath Port Talbot Council indicated that it wished to review the decision taken in respect of the Swansea Valley school reorganisation proposal.

The Proposal

22. It is proposed to establish an English-medium 3-11 school with a specialist learning support centre, in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwig primary, all of which will close on 31st August 2025.
23. It is proposed that the new school will be built on land in Council ownership at Parc Ynysderw, Pontardawe and that it will form part of learning, health and wellbeing community campus made up of Cwmtawe Community School and Pontardawe Leisure Centre. The campus will be further enhanced by the addition of a new build 25 metre, 6-lane swimming pool with additional learner pool on the site, to complement the current health and wellbeing offer for pupils and the wider community.
24. The new English-medium community primary school for boys and girls aged 3-11 years will accommodate 630 full-time pupils and 140 part-time (70 a.m./70 p.m.) nursery age pupils. It will be managed with one head teacher and one governing body and will have one budget allocation and one group of staff.
25. The new school will serve the combined catchment areas of Alltwen, Llangiwig and Godre'rgraig primary schools. Pupils from the three existing schools will automatically transfer to the new school subject to parental preference.
26. The new school will provide primary education for children aged 3-11 in a new build 21st century facility which will provide a stimulating teaching and learning environment in state of the art facilities .
27. Additionally the new school will provide support for pupils through the establishment of an LSC for 16 pupils with a statement of ASD. It will provide the opportunity for the proposed school to become a

community hub for the area, building on the work already being undertaken by other well established primary school LSCs.

28. The new build will be funded jointly from Welsh Government Sustainable Communities for Learning Programme capital grant monies and from the Council's prudential borrowing capacity.
29. The scheme will also include a new build 25 metre 6 lane swimming pool with additional learner pool, to further enhance the physical activity and wellbeing opportunities for pupils who currently attend Alltwen, Godre'rgraig and Llangiwig primary schools and Cwmtawe Community School, as well as pupils attending nearby YGG Trebannws and YGG Pontardawe.
30. Furthermore, the facilities will provide sustainable opportunities for swimming curriculum development for potentially 2500 pupils aged 3-16 in the nearby communities. The swimming pool will complement the current school and community facilities on site to deliver a 21st century health and wellbeing offer for pupils aged 0-16 and for wider community use, making it a sustainable delivery model.
31. The combined new build school, specialist ASD provision and pool will form part of a learning, health and wellbeing community campus at the Parc Ynysderw site, complementing the existing Cwmtawe Community School and Pontardawe Leisure Centre provision. In locating the new build facilities close to Cwmtawe Community School the development will enable pupils and staff from both schools to benefit from increased partnership working, made easier due to their close proximity.

Consultation

32. This school reorganisation proposal is being brought forward under the Council's Strategic School Improvement Programme. Formal consultation is required in line with the Welsh Government's School Organisation Code, November 2018, which specifies the procedures to be followed, including the content of the consultation document, those to be consulted and timeframes.
33. Consultation on this proposal commenced on 5th December 2022 and closed on 7th February 2023. The consultation document was made available by e-mail to consultees, with the schools managing

distribution to their school communities. It was also available on the Council’s website. Hard copies were available on request.

- 34. A pupil version of the consultation document was also made available to schools to distribute as appropriate.
- 35. Responses to the consultation were submitted by email, post and via the Council’s online consultation portal. Details of how to respond were included in the consultation document and links to the online consultation portal were included on the website and on the Council’s social media channels.

Consultation meetings

- 36. During the consultation period, face-to-face meetings were held with staff, governors and parents to answer questions and clarify aspects of the proposal.
- 37. Meetings were held as follows

Table 1

	Alltwen	Godre’rgraig	Llangiwig
Pupils	Tuesday 17th January 1pm	Wednesday 18 th January 1pm	Monday 16th January 1 pm
Staff	Tuesday 10th January 3.30pm	Monday 9th January 3.30pm	Thursday 12th January 3.30pm
Governing Body	Tuesday 10th January 4.30pm	Monday 9th January 4.30pm	Thursday 12th January 4.30pm
Parents	Tuesday 17th January 2-4pm	Wednesday 18th January 2-4pm	Monday 16th January 2-4 pm

- 38. Two public meetings were also held, in person at Cwmtawe Community School on Monday 30th January, and online on Wednesday 1st February.
- 39. Meetings were also held with pupils of Alltwen, Godre’rgraig and Llangiwig primary schools to gather their views on the proposal. Notes of the comments made and officer responses given at the pupil meetings are included in the consultation report.
- 40. It should be recognised that the notes of the meetings reflect the officers’ understanding of the views expressed and, as such, may not wholly capture the substance of individual comments made and queries raised. In this respect and to support the consultation

process, at each meeting pupils were also reminded to submit their comments in writing if they so wished.

Consultation Responses

Online responses	482
Emails	114
Paper forms/letter	23
In total	619

41. Additionally Alltwen Primary School pupils completed consultation forms in school with their teachers, key stage 2 pupils completed individual forms and Foundation Phase pupils completed whole class responses, totalling 127 responses. 70 pupils from YGG Pontardawe pupils also completed individual consultation forms in school with staff.

42. Including these, the responses totalled 816:

Against the proposal	576
In support of the proposal	201
Unsure	39
Total	816

43. It should be noted that a number of the online responses submitted both for and against the proposal, were identical or similar in content. Online responders were not required to leave names or email addresses, so it is not possible to know whether responses were from separate individuals or from one person submitting a response repeatedly. It is also the case that some respondents submitted both an online response and an email response. It has not been possible to cross-reference every response but it would appear that those noted are relatively small in number and not significant enough to suggest that the overall outcome would be different, so all responses have been counted and included for member consideration. All points raised in the consultation responses are included in the report and are responded to accordingly.

44. 16 standard responses from different individuals were returned by email stating

I object to the proposal of the merging of Godre'rgraig, Llangwig and Alltwen primary schools on the Ynysderw playing fields. I feel it is not in the interest of the pupils, the community, the infrastructure or the welsh language. Please register this as my objection to the current consultation. I would prefer new funding applications to be submitted in which the 21st Century schools funding is used to ensure that Godre'rgraig School remains in the north of the valley to maintain English medium choice there and for Alltwen and Llangiwg to be enhanced and upgraded in their current locations.

45. Although a count of the responses is shown below, no particular weight is given to the number received as it is the views expressed and issues raised which informed the consultation report.

Table 2

Pupils	238	Prospective parents	46
Parents/Carers	201	Members of the Community	258
Staff	10	Others	36
Governors	12	Councillors	2

Additionally the following responses were also received.

Table 3

Governing Bodies x5 (Alltwen, Godre'rgraig and Llangiwg Primary schools, YGG Trebannws and YGG Pontardawe)	RhAG
Pontardawe Town Council	Tŷ'r Gwrhyd
Community Councils x 2 (Cilybebyll and Ystalyfera)	Menter Iaith

ESTYN	MS Sioned Williams
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46. Copies of all written responses are made available to members on the Members Hub or for paper responses in the members' room at Port Talbot Civic Centre, prior to the meeting of the Council's Cabinet at which the proposal and consultation report will be considered.
47. Members are reminded that comments should be conscientiously considered in an open-minded approach, alongside the case put forward for publication of the proposal. In deciding whether to publish the proposal, Members must read and give due regard to the proposal as consulted upon and the comments received together with officer comments.
48. The consultation report has been made available to those required by the Code, including responders who requested a copy, with the latter being contacted by email advising of the link to the report on the Council's website.

Consultation – summary responses

49. A summary of the comments received in support of and against the proposal are noted below
50. In support of the proposal -
 - **Education** – purpose built facilities will improve standards and opportunities; less age groups in one class; opportunities to use the comprehensive school science and technology facilities; better access to sports facilities and more specialist teachers; new technology and modern facilities;
 - **Pupil wellbeing** – great opportunities for sport and outdoor activities; will enhance physical and mental wellbeing in the valley for generations to come; ASD pupils will have specialist teaching in purpose built facilities and this will make a massive difference to them; will provide a safe environment for children

- **ALN** - the inclusion of the LSC is welcomed; ALN pupils shouldn't have to travel long distances to access provision; purpose built facilities will be better for pupils;
- **Traffic** – current parking and access is problematic at (current) school and is dangerous for adults and children; traffic at Parc Ynysderw is a concern and must be addressed
- **Parc Ynysderw and Leisure Amenities** -availability of playing fields and leisure facilities on site would be beneficial for pupils; great facilities for the community
- **Community Impact** – better facilities for the community; provide an opportunity for the whole community to experience a much-needed new facility
- **Finance** – investment in these outdated buildings would be false economy; invest to give our children a fighting chance; proposal makes effective and efficient use of resources

51. Against the proposal -

- **Education** – the proposed new school would not be able to provide as good or better education than the current schools; new build facilities do not mean better standards;
- **Pupil wellbeing** – larger schools do not/cannot provide the same nurture and care as smaller schools; pupils would be negatively impacted by the proposal;
- **Size of school** – larger schools offer poorer educational standards and experiences for pupils; too many pupils in one school leads to lack of attention and larger classes with less staff; pupils are unlikely to make friends
- **ALN provision** – the provision is too small and doesn't account for the children already in the schools; more should be done to support pupils with ALN generally
- **Traffic management** – the proposal will create chaos around Parc Ynysderw; the situation is already very bad and this will make it worse
- **Transport** - This proposal prevents pupils walking to school and increases congestion and pollution; there are no suitable walking routes; it is not acceptable for pupils to travel on a bus; nursery pupils will be negatively impacted because they are not eligible for transport
- **Parc Ynysderw and Leisure Amenities** – the fields will be lost causing a negative impact on the health and wellbeing of users and community as whole; the pool should not be included in the proposal, this is about education not leisure;

- **Community impact** – removing the schools from their communities will have a negative impact; schools are the life of the community; there will be nowhere else for community events to take place;
- **Pupil numbers** – the pupil numbers don't make sense; the school is too big for the pupils in the current schools so another school will have to close;
- **Finance** – cost estimates for the new build school are out of date and are therefore misleading; the current schools can be refurbished or remodelled in order to provide 21st century learning environments and this would be a cheaper or more cost effective option than the proposed scheme; per pupil funding figures in the consultation document are based on notional pupil numbers not actuals so estimated efficiencies were misleading; backlog maintenance should be addressed – this is a cheaper option.
- **Impact on the Welsh language** – a new build English–medium school will be more attractive to parents and so pupil numbers in the current Welsh-medium schools will decrease; such a large school will negatively impact on the language in the Pontardawe area;

52. A number of alternative suggestions were also received; these, along with officer responses to the comments received, are summarised below. Members should also read the fuller responses set out in the consultation report.

Officer responses:

Quality and Standards of education

53. Quality of leadership is the most important factor to impact on raising standards in schools. However, a significant amount of research has been undertaken to demonstrate how new, well planned, purpose built facilities can have significant impacts on the educational experiences of pupils and staff leading to improvements in teaching and learning, and consequently to raised standards and improved pupil outcomes.

54. Estyn in their response to the consultation note that 'The proposals are likely to have a positive impact on provision for primary aged pupils in the area. New facilities will probably provide benefits for pupils' wellbeing and improve curriculum delivery. Additional provision through a learning support centre should benefit primary aged pupils with ASD. A new swimming pool is likely to enhance provision for health and wellbeing in the area.'

55. In recent years, a number of new schools have opened in Neath Port Talbot, to accommodate both primary and secondary pupils. Contrary to comments received during the consultation none of the new schools are 'failing', it is the case that Estyn inspections, local authority monitoring visits and reviews have found that the additional facilities available and improved conditions for teaching and learning have had a positive impact on pupils, parents, staff and the community.

Estyn reports are available online at
<https://www.estyn.gov.wales/inspection-reports>

Pupil wellbeing

56. There is no reason to assume that this proposal would impact negatively on pupil wellbeing and no evidence has been provided to support this view in response to the consultation.
57. Estyn in their response to the consultation state 'It is noted that pupils will benefit from a stimulating teaching and learning environment in a state of the art building. This should impact positively on the self-esteem and wellbeing of pupils'

Size of school

58. There is no available evidence to suggest that the size of the pupil population in a school will impact negatively on standards or on the teaching and learning experience of pupils, and no evidence has been received in response to the consultation to support this view.
59. The Estyn report '**School Size and Education effectiveness**' December 2013, would suggest that in fact larger schools are better able to impact on standards –it states '*Curriculum provision is better in large schools*' – *this means larger schools can provide greater opportunities for teaching and learning.*' Full details including analysis of data gathered by Estyn is contained in the report.
60. Having a greater number of children of the same age group will provide more opportunities for socialisation, not less, and it is to be expected that much work will take place prior to the proposed new school opening to ensure that pupil friendships are maintained through the process.

Additional Learning Needs provision

61. Generally, comments received around the proposed provision of an LSC for 16 pupils with statements of ASD were positive and the additional places are welcomed.
62. Some comments stated that there are more than 16 pupils in the current schools with ALN so the provision of an LSC will not meet the needs of the current pupils. These comments misunderstand the proposal - the proposed LSC is not for pupils in the current schools but for pupils with more complex needs who require more specialist support than a mainstream school can provide.
63. It is often the case however that having an LSC enables specialist knowledge and experience to be shared across the school, meaning mainstream staff benefit from the expertise available and are able to adapt teaching methods to better meet the needs of ALN pupils in their mainstream classes.

Traffic Management

64. The issue of traffic in and around the Pontardawe area has been raised repeatedly during consultation and would appear to be one of the most frequent reasons for disagreeing with the proposal.
65. If progressed this proposal will be subject to the usual planning legislation. Every new school build in Neath Port Talbot is subject to rigorous highways and planning scrutiny before planning approval is granted and in many cases, as part of the scheme, significant work has led to improved traffic management and access arrangements in the area. These processes are well established and have been tried and tested over many years. It is expected that sufficient staff and visitor parking as well as parent and bus drop off areas will be a requirement of planning consent. These elements would be developed as part of the scheme and would seek to improve the current arrangements on the Parc Ynysderw site.
66. While it is recognised that traffic management on the Parc Ynysderw site is already problematic, there exists through this proposal the opportunity to improve the situation, through reconfiguration of the area within the site confines. This would be funded through the Councils 35% contribution to the £22 overall project funding.

Transport

67. Many comments have been received which state that this proposal prohibits pupils from walking to school. It should be noted however that based on data collected in 2022, both Alltwen and Llangiwg primaries already have a high percentage of pupils who travel to school by car or taxi, 65% of Alltwen Primary pupils and 70% of Llangiwg Primary pupils. The majority of Godre'rgraig pupils (70%) now travel by bus, as expected due to the increased distance to travel to the temporary site. However prior to moving to Parc Ynysderw the percentage of pupils travelling to school by car or taxi was 47%.
68. All schools in Neath Port Talbot are committed to encouraging walking and cycling to school where possible. For many of the primary aged pupils affected by this proposal the location of the new school on the site at Ynysderw remains within 2 miles travel distance for homes in the catchment area.
69. Suitable walking routes to Parc Ynysderw from Alltwen and Llangiwg catchment areas are in existence and have already been assessed.
70. Support with home to school travel will be made available in line with the Council's Home to School Travel policy. This means that primary school aged pupils living 2 miles or more from their nearest suitable or designated school will be considered for transport assistance.
71. Comments have been received which state that by not providing transport assistance for nursery pupils these children will be denied access to a nursery education, deemed to be particularly important in this case. Previous reorganisation schemes have also raised these concerns, however data indicates that pupils attending full time school in reception classes have also accessed nursery provision either at the school they currently attend or at another school. This has included schools where full time pupils have transport assistance, and includes schools in areas of high deprivation. It would therefore seem unlikely that this proposal would have a significant negative impact on nursery pupils.

Parc Ynysderw and Leisure Amenities

72. Many comments received relate to the Parc Ynysderw playing fields. It is important to note that there would be no loss of leisure amenities to the community as a result of this proposal – it is planned that the current playing fields would be reconfigured in an effort to ensure that

the number of fields would not be reduced, and the quality of the pitches would also be improved under this proposal.

73. It is expected that the scheme would include replacing the community changing rooms, which are in disrepair, and would relocate the children's play park on the site.
74. The proposal seeks to create a learning, health and wellbeing community campus at the Parc Ynysderw site, complementing the existing Cwmtawe Community School and Pontardawe Leisure Centre provision.
75. The proposal also provides an opportunity to provide a new build 25 metre, 6 lane swimming pool with additional learner pool to replace the existing Pontardawe Swimming Pool, funded under the same conditions as the new school. The primary purpose of the proposal is to provide new build educational facilities; however it is the case that this scheme provides the opportunity to also replace Pontardawe Pool through Welsh Government Sustainable Communities for learning grant funding, as part of the learning, health and wellbeing campus. Without this funding, if a community swimming pool is to remain in the area then alternative sources of funding would need to be found.

Community Impact

76. A community impact assessment has been undertaken, following the Schools Organisation Code guidelines, which has found that many community based activities and events are not reliant on the schools. Therefore, there should be no adverse effect on community activities or events if the schools were to close.
77. Additionally, it is not apparent why community activities that take place for children and young people outside of school hours and in other venues would not continue, or why children and young people who currently enjoy participating in them would not want to do so should they attend school elsewhere. Schools are open to pupils for 190 days of the year. Outside of the school day; that is, before and after school, weekends and during school holidays, pupils will be in the areas where they live and available to make use of local facilities.

Pupil Numbers

78. Concerns have been raised regarding the pupil numbers contained in the consultation document. The proposed new school will be built to

accommodate 630 full time and 140 part time pupils. These forecasted numbers determine the size of the building and the number of classrooms and additional rooms that will need to be included in the proposed new school. This information has been included in the Business Case submitted to Welsh Government to secure the funding to build the proposed new school and has been scrutinised and approved.

79. Over the last 10 years, the number of pupils in Swansea Valley schools has increased by over 160 extra pupils, and it is expected that these numbers will continue to rise as the population continues to grow. It is also the case that a significant number of new housing developments are planned for the area, which could potentially increase numbers further.
80. There is no intention to include any other school in the proposed scheme despite comments received that other schools are to be added at a later date. Any school reorganisation plan would be subject to exactly the same procedures as the current proposal. Current legislation does not permit the ad-hoc addition or removal of schools not already named in the consultation without commencing a new statutory process.

Alternative Options

81. The consultation document contained 15 options which had been considered prior to the consultation period and which had been subsequently discounted. The full range can be seen in the consultation document. Additional options have also been submitted by consultees.
82. Responses were received which state that the backlog maintenance of Alltwen and Llangiwg primary schools should be addressed instead of the new build proposal, and that this would provide appropriate enhanced and improved educational facilities for the future.
83. The Council has followed strict Welsh Government guidance and methodology in assessing condition grades, backlog maintenance and accessibility costs of the schools involved in this proposal thus ensuring a consistency of approach across Welsh schools, and the condition report for Pontardawe Swimming Pool was undertaken by an independent external consultant.

84. It is important to clarify that the backlog maintenance and accessibility costs derived from the condition reports are estimates. The backlog costs are for putting the existing buildings back into repair, and do not allow for improving or upgrading which would provide schools with enhanced facilities for teaching and learning.
85. Maintaining the three schools at their present sites is not considered to be the best use of resources as that would lead to cost inefficiency and would mean that the potential benefits afforded by a new build would not be realised.
86. A significant number of responses also state that Alltwen and Llangiwig should be renovated and refurbished to the standard of a new build 21st century school, including a detailed response from Llangiwig Primary Governing Body who have submitted an alternative proposal with the intention 'to offer the very best 21st century environment within the community'. The information provided is included in the consultation responses available for members to consider.
87. While it is clear that Llangiwig Primary's alternative proposal contains some elements of a 21st century new build school, more discussions between officers and the governors would be needed to properly understand and comment on the proposal fully, which time constraints do not allow for. However, should the current proposal being consulted upon not progress and a future stand-alone proposal for Llangiwig Primary is to be considered then it would be beneficial for that discussion to take place and the viability of the governors' proposal could be further analysed at that stage.
88. However in officers' opinion, early indications are that it would be extremely challenging to achieve a 21st Century School standard utilising the existing primary school building, even with extensive refurbishment and extensions as outlined by governors. It is also noted that their proposal relies on the acquisition of two parcels of land currently not in council ownership.
89. In relation to options referring to refurbishment of Alltwen and Llangiwig Primary schools it is important to note that Welsh Government have a strict business case process that must be satisfied in order to obtain Sustainable Communities for Learning grant funding, which includes scrutiny of the strategic, economic and financial case of any proposal. Welsh Government 'Sustainable

Communities for Learning Business Case Guidance' document provides further details <https://www.gov.wales/sustainable-communities-learning-business-case-guidance>

90. The guidance also contains detailed information regarding the additional aspects that need to be met to satisfy Welsh Government, including ensuring modern construction standards for acoustics, accessibility, recycled content with new builds now expected to achieve net carbon zero in operation standard and carbon reduction, and that the requirements of the biodiversity and resilience of ecosystems duty are met. Projects funded through Sustainable Communities for Learning Programme are also expected to optimise the use of infrastructure and resources, to deliver facilities that can be used by communities.
91. It is the case that both existing schools are compromised in terms of their building suitability for 21st Century teaching and learning, and fall short of many of the internal and external space standards and requirements as set out within Building Bulletin 99 that would ordinarily be expected in a brand new 21st Century school. The complexities of ensuring that a robust business case can be developed and approved, with the likely significant additional costs of creating three 21st century schools to the required standards, would be extremely challenging.
92. Options have also been considered which suggest alternative sites for a new school. Extensive desktop work has been undertaken on all identified potential sites across the area and all but two have been ruled out for a range of reasons, including being too small, at risk of flooding, previous mine workings, contaminated land and land of ecological value. Of the remaining two sites Parc Ynysderw is the preferable site and is the only site which will support the development of a learning, health and wellbeing campus.
93. Should this proposal not be approved then an alternative solution would need to be found for Godre'rgraig Primary. A number of responses focus on the possibility of a new school just for Godre'rgraig Primary pupils in or near to Godre'rgraig.
94. The only feasible site available is Gnoll Road. However as noted in the consultation document this site is a very difficult one to develop due to the site being identified as high risk area for coal workings, and partly within a flood zone (lower end).

95. Contamination of the land is also noted, so the site would require full investigation and standard conditions. The site is also noted to be outside settlement limits and in a prominent position in open countryside which could pose planning approval difficulties.
96. The location of the site leads to a challenging gradient, and bends close down the area of visibility, making the current access road unsafe and unsuitable; work to address this would need to take up significant amounts of land into the site to address TAN 18 requirements. There are also currently no suitable pedestrian footway links to the site.
97. In response to consultation comments, an independent feasibility study has been undertaken which details the type of work that would be needed to establish a new build, one form entry, primary school on the site. This provides more detail around the challenges of the site and identifies indicative costs as circa. £17m.

Financial impact

98. Following the submission of a detailed business case, Welsh Government 21st Century Schools Programme (now Sustainable Communities for Learning) capital grant funding has been approved subject to conditions.
99. The Council is required to meet 35% of the cost, with the remaining 65% funded by Welsh Government. The Council's contribution will be funded from efficiencies within the delegated schools budgets, and the reduction in running costs as a result of closing the three schools, detailed within the report. These cost efficiencies will enable the Council to prudentially borrow to fund its 35% element of the capital bill. The cost of the new build is estimated at c. £22,705,000 apportioned as per table 4 below.

Table 4

Project	NPT Investment	WG Investment	Total Investment
Ysgol Newydd Swansea Valley	7,946,750	14,758,250	22,705,000

100. The approved funding has been awarded for the current proposal and any change to that proposal would require a new business case

to be submitted to Welsh Government. This has been confirmed in writing.

101. Consultation comments have been received which suggest that as costs have risen in the 2 years since the business case was approved, a new business case should now be submitted. This is not the case – the business case approval has been obtained and the £22.7m identified for the scheme is secure.
102. As with all schemes across Wales rising costs have meant that projects have had to be revisited, and decisions taken around either increasing the budget or reviewing the costs. Welsh Government are aware of the problems faced by local authorities in delivering schemes at the current time and have indicated that they are open to discussions around additional funding requirements. At the present time it is broadly anticipated that the additional costs needed to complete this project would be in the region of 25%-30% above the initial cost estimates (i.e. £29,555,552 – an estimated difference of £6,850,552).
103. Comments have also been received which suggest a better use of public money would be to address the backlog maintenance issues at the existing schools and swimming pool. Total backlog maintenance and accessibility costs for Alltwen and Llangiwg primary schools and the swimming pool amount to circa. £3.1m.
104. The Council currently spends circa £1.2m each year of its own capital funding to address maintenance needs on schools and there are many competing priorities each year. Given the current financial situation, it is not realistic to expect a huge influx or redistribution of finances in the foreseeable future.
105. With this in mind if the Council only addressed the notional £1.9m of Alltwen and Llangiwg primary school backlog maintenance costs then that alone would exhaust all of the capital resources currently allocated to cover repairs and backlog maintenance pressures across the whole of the school portfolio for almost three years.
106. Comments have also been received which express the notion that the current schools can be refurbished or remodelled in order to provide 21st century learning environments and that this would be a cheaper or more cost effective option than the proposed scheme.

107. Using Welsh Government standard 2024 where Heavy Refurbishment cost/m² = £2,851, it is possible to estimate notional costs.
108. Heavy Refurbishment Investment includes significant structural alterations and may also include the replacement of facades and roof finishes. The complete renewal of internal fittings, finishes, and Mechanical and Electrical systems. The building is typically unoccupied. Extension of economic life is approximately 15 - 30 years. Works include strip out of existing space, shell and core refurbishment including cosmetic upgrades. Replacement to raised floors, ceilings and new services.
109. Calculations have been carried out for Alltwen Primary based on a heavy refurbishment for the main teaching block, new build replacement for the existing demountable classrooms and an allowance for IT and Furniture Fittings and Equipment (FFE), based on pupils on roll at January 2022. Total notional/estimated costs are circa £4.1m.
110. Calculations for Llangiwg Primary, based on heavy refurbishment for main teaching block, new build nursery classroom on main site, and an allowance for IT and FFE based on pupils on roll at January 2022. Total notional/estimated costs are circa £3.2m.
111. Godre'rgraig Primary does not have a permanent building to be able to compare costs. Total notional costs therefore for both schools amount to circa. £7.3m for partial rebuild and refurbishment.
112. It should be noted however that -
- The calculations do not allow for any additional pupils, only pupils currently on roll. This is less than the current school capacities and less than would be desirable due to the number of catchment pupils attending other schools who can claim a place, i.e. both schools would need to be bigger than these calculations allow for.
 - No costs have been identified for the hire of temporary buildings to house pupils during any programming of works. Alltwen and Llangiwg primary pupils and staff would need to vacate for an extended period of time (possibly a full academic year). There are major financial and logistical implications associated with the hire of temporary accommodation and pupil transportation all of which would be "lost" money. It would also be necessary to identify a location for the pupils

to be relocated to as neither site could be developed with pupils in situ.

- The calculations do not allow for any transformational work to provide enhanced teaching and learning facilities, either indoors or outdoors, and so would effectively be providing more or less the same as currently exists.
- No account has been taken of Godre'rgraig Primary's need for a new build, which will need to be factored into the overall notional/estimated costs, or if not an option then even more additional space would be needed at the other schools to allow for Godre'rgraig Primary pupils to be dispersed.
- It should also be noted that there are many other schools in Neath Port Talbot in a similar or more urgent situation in relation to backlog maintenance, accessibility and the ability to successfully meet the demands of 21st century teaching and learning, and which therefore may be more of a priority than either Alltwen or Llangiwg primaries for this type of scheme.

113. Estimated costs for a new build primary in Godre'rgraig amount to circ. £17m due to the various challenge and constraints that exist in the area, as noted previously.

114. Overall, the notion of refurbishment or remodelling of the current schools, with or without a new build Godre'rgraig primary, does not represent better value for money than the current proposal; it would not deliver the expected benefits of the proposed new build school at Parc Ynysderw; it would not provide the additional enhanced facilities that would be provided on Parc Ynysderw (including direct access to playing fields, leisure facilities and the pool as well as improved opportunities for transition work with Cwmtawe Community School); it is likely that any such scheme would not attract funding for a new pool, and it would cause significantly more disruption to the individual schools over a longer period of time for ultimately a poorer educational offer than the proposed scheme.

115. Without Welsh Government funding, any alternative proposal that revolved around maintaining all three existing schools and the pool in their current locations would mean that the Council would have to meet 100% of any associated capital costs.

116. Comments have been received which state that per pupil funding calculations contained in the consultation document are misleading. To clarify - revenue funding for schools is distributed on an annual basis by means of an approved formula. This ensures school budget shares are allocated on a simple, objective and measurable basis.
117. Most of the revenue budget allocation to Alltwen, Godre'rgraig and Llangiwig Primary schools is generated by pupil numbers. Similarly, the new primary school's budget will be based mainly on the combined pupil roll. Efficiencies will be secured as the new school will have one head teacher and one management structure. Revenue savings will be re-invested in the education budget. In this regard, the proposal supports the Council's management of its education budget and promotes the more equitable distribution of funding across local schools.
118. Based on the funding delegated to schools in the 2022/2023 financial year, per pupil funding for Alltwen Primary school is £4,006 whilst for Llangiwig Primary school per pupil funding is £4,561 and for Godre'rgraig Primary school £ 4,206. This compares with the average for NPT primary schools at £4,272.
119. Based on a school of 770 pupils (700 F.T.E) the projected budget share for the proposed new school is estimated to be in 2022/23 = £2,556,487. Per pupil funding for the proposed new school would be approximately £3,652.
120. Based on a school for 397(FTE) –this would be the numbers on roll at the three schools at the time of calculations – the projected budget share for the proposed new school is estimated to be in 2022/23 = £1,567,819. Per pupil funding for the proposed new school would be £3,949.
121. Per Pupil Funding is calculated by the annual schools specific budget share divided by the full year effect of pupil numbers; larger schools can benefit from economies of scale meaning they can be more cost effective, and can be more flexible - the more pupils in a school, the more money will be available for the head teacher and governing body to be able to resource the school both with staff and physical resources.
122. Prior to the proposed new primary school opening on 1st September 2025 Alltwen, Godre'rgraig and Llangiwig primary schools will receive

their annual school budget shares for the 5/12^{ths} of the financial year 2024/2025. When the new school opens on 1st September 2025 it will receive a budget share based on the number of pupils on roll at that time.

123. The proposed new school will receive additional funding to manage the LSC provision for up to 16 pupils. Meeting the special needs education of pupils in local settings, i.e. within the County Borough, avoids having to secure expensive out-of-county provision. The cost of providing education outside the County Borough for pupils with specialist needs is high, and can amount to circa. £80k per pupil per year. This annually presents a significant demand on the Council's education budget.
124. Additional recurring revenue costs may be incurred; similarly there will be revenue efficiency savings associated with this proposal.
125. Additional transport costs are likely to be incurred should the proposal be implemented. Currently annual transport costs for Godre'rgraig Primary School amount to £101,245. It was agreed when Godre'rgraig Primary School moved from Graig Road to the temporary location at Parc Ynysderw that nursery pupils would be granted discretionary transport assistance, this cost is included in the above figure. In terms of additional pupils requiring transport as a change of school raises the number of pupils with entitlement for every minibus the average cost is £150 - £200 per day; alternatively for every coach the average cost is £220 - £260 per day. It is not yet known how many children will be entitled to transport.
126. Any capital receipt resulting from future sale of the current school or pool sites has not been included in the business case approved by Welsh Government for the proposal, although the Council has previously resolved to re-invest any monies received from the sale of school premises that become surplus to operational requirements as a result of its Strategic School Improvement Programme, into the Education budget.

Welsh language Impact

127. Whilst these proposals directly affect English-medium school provision, there is also a potential effect (that may be positive, negative or neutral) on Welsh-medium schools in the county, which has also been considered.

128. This is due not only to Welsh Government regulations on Education provision, but also considerations under a range of other statutory duties identified in this assessment, and in particular due to the requirements of the Welsh Language (Wales) Measure 2011, further details of which are set out in Appendix B
129. The Welsh Language Standards that stem from the Measure require policy decisions of any kind to be assessed as to their effect on the Welsh language in the policy and/or geographic area in question. Those same policy-making standards apply to both Welsh Government and Neath Port Talbot County Council.
130. A council's policy framework is an interlinked set of documents, and in the same way, an impact assessment's contents are interlinked and cannot be regarded section by section in isolation, but as a cumulative whole. Even when driven by a primary policy or legislative requirement, other policies and legislative requirements have to be acknowledged and considered, even if they do not ultimately change the final decision that is made. Accordingly, members are required to consider all factors as part of decision making.
131. A Welsh Language Impact Assessment (WLIA) has been undertaken, and is included as Appendix B to this document. The WLIA recognises that there may be negative and positive impacts as a result of this proposal on the development of the Welsh language in the community and on Welsh-medium schools in the area.
132. The Council has considered the possible impacts of the proposal on opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language. Potential impacts are highlighted along with proposed actions to mitigate against possible negative impacts, as well as identifying additional steps to reinforce positive impacts.
133. Comments have been received which state that a new English-medium school will negatively impact on the Welsh-medium schools in the locality and that pupil numbers will drop in Welsh-medium schools.
134. The suggestion that the condition of the building and available facilities are a more important factor than the language medium of education when parents are choosing a school for their children is

debatable. Data reveals that new build English-medium schools in Neath Port Talbot which have opened in the last 10 years have had no significant impact on nearby Welsh-medium schools.

135. A number of comments have been received which specifically relate to the concern that the proposal will damage the development of the Welsh language in the area.
136. Mitigating actions that have been considered include establishing a local Swansea Valley working group to consider thematic issues e.g. marketing Welsh-medium education, community involvement and Welsh-language opportunities within the community. Further actions refer to close and effective engagement with Menter Iaith, Urdd and Tŷ'r Gwrhyd to provide opportunities to promote the benefits of the Welsh language within the community and ensuring provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education.
137. Specific actions will be further supported by targets outlined in Neath Port Talbot's Welsh in Education Strategic Plan, with specific reference to Outcome 5.

Welsh in Education Strategic Plan

138. Section 84 of The School Standards and Organisation Act 2013 requires Local Authorities to prepare a Welsh in Education Strategic Plan (WESP). Neath Port Talbot's WESP details the plan to support and further develop Welsh language education in schools, both Welsh and English medium, and in the wider communities, and planning for future growth. The plan details how further development will be secured over the next 10 years, January 2022 - January 2032.
139. The WESP 2022-32, is the cornerstone for the Council's vision for increasing and improving the planning of the provision of Welsh-medium education in Neath Port Talbot, to enable all learners to develop their Welsh language skills and to use the language confidently in everyday life. It both complements and assists in facilitating the national vision for the Welsh language, to have one million Welsh speakers by 2050.

140. The plan has been developed through close working with partners including Neath Port Talbot schools, Menter Iaith, RhAG, Muddiad Meithrin, Neath Port Talbot College, Academi Hywel Dda Swansea University, the Urdd and with Welsh Government.
141. The draft WESP was submitted to Welsh Government ministers following approval by full Council on 2nd February 2022. In May 2022, in line with Section 85(5)(a) of the School Standards and Organisation (Wales) Act 2013 ("the 2013 Act"), Welsh Government consulted with officers regarding modifications to the plan. Following further discussions the majority of modifications were agreed and the WESP was amended. Formal approval of the WESP was then granted by the Minister for Education and Welsh Language in July 2022, and Council approval was granted on September 28th 2022.

Integrated Impact Assessment

142. An Integrated impact assessment, attached at appendix C, has been undertaken. The proposal would create a new build, 21st Century School for pupils which would enhance well-being, and would provide the conditions to improve standards. The addition of an LSC for primary aged ASD pupils would address the need for additional provision in Neath Port Talbot and would seek to improve opportunities for these pupils as well as provide training and development for mainstream staff in the proposed school and the wider area. The proposed new pool would complement current provision and enhance the health and wellbeing offer for pupils and the wider community.
143. The Socio-Economic Duty (Equality Act 2010) came into force on 31 March 2021. This duty requires councils, when taking strategic decisions such as setting priorities, to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. As relevant to the Public Sector Equality Duty under s.149 of the Equality Act 2010, the proposal can be seen to have positive impacts on Age and Disability and a neutral impact on all other protected characteristics. A new build 21st Century school would impact positively on pupils from all socio economic groups, due to the significantly improved facilities provided and would also positively impact on community cohesion, and social exclusion. An

explanation of the Public Sector Equality Duty can be found at paragraphs 19-31 of Appendix D.

144. With the implementation of mitigating actions the proposal should have at least a neutral impact on biodiversity.
145. The Wellbeing of Future generations has been considered and the proposal directly supports the Council's wellbeing objectives.
146. Members are reminded that in response to the Well-being of Future Generations (Wales) Act 2015 the Council has set four strategic objectives which contribute to the seven national well-being goals that the Welsh Government requires all public bodies in Wales to contribute to, in order to achieve 'the Wales we want'.
147. The Council's well-being objectives and the supporting improvement priorities are set out in the Council's Corporate Plan. This proposal directly supports wellbeing objective – 'to ensure all children get the best start in life' through the provision of a 21st century school for current and future generations of primary aged pupils. With the inclusion of a 16 place LSC for primary aged pupils with ASD in the proposal further support for the plan is evidenced, through ensuring that pupils with ALN are also given opportunities to benefit from new purpose built facilities.
148. Through creating facilities that can be used by the community the proposal also contributes to wellbeing objective – 'all communities are thriving and sustainable'.
149. To obtain Welsh Government approval of the business plan it has been essential to ensure that community benefits are fully explored and implemented throughout the construction phase. Part of this work will ensure that local businesses are used to supply labour and materials whenever feasible, local people will benefit from employment schemes and the local economy will benefit due to an increased number of people working in the area. This contributes to well-being objective 4 - 'Working with our partners we create the conditions for more secure, well paid and green work in the area and support local people into those jobs'

Workforce impacts

School staff

150. There are potential teaching and learning benefits for staff working at a large primary school, including greater opportunity for staff development and career progression through a broader range of experiences.

151. The proposal will mean changes that impact on the employment of school staff as the existing schools will close on 31st August 2025. Upon closure, all staff will cease to be employed at their respective schools. The new school will set a new staffing structure appropriate to its needs and budget.

152. A temporary governing body will be established before the opening of the primary school. The temporary governing body will have the responsibility of appointing a head teacher. Specifically in relation to the posts of head teacher and deputy head teacher, the Council's policy is for these to be advertised nationally. Once the head teacher has been appointed that person will, together with the temporary governing body, be responsible for determining the staffing structure for the new primary school.

153. The new primary school will open on 1st September 2025 and school staff will be employed by the new governing body for the primary school (albeit appointed by the temporary governing body).

Centrally employed staff

154. Although this proposal rationalises provision across the three schools, there will be employment opportunities at the new school for centrally employed catering and cleaning staff.

Staff support

155. As part of the process all school based staff will be supported by the relevant school policies and procedures, which will include full consultation. Previous experience has shown that some staff wish to secure employment in the new school but others take the opportunity to take on new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across

the Council, via an employers' pledge. The Council has a good track record for supporting staff in such situations.

Legal impacts

156. Members are referred to Appendix D, which sets out in detail the relevant legislation and legal implications relating to a decision on this proposal.

157. The proposal requires the establishment and discontinuation of schools. The School Standards & Organisation (Wales) Act 2013 (the Act) provides the legislative framework by which the Council may implement the proposal. The Welsh Government's School Organisation Code, November 2018, made under Sections 38 and 39 of the Act, imposes on the Council requirements and guidelines on matters relating to school organisation, including consultation.

158. Pupil travel arrangements will be in line with the requirements of the Learner Travel (Wales) Measure 2008; the Learner Travel Statutory Provision and Operational Guidance 2014; and the Council's Home to School Travel Policy.

159. Revenue funding will be in line with the requirements of the School Standards and Framework Act 1998; the School Funding (Wales) Regulations 2010; and the Council's approved formula for funding schools.

160. The management of staff affected by the proposal will follow the relevant school policy and procedure requirements.

161. The legislation referred to above is available using the electronic links in the section on background papers, below.

Risk management

162. A risk assessment has been carried out under the Council's Risk Management Policy 2018.

163. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.

164. Potential risk areas in implementing the proposal include:

- resistance to change leading to lack of pupil, parent and staff support

- educational standards not maintained
- less effective support for pupil well-being in a new, amalgamated school
- increased home to school travel time for some pupils
- staff anxiety about job security and new management arrangements
- loss of school identity from closure of existing establishments
- forecasted pupil numbers do not materialise
- budget allocation insufficient to meet needs
- Welsh Government Sustainable Communities for Learning capital
- Welsh language not developed further
- negative impact on the Welsh language
- discrimination against protected characteristics
- loss of community facilities
- increased governance and staff responsibilities

165. Additionally, should the proposal progress then the Council face the risk that forecasted pupil numbers do not materialise, leading to surplus places at the new school. There is also a risk that the additional Welsh Government funding required as a result of increased costs would not be available, meaning the full cost of the additional funding required would fall to the council.

166. Failing to implement the proposal will result in the following teaching/learning and financial benefits not being fully realised, particularly in relation to:

- providing a stimulating and innovative teaching and learning environment that will impact positively on the self-esteem and well-being of all pupils and staff
- pupils accessing a wider range of staff expertise
- pupils accessing greater opportunities for sport and leisure activities
- opportunities for wider peer group interaction
- staff having greater opportunity for curriculum development and career opportunities through broader experience and enhanced continuing professional development options
- a more efficient and effective use of resources, and savings from economies of scale
- reducing the number of surplus pupil places and improving the school building environment
- creating a learning and recreational campus promoting community cohesion

167. The benefits of implementing the proposal will mitigate the effects of identified risks. A new school provides greater prospects for improving educational attainment for pupils. Estyn (Jan 2007) reported on the performance of schools before and after moving into new buildings, stating that ageing school buildings which are in a poor state of repair cannot meet modern teaching and learning needs. The report also states that inadequate buildings make improvements in standards more challenging and that in nearly all schools with new or refurbished buildings, pupils attainment and achievement have improved and in some cases the improvement has been significant.
168. Failure to implement the proposal could result in Swansea Valley pupils not receiving the benefits of a new school; it would mean that Welsh Government funding for this scheme would not be realised and any subsequent applications for an alternative proposal is not guaranteed.
169. Additionally, if the proposal is not implemented then Godre'rgraig Primary risks a further period of time in temporary buildings while a new solution is sought for the future of the school.

Valley Communities Impact

170. The proposal for a new build school is aimed specifically at pupils and the community in the Swansea Valley, with the ambition of impacting positively on educational standards through improved teaching and learning environments, as well as improving health and wellbeing through the creation of a Learning, Health and Well-being campus, to include the proposed new school and pool, Cwmtawe Community school and the existing sport and leisure facilities.
171. While comments have been received which express the view that the communities will be negatively impacted by the closure of the schools, it is the case that a new build facility for the Swansea Valley represents a substantial investment in the area, and provides opportunities for improving education and leisure facilities for children, young people and the wider community at the present time and for future generations.
172. It is the case that the proposal would mean the permanent loss of an English-medium school in the Godre'rgraig area, as under this proposal pupils would receive their education in the proposed new

build school at Parc Ynysderw in Pontardawe. However the school building located at Graig Road has closed for safety reasons unrelated to this proposal and should this proposal not progress then any future scheme is not guaranteed to provide a new build school for Godre'rgrraig pupils in their immediate local area.

Recommendation

173. It is recommended that giving due regard to the responses to consultation, the integrated impact assessment, the Welsh language impact assessment and the impact assessments in relation to equality, risk, community usage, and the information referred to in this report and the appendices.

(a) In line with Section 48 of the School Standards and Organisation (Wales) Act 2013, Members approve the statutory publication of a proposal to establish an English-medium 3-11 school with a LSC, in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgrraig Primary and Llangiwg Primary, all of which will be discontinued on 31st August 2025.

(b) The proposed date of implementation to be 1st September 2025.

(c) Notice of the proposal to be published on 25th April 2023, allowing 28 days for receipt of objections and a report be brought back to members following the outcome of this period for final determination by members.

Reasons for proposed decision

174. This decision is necessary to comply with the formal consultation requirements imposed on the Council by the School Organisation Code.

175. Subject to the outcome of consultation, implementation of the proposal will enable the Council to promote high educational standards and the fulfilment of every child's potential. It will also enable the Council to meet its duty to secure efficient education in its area.

Implementation of the decision

176. The decision is proposed for implementation after the three-day call in period.

Appendices

Appendix A: Consultation Report

Appendix B: Welsh Language Impact Assessment

Appendix C: Integrated Impact Assessment

Appendix D: Legal Impacts

Appendix E: Draft Statutory notice

List of background papers

a. Cabinet Report: October 2017

<http://moderngov.npt.gov.uk/documents/s32731/CABINET%20report%20041017.pdf>

b. Strategic School Improvement Programme Principles Paper: September 2008

[https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/\\$CAB-240908-REP-EL-KN.doc.pdf](https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/$CAB-240908-REP-EL-KN.doc.pdf)

c. Cabinet report 30th November 2022

[Final Cab report 30.11.22.pdf \(npt.gov.uk\)](#)

d. Consultation Document

[Consultation Documents – Neath Port Talbot Council \(npt.gov.uk\)](#)

e. Welsh Government - School Organisation Code: November 2018

<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>

f. School Standards & Organisation (Wales) Act 2013

http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf

g. Well-being of Future generations (Wales) Act 2015

<https://gov.wales/well-being-future-generations-wales-act-2015-guidance>

h. Learner Travel (Wales) Measure: 2008 & the Learner Travel Statutory Provision and Operational Guidance: 2014.

http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf

<http://gov.wales/docs/det/publications/140616-ltqg-en.pdf>

i. Home to School Travel Policy: 2017

https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf?v=20170627002146

j. Corporate Plan 2022 -2027

[Corporate Plan 2022-27 - Recover, Reset, Renew \(npt.gov.uk\)](#)

k. Sustainable communities for learning Business Case Guidance

[Sustainable Communities for Learning: business case guidance | GOV.WALES](#)

l. Estyn

<https://www.estyn.gov.wales/inspection/search>

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Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Education, Leisure & Lifelong Learning
Service
Strategic School Improvement Programme

CONSULTATION REPORT

Proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg Primary schools

April 2023



Response to consultation on the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools - analysis and comments

Introduction

On 30th November 2022, the Council's Cabinet determined to consult on the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools, with a learning support centre (LSC) for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). The consultation period ran from 5th December 2022 to 24th January 2023. A list of consultees is included at Appendix A. This consultation report summarises the issues raised by consultees during the consultation period. It responds to these by means of clarification and commentary, with supporting reasons.

Many of the responses relate to similar issues, with the most comments being received relating to the perceived loss of the Parc Ynysderw playing fields, traffic concerns, potential impact on the community and the notion that a new school isn't needed because the existing schools can be transformed into 21st century learning environments on their current sites.

The view of Estyn, the schools' inspectorate, is included in this consultation report together with notes of meetings with pupils.

This report needs to be read alongside the consultation document, 'Proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools, all of which will be discontinued on 31st August 2025.

Context

The Council has consulted with interested parties on the proposal to establish an English-medium 3-11 school with specialist learning support centre, in new build premises to accommodate pupils from the catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary all of which will subsequently be discontinued on 31st August 2025

Background

The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools

in the right place and ensuring that they are fit for the 21st century learner is the challenge facing the Council. Achieving this will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities.

Implementing the Council's Strategic School Improvement Programme (SSIP) involves reviewing existing provision and determining the number and type of schools needed to deliver education effectively and efficiently across the County Borough. It will most likely lead to substantial change involving opening new schools, closing existing schools, merging or amalgamating schools, federating schools and promoting new initiatives that support collaborative working between schools.

The Council has determined to review its provision on the basis of:

- educational standards
- the need for places and the accessibility of schools
- the quality and suitability of school accommodation
- effective financial management

The Council is proposing to build a new, 21st century primary school for the Swansea Valley to replace Alltwen, Godre'rgraig and Llangiwg Primary schools, all of which will be discontinued on 31st August 2025

It has been proposed that the new school will be built on land in Parc Ynysderw, Pontardawe and that it will form part of a learning, health and wellbeing community campus made up of Cwmtawe Community School and Pontardawe Leisure Centre. The campus will be further enhanced by the addition of a new build 25 metre, 6 lane swimming pool with additional learner pool on the site to complement current provision and enhance the health and wellbeing offer for pupils and the wider community.

The new English-medium primary school for boys and girls aged 3-11 years will accommodate 630 full-time pupils and 140 part-time (70 a.m./70 p.m.) nursery age pupils in a new build 21st century facility which will provide a stimulating teaching and learning environment in state of the art facilities.

The new school will serve the combined catchment areas of Alltwen, Godre'rgraig and Llangiwg Primary schools and will have sufficient capacity for pupils from the area. Pupils from the three existing schools will automatically transfer to the new school subject to parental preference. It will be managed with one head teacher and one governing body and will have one budget allocation and one group of staff.

Additionally the new school will provide a learning support centre (LSC) for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). It will also provide the opportunity to become a community hub for the area, building on the work already being undertaken by other well established primary school LSCs.

The new build will be funded jointly from Welsh Government's Sustainable Communities for Learning Programme capital grant monies and from the Council's prudential borrowing capacity.

The combined new build school, specialist ASD provision and pool will form part of a learning, health and wellbeing community campus at the Parc Ynysderw site, complementing the existing Cwmtawe Community School and Pontardawe Leisure Centre provision. In locating the new build facilities close to Cwmtawe Community School the development will enable pupils and staff from both schools to benefit from increased partnership working, made easier due to their close proximity.

The school building stock is ageing and the Council is facing increasing backlog maintenance and repair costs. As money and opportunity becomes available the Council will seek to replace existing schools with new builds and state of the art teaching and learning facilities. This proposal will remove circa. £1.9m of backlog maintenance costs across the Alltwen and Llangiwig primary schools, and will also remove a split site arrangement at Llangiwig Primary School.

Currently the three schools are separate establishments, on sites some distance apart. Creating a single larger primary school can lead to increased benefits for staff and children, as well as enabling a more efficient and effective use of resources.

Consultation process

On 30th November 2022 the Council's Cabinet determined to consult on the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwig primary schools, with a learning support centre (LSC) for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). The consultation period ran from 5th December 2022 to 7th February 2023. A list of consultees is included at Appendix A. The consultation document was made available by e-mail to consultees, with the schools managing distribution to their school communities. It was also available on the Council's website. Hard copies were available on request.

A pupil version of the consultation document was also made available to the schools to distribute as appropriate.

Responses to the consultation were submitted by email, post and via the Council's online consultation portal. Details of how to respond were included in the consultation document and links to the online consultation portal were included on the website and on the Council's social media channels.

The consultation document invited views and opinions to be submitted in respect of the proposal. The Welsh Government's School Organisation Code 2018 requires the Council to consult on its proposal and to publish a consultation report summarising any issues raised by consultees, the Council's response to those issues and Estyn's view of the overall merit of the proposal.

The proposal and the consultation report will be considered by elected Members of the Council and should it be agreed to proceed with the plans consulted upon then the next stage of the process will be to publish a statutory notice outlining the proposal. This would be published for a period of 28 days during which written objections may be submitted.

Where objections are received, an objection report will be published summarising the objections and the Council's response to those objections. Elected Members of the Council will consider the proposal in light of objections received when taking a decision as to whether or not the proposal is to be implemented.

Consultation meetings

During the consultation period a face to face meetings were held with staff, governors and parents to answer questions and clarify aspects of the proposal.

Meetings were also held with pupils of Alltwen, Godre'rgraig and Llangiwig primary schools to gather their views on the proposal.

Meetings were held as follows

Table 1

	Alltwen	Godre'rgraig	Llangiwig
Pupils	Tuesday 17 th January 1pm	Wednesday 18 th January 1pm	Monday 16 th January 1 pm

Staff	Tuesday 10 th January 3.30pm	Monday 9 th January 3.30pm	Thursday 12 th January 3.30pm
Governing Body	Tuesday 10 th January 4.30pm	Monday 9 th January 4.30pm	Thursday 12 th January 4.30pm
Parents	Tuesday 17 th January 2-4pm	Wednesday 18 th January 2-4pm	Monday 16 th January 2-4 pm

Two public meetings were also held, in person at Cwmtawe Community School on Monday 30th January, and online on Wednesday 1st February.

Pupils at all three schools gave their views on their current schools and voiced concerns over moving to a new school. Notes of the comments made and officer responses given at the meeting are included at Appendix B .It should be recognised that the notes of the meetings reflect the officers' understanding of the views expressed and, as such, may not wholly capture the substance of individual comments made and queries raised. In this respect and to support the consultation process, at each meeting pupils were also reminded to submit their comments in writing if they so wished.

Consultation Responses

Online responses	482
Emails	114
Paper forms/letter	23

In total	619
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Additionally Alltwen Primary School pupils completed consultation forms in school with their teachers; key stage 2 pupils completed individual forms and Foundation Phase pupils completed whole class responses, totalling 127 responses. 70 pupils from YGG Pontardawe pupils also completed individual consultation forms in school with staff

Including these the responses totalled 816,

Against	576
For	201
Unsure	39
Total	816

16 standard responses were returned stating

I object to the proposal of the merging of Godre'rgraig, Llangwig and Alltwen primary schools on the Ynysderw playing fields. I feel it is not in the interest of

the pupils, the community, the infrastructure or the welsh language. Please register this as my objection to the current consultation. I would prefer new funding applications to be submitted in which the 21st Century schools funding is used to ensure that Godre'graig School remains in the north of the valley to maintain English medium choice there and for Alltwen and Llangiwig to be enhanced and upgraded in their current locations.

It should be noted that a number of the online responses submitted were identical or similar in content. Online responders were not required to leave names or email addresses, so it is not possible to know whether responses were from separate individuals or from one person submitting a response repeatedly. It is also the case that some respondents submitted both an online response and an email response. It has not been possible to cross reference every response but it would appear that those noted are relatively small in number and not significant enough to suggest that the overall outcome would be different, so all responses have been counted and included for member consideration. All points raised in the consultation responses are included in the report and responded to accordingly.

Although a count of the responses is shown below, no particular weight is given to the number received as it is the views expressed and issues raised which informed this consultation report.

Table 2

Pupils	238	Prospective parents	46
Parents/Carers	201	Members of the Community	258
Staff	10	Others	36
Governors	12	Councillors	2

Additionally the following responses were also received.

Table 3

Governing Bodies x5 (Alltwen Primary School, YGG Trebannws and YGG Pontardawe)	RhAG
Pontardawe Town Council	Tŷ'r Gwrhyd

Community Councils x 2 (Cilybebyll and Ystalyfera)	Menter Iaith
ESTYN	MS Sioned Williams

Copies of all written responses will be made available to Members prior to the meeting of the Council's Cabinet at which the proposal and consultation report will be considered.

Overview of comments

A summary of the comments received in support of and against the proposal are noted below

In support of the proposal -

- Education – purpose built facilities will improve standards and opportunities; less age groups in one class; opportunities to use the comprehensive school science and technology facilities; better access to sports facilities and more specialist teachers; new technology and modern facilities;
- Pupil wellbeing – great opportunities for sport and outdoor activities; will enhance physical and mental wellbeing in the valley for generations to come; ASD pupils will have specialist teaching in purpose built facilities and this will make a massive difference to them; will provide a safe environment for children
- ALN - the inclusion of the LSC is welcomed; ALN pupils shouldn't have to travel long distances to access provision; purpose built facilities will be better for pupils;
- Traffic – current parking and access is problematic at (current) school and is dangerous for adults and children; traffic at Parc Ynysderw is a concern and must be addressed
- Parc Ynysderw and Leisure Amenities -availability of playing fields and leisure facilities on site would be beneficial for pupils; great facilities for the community
- Community Impact – better facilities for the community; provide an opportunity for the whole community to experience a much-needed new facility
- Finance – investment in these outdated buildings would be false economy; invest to give our children a fighting chance; proposal makes effective and efficient use of resources

Against the proposal -

- Education – the proposed new school would not be able to provide as good or better education than the current schools; new build facilities do not mean better standards;
- Pupil wellbeing – larger schools do not/cannot provide the same nurture and care as smaller schools; pupils would be negatively impacted by the proposal;
- Size of school – larger schools offer poorer educational standards and experiences for pupils; too many pupils in one school leads to lack of attention and larger classes with less staff; pupils are unlikely to make friends
- ALN provision – the provision is too small and doesn't account for the children already in the schools; more should be done to support pupils with ALN generally
- Traffic management – the proposal will create chaos around Parc Ynysderw; the situation is already very bad and this will make it worse
- Transport - This proposal prevents pupils walking to school and increases congestion and pollution; there are no suitable walking routes; it is not acceptable for pupils to travel on a bus; nursery pupils will be negatively impacted because they are not eligible for transport
- Parc Ynysderw and Leisure Amenities – the fields will be lost causing a negative impact on the health and wellbeing of users and community; the pool should not be included in the proposal, this is about education not leisure;
- Community impact – removing the schools from the community will have a negative impact; schools are the life of the community; there will be nowhere else for community events to take place;
- Pupil numbers – the pupil numbers don't make sense; the school is too big for the pupils in the current schools so another school will have to close;
- Finance – cost estimates for the new build school are out of date and are therefore misleading; the current schools can be refurbished or remodelled in order to provide 21st century learning environments and that this would be a cheaper or more cost effective option than the proposed scheme; per pupil funding figures in the consultation document are based on notional pupil numbers not actuals so estimated efficiencies were misleading; backlog maintenance should be addressed – this is a cheaper option.
- Impact on the Welsh language – a new build English–medium school will be more attractive to parents and so pupil numbers in the current Welsh-medium schools will decrease; such a large school will negatively impact on the language in the Pontardawe area;

Governing Body Responses

The Governing Bodies of Alltwen, Godre'rgraig and Llangiwg primary schools have each responded to the proposal. None of the Governing Bodies support the proposal.

The Governing Body of Alltwen Primary raises concerns around the impacts on the Welsh language, the children, the community, and statistical information.

The Chair of the Governing Body of Godre'rgraig Primary School raises concerns regarding the need for an English medium school in the north of the Swansea Valley, deprivation and distance to school, inappropriate choice of new location, curriculum, proposed size of new school, and lack of parental support for the new school.

The Governing Body of Llangiwg Primary School state in their response that 'We firmly believe that the new school is not in the best interests of our children. We feel the education of the children, and their ability to excel will be detrimentally affected should they be moved to the new school.' Additionally the governors have submitted an alternative proposal with the intention 'to offer the very best 21st century environment within the community'.

The information provided is included for members to consider. While it is clear that the alternative proposal has been thought out and contains some elements of a 21st century new build school, more discussions between officers and the governors would be needed to properly understand and comment on the proposal fully, which time constraints do not allow for. However in officers' opinion, early indications are that it would be extremely challenging to achieve a 21st Century School standard utilising the existing primary school building, even with extensive refurbishment and extensions as outlined by Governors which also relies heavily on the acquisition of two parcels of land currently not in Council ownership.

In addition to the uncertainty around land purchase, it appears Governors are suggesting that the alternative proposal would accommodate up to 162 pupils where in reality in order to accommodate all catchment pupils it is likely that a single school solution for Llangiwg Primary would need to have a capacity for 233 full time pupils (1 FE).

Other early concerns and challenges with Governors' alternative proposal as submitted are;

- Four out of five classrooms would remain on average 20% undersized
- Compromised adjacencies kitchen/hall/library/wcs
- Off site playing fields
- Off site parking for staff, visitors, parental drop-off (reliant on land acquisition)
- Significant challenges to achieving Net Carbon Zero or even BREEAM Excellent which are conditions of Welsh Government grant
- General accessibility concerns transitioning between teaching and play areas
- Nursery site unlikely to be able to accommodate a new LSC, Sports hall and ATP
- Logistical arrangements for decanting pupils during any construction phase

Notwithstanding the above initial concerns and challenges, if the current proposal being consulted upon is not progressed and a future stand-alone proposal for Llangiwig is being considered then it would be beneficial for that discussion to take place and the viability of the proposal could be further analysed at that stage.

Responses were also received from the governing bodies of YGG Pontardawe and YGG Trebannws. Both responses focus on the impact this proposal may have on Welsh-medium schools in the area and on the development of the Welsh language as a whole. Neither school governing body supports the proposal.

12 individual school Governors responded to the online consultation from Alltwen, Godre'rgraig and Llangiwig primary schools and Cwmtawe Community School, YGG Trebannws and YGG Pontardawe. 10 responses highlighted that they responding as governors while 2 were noted to be 'other' and identified themselves as also being Governors. 5 governors support the proposal while 7 do not support the proposal.

Community and Town Councils

Responses have been received from Cilybebyll Community Council and Ystalyfera Community Council, and from Pontardawe Town Council.

Cilybebyll Community Council raised concerns that displaced after school and community activities would need to take place in Alltwen Community Centre and raised concerns over funding for adaptations to the building.

The consultation document does not reference after school activities needing to take place at Alltwen Community Centre, it is fully expected that any activities would take place at the proposed new school, with its purpose built, enhanced facilities. It is also not clear what community activities are being referred to as the Community Impact Assessment does not identify community activities taking place in the current school that would need to be displaced.

The response also states 'Other options presented in the consultations had been discounted without sufficient explanation'. However the Consultation Document at Appendix B Options Table, provides 15 options with the benefits and risks associated with each one, demonstrating both why the option had been considered and why it had not been progressed further.

Ystalyfera Community Council state in their response that 80% of the pupils in Godre'rgraig are catchment pupils when in fact over 30% of the pupils attending the school travel from outside the catchment area. The response also notes that there are no safe walking routes for pupils within 3 miles of the school. In fact primary aged pupils living over 2 miles from the school would be eligible to apply for transport assistance, and for those within the two mile radius, suitable walking routes are available.

The response also states that historically there had always been 1 Welsh-medium primary school and 1 English-medium primary school in the Ystalyfera Community Council area. Permanently closing Godre'r Graig Primary would result in local residents having less choice as to which school to send their children - removing this choice could be seen as discriminatory. Officers would not agree with this view - there are many villages across Neath Port Talbot and indeed Wales where there is no local school of either language medium. The upper Swansea Valley has in fact a number of primary schools within relatively easy access of Godre'rgraig including Welsh medium schools YG Ystalyfera, YGG Cwmllynfell and YGG Dyffryn Y Glowr, and English-medium schools Ysgol Bryntawe and Ysgol Golwg Y Cwm.

Additionally the response suggests that Rhyd-y-fro Primary should be included in the proposal and not Godre'rgraig. This is addressed elsewhere in this report.

Pontardawe Town Council note that 'The consultation does not consider the future expansion of playing field provision in Pontardawe, based on current projections and especially with the increase of girls wishing to be involved in football and the creation of girl's teams'. The consultation document explains that there should be no loss to the playing fields provision as a result of this proposal and that the proposal seeks to improve and enhance the sport and

leisure facilities at the site. Any plans for future development of the site would be considered at the relevant time and not as part of this consultation, which is concerned with establishing a new school in new build premises.

Additional comments received from the community and town councils are addressed elsewhere in this report

Estyn

It is Estyn's view that that this proposal is likely to at the least maintain the present provision for English medium primary education in the area and that the proposal is '**likely to have a positive impact** on provision for primary aged pupils in the area. New facilities will probably provide benefits for pupils' wellbeing and improve curriculum delivery. Additional provision through a learning support centre should benefit primary aged pupils with ASD. A new swimming pool is likely to enhance provision for health and wellbeing in the area.'

Estyn considers that 'The proposer has considered the continuing delivery of the curriculum for all pupils appropriately. It is predicted the proposal will benefit the delivery of the curriculum and provide pupils with better learning experiences that come with a larger pupil population and purpose built facilities.'

Estyn has also noted that 'the proposer has taken appropriate account of the impact of the proposal on the Welsh language'.

Estyn also comments that the proposal does not appear to consider the effect of increased traffic and accessibility issues or how the identified risks, namely resistance to change by pupils, increased travel time and less effective wellbeing support in a larger school will be mitigated against.

Estyn's comments are responded to in the Quality and Standards of Education, Proposed site and traffic management, and Transport and Travel, sections of the report.

The full response is included as Appendix C.

Members of the Senedd

Sioned Williams, Member of the Senedd for South West Wales has expressed her opposition to the proposed school and makes a number of comments including concerns around educational benefits, access and accessibility, impact on the Welsh language and accessibility of green spaces. These comments are noted and responded to within this report.

The response also states that the 21st Century Schools programme is intended to improve education, not to provide funding for local leisure services that desperately need investment and have been neglected for years. She notes that reference therefore to the development of leisure facilities in the scheme is inappropriate and a cynical way of trying to gain support for the scheme.

It is the case that consultation on the proposed new pool is not a requirement of the School Organisation Code, however it is a part of the overall proposal to create a health and well-being community campus and that funding for the pool and the school has been secured as part of Welsh Government's Sustainable Communities for Learning capital grant as one scheme.

Omitting details about the pool from the consultation document could therefore be seen as failing to include all facts around the proposal and possibly judged as misleading.

Officer responses

– Quality and Standards of Education

Comments have been received which state that the quality of education will decline as a result of the proposal. The consultation document contains detailed information on the quality and standards of education delivered at the three schools and it is recognised that all three have made progress in recent years and are judged as 'Good' in many areas by Estyn. The proposed new school will build on and develop the progress made by the individual schools, and there is no reason to believe that standards would be negatively impacted by this proposal. Estyn in their response to the proposal appear to agree that this will be the case ***'The proposals are likely to have a positive impact on provision for primary aged pupils in the area. New facilities will probably provide benefits for pupils' wellbeing and improve curriculum delivery. Additional provision through a learning support centre should benefit primary aged pupils with ASD. A new swimming pool is likely to enhance provision for health and wellbeing in the area.'***

This proposal offers the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of pupils and will aim to further improve the learning outcomes for all children across the ability range. With a new school comes more choices and improved opportunities because there is more space and better facilities. In the Estyn report of 2007, ***'An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises'***, it is reported that the attainment and

achievement of pupils improves significantly when they move into new or significantly refurbished buildings.

The governing body and senior leadership team of the proposed school will look to build on the success of the three primaries and utilise the skills that the staff will bring to ensure a smooth transition and continue their success. In recent years a number of new schools have opened in Neath Port Talbot, to accommodate both primary and secondary pupils. Contrary to comments received during the consultation none of the new schools are 'failing', it is the case that Estyn inspections, local authority monitoring visits and reviews have found that the additional facilities available and improved conditions for teaching and learning have had a positive impact on pupils, parents, staff and the community.

Estyn reports are available online at <https://www.estyn.gov.wales/inspection-reports>

– ***Pupil wellbeing***

Comments have been received which suggest that the wellbeing of pupils will suffer should the proposal progress. There is no reason to assume that this would be the case either because of a move to the proposed new school or by the size of the school. It is noted that the current schools provide good levels of care and support, and there is nothing to suggest that the new school won't at least offer the same.

Informal interviews conducted with members of the school communities within Neath Port Talbot where schools have amalgamated or where pupils have moved from a closed small school to a larger school have shown that pupils adapt to their new environments very quickly, that they make new friends and that their educational progress is not negatively affected.

Comments have been received which suggest that a new build will not have a positive impact on wellbeing. Effective leadership in purpose built facilities, and the school's environment and services can impact pupils' health and wellbeing. In a report by Estyn 'Healthy and happy - School impact on pupils' health and wellbeing' June 2019, it states that schools having an inclusive whole-school approach to supporting pupils' health and wellbeing aim to make sure that the everyday school experience of pupils is consistent with messages given about health and wellbeing in lessons, assemblies and in school policies. These schools develop pupils as healthy, confident individuals, ready to lead fulfilling lives as valued members of society – one of the four purposes of the emerging new curriculum for Wales. Some of the

factors that good schools had were: Policies and practices that ensure pupils make good progress in their learning: continuing professional learning for all staff that enables them to support pupils' health and wellbeing and an environment and facilities that promote good health and wellbeing, such as space to play, socialise and relax at break times. It is the case that the proposed new school will provide these important aspects far more effectively than the current schools are able to.

Other factors that support pupils' health and wellbeing can be transferred from the good practice in the current schools to the new school and these include: leaders who 'walk the talk' about supporting pupils' health and wellbeing; a nurturing culture, where positive relationships enable pupils to thrive ; an inclusive community and ethos; detailed knowledge about pupils' health and wellbeing that influences policies and actions and policy; a broad and balanced curriculum, that includes discrete, evidence-based learning experiences that promote health and wellbeing; supportive pastoral care and targeted interventions for pupils that need additional support; effective links with external agencies and close partnerships with parents and carers.

Additionally Estyn note in their response to the proposal that '*It is noted that pupils will benefit from a stimulating teaching and learning environment in a state of the art building. This should impact positively on the self-esteem and wellbeing of pupils*'

Concerns have been raised regarding the loss of pupil friendships should the proposal progress. It should be noted that if all pupils in the three schools at the point of closure transfer to the proposed new school then friendship groups can be maintained and extended. It has been the case that previous school reorganisation schemes have all made sure that pupils remain within their close friendship groups, with staff that they already know well to ensure that the transition process is as smooth as possible. It is to be expected that the leadership team at the proposed new school would also recognise the importance of this and ensure this is considered.

– **Size of school**

Comments have been received which state that the size of the school will prevent effective teaching and learning, and that pupils will not make the expected levels of progress. In response to these claims it can be seen that delivery of education can be more effective in larger schools. The Estyn report '**School Size and Education effectiveness**' December 2013, states 'Curriculum provision is better in large schools' – this means larger schools can provide greater opportunities for teaching and learning. Full details including analysis of data gathered by Estyn is contained in the report.

Comments received which suggest that a larger pupil population will hinder children's social development are not supported by the evidence available. Social skills rely on the ability to communicate effectively. Estyn report again in 'School Size and Educational Effectiveness' that 'Foundation Phase assessment outcomes improve with school size for language, literacy and communication skills'.

Having a greater number of children of the same age group will provide more opportunities for socialisation, not less. Estyn also find that aspects of social development are found to be excellent in 15% of large primary schools

Creating a larger school community does not necessarily mean that the 'family' feel of the current schools will no longer exist, although it may need to be planned for more carefully. It is possible to create 'little schools' or communities within the larger school structure, either through year/phase groups, where activities and events are planned for children and parents of those particular classes, or through systems such as House Groups, where children and classes are sub divided into separate sections within every class for events usually of a competitive nature such as sports day or eisteddfods.

It may be more difficult for every member of staff to know every pupil by name as pupil population increases. It has been suggested that the Headteacher should know every pupil if standards of attainment are to improve. However whilst learning the names and faces of pupils is an admirable skill that many headteachers are able to do, it does not guarantee success for those pupils. There is a multitude of arrangements in place that leadership teams use to monitor the progress of individual pupils in all schools in Neath Port Talbot and this forms part of the school performance review that schools receive annually.

Some consultees have raised concerns with the relationships between staff and parents in a larger school, commenting that good relationships will be impossible with such a larger pupil population. There is no evidence available to suggest that this is a problem for larger schools. Despite the size of the overall school it is likely that classes within the school will remain at or below 30 pupils, and there is no reason to expect that teachers and support staff will not know the pupils in their class as well as they do in any other school. Equally it is to be expected that parental relationships would be as important to the staff in the proposed new school as they are in the three current schools.

It is expected that parental links with the proposed new school would not be of a lesser quality than they are now, and a larger number of parents can mean

a more vibrant and varied school community available to support school activities and to form support groups. Good relationships that have been formed between the school, parents and the community should not be lost if the majority of staff from all three schools transfer to the new school as anticipated, as this would mean the wealth of experience and local knowledge which currently exists will be retained and developed for the future.

Concerns have also been raised that the larger school community will impact upon the opportunities for parents to build friendships. Again there is no reason why greater numbers of parents would prevent friendships being formed. Many parents will still have the opportunity to walk to the school with other parents; additionally those parents who have pupils travelling by bus will also have the opportunity to build friendships while waiting for their children to get on or off transport. Across all schools there are many parents who are not able to drop off or pick up their children from school due to work or other commitments, and it is not the case that either the parents or pupils are disadvantaged because of this. Larger schools are often able to organise more parent events through the school year (due to the greater number of staff available for organising them), giving more opportunities for socialising between parents. Should the proposal progress then there will be opportunity for parents to discuss this with officers and the new governing body of the school, in an effort to find solutions for any challenges presented.

Comments have been received which suggest that the proposed new school will prevent the new curriculum from being delivered effectively in relation to social influences based on their local area. However there will be opportunity to study the locality and community from where the pupils live under the four purposes of the new curriculum for Wales, in particular within the 'ethically informed citizens' purpose. There will also be the opportunity to learn about the greater historical heritage and cultural values from the wider Swansea Valley area and to understand the subtle differences between communities within the area. The governors and senior team within the proposed school will ensure this is part of their learning programme.

Whilst there is currently much investment in ICT in all Neath Port Talbot schools, the age and condition of many school buildings make it difficult to get the quantity and quality of provision that would be desirable for the future. On new build projects the ICT team are involved from the planning phase to ensure that pupils have adaptable ICT facilities and integrated mobile technology suitable for learning in the 21st century, and appropriate hardware and software (electric and data points, Wi-Fi modems, etc.) to be included in the process to future proof the schools to ensure the best possible solutions for future teaching and learning needs.

– **Staffing**

As stated in the consultation document the proposal will mean changes that impact on the employment of school staff. All of the existing schools will close on 31st August 2025. Upon closure all staff will cease to be employed at their respective schools. The new school will set a new staffing structure appropriate to its needs and budget.

A temporary governing body will be established before the opening of the primary school. The temporary governing body will have the responsibility of appointing a head teacher.

Specifically in relation to the posts of head teacher and deputy head teacher, the Council's policy is for these to be advertised nationally. Once the head teacher has been appointed that person will, together with the temporary governing body, be responsible for determining the staffing structure for the new primary school.

All school staff are employed by Neath Port Talbot Council. As part of the process all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that some staff wish to secure employment in the new school but others take the opportunity to take on new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a good track record for supporting staff in such situations.

The Council will seek to ring fence the current staff of Alltwen, Godre'rgraig and Llangiwg primary schools (with the exception of the Head and Deputy roles) to the staffing structure of the new school, therefore giving them priority in relation to appointments, however this is a decision of the temporary governing body

There are concerns that current staff at the school will leave due to the threat of closure and that pupils will have a poorer education as a result. The risk of significant numbers of staff leaving the school following a school reorganisation decision is small and there are no past trends to suggest this would occur. However, the Council respects the rights of staff to further their careers and this would be the case whether or not the council was proposing a school closure.

– ***Additional Learning Needs provision***

Generally, comments received around the proposed provision of an LSC for 16 pupils with statements of ASD were positive and the additional places are welcomed. It is recognised that a new provision in the proposed new school would provide additional places in an area where need has been identified, potentially making transition easier and allowing the pupils to integrate with their friendship groups and peers within the mainstream classes whenever possible.

However comments have been received which state that the proposed LSC would not be big enough even to support ALN pupils in the current schools and that the Council should provide more places to accommodate all the pupils with ALN in the schools at the present time. This demonstrates a lack of understanding of the purpose of a specialist LSC. All schools are expected to manage pupils with ALN within their mainstream classes, it is only the pupils with higher level needs who are allocated a place in a specialist facility. Each LSC in Neath Port Talbot provides education for children with ALN from a variety of other schools, it is not the case that only children from the school where the LSC is located will attend. As such the LSC would not provide specific support for pupils in the current schools with ALN, unless a pupil has a statement for ASD which recommends a specialist facility placement.

It should be noted that the LSC located at YGG Trebannws is not a part of this proposal. ALN provision within the Welsh-medium sector is not addressed in this consultation as this is a proposal to establish a new English-medium primary school with an LSC.

Comments have been received which state that a large school would not be able to cater for the needs of children with ALN because of greater pupil numbers. However larger schools often have more capability of addressing specific learning needs. Estyn report that 'Large and medium sized primary schools are also better able to identify pupils' additional learning needs at an early stage and make the necessary adjustments in the provision for those pupils. This is because they often have teachers with specific additional needs knowledge and understanding either working with these pupils directly or providing guidance and support to other teachers and support staff.' - School Size and Educational Effectiveness, December 2013.

It is often the case also that having an LSC in a school enables specialist knowledge and experience to be shared across the school, meaning mainstream staff benefit from the expertise available and are able to adapt teaching methods to better meet the needs of ALN pupils in their mainstream classes.

It is possible to create a new LSC in an existing school and this has been done on many occasions previously. However, there are requirements that have to be fulfilled before a school is considered to be the right place to establish a primary LSC as set out below.

The host school must:

- be fully committed to inclusion and demonstrate a good track record for ensuring the progress of all pupils
- provide the opportunity for integration into mainstream classes and mainstream activities
- be a primary school setting. LSC children will need to have access to the curriculum, the mainstream classes must have good provision and be able to provide pupils with high quality indoor and outdoor learning experiences
- have space available suitable to meet the needs and requirements of the children.
- be within reasonable travelling distance for the majority of children and have easy vehicular access

The three current schools would not be deemed suitable as they do not meet all of the above requirements.

– ***Proposed site and traffic management***

A significant number of comments received have raised concerns around traffic management on and around the site at Parc Ynysderw. The proposal relates to establishing a new school. Should the proposal be approved it will be a pre-requisite of gaining planning consent that traffic management and safe routes for pupils and parents are thoroughly addressed.

Every new school build in Neath Port Talbot is subject to rigorous highways and planning scrutiny before planning approval is granted and in many cases, as part of the scheme, significant work has led to improved traffic management and access arrangements in the area. These processes are well established and have been tried and tested over many years. It is expected that sufficient staff and visitor parking as well as parent and bus drop off areas will be a requirement of planning consent. These elements would be developed as part of the scheme and would seek to improve the current arrangements on the Parc Ynysderw site.

It is unlikely that a solution to the longstanding issues already experienced at the site will be found in the near future; the cost of such works, along with the disruption that would be caused to the current school and leisure centre users necessary to amend the general site layout, would make any scheme difficult to plan for. This proposal would seek to improve the current situation as part of the construction process, which has WG funding approved and which would involve disruption to the area to provide enhanced facilities over and above traffic improvements. A large scale project benefits from economies of scale and might, for example, seek to undertake enabling works by providing a temporary car park facility while current car parking areas would be disrupted; a smaller scale project would not be able to absorb the cost of such works.

In respect of the potential highway impact for the proposed school, an independent Traffic Impact Assessment has found that the site is located in a sustainable location with good walking and cycling connections from the surrounding area. Additionally as an existing school is already present directly adjacent to the site, on-site Safe Routes to School /in Communities assessments have previously been carried out, and there are good public transport connections within the immediate vicinity of the site allowing for good accessibility for staff and parents travelling to the site from further afield.

A further updated Transport Impact Assessment (TIA) would be required together with a rigorous Travel Plan should the proposal progress.

The Transport Impact Assessment will be in accordance with the requirements under the Welsh Governments Technical Advice Note (TAN) 18. The aim of the TIA is to clearly communicate the highway and traffic impacts of this development, whilst demonstrating that this development location shall satisfy desired, and predicted traffic output in terms of traffic trips, delays and capacity. The assessment shall provide data via traffic surveys, to show levels of existing traffic, pedestrian and cyclist movements, together with the likely effects the new development will have on existing traffic movements and capacity.

Through analysis, the Council will evaluate the potential effects on existing and proposed movement patterns, and will endeavour to mitigate negative transport impacts through the process of detailed highway design, and planning conditions.

– ***Transport and Travel***

Local authorities are under a legal duty to assess the travel needs of learners who walk to school, as required by the Welsh Government *Learner Travel Statutory Provision and Operational Guidance, June 2014*. This assessment

will involve the consideration of a range of aspects including traffic management, available footpaths, lighting and crossing points.

All schools in Neath Port Talbot are committed to encouraging walking and cycling to school where possible. For many of the primary aged pupils the proposed location of the new school on the site at Ynysderw remains within 2 miles travel distance for homes in the catchment area.

Neath Port Talbot Council's Road Safety team collect modes of transport data from all Neath Port Talbot schools on an annual basis. Based on data collected in 2022, both Alltwen and Llangiwg primaries have a high percentage of pupils who travel to school by car or taxi, 65% of Alltwen Primary pupils and 70% of Llangiwg Primary pupils. The majority of Godre'rgraig pupils (70%) now travel by bus, as expected due to the increased distance to travel to the temporary site. However prior to moving to Parc Ynysderw the percentage of pupils travelling to school by car or taxi was 47%. This represents 237 children already travelling by car to access education in one of the three schools. Overall, the data indicates that the number of pupils who walk, cycle or scooter to school is relatively small compared to the number who use cars or taxis.

All three of the schools have pupils from outside their catchment area – 41% of pupils attending Alltwen live outside the school catchment area, 41% of Llangiwg primary pupils live outside Llangiwg catchment area and 30% of Godre'rgraig pupils live outside of Godre'rgraig catchment area, suggesting that the current schools already contribute to the traffic in the area. Additionally, the number of primary aged pupils who travel to the other schools in the area and travel to schools outside of the Swansea Valley area, (approx.300 pupils) further increases the number of cars and taxis in and around the Pontardawe area every morning and afternoon.

An estimate of the numbers of pupils who live further than 2 miles away from the proposed new school site at Parc Ynysderw, based on the numbers and addresses of the pupils in the three schools (2020), suggests that approx. 176 pupils could potentially be eligible for assistance with transport, which removes the need for parents to transport pupils to school by car. Support with home to school travel will be made available in line with the Council's Home to School Travel policy. Home to school journey times from within the catchment area are expected to fall within reasonable limits for primary age pupils. The remaining pupils live on routes that have been assessed as safe, although these routes will be reassessed should the proposal progress and when details of the pupils who will be attending the new school are known. At that time the Neath Port Talbot Road Safety Officers will be available to assist

and support schools, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance.

In terms of the length of journey times, guidance relating to school reorganisation suggests that journey times for primary aged pupils should not exceed 45mins, however, the guidance does not indicate how this journey is to be made i.e. walking, cycling, local bus service or contracted school vehicle.

When considering pupil travel, reference must always be made to guidance under the Learner Travel (Wales) Measure, which refers to mileage and stipulates that pupils of primary age are entitled to home to school travel assistance if they reside 2 or more miles away from their nearest suitable education provision or where there is no suitable walking route.

Nursery education is classified as non-statutory provision under the Welsh Government's Learner Travel Measure. The Council's current Home to School Travel Assistance Policy reflects this and there is no entitlement to transport assistance for nursery children. In some circumstances and where opportunities present, under temporary discretionary arrangements, parents of nursery age pupils are able to request the use of a vacant seat on a vehicle which travels along a relevant route and which is suitable for nursery aged pupils.

These arrangements are no less favourable than those applying to other parents of nursery age children across the County Borough.

Comments have been received which state that by not providing transport assistance for nursery pupils these children will be denied access to a nursery education, deemed particularly important in this case due to the deprivation in the area. Previous reorganisation schemes have also raised these concerns, however data indicates that pupils attending full time school in reception classes have also accessed nursery provision either at the school they currently attend or at another school. This has included schools where full time pupils have transport assistance, and includes schools in areas of high deprivation. It would therefore seem unlikely that this proposal would impact on nursery pupils any more than previous school reorganisation schemes have done.

Extra transport for pupils to access breakfast club and after school activities will not be provided. It is expected that arrangements will be made by the head teacher and Governing Body of the new school should the proposal go

ahead, with the aim of ensuring that all pupils attending the school regardless of where they live have equal opportunities

Arrangements for extra-curricular activities are not an uncommon challenge for schools that have pupils attending from outside the immediate area. There are a range of solutions to this problem found by other schools that include: arrangements with transport companies, arranging activities at lunchtime or other times during the school day or facilitating car shares with parents.

The same active management arrangements will apply where pupils become unwell or need to leave school during the day. Contingency arrangements are made and schools manage the situation in the best and most appropriate way possible, always with the pupil's well-being foremost in mind.

There is no evidence to suggest that travelling a further distance to school will have a detrimental effect on attendance rates, and in fact the provision of school transport can have a positive impact on punctuality.

Pupil safety and well-being on school transport are given high priority by the Council. Many schools in Neath Port Talbot and across Wales admit pupils from outside of the immediate vicinity of the school and very many children and young people are transported to school every day from all parts of the County Borough.

In line with the Council Home to School Travel policy, passenger assistants will be provided.

Pupils from across the primary age range are likely to travel in the same vehicle as they do across the county borough; this is not perceived to be problematic as these children attend the same school and are likely to mix at other times during the school day.

This proposal recognises that for some children walking or cycling to school will not be possible, as is also the case now for some pupils on roll at the three schools. However opportunities will still exist through curricular and extra-curricular arrangements for pupils to learn about the importance of a healthy lifestyle, and the enhanced leisure facilities available on the proposed site will enable them to take part in activities which further promote this.

– ***Backlog Maintenance***

The Council has followed strict WG guidance and methodology in assessing condition grades, backlog maintenance and accessibility costs of the schools involved in this proposal thus ensuring a consistency of approach across

Welsh schools and have appointed an independent external consultant to undertake a review on the condition of Pontardawe Swimming Pool.

All schools will have access to their condition surveys and are supported by a multi-disciplinary team of technical staff to manage maintenance issues. A dedicated building surveyor is assigned to the school to monitor and respond to building maintenance matters.

It is important to clarify that the backlog maintenance and accessibility costs derived from the condition reports are estimates. The backlog costs are for putting the building back into repair, and don't allow for improving or upgrading which would provide schools with better facilities for teaching and learning.

Maintaining the three schools at their present sites is not considered to be the best use of resources or facilities as that would lead to cost inefficiency and would mean that full range of the potential benefits afforded by a new build would not be realised.

Increasing pupil numbers on one site by combining the three schools in a brand new purpose built facility would provide a far more effective use of public money, address surplus places and provide a 'state of the art' 21st Century teaching and learning environment delivering a positive impact on pupil outcomes.

– ***Impact on other Schools***

Comments have been received which state that this proposal will negatively impact on other schools, both English and Welsh- medium.

It has been suggested that Rhydyfro Primary School would have been a more suitable choice for inclusion as it is located in Pontardawe, and should be substituted for Godre'rgraig Primary which is stated to not be part of Pontardawe, but part of the Ystalyfera community council area.

While it is correct to state that geographically Rhydyfro Primary could be considered to be a better choice, other important factors have ruled out the inclusion of the school in this proposal. In summary Rhydyfro Primary was built in the early 1980s so is relatively modern and the newest English-medium school in the area. It has suitable sized, flexible classrooms, a multipurpose hall, shared resource areas, dedicated playing field and sufficient external hard play areas, along with on-site parking and parental drop off area. This school will find delivery of the new curriculum considerably easier than the three schools named in the proposal.

Rhos Primary was the only one of the five schools that wasn't included in the Strategic Outline Plan submitted to Welsh Government in 2017 and has

continued to be excluded from this proposal. Similarly to Rhydyfro Primary, other factors have been considered for Rhos Primary besides its location. Rhos Primary has a number of pupils who attend from outside of its immediate catchment, many from the Swansea Valley but also pupils who travel from the Bryncoch area. Additionally a significant new housing development has commenced directly opposite the school which could add to the number of pupils in the village who will need to be accommodated in the future. If these pupil numbers materialise it could be the case that extra accommodation will need to be provided for them at Rhos, it is not anticipated that pupils will need to travel to Pontardawe.

– ***Impact on the community***

A Community Impact Assessment (CIA) has been undertaken for the purpose of providing information on the impact of the proposal on the local community's access to facilities and services currently available at the three schools. It has been prepared in line with the requirements of the Welsh Government's School Organisation Code. The CIA has been prepared using a range of sources and evidence, including discussion with various partner organisations in the Swansea Valley and the schools and provides further information all of which enables decision makers to have a fuller understanding of the possible consequences on communities as a result of school closure.

For this consultation, figures were updated from the 2020 version; recent investment in the community has been included and due to officers being heavily involved in community schemes through grant aid, for example improving Hwb y Gors,(the former Cwmgors Primary School), the Pontardawe Heritage Centre ,YGG Pontardawe, YG Ystalyfera, Pontardawe Town FC, etc. the narrative has also been updated.

The CIA recognises the importance of Alltwen, Godre'rgraig and Llangiwg Primary School in providing a venue for school based events, extracurricular activity and community use. Following evaluation, it has been demonstrated that under this proposal the existing community/ school interaction is either retained, preserved, relocated or enhanced as appropriate with no adverse effect or loss of amenity to the wider community. It is recommended that the community use developed over an extended period should not be lost.

The CIA contains a comprehensive assessment of the facilities and services in the Swansea Valley and while the need to understand and mitigate the impact of a school closure proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.

It is not necessarily the case that by closing a school the community in which it is situated automatically declines. The report of the Institute of Welsh affairs - Small School Closure in Wales: New Evidence David Reynolds and Meriel Jones, 2007 states "There are many examples within Wales of strong, vital, connected communities that have no local school at all. It is the people, not a school building, who surely create a community. "

There is no reason to suggest that by attending school outside of the village children and young people will no longer 'belong' to the community where they live. The Community Impact Assessment (CIA) highlights the fact that many community based activities and events are not reliant on the schools and so it is not apparent why it is held that these activities would not continue, or why children and young people who currently enjoy participating in them would not want to do so should they attend school elsewhere. Schools are open to pupils for 190 days of the year. Outside of the school day; that is, before and after school, weekends and during school holidays, pupils will be in the areas where they live and available to make use of local facilities.

It is already the case that pupils across the Swansea Valley attend schools other than their local school, and that pupils attending the three schools named in this proposal do not all live in the location of the school they attend. Pupils from the area attend schools across Neath Port Talbot and other local authorities for a variety of reasons. Children and young people do not only mix socially through their schooling, as many will attend local after school groups or be part of wider community events. There is no reason why this wouldn't continue to be an important part of their lives should the proposal go forward. In other communities where school closures have taken place and where fears have existed that pupils would lose their sense of identity, it appears that this that this has not happened and that pupils continue to take part in community events.

Estyn states in its report, 'Community schools: families and communities at the heart of school life', July 2020, that the most effective community schools place families, communities and their wellbeing at the heart of the school. The proposed new school will look to build on the strengths of the individual schools and provide leadership that has a strong community vision and sense of civic responsibility; and that their school has an important role to play by working in close partnership with families, parents and the wider community. The school will look to provide opportunities for parents to play a full part in the life of the school and on the wider education of their children.

– ***Leisure Amenities***

Many comments have been received relating to the loss of the playing fields at Parc Ynysderw. The view that all the land will be lost to the proposed new build has been repeatedly raised, however this is entirely false. The exact location of the proposed new school within the Parc Ynysderw site will be further explored should the proposal progress, when the planning application and detailed ground investigations will be undertaken. It is the case that any loss to the playing fields at Parc Ynysderw can be compensated by reconfiguration of the current pitches as well as drainage improvement works to one underutilised pitch.

Funding for drainage works related improvement works such as drainage or associated investigative costs has been identified within the budget for the proposed new build school and pool, along with enhancing the children's playground adjacent to the leisure centre, which may also be affected by the proposed works, to ensure no loss of amenities in the area.

The Council's title to the land is subject to a deed of dedication in favour of the National Playing Fields Association (as the duly appointed Trustees of the King George V Foundation) so the prior approval of the Fields in Trust is required to enable the land to be released.

Formal approval from Fields in Trust to release the land has been received. It has been agreed that the Pontardawe Recreation Ground will be a suitable replacement and will therefore become part of the King George V Foundation with both Parc Ynysderw Sports Association and Pontardawe Community Sports and Recreation Association in agreement.

Many comments have been received which state that the pool should not have been a part of this proposal. It is the case that consultation on the proposed new pool is not a requirement of the School Organisation Code, however as it is part of the overall proposal to create a health and well-being community campus it has been considered appropriate to include information about it in the consultation document. Further details on the construction of the proposed pool will form part of the planning process should this proposal progress.

It should be noted that the funding for the pool and the school has been secured as part of the Sustainable Communities for Learning capital grant as one scheme. If the proposal for the new school is not approved then the funding for a new pool will also not be available from this source. Therefore an

additional source of funding will be required, or the Council will need to fund from its own resources, if the pool is to be delivered.

Pontardawe Swimming Pool was built in 1974. The latest condition survey from August 2014 indicated that while the building was in reasonable condition, the core building services have exceeded their recommended anticipated lifecycle. A total of £1,221,783 of maintenance works was identified as being required between 2015 and 2022. Due to the complexity of the works required the recommendation at that time was that the vast majority of the works be completed within one single phase in order to reduce the overall disruption to the facility. To date due to Capital expenditure pressures and logistics surrounding phasing, these works have not been completed.

In 2022 a further survey was undertaken which has identified that “the already serious structural defects noted in previous reports have continued to deteriorate. Comprehensive structural repair of these elements is now both necessary and urgent.”

In summary, the report notes that to extend the life of the existing building significantly would require extensive and costly repairs to be made which are likely to be cost prohibitive when compared to the cost of providing a new facility. It highlights the fact that “If the Council wishes to continue to operate the facility in the meantime, immediate action will be required” (2022 survey report)

Given the poor condition and age of the current facilities, aligned with the space available at the proposed Parc Ynysderw site, the Council are presented with an opportunity to integrate the pool and school facilities creating a new sustainable school and community asset. Inclusion of a pool at the site will further enhance the physical activity and wellbeing opportunities open to pupils and the community

The pool and leisure centre will continue to be managed separately to the school and decisions on how the pool will be managed will not be taken by school staff or governors. However it is expected that there would be increased use by pupils due to the close proximity of the pool and leisure centre and that opportunities will exist both in the school day and for extracurricular activities. It is not expected that this would limit the use of the pool by members of the public, and that the improved facilities along with the co-location adjoining the leisure centre would enhance the experience for members of the community as well as for pupils.

– ***Childcare***

Comments have been received regarding childcare provision, and concerns raised that parents will not be able to access wraparound provision as there is no facility planned within the proposed new school. As a result of considering the current sufficiency of childcare within and around the catchment area of the proposed new build primary at Parc Ynysderw, the need for a childcare setting within the school was not accepted due to the fact that the area is already well served with childcare provision, with a number of settings offering full day and sessional care, and approx. 8 childminders with the capacity to take 65 children, all within reasonable distance of the proposed school site. It is expected that existing childcare provisions could adapt their transportation of children plans to enable children from the new school location to access/continue to access their provision. It was also felt that should the proposed new school include extra childcare provision then the required tender for any new childcare services within schools would unsettle and disrupt the successful and established childcare in place in and around the area.

Comments have been received which state that should Alltwen primary school close as a result of this proposal then the childcare provision based on site at the school would also close. It is not clear why this would need to be the case. It may be possible to retain the provision on the Alltwen Primary site, or for the provision to relocate elsewhere if appropriate. If the proposal is approved then discussion between the childcare providers and the Local Authority can be progressed to find a solution that is suitable for users and providers of the service.

– ***Impact on Welsh Language Development***

A Welsh Language Impact Assessment has been carried out.

Comments have been received which state that a new English-medium school will negatively impact on the Welsh-medium schools in the locality and that pupil numbers will drop in Welsh-medium schools.

The suggestion that the condition of the building and available facilities are a more important factor than the language medium of education when parents are choosing a school for their children is debatable. Data reveals that new build English-medium schools in Neath Port Talbot which have opened in the last 10 years have had no significant impact on nearby Welsh-medium schools. Awel-y-Mor Primary opened in 2013 and despite significantly more pupils attending than predicted, it is evident that these pupils did not migrate from YGG Rhosafan, the nearest Welsh-medium school. In fact numbers at YGG Rhosafan have steadily increased, from 336 in 2011 to 392 in 2021. If it

were the case that new English-medium schools significantly attract pupils who would otherwise have attended a Welsh-medium school then YGG Rhosafan should be hugely impacted as the catchment area of the school has also seen the opening of Ysgol Bae Baglan and Ysgol Cwm Brombil in recent years but the school has still continued to grow year on year. Similarly Ysgol Tyle'r Ynn is a short distance away from the newly opened Ysgol Carreg Hir and again pupil numbers have risen not declined over 10 years, from 197 in 2010 to 256 in 2021, and there does not appear to be significant movement of pupils from this school to the new build Ysgol Carreg Hir.

Conversely Welsh –medium education is already being provided in a 21st century school build in the Swansea Valley at Ysgol Gymraeg Ystalyfera –Bro Dur, which opened in 2017, a 3-19 Welsh-medium middle school established in place of YGG Y Wern and Ysgol Gymraeg Ystalyfera, across two sites in Ystalyfera and Port Talbot. The primary phase of the school has not yet seen significant growth despite being in a new purpose built 21st Century building. It is also the case that transition data indicates that pupils continue to transfer from the Welsh-medium primary schools to Cwmtawe Community School rather than to Ysgol Gymraeg Ystalyfera, despite Cwmtawe Community School now being over 25 years old. This would suggest that more than condition of buildings is being considered by parents/carers when decisions are made about which school children will attend.

Neath Port Talbot Council does not have an unlimited source of funding and as such it is inevitable that across the school estate, including all Welsh and English- medium schools, difficult decisions have to be made when identifying which schools are most suitable for inclusion in new build schemes.

It is also the case that where possible the Council will utilise any source of funding available in order to improve and enhance current schools, not just 21st century schools grants for new build projects.

In the last 3 years significant funding has been secured for YGG Pontardawe, with the aim of increasing the school capacity and providing enhanced teaching and learning environments across the school. The £2.19m Welsh Government funded grant has provided the school with remodelled and extended childcare and nursery facilities along with 2 new build Foundation Phase classrooms, a new entrance way, staffroom, meeting room and office and additional play areas, fencing and pathways, along with medium refurbishment of the hall. It has provided space for an additional 60 pupils, and the extended childcare facilities has allowed the current provision to increase to 28 places. The scheme was aimed at strengthening Welsh-medium education in the Pontardawe area, enabling the school to further develop as a thriving and sustainable provision. An immersion provision for latecomers to the Welsh language has also opened in YGG Pontardawe in

September 2022. The name of the provision is 'Y Cwm'. The hub provides face to face intensive, cross-curricular Welsh language immersion provision over a 10 week block from experienced and effective language teachers. When at full capacity, it provides immersion and intensive language support to a maximum of 16 pupils per 10 week block on a termly basis.

YGG Trebannws has also benefited from remodelling and improvement works to the school to facilitate the development of a new WM LSC. Additionally it has created a new 12 place WM childcare provision and improved foundation phase facilities. A Welsh-medium capital grant was approved by Welsh Government for the project with the aim of increasing the number of pupils on roll and ensuring Welsh-medium wrap around provision for parents in the area.

A number of comments have been received which specifically relate to the concern that the proposal will damage the development of the Welsh language in the area. Comments have been received from the governing bodies and parents of pupils attending the Welsh medium schools in the area, as well as from local and national individuals and groups who support the development of the language across Wales.

The Council has considered the possible impacts of the proposal on opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language. The impact assessment identifies potential impacts, both positive and negative, and also possible mitigating actions.

Mitigating actions that have been considered include establishing a local Swansea Valley working group to consider thematic issues e.g. marketing Welsh-medium education, community involvement and Welsh-language opportunities within the community. Further actions refer to close and effective engagement with Menter Iaith, Urdd and Tŷ'r Gwrhyd to provide opportunities to promote the benefits of the Welsh language within the community and ensuring provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education.

The proposed new school is not proposed to be a bilingual school. Alltwen, Godre'rgraig and Llangiwg primaries teach Welsh as a second language and this will also be the case for the new school. Currently 20% of staff across the three schools are fluent or fairly fluent Welsh speakers. By combining the three schools Welsh language provision could be improved as there could be greater impact on having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of

Welsh. Specific actions will be further supported by targets outlined in Neath Port Talbot's Welsh in Education Strategic Plan, with specific reference to Outcome 5.

If the proposal is approved and progresses, the Welsh Language Impact Assessment will continue to be an important document, not just to ensure that any mitigating actions are carried out but to continue to highlight any areas of concern and to further support the planning process.

Finance

This proposal is being brought forward for consultation based on the four principles of the Strategic School Improvement Programme, as stated in the consultation document. It is the case that one of the four principles of the SSIP programme is the need for effective financial management and this proposal will result in revenue efficiency savings which will be re-invested in the education budget. In this regard, the proposal supports the Council's effective management of its education budget.

Following the submission of a detailed business case, Welsh Government 21st Century Schools Programme (now Sustainable Communities for Learning) capital grant funding has been approved. The Council is required to meet 35% of the cost, with the remaining 65% funded by Welsh Government. The Council's contribution will be funded from efficiencies within the delegated schools budgets, and the reduction in running costs as a result of closing the three schools, detailed within the report. These cost efficiencies will enable the Council to prudentially borrow to fund-its 35% element of the capital bill.

The approved funding has been awarded for the current proposal and any change to that proposal would require a new business case to be submitted to Welsh Government. This has been confirmed in writing.

Comments have been received which suggest that as costs have risen in the 2 years since the business case was approved, it would now be necessary to update the original business case or submit a new one. This is not the case – the approval has been obtained and the £22.7m identified for the scheme is secure. As with all schemes across Wales at the present time, rising costs have meant that projects have had to be revisited, and decisions taken around either increasing the budget or reviewing the costs. Welsh Government are aware of the problems faced by local authorities in delivering schemes at the current time and have indicated that they are open to discussions around additional funding requirements. At the present time it is broadly anticipated that the additional costs needed to complete this project would be in the region of 25%-30% above the initial cost estimates (i.e. £29,555,552 – an estimated difference of £6,850,552.). Should the proposal progress then a full review of potential cost increases will be undertaken in partnership with the

appointed contractor. In the event of additional costs being identified, further funding options will be explored in detail with Welsh Government at that time.

Any capital receipt resulting from future sale of the current school or pool sites has not been included in the business case approved by Welsh Government for the proposal, although the Council has previously resolved to re-invest any monies received from the sale of school premises that become surplus to operational requirements as a result of its Strategic School Improvement Programme into the Education budget.

Combined backlog maintenance and accessibility costs for the existing schools amounts to circa. £1.9m which would be removed by this proposal along with the ongoing need to fund the associated costs of Godre'rgraig Primary School's current off-site hired/leased accommodation.

Pontardawe Pool has recently reopened after emergency works, however the long term future of the pool is at risk. Without the school scheme funding will not be available for the pool from Sustainable Communities for Learning and an alternative source of funding will be required. Estimated costs for the pool as part of this project are estimated to increase from circa. £8.9m to circa. £11.6m, but a standalone project is likely to cost significantly more.

Comments have been received which state that per pupil funding calculations contained in the consultation document are misleading. To clarify - revenue funding for schools is distributed on an annual basis by means of an approved formula. This ensures school budget shares are allocated on a simple, objective and measurable basis.

Based on the funding delegated to schools in the 2022/2023 financial year, per pupil funding for Alltwn Primary school is £4,006 whilst for Llangiwig Primary school per pupil funding is £4,561 and for Godre'rgraig Primary school £ 4,206. This compares with the average for NPT primary schools at £4,272.

Based on a school of 770 pupils (700 F.T.E) the projected budget share for the proposed new school is estimated to be in 2022/23 = £2,556,487. Per pupil funding for the proposed new school would be approximately £3,652.

Based on a school for 397(FTE) –this would be the numbers on roll at the three schools at the time of calculations – the projected budget share for the proposed new school is estimated to be in 2022/23 = £1,567,819. Per pupil funding for the proposed new school would be £3,949.

Per Pupil Funding is calculated by the annual schools specific budget share divided by the full year effect of pupil numbers; larger schools can benefit from economies of scale meaning they can be more cost effective, and can be more flexible - the more pupils in a school, the more money will be available

for the head teacher and governing body to be able to resource the school both with staff and physical resources.

Consultation responses have also queried additional transport costs as a result of the proposal. As outlined in the Consultation Document additional transport costs are likely to be incurred should the proposal be implemented. Currently annual transport costs for Godre'rgraig Primary School amount to £101,245. It was agreed when Godre'rgraig Primary School moved from Graig Road to the temporary location at Parc Ynysderw that nursery pupils would be granted discretionary transport assistance, this cost is included in the above figure. In terms of additional pupils requiring transport as a change of school raises the number of pupils with entitlement for every minibus the average cost is £150 - £200 per day; alternatively for every coach the average cost is £220 - £260 per day. It is not yet known how many children will be entitled to transport.

Comments have been received which suggest a better use of public money would be to address the backlog maintenance issues at the existing schools and swimming pool. It is important to clarify that the backlog maintenance and accessibility costs derived from the condition reports are estimates for putting the building back into repair, and do not account for improving or upgrading (internally or externally).

Developing a scheme to undertake this type of improvement work would prove to cost considerably more than the figures outlined in the condition report. The backlog maintenance and accessibility estimates do not take account of costs associated with design, supervision or any statutory fees nor do they provide for any remodelling works internally or externally to improve the suitability and layouts of the existing premises. The condition report has not considered needs beyond 5-10 years (mainly 1-5 years in accordance with Welsh Government backlog maintenance returns); other works, required after 10 years, may be of a substantial and significant cost that would need to be undertaken during any future refurbishment and fall outside the scope of the current condition survey.

Taking the above into account and with the passage of time and fluctuating market conditions, costs are likely to increase appreciably and in reality, it is the case that the costs identified within the condition reports would not be sufficient to deliver fully designed and tendered, meaningful improvement schemes, for each of the premises.

It is also the case that both Alltwen and Llangiwig schools are compromised in terms of their building suitability for 21st Century teaching and learning and fall short of many of the internal and external space standards and

requirements as set out within Building Bulletin 99 that one would ordinarily expect to see in a brand new 21st Century school.

In response to comments received which suggest Welsh Government funding can be accessed to support this kind of scheme- Welsh Government have a strict business case process that must be satisfied that includes scrutiny of the strategic, economic and financial case of any proposal. It is considered highly unlikely that Welsh Government would financially support the 'patch and mend' status quo approach that is being suggested. Welsh Government 'Sustainable communities for Learning Business Case Guidance' document provides further details -<https://www.gov.wales/sustainable-communities-learning-business-case-guidance>

The guidance also contains detailed information regarding the additional aspects that need to be met to satisfy Welsh Government, including ensuring modern construction standards for acoustics, accessibility, recycled content with new builds now expected to achieve net carbon zero in operation standard and carbon reduction, and that the requirements of the biodiversity and resilience of ecosystems duty are met. Projects funded through Sustainable Communities for Learning Programme are also expected to optimise the use of infrastructure and resources, to deliver facilities that can be used by communities.

It is the case that both existing schools are compromised in terms of their building suitability for 21st Century teaching and learning, and fall short of many of the internal and external space standards and requirements as set out within Building Bulletin 99 that would ordinarily be expected in a brand new 21st Century school. The complexities of ensuring that a robust business case can be developed and approved, with the likely significant additional costs of creating three 21st century schools to the required standards, would be extremely challenging and Welsh Government funding could not be guaranteed.

Without Welsh Government funding, any alternative proposal that revolved around maintaining all three existing schools and the pool in their current locations would mean that the Council would have to meet 100% of any associated capital costs.

The Council currently spends circa £1.2m each year of its own capital funding to address maintenance needs on schools and there are many competing priorities each and every year. Given the current financial situation it is not realistic to expect a huge influx or redistribution of finances in the foreseeable future.

Total backlog maintenance and accessibility costs for Alltwen and Llangiwig primary schools and the swimming pool amount to circa. £3.1m.

With this in mind if the Council only addressed the notional £3.1m of backlog maintenance costs then that alone would exhaust all of the capital resources currently allocated to cover repairs and backlog maintenance pressures across the whole of the school portfolio for almost three years.

Comments have also been received which express the notion that the current schools can be refurbished or remodelled in order to provide 21st century learning environments and that this would be a cheaper or more cost effective option than the proposed scheme.

Using Welsh Government standard 2024 where Heavy Refurbishment cost/m² = £2,851, it is possible to estimate notional costs.

*Heavy Refurbishment Investment includes significant structural alterations and may also include the replacement of facades and roof finishes. The complete renewal of internal fittings, finishes, and Mechanical and Electrical systems. **The building is typically unoccupied. Extension of economic life is approximately 15 - 30 years.** Works include strip out of existing space, shell and core refurbishment including cosmetic upgrades. Replacement to raised floors, ceilings and new services.*

Calculations have been carried out for Alltwen based on a heavy refurbishment for the main teaching block, new build replacement for the existing demountable classrooms and an allowance for IT and Furniture Fittings and Equipment (FFE), based on pupils on roll at January 2022. Total notional/estimated costs are circa £4.1m.

Calculations for Llangiwig, based on heavy refurbishment for main teaching block, new build nursery classroom on main site, and an allowance for IT and on pupils on roll at January 2022. Total notional/estimated costs are circa £3.2m.

Godre'rgraig primary does not have a permanent building to be able to compare costs.

Total notional costs therefore for both schools amount to circa. £7.3m for partial rebuild and refurbishment.

It should be noted however that -

- The calculations do not allow for any additional pupils, only pupils currently on roll. This is less than the current school capacities and less than would be desirable due to the number of catchment pupils attending other schools who can claim a place, i.e. both schools would need to be bigger than these calculations allow for.
- No costs have been identified for the hire of temporary buildings to house pupils during any programming of works. Alltwen and Llangiwig Primaries

would need to vacate for an extended period of time (possibly a full academic year). There are major financial and logistical implications associated with the hire of temporary accommodation and pupil transportation all of which would be “lost” money. It would also be necessary to identify a location for the pupils to be relocated to as neither site could be developed with pupils in situ.

- The calculations do not allow for any transformational work to provide enhanced teaching and learning facilities, either indoors or outdoors, and so would effectively be providing more or less the same as currently exists.
- No account has been taken of Godre’rgraig Primary’s need for a new build, which will need to be factored into the overall notional/estimated costs, or if not an option then even more additional space would need to be included in the current two schools to allow for Godre’rgraig pupils to be dispersed.

It should also be noted that there are many other schools in Neath Port Talbot in a similar or more urgent situation in relation to backlog maintenance, accessibility and the ability to successfully meet the demands of 21st century teaching and learning, and which therefore may be more of a priority than either Alltwen or Llangiwig primaries for this type of scheme.

Estimated costs for a new build primary in Godre’rgraig amount to circ. £17m due to the various challenge and constraints that exist in the area.

Overall, the notion of refurbishment or remodelling of the current schools, with or without a new build Godre’rgraig primary, does not represent better value for money than the current proposal. While it may look as if this would be a cheaper option, it would not deliver the expected benefits of the proposed new build school at Parc Ynysderw, it would not provide the additional enhanced facilities that would be provided on Parc Ynysderw (including direct access to playing fields , leisure facilities and the pool as well as improved opportunities for year 6 transition), it would not be possible to fund a new pool as part of any such scheme and it would cause significantly more disruption to the individual schools over a longer period of time for a ultimately a poorer educational offer.

In relation to the swimming pool as noted above, emergency works have recently been undertaken to allow the pool to remain open. However the most recent (2022) report on the condition of the pool notes that to extend the life of the existing building significantly would require extensive and costly repairs to be made which are likely to be cost prohibitive when compared to the cost of providing a new facility.

– ***Consultation Process***

Consultation on the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwig primary schools has followed the procedures required under the Welsh Government's School Organisation Code which specifies the type of school organisation activity on which the Council is required to consult and the process to be followed in conducting consultation.

The Code also specifies the persons with whom the Council must consult and how the consultation document will be made available to them. In this regard, a school organisation proposal has an identified audience and that audience has been appropriately targeted in line with the Code.

On 20th October 2021, following a thorough consultation process in line with the Welsh Government's School Organisation Code 2018, the Council's Cabinet at that time approved the proposal to establish an English-medium 3-11 school with a specialist Learning Support Centre (LSC) for 16 pupils with a statement of special educational needs relating to Autistic Spectrum Disorder (ASD), in new build premises to accommodate pupils from the current catchment areas of Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary, all of which would be discontinued on 31st August 2024.

In January 2022 the Council received notification that the decision was to be challenged by a Welsh-medium education parents group. The challenge was brought on three grounds all relating to the notion that a Welsh Language Impact Assessment should have been included as part of the original consultation process. The judgement received in October 2022 upheld one of the three grounds of appeal.

Furthermore in June 2022 the new Rainbow Coalition administration at Neath Port Talbot Council indicated that it wished to review the decision of the previous administration taken in respect of the Swansea Valley school reorganisation proposal.

In light of the judgement and the desire of the new administration for a review, a new consultation has been undertaken.

Comments have been received which question why this consultation is the same proposal as the previous one. This is because, in the view of officers, this proposal delivers the most benefits to the pupils of the Swansea Valley, and after considering in detail all the alternative suggestions received it is still believed that this is the case.

Comments have been received which suggest only the preferred option has been considered. This is not the case, a range of options were presented in

the consultation document, giving sufficient reasons to allow consultees to give intelligent consideration and response.

The Council must conscientiously take into account the responses before finalising its decision. As such the views of consultees are able to influence the decision making process.

Alternative proposals brought forward as part of the consultation process have been explored and will help elected Members take a reasoned and rational decision as to how the proposal is to be progressed. It will be for elected Members to decide on the most appropriate proposal, if any, to take forward.

Should the proposal be rejected then this process stops, and any new proposal will need to be developed and brought forward for consideration. In line with the Code, this report discusses below alternatives suggested or supported in consultation.

– ***Well-being of Future generations***

It has been stated that this proposal is in breach of the requirements of the Well-being of Future Generations (Wales) Act 2015, specifically in relation to the impact of school closures on the local communities. It is not clear why this is considered to be the case. Neath Port Talbot Council produces a corporate plan which includes well-being objectives. The three well-being objectives enable the Council to maximise its contribution to the seven well-being goals that Welsh Ministers have set for the whole of Wales in their Well-being of Future Generations (Wales) Act 2015. The first of the three objectives specifically relates to children and young people - 'To improve the well-being of children and young people', and the plan sets out in detail how this objective contributes to the seven well-being goals. It is the view of officers that this proposal can enable the Council to meet many aspects of this objective including through providing 21st century teaching and learning experiences, supporting the implementation of new statutory duties to benefit pupils with ALN and to increase the opportunities for pupils to participate in activities that promote health and well-being.

It is the case that a new 21st century school will greatly enhance teaching and learning experiences, which in turn can positively impact on pupil outcomes. The increased skills and knowledge will provide greater life chances for pupils, enabling them to become as adults more prosperous, more resilient and more equal. By providing access to improved facilities and by broadening social and cultural experiences the proposal contributes to healthier individuals and more cohesive communities.

– ***Pupil Numbers***

Concerns have been raised regarding the pupil numbers contained in the consultation document.

The proposed new, 21st century build, English-medium 3-11 primary school will provide for up to 630 full-time primary age pupils, 140 part-time (70 a.m./70 p.m.) nursery age pupils. This will deliver sufficient accommodation for the total combined forecasted pupil numbers, including potential growth in pupil population. For the purpose of consultation, the proposed admission number for the new primary is 90.

These forecasted numbers determine the size of the building and the number of classrooms and additional rooms that will need to be included in the proposed new school. This information has been included in the Business Case submitted to Welsh Government to secure the funding to build the proposed new school, and has been scrutinised and approved.

Five year pupil number forecasts for the 3 schools are shown in table 1 below. The projections are calculated based on the January 2022 PLASC Actual data – with all of the year groups dropped down for subsequent years. Nursey and Reception figures are based on the previous 3 year average.

Table 4

School	Jan 2022	Jan 2023	Jan 2024	Jan 2025	Jan 2026	Jan 2027
Alltwn Primary (exc. nursery)	207	193	189	176	170	163
Alltwn Primary nursery only	48	40	43	44	42	43
Godre'rgraig Primary (exc. nursery)	119	105	103	101	99	99
Godre'rgraig Primary nursery only	15	17	16	16	16	16
Llangiwig Primary (exc. nursery)	110	97	95	90	91	91
Llangiwig Primary nursery only	15	16	16	16	16	16
New Primary (exc. nursery)	436	395	387	367	360	353
New Primary nursery only	78	73	75	76	74	75

However the figures in the table above need to be considered with other information that exists. It is difficult to accurately determine the capacity of a new primary school and as the proposed new school is not expected to open until 2025 predicting the number of children who will require a place this far in advance is even more challenging. However it is vitally important to ensure that the size of the school is sufficient to be able to accommodate **all** pupils who are entitled to claim a place at the point of opening and in the future. Insufficient space could mean pupils having to travel to the nearest available school which can be distressing for pupils who are moved away from their peers and can also be costly as additional transport will be required.

A number of factors have been taken into account to estimate the size needed for the new school. This involves a range of data sources combined with experience of previous school builds and outcomes.

Over the last 10 years the number of primary aged pupils in Neath Port Talbot Swansea Valley schools has increased by almost 130 extra pupils, and it is expected that these numbers will continue to rise as the population continues to grow. The pupil population is transient across the primary schools.

Table 5

Involved schools	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Alltwen	252	260	226	195	215	223	234	240	231	254	255
Godre'rgraig	95	102	118	126	138	147	156	159	153	155	134
Llangiwg	87	99	136	159	152	150	136	138	136	124	125

Table 6

	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Rhos	144	148	161	161	153	150	156	148	150	155	157
Rhydyfro	107	118	124	125	137	154	154	153	167	169	175
YGG Pontardawe	340	332	336	349	351	352	356	347	336	322	335
YGG Trebannws	120	116	123	115	118	104	104	102	101	102	97
YG YBD (prim)							152	159	157	162	160
YGG Y Wern	165	156	150	155	149	148					

Data indicates that pupil numbers can alter significantly over a short period of time in these schools, with substantial numbers of pupils attending from outside their schools catchment area, but from within the wider Swansea Valley area, as shown in the table below.

Table 7: Schools and Catchment Pupil Percentages. Data source: PLASC 2022

English Medium Schools	Percentage of pupils in catchment				
	Alltwen	Llangiwg	Rhydyfro	Godre'rgraig	Rhos
Alltwen	59.3%	12.1%	1.2%	6.6%	12.9%
Llangiwg	19.4%	58.6%	20.7%	14.8%	4.3%
Rhydyfro	3.2%	1.0%	59.1%	1.6%	2.2%
Godre'rgraig	9.3%	23.2%	6.1%	69.6%	1.4%
Rhos	3.7%	0%	0.6%	0.8%	70.5%

Over 100 children from the catchment area of Alltwen, Godre'rgraig and Llangiwg attend English-medium schools elsewhere in Neath Port Talbot. Data for pupils who reside in Neath Port Talbot but attend schools elsewhere is not held by this authority, however information provided by other local authorities indicates that a significant number of children from the Swansea Valley also travel for English-medium education into Powys and Swansea.

Table 8 (November 2022)

	Pupil Numbers
Pupils living in the catchment area of Alltwen, Llangiwig or Godre'rgraig attending an EM school elsewhere in NPT	109
Pupils attending neighbouring EM schools outside NPT (Swansea and Powys)	204
Total number of pupils	313

In addition the Local Development Plan contains details of a number of new housing developments with 486 new units already created in the area, and a further 11 planned housing developments which could generate over 580 more units by 2026. This could see an additional increase in pupil numbers in the area adding to the numbers of pupils the proposed new school would need to accommodate.

There is no intention to include any other school in the proposed scheme despite comments received that other schools are to be added at a later date. Any additional school reorganisation plan would be subject to exactly the same procedures as the current proposal. Current legislation does not permit the ad-hoc addition or removal of schools not already named in the consultation without commencing a new statutory process.

– ***Godre'rgraig Primary, Graig Road Site***

Some comments continue to suggest that the relocation of the school to the temporary site was a deliberate act to facilitate permanent closure.

It is important to note that this consultation is not about whether Godre'rgraig Primary should remain in its temporary location, or whether remedial works should be undertaken to allow for a return, but instead is about a proposal to establish a new 3-11 English –medium primary school in new build premises to replace three existing primary schools, of which Godre'rgraig Primary is one. Whether the location of the school remained at Graig Road, Godre'rgraig or in its temporary location at Parc Ynysderw the current consultation would still be undertaken in the same way and the same principles for embarking on consultation would still apply.

The consultation document clearly outlines the reasons for the proposal; the expected benefits that a new school, along with the creation of a health and wellbeing community campus, can deliver are as relevant to pupils of Godre'rgraig as for pupils of Alltwen and Llangiwig.

The proposal which has been consulted upon is therefore in the opinion of officers considered to be the best option for all of the schools, including for pupils currently attending Godre'rgraig Primary.

Godre'rgraig Primary school staff and pupils cannot return to their original location. The risk associated with the quarry spoil tip above the school remains, and it is therefore deemed unsafe for pupils and staff to return to the site. A feasibility study to investigate design options and produce budget estimates for works associated with the remediation of the quarry spoil tip above the Graig Road site has been undertaken by Earth Science Partnership following a report presented to the Streetscene and Engineering Cabinet Board on 21st May 2021 by The Head of Engineering and Transport.

In June 2021 ESP were asked to investigate design options and produce budget estimates for works associated to the tip, to include, but not limited to:

Option 1 - The development of a design and production of a budget estimate for the removal of the spoil materials associated with Cilmaengwyn Godre'r Graig tip.

Option 2 - The development of a design and production of a budget estimate for a hard engineering solution in the form of bunds, catch walls etc., to protect Godre'r Graig Primary School from the slip of any spoil material associated with Cilmaengwyn Godre'r Graig Tip;

Option 3 - The development of a design and production of a budget estimate for demolition of Godre'r Graig Primary School building and reusing as a biodiversity habitat site. This option would also have to take into account the effect on properties downhill of the school from the slip of any spoil material associated with Cilmaengwyn Godre'r Graig Tip.

At a meeting of the Environment, Regeneration and Streetscene Services Cabinet Board on 2nd December 2022, members were informed of the results of Earth Science Partnership's work to investigate design options and produce budget estimates for works associated with the remediation of Cilmaengwyn Spoil Tip. The report outlined detailed remediation options and associated costs for the remediation of Cilmaengwyn Spoil Tip and its effect on the Godre'r Graig Primary School site.

Having due regard to the report undertaken by Earth Science Partnership, Members approved to implement Option 3 to manage the risk and improve the local environment at a cost of £395K and an annual ongoing cost of circa £2.5K to maintain drainage systems as this was the only affordable solution available to the Council. Costs are to be funded from the Council's Corporate Contingency Reserve, or via any future Welsh Government funding that becomes available.

Godre'rgraig staff and pupils will continue to operate from the temporary location adjacent to Cwmtawe Community School until a different solution is found if the proposal is dismissed.

- *The proposed site – Parc Ynysderw*

Parc Ynysderw has been identified as the preferred site for the proposed new build school for a number of reasons. A new build primary school at this location will provide opportunities for enhanced health and wellbeing activities, with the leisure centre and the proposed new pool in close proximity and the numerous playing fields readily available for use. The collocation of the primary with the secondary school will also aid transition for pupils from one phase to another, will provide opportunities for primary pupils to benefit from more specialised secondary school teaching resources (e.g. science labs, DT rooms, food technology rooms) and will make cross phase working easier to facilitate. This is the only site in the area which is owned by the Council and offers these collective benefits.

The amount of land required for the proposed new school is circa. 27,976m² to 31,140m². Included in this range is the additional land requirements for playing fields of circa. 14, 320m², however this playing field area can be omitted as playing fields already exist at Parc Ynysderw. A different site without such provision would need 27, 976m² to 31,140m² to accommodate the proposed new school.

Land for a project of this magnitude is not readily available in the Swansea Valley area, and it is the case that while this site has some construction challenges these are believed to be less problematic than any of the other suggested alternative sites. Officers are aware that this land is Zone B flood risk area as identified in **Welsh Government Planning Policy and Guidance Technical Advice Note (TAN) 15: Development and Flood Risk**. It is also the case that land at the site may be contaminated, as is the case for some of the alternative sites suggested by consultees, and funding for potential mitigation works has been identified within the budget for the proposed new build school and pool. These aspects will be further explored should the proposal progress when the planning application and detailed ground investigations will be undertaken.

Alternative Options

Consultees have responded with alternative suggestions which are responded to below.

A. Maintain each of the schools on their current site

Comments have been received which suggest a better use of public money would be to address the backlog maintenance issues at the existing schools

and swimming pool. This would not be preferred option, for the reasons noted previously in this report in the finance section.

Additionally it should be noted that Godre'rgraig Primary School does not have a permanent site and currently the school operates from temporary buildings at Parc Ynysderw.

B. Alternative New Build Options for Alltwen, Llangiwg and Godre'rgraig Primary schools

It has been suggested that each of the schools should have their own 21st century build either on or very near to their current site.

The Council has the responsibility for ensuring that it is making the best use of resources and facilities in order to deliver the very best educational and recreational opportunities for children, young people and adults in the wider community.

Maintaining the three schools at their present sites is not considered to be the best use of resources or facilities as that would lead to cost inefficiency and would mean that the potential benefits afforded by a new build would not be realised. In the same way new builds on one or all of the current sites would not be the most efficient use of available resources. Separate business cases for each scheme would need to demonstrate to Welsh Government that they **individually** offer the best option strategically, economically and financially before securing grant support. The Council would also need to fund its share of each new build and without realising any efficiency savings it is questionable whether this approach would be affordable on the Council's part. Three separate builds would not produce the added benefits of the health and well-being campus or of increased cross phase working between the secondary and primary phases as co-location would not be a possibility if the schools were to remain in their current locations.

If only one of the schools were to go forward for a new build proposal then the English-medium pupils in the remaining two schools who would otherwise have been part of this proposal would no longer have the opportunity to benefit from the proposal. Community benefits of the health and wellbeing campus with the new build pool adjacent to the leisure centre would also not be realised.

Increasing pupil numbers on one site by combining the three schools in a brand new purpose built facility would provide a far more effective use of public money and provide a 'state of the art' 21st Century teaching and learning environment.

Each alternative new build option that has been suggested during the consultation has been further explored and reported on below.

In order to evaluate these suggestions a new primary school built to the Sustainable Communities for Learning Programme construction and space standards has been assessed and costed for each of the schools named in this proposal. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build primary school.

Guidance on accommodation and external area specifications for mainstream schools are set out in Building Bulletin 99. The key components of a primary school comprise: teaching areas (general classrooms, practical lesson areas etc.); halls (multi-purpose main hall used for PE, performance, dining etc.); learning resource areas (library, learning support, SEN small group room, nurture space etc.); staff and administration (staff room, reception, admin & reprographics, etc.); dining (full production kitchen; dining area in multi-purpose hall, etc.), toilets and personal care (accessible pupil, staff, visitor toilet areas, hygiene rooms etc.) and storage (cloaks, materials preparation, equipment, consumables, etc.). The assessments that follow are based on Building Bulletin 99 with the space allocation for primary schools adopted by the Welsh Government for grant funding purposes. This is a basic space standard which is less than Neath Port Talbot Council would ordinarily seek to build. The specifications in the Building Bulletin only allow for the accommodation needs of a school and not for the requirements of other services e.g. Learning Support Centre, health and wellbeing aspirations etc.

When considering the design for new build schools it is generally the case that the smallest new build school would have the capacity to educate 210 fulltime and 45 part time nursery pupils; this creates one classroom space for each year group from Nursery to year 6, allowing space for 30 children in each class. New build school capacities would then increase by multiples of 15 (half a class) or 30 full class depending on the required size of the new build school.

For Alltwen primary it is estimated that to allow for the current pupils and estimated additional pupils, a new build to accommodate a one and a half form entry school would be appropriate, ie for 349 pupils, (full time equivalent) Similarly, for Llangiwig primary it is estimated that to allow for the current pupils and estimated new pupils a new build to accommodate a one form entry school would be appropriate, ie for 233 pupils, (full time equivalent)

The table below indicates the current school site area, alongside the required site area needed for a new build school following Building Bulletin 99 for the estimated number of pupils.

Table 9

EXISTING SCHOOLS	SITE AREA m2	BB99 Non confined M2	BB99 Confined M2	PUPIL FTE (incl N)
ALLTWEN PRIMARY	11629	14,764 to 16,460	4245 to 5094	349
LLANGIWG PRIMARY	3262 1345	10,588 to 11,820	3665 to 4398	233

Alltwen Primary School

- New Build on current site

As shown above the current site would not provide enough space to accommodate a new 21st century school following the BB99 guidelines. It has been suggested by consultees that it would be acceptable however to build a new school following BB99 confined site guidelines.

Confined site guidelines are generally applicable to existing schools where site areas cannot physically meet the standard area requirements of BB99 e.g. town/city centre schools where no feasible alternative options exist to expand the site and this is not the case with the proposal being consulted on.

Generally speaking, confined site area guidelines result in playing fields being provided off-site (nearby) and a significant reduction (of circa 33%) in external spaces allocated for play, games, socialising, habitat etc.

The proposal consulted upon will provide a brand new 21st century new build school that will be fully compliant internally and externally with BB99 (non-confined) area guidelines on the Parc Ynysderw site.

Even if it is possible to build a new replacement school on Alltwen using the BB99 confined site guidance the compromise would be significant (e.g. the current field is likely to be lost completely meaning no onsite provision, the classrooms would probably need to be smaller than BB99 recommendations, and adjacencies might be compromised).

Additional requirements to meet new build childcare provision would also need to be factored in and space for this would come second to the space required for the school, so potentially the childcare could be lost.

The BB99 guidance does not take into account any site specific restraints around topography, access, flooding etc. Recently there is increasing

pressure around highways, parking, drop off zones, Sustainable Drainage (SuDs) and ecological enhancement for every new build project.

The site itself would provide many challenges for construction – narrow/confined access to site in a residential area for example and on top of the build costs, additional accommodation costs would be needed as pupils could not remain on site and would need temporary classrooms elsewhere. A location would also need to be found for this temporary provision.

There is also a large wooded area on the site of Alltwen of approximately 2600m² which could be off limits for development.

It should be clear therefore that even if it is taken into account that Alltwen is a confined site the compromise that would be needed to meet all planning and building regulations, as well as educational requirements, would be significant and would mean that ultimately the benefits of a 21st century school would not be realised on that site.

Comments have been received which state that it would be better for pupils to have to access offsite playing fields once a week than it would be for them to have to travel daily to a site which has full access to playing fields. This view does not take into account other aspects of compromise that would be needed on a confined site. It also doesn't take into account that time during the school day used for travelling to playing fields is missed time for teaching and learning, and in general primary schools who have to travel to use facilities are rarely able to make full use of them. Organising this would be a challenge – for example regular disruption to the rest of the school as one or more classes are out every day; school timetables and staff supervision duties would need adapting to accommodate both the lesson time and the additional journey times; lack of flexibility to use the fields on an ad hoc basis to make up for missed sessions due to inclement weather.

Walking pupils to an offsite provision requires supervision and pupil to adult ratios would need to be adhered to for safeguarding purposes – this is often difficult to manage particularly in smaller schools. Equally, transporting pupils is costly and this would need to be funded from the schools budget, presenting further challenges for the school.

It also misses the point that having easy daily access to such facilities gives the opportunity for far more than just structured physical health and development lessons or games; it also allows the space and freedom for unstructured play activities which is a vital part of children's health and wellbeing and meets the requirements of the new curriculum.

An additional suggestion for Alltwen Primary school has been received which compares a potential refurbishment at Alltwen to one taking place at the former YGG Cwmgors. The comment suggests that as the two buildings are

of similar size then a refurbishment should be of similar cost (£2m), and produce the same results.

There are a number of points to consider in relation to this suggestion. First Alltwen Primary is approximately double the size of the previous YGG Cwmgors school building, therefore the £2m quoted would need to be uplifted to account for the additional area. Additionally it should be remembered that Alltwen Primary is an operational school and any work would need to provide at least improved and enhanced facilities for teaching and learning, which is not a focus for Hwb Y Gors, which is described as a low carbon arts and community centre. YGG Cwmgors was a vacant building, allowing work to take place unhindered – any work on school sites has to be undertaken generally when pupils are not there, so most work is scheduled for holiday periods often meaning that costs are increased due to time constraints. It is also the case for significant renovation or refurbishment work as would be needed here that pupils would have to be educated elsewhere, again adding significantly to the cost and inconvenience.

It is extremely unlikely therefore that the notional £7m quoted from the Council's share of the £22m would be sufficient to address remodelling and refurbishment works at Alltwen Primary as well as addressing the additional requirements for Godre'rgraig and Llangiwig primaries.

- **New build on alternative site**

There is no suitable land in Alltwen in Council ownership to accommodate a site area of the required 14,764m² to 16,460m²

- **Retain school and add LSC**

Adding an LSC to the current school would mean another building added to the site. Any addition would mean compromise both for the LSC and for the school, further restricting the space available on the site, and would not be an option that officers would recommend.

- **Merge schools on Alltwen site**

The current school does not have sufficient available space to accommodate pupils from either Godre'rgraig Primary or Llangiwig Primary, and only has limited space to expand should its own catchment pupil numbers increase as predicted.

Godre'rgraig Primary School

- **New build on alternative site (as identified during consultation)**

Tareni

Land at Tareni identified by consultees is outside settlement limits and is identified as being within a high risk area for flooding and as such planning approval to build a school is not assured, as detailed in Welsh Government

Planning Policy and Guidance Technical Advice Note (TAN) 15: Development and Flood Risk. Additionally, this area is classified in the Coal Authority register as low risk for development.

Due to the industrial legacy of the proposed development area, the site would require the full breadth of contaminated land condition surveys to be undertaken.

Hodgson's Road

As above, this portion of land is outside settlement limits and is identified as being within a high risk area for flooding. Additionally, this area is classified in the Coal Authority register as low risk for development.

The loss of the sports pitch would need to be compensated for, and an ecological survey would be required to assess any impact on wildlife.

Gnoll Road

As noted in the consultation document this site is a very difficult one to develop due to the site being identified as high risk area for coal workings, and partly within a flood zone (lower end).

Contamination of the land is also noted, so the site would require full investigation and standard conditions. The site is also noted to be outside settlement limits and in a prominent position in open countryside which could pose planning approval difficulties.

The location of the site leads to a challenging gradient, and bends close down the area of visibility, making the current access road unsafe and unsuitable; work to address this would need to take up significant amounts of land into the site to address TAN 18 requirements. There are also currently no suitable pedestrian footway links to the site.

In response to consultation comments an independent feasibility study has been undertaken which details the type of work that would be needed to establish a new build, one form entry primary school on the site. This provides more detail around the challenges of the site and identifies indicative costs of circa. £17m.

This suggestion has been made to ensure that an English-medium primary school is retained in the north of the Swansea valley and would mean that Godre'rgraig and Ystalyfera pupils would be able to remain in their immediate local area. It could also address the perceived disadvantages for Godre'rgraig pupils having to travel to the proposed site at Parc Ynysderw.

However if a new school was to be considered for Godre'rgraig pupils it is unclear what is suggested for pupils at Llangiwig and Alltwen who would not be included in the scheme.

If an alternative proposal is to be considered then it must be noted that the identified benefits of creating a health and well-being campus for pupils of all three schools at Parc Ynysderw would be lost. This would also mean that funding would not be available for a stand-alone new pool at another location. Additionally the backlog maintenance costs at the other sites would all remain.

Welsh Government would still expect the Council to fund its 35% of the capital construction costs under such a proposal and as there would be no significant efficiency savings from this scheme the additional cost would need to be met from elsewhere in the Council's budget which in the current climate may not be affordable.

Llangiwig Primary School

– New Build on current site

As indicated in Table 9 neither of the current Llangiwig Primary school sites would be sufficient in size to accommodate a new build school to 21st century standard, following BB99 guidelines, including those for a confined site.

– New build on alternative site

Officers have not been able to locate any suitable alternative site within Council ownership in the Llangiwig area, and no suggested sites have been brought forward. The possible suitability of Glanrhyd is highlighted below.

C. Alternative sites for the current proposal

- Glanrhyd – Riverside Industrial Estate

The Glanrhyd (Riverside Industrial estate) site is currently outside settlement limits and it will need detailed ecological survey work and a compensation site of at least double the area where the habitats lost / species affected can be mitigated for, due to it being a Site of Importance for Nature Conservation (SINC). This land is also a high risk flood area and is classed as an area where highly vulnerable development (such as a school) should not be considered. This area has also been deemed a high risk area for development by the Coal Authority.

- Pontardawe Recreation Fields

Even though the area has difficult access these fields are currently used by Pontardawe RFC, Pontardawe Athletic FC and Pontardawe Cricket Club and leased to other local sports sides and is a local green open space. It is currently outside settlement limits and is bordered by a Site of Importance for

Nature Conservation (SINC). This land is also a high risk flood area and is classed as an area where highly vulnerable development should not be considered.

D. Other Options

In order to keep Godre'rgraig pupils in the Godre'rgraig area it has been suggested that the school should be split and that pupils who reside nearer to Ystalyfera should attend schools in this area while others attend Llangiwg or one of the other Pontardawe schools.

This would not provide Godre'rgraig pupils with a 21st Century school educational provision, and would mean that the pupils and families of the current school would be divided and as such this option would not be recommended by officers. Should the proposal succeed then parental choice will mean that those pupils who wish to transfer to a school nearer Ystalyfera would be able to do so subject to the Admission Policy, while still providing them with the opportunity to access the proposed new school with its enhanced facilities if preferred.

Comments have been received which state that land and buildings are available at the vacated former YGG Y Wern site, at Clare Road, Ystalyfera. The site consists of two main separate buildings, both over 100 years old which have been vacant since 2018 when the YGG Y Wern pupils and staff moved into a new build 21st Century premises on the site of YG Ystalyfera, forming the primary phase of the 3-18 school.

The site itself is confined as far as BB 99 standards are concerned with approx. 6,664m² available if the buildings were demolished and a new school constructed. The location of the site in a residential area, on a slope and with narrow access roads would make constructing a new school very challenging. Access is poor on all sides and the highway infrastructure around the site is insufficient to allow buses to navigate the narrow streets and they can only be accessed from the main road. It is difficult to see how suitable provision for staff/visitor parking and vehicular drop off for cars or buses could be made on or off site. There is no suitable walking route from Godre'rgraig so pupils would still need to be transported in line with the Council's Home to School Transport Policy.

The existing buildings are noted to be category D condition with over £1.8m of backlog maintenance (July 2021 survey). The work required to recommission the buildings would be significant and costly, and any work is unlikely to provide 21st century educational facilities for pupils without significant compromise.

A Building Accessibility Appraisal (July 2021) has also categorised the premises as category C noting that the buildings are largely inaccessible and non-compliant with accessibility legislation but could be made so subject to extensive works. The accessibility works have been estimated at £97,350.

These maintenance and accessibility estimates will be significantly increased as the building has been empty for over 4 years and costs predominantly only relate to putting building elements back into a state of good repair. They do not take account of any improvement and/or remodelling works that may be required should there be a proposal brought forward to re-occupy the site in the event that the proposal being consulted on is abandoned.

This option is not one that officers would recommend, even if funding could be secured, which is unlikely.

It has also been suggested that two new builds should be considered, one at the north to accommodate children living in Godre'rgraig and Ystalyfera, and another in the south to accommodate, pupils from Alltwen and Llangiwg, possibly on the Parc Ynysderw site so that a new build pool could then also be included.

The cost of two new builds in separate, reasonably close locations in the Swansea Valley, both to accommodate pupils of the same age range and the same language medium would be difficult to justify in a business case, as build costs and ongoing revenue costs would both be increased if this were to be delivered. It is also the case that this scheme when compared to the proposal being consulted upon would reduce the efficiency savings generated and so it is questionable whether this suggestion would be affordable on the Council's part.

This option is not recommended by officers and it is still the case that the proposal which has been consulted upon offers the most effective use of public money and will deliver better educational and recreation facilities.

Conclusion

Having considered all the information gathered to date, it is the view of officers that closing Alltwen, Godre'rgraig and Llangiwg Primary schools and establishing a new community school for 630 pupils and 140 nursery pupils in a 21st century new build will deliver the greatest benefits to pupils, staff and the wider community as a whole.

The inclusion of an LSC for primary aged pupils with ASD gives an opportunity to provide pupils with a purpose built facility with the aim of ensuring best possible outcomes for pupils,

Additionally establishing the school on the identified site of Parc Ynysderw and creating enhanced learning, health and wellbeing facilities to include the leisure centre, new swimming pool and Cwmtawe Community Comprehensive, will provide opportunities to develop and improve primary education in the area.

The next step

Following the publication of this consultation report, should the Council decide to progress with its plans as consulted upon then the next stage will be for it to approve the publication of a proposal, allowing 28 days for objections.

Consultees are advised that, unfavourable comments made during the consultation period will not be treated as objections. Anyone wishing to object will need to do so in writing during the statutory objection period. Comments submitted as part of this consultation process will need to be re-submitted in writing during the statutory objection period if they are to be considered as objections.

Appendices

Appendix A

List of Consultees	
Alltwn, Godre'rgraig and Llangiwg Primary Schools: Pupils Parents / carers Staff Governing Body Wider School Community	NAASH (Secondary Schools Forum)
	LLAN (Primary Schools Forum)
	Bordering authorities – Swansea/ Bridgend/ Carmarthenshire/ Powys/ RCT
All other NPT schools	Pontardawe Town Council Cilybebyll Community Council Cwmllynfell Community Council Gwaun Cae Gurwen Community Council Ystalyfera Community Council
NPT Elected Members	WG Schools Management Division
Diocesan Directors of Education - Diocese of Menevia, Swansea - Diocese of Llandaff, Vale of Glamorgan	MP and MS For Neath and Aberafan
Trade Unions	Reginal members of the Senedd
Estyn	SEN Partners

Regional Education Consortium	Children and Young Person Partnership (inc.Early Years Development and Childcare)
NPTCBC Integrated Transport Unit	Police and Crime Commissioner
Communities First Partnership	NPTCBC Officers

Summary of Pupil Consultations – Alltwen Primary School, Llangiwg primary School and Godre'r Graig Primary school

Neath Port Talbot Council met with the pupils (10) from Llangiwg Primary school on 16th of January 2023, the pupils (10) from Alltwen Primary school on the 17th of January 2023 and the pupils (10) from Godre'r Graig Primary School on the 18th of January 2023. A selection of pupils from various year groups from each school were present on each occasion when pupils were consulted, to ensure that their voice was heard and all pupils had an equal opportunity to speak.

It should be recognised that the notes of the meetings reflect the officers' understanding of the views expressed and, as such, may not wholly capture the substance of individual comments made and queries raised. In this respect and to support the consultation process, at each meeting pupils were also reminded to submit their comments in writing if they so wished.

This is a summary of the information that the pupils from all three primary schools gave.

30 pupils were consulted in total.

Each group were given a summary of the proposal as outlined in the pupil consultation form and were asked to comment.

- **Is there anything that you would like to know about the proposal?**
- **Is there anything that you would look forward to or have concerns about the proposal?**
- **What else would you like to say?**

Children in each group had similar concerns and questions.

The Consultation Process

The process was explained to the children and they were pleased to note that their responses and questions would form part of the consultation report. It was explained that every one's opinion was important but that just 'saying no' to the proposal would not mean that it would not happen – there would need to be good reasons given to suggest it is a bad idea and these would be recorded and passed on. They were keen that officers were aware of their thoughts.

A record of the questions asked in each school along with an outline of the answers given can be found below.

Pupil Consultation @ Llangiwg Primary School
On Monday 16th January 2023
with pupil representatives from Years 2/ 3/ 4/ 5 and 6

Question	Answer
Have you considered the amount of pollution and rubbish?	If the school is built because of rules it would have to be environmentally friendly and meet strict targets for energy efficiency. Hopefully, the children would not leave rubbish on the grounds of the new school.
What would be the effect of a big school on our well-being?	The new build school will be an exciting place with light, spacious classes and areas. There will lots of spaces to meet friends and lots of areas that will make learning exciting. It is possible that this could have a positive effect of the well-being of pupils and staff.
Would we get less attention in a big school?	The school will be big but there is a rule that class sizes cannot be bigger than 30 pupils but it is true that classes will likely be bigger than you have in your school now. This doesn't mean that you'll get less attention as there will be a lot of staff in the new school.
Will the small children (Nursery) be scared?	It will be a big building but there would be some spaces especially for the smaller children and other spaces for the bigger children.
Will the Headteacher and the staff be going to the new school?	We don't think that any staff will lose their jobs as the schools have the right number of teachers for the number of pupils so the proposed new school would need the same number of teachers and teaching assistants but it may affect the headteacher and deputy as a new school would only need one headteacher and one deputy
Will we be able to stay with our friends?	When a new school has opened before teachers have been able to keep friends together in the same class but also they have arranged for activities for the pupils from different schools to meet each other and make new friends

<p>If there are 2 year groups, will we be split from our friends?</p>	<p>When a new school has opened before teachers have been able to keep groups of friends together in the same class. They will make sure that you will have some friends in the same class as you.</p>
<p>Will there be a football club there?</p>	<p>It will be up to the new Headteacher and staff to decide if there's a football club there but the new Headteacher will be speaking to staff and pupils in all 3 schools. A new school would have playgrounds and playing fields, new schools often have a MUGA which is a multi-use games area</p>
<p>Why do we need a new school? What's wrong with our school?</p>	<p>We believe that one school would be better for all the pupils of the separate three schools as it would provide brand new facilities.</p>
<p>Why are there places for more pupils? Will you be closing other schools?</p>	<p>The proposed school is for 700+ children but there would not be that many children to start with. The children from the existing schools add up to a bit more than 400 pupils but the bigger size means the school could grow if other pupils want to go there including pupils who may not think about going to a school in the Pontardawe area but would think about it if there is a new school. We will not be closing any other schools in the area in order to move them to the new school.</p>
<p>Will we like everything about the new school?</p>	<p>Not everyone will like everything about the new school as people have different opinions.</p>
<p>What will be outside?</p>	<p>There will be lots of space outside and different areas including green areas, sports areas, seating areas and a MUGA.</p>
<p>What will it be like with all the traffic?</p>	<p>Every new school in Neath Port Talbot has to have planning permission which includes looking at effective ways of managing traffic and making sure that pupils and parents have safe routes to get to school.</p>
<p>Will the new school use Dojo's?</p>	<p>It will be up to the new Headteacher and staff if they use Dojo's in class</p>

	but the new Headteacher will be speaking to staff and pupils in all 3 schools to see what works for them.
Will there be more arguments in a large school?	It is unlikely that there will be more arguments in a large school. It is possible that there will be less as it will be easier to move pupils around to help avoid incidents of poor behaviour. The school will also have a behaviour policy that all pupils should follow.
Why can't you use the money to make out school better?	At the moment, a lot of the money for the new school has been given to us from Welsh Government but we can only spend the money on this project and we can't use it for any different projects and works. We would have to reapply and ask Welsh Government for money to make your schools better. This can take a lot of time and there is no guarantee that Welsh Government would give us the money.
Will our parent have to drive us to school?	A lot of pupils would still live close enough to walk to the school but its correct that not all pupils would be able to walk so a bus would be provided if you live over 2 miles from the school

Pupil Consultation @ Alltwen Primary School
On Tuesday 17th January 2023
with pupil representatives from Years 2/ 3/ 4/ 5 and 6

Question	Answer
How would you solve the traffic problem?	Every new school in Neath Port Talbot has to have planning permission which includes looking at effective ways of managing traffic and making sure that pupils and parents have safe routes to get to school. This will be looked at carefully during the planning process and highway experts will try to solve any traffic problems.
How would they manage all the pupils?	The proposed school is for 700+ children but there would not be that many children to start with. The children from the existing schools add up to a bit more than 400 pupils but the bigger size means the school could grow if other pupils want to go there including pupils who may not think about going to a school in the Pontardawe area but would think about it if there is a new school. It will be a big building but there would be some spaces especially for the smaller children and other spaces for the bigger children. There is a rule that class sizes cannot be bigger than 30 pupils and there will be lots of staff in the school to help manage all the pupils.
How long would this take?	It is likely that the new school would be ready sometime between 2025 and 2026
Would the shops have to move or close down?	No, the shops would not close or move.
Would there be a new pool?	Yes, there will be a new pool attached to the leisure centre.
Would we have the same as here- lockers, instruments?	It will be up to the Headteacher and staff to decide what would be there but it's very unlikely that they would want to get rid of anything that works well in your school. It is likely that you will have more new things and facilities in the new school.
How many floors would there be?	It's likely that there would be 2 floors.

Would it be one building or lots of buildings?	It's likely that it will be one building.
How big will the building be?	It will be a big building but there would be some spaces especially for the smaller children and other spaces for the bigger children.
How long will it take me to get there?	It will depend on where you live and how you would get there. A lot of pupils would still live close enough to walk to the school but its correct that not all pupils would be able to walk so a bus would be provided if you live over 2 miles from the school. There will also be safe routes for parents and pupils to get to the school.
Will it be dangerous to get there on bikes and scooters?	Every new school in Neath Port Talbot has to have planning permission which includes looking at effective ways of managing traffic and making sure that pupils and parents have safe routes to get to school, including safe routes for walking, bikes and scooters.
Will we have to be home schooled during the build?	No. If the new school goes ahead, your school will not close until the new one is ready to open.
Would we have access to Cwmtawe and the Leisure Centre?	Access to Cwmtawe and the Leisure Centre will be easier as they are within walking distance. It would be up to the staff of the schools and the Leisure Centre to arrange the access when needed.
Will the staff have jobs or will they have to reapply?	We don't think that any staff will lose their jobs as the schools have the right number of teachers for the number of pupils so the proposed new school would need the same number of teachers and teaching assistants but it may affect the headteacher and deputy as a new school would only need one headteacher and one deputy. Only the headteacher and deputy would have to reapply.
Would all of Year 5s go on a trip together (as there would be more than one year 5 class)?	This would be up to the teachers and staff to decide but it is likely that if you were studying the same subject

	that all of you would go on a trip together.
Would there be an area and grass for football?	Yes. A new school would have playgrounds and playing fields, new schools often have a MUGA which is a multi-use games area.
Would classes get separated and would we be split from our friends?	It is likely that there will be more than one class for each year. When a new school has opened before teachers have been able to keep friends together in the same class but also they have arranged for activities for the pupils from different schools to meet each other and make new friends.
What happens if you get lost or go to the wrong classroom?	It is true the school would be bigger than the school you are in and everyone would need to learn how to get around a new place. There would be plenty of staff there to help you if you get lost when you first start there.
What would happen to the clubs?	The proposed new school could offer more opportunities as there would be more school staff in the same place who have different interests and may like to start a club. Also if there are more pupils there is the possibility for more than one sports team so more pupils could take part in a team.
Why not use the money for other schools?	At the moment, a lot of the money for the new school has been given to us from Welsh Government but we can only spend the money on this project and we can't use it for any different projects and works. We would have to reapply and ask Welsh Government for money to use the money for other schools. This can take a lot of time and there is no guarantee that Welsh Government would give us the money.
How will it be funded after the build (bills etc)?	The new school would be funded in the same way as all the other schools in Neath Port Talbot.

Pupil Consultation @ Godre'r Graig Primary School
On Wednesday 18th January 2023
with pupil representatives from Years 2/ 3/ 4/ 5 and 6

Question	Answer
If the new school is not built can you build us a new school but not in porta-cabins?	Not sure what would happen as there has to be a decision on if the proposed new school will be built but this decision has not been made yet
If a new school does go ahead when will it be built?	In 2025
How many pupils would there be? - school would be so big people would get lost especially the little kids	The proposed school is for 700+ children but there would not be that many children to start with. The children from the existing schools add up to a bit more than 400 pupils but the bigger size means the school could grow if other pupils want to go there including pupils who may not think about going to a school in the Pontardawe area but would think about it if there is a new school. It will be a big building but there would be some spaces especially for the smaller children and other spaces for the bigger children
I heard that a big pool will be built and the Pontardawe pool will close?	Pontardawe pool is closed at the moment as it needs to be repaired. There is a proposal to build a new pool at the same time as the proposed new school but the pool would not be part of the school, it would still be part of the leisure centre so if people want to use the pool they would not have to go to the school to do this. The pool would not be in the same building as the school.
Did you build the porta-cabins?	The porta-cabins were built by a company who make porta-cabins.
Where will they build the school?	There is a suggestion that the school could be built not too far away from where we are today so somewhere between Cwmtawe School and the playing fields but this would have to be checked to make sure it is the best place to have a school
Will the leisure centre be knocked down?	No the leisure centre would still be where it is

What will happen to old Godre'r Graig School?	We don't know the answer to that question
Will we go back to old Godre'rgaig School?	We don't know the answer to that question but at the moment it is not safe to go back
Will we have a new Godre'r Graig School somewhere in Godre'r Graig or somewhere else?	At the moment the only land available to build a school is on Park Ynysderw
Could we extend Alltwen School to fit us all in?	There would not be enough room at Alltwen School to fit in all the pupils of Godre'r Graig School
Will teachers lose their jobs?	We don't think so as the schools have the right number of teachers for the number of pupils so the proposed new school would need the same number of teachers and teaching assistants but it may affect the headteacher and deputy as a new school would only need one headteacher and one deputy
I don't want the school because of the traffic but would the schools start at different times?	It would make sense for the schools to start at different times so Cwmtawe and the proposed new school would be starting and finishing at different times to each other
I don't want a longer drive for the people living in Alltwen	
We should have a new school because we can make new friends	
I don't want the school as we shouldn't force pupils on a bus	
I don't want a new school because of the chaos with lots of children	
I don't want the school because of road accidents with more people coming to the school and the pollution	
The machinery to build a new school is bad for the environment and the new school would be bad for the environment because it would need three times more gas and electricity	If the school is built because of rules it would have to be environmentally friendly and meet strict targets for energy efficiency
Children will be worried about being in big classes	There is a rule that class sizes cannot be bigger than 30 pupils but it is true that classes will likely be bigger than you have in your school now

Why close all three schools?	We believe that one school would be better for all the pupils of the separate three schools as it would provide brand new facilities
In a new school we might get separated from our friends	When a new school has opened before teachers have been able to keep friends together in the same class but also they have arranged for activities for the pupils from different schools to meet each other and make new friends
What if the school is too big and we need maps?	It is true the school would be bigger than the school you are in and everyone would need to learn how to get around a new place
People can't walk to school as they won't live near the school	A lot of pupils would still live close enough to walk to the school but its correct that not all pupils would be able to walk so a bus would be provided
If the new school is built we would be able to see our friends who are in different schools	
We would have less opportunity to take part in activities as we don't all like football for example	The proposed new school could offer more opportunities as there would be more school staff in the same place who have different interests and may like to start a club also if there are more pupils there is the possibility for more than one sports team so more pupils could take part in a team
Will there be sports equipment and playing fields?	Yes a new school would have playgrounds and playing fields, new schools often have a MUGA which is a multi-use games area

Estyn response to the proposal

Estyn's response to proposal by Neath Port Talbot Council to establish an English –medium 3-11 school to replace Alltwen Primary School, Godre'r graig Primary School and Llangiwg Primary School, all of which will close.

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.

Introduction

This consultation proposal is from Neath Port Talbot Council.

The proposal is:

- To establish a new build, 21st century English-medium 3-11 school to replace Alltwen Primary, Godre'r graig Primary and Llangiwg Primary, all of which will close on 31st August 2025.
- To include a new Learning Support Centre (LSC) for up to 16 primary aged pupils with Autistic Spectrum Disorder (ASD) with a statement of Special Educational Needs (SEN).
- To build a new 25m pool and teaching pool on the site to replace the existing Pontardawe Swimming Pool.
- That the combined new build school, specialist ASD provision and leisure facilities will form part of a learning, health and wellbeing community campus at the Parc Ynysderw site.

Summary/ Conclusion

It is Estyn's opinion that this proposal is likely to at the least maintain the present provision for English medium primary education in the area.

Description and benefits

The proposals are likely to have a positive impact on provision for primary aged pupils in the area. New facilities will probably provide benefits for pupils' wellbeing and improve curriculum delivery. Additional provision through a learning support centre should benefit primary aged pupils with ASD. A new swimming pool is likely to enhance provision for health and wellbeing in the area.

The proposer has outlined a clear rationale for the proposal. The report details how a learning, health and wellbeing community campus will be developed on one site at Parc Ynysderw. This includes a secondary school, leisure centre and the proposed new build primary campus with learning support centre. The need for a new build is explained clearly in the proposal for replacing ageing school buildings, of which one site is deemed unsafe. It can also lead to increased benefits for staff and pupils as well as enabling more efficient and effective use of resources.

The expected benefits of the proposal compared to the status quo, as outlined in the report, include the following:

- improved educational and health and wellbeing facilities
- more efficient and effective use of resources, resulting in revenue savings for reinvestment in the education budget
- enable more effective delivery of the whole curriculum
- prevent the need for mixed age classes over more than 2 year groups
- provide greater opportunities for peer interaction and the development of social skills
- reduce teacher workload through the wider sharing of responsibilities
- provide more opportunities for extra-curricular activities
- provide more targeted support for children with additional learning needs through wider expertise and greater numbers of support staff
- allow for better staff development, greater opportunity for curriculum development and career opportunities through broader experience and enhanced continuing professional development options
- enable more efficient and effective use of resources, including saving money through economies of scale
- give the head teacher and governing body greater flexibility in the organisation of classes and deployment of staff

The potential risk areas identified clearly being:

- resistance to change leading to lack of pupil, parent and staff support
- educational standards not maintained

- less effective support for pupil well-being in a larger school and in a different location
- increased home to school travel time for some pupils
- staff anxiety about job security and new management arrangements
- loss of school identity from closure of existing establishments
- forecasted pupil numbers do not materialise
- budget allocation insufficient to meet needs
- 21st Century School capital funding opportunity not realised
- Welsh language not developed further
- discrimination against protected characteristics
- loss of community facilities
- increased governance and staff responsibilities

It seems that the benefits outlined previously will mitigate the effects of these risks.

The proposer has considered a range of 14 alternative options to the recommended proposal.

The proposed option is to close all three primary schools and replace with a new build school on a new site and establish a new ASD provision and build a new swimming pool. No other option would provide the whole package of a large new build, a learning support centre and new pool.

The proposer has considered carefully the impact of the proposal on travel arrangements. Pupils living beyond the two-mile limit to the campus will be considered for travel assistance. The proposer does not appear to consider the effect of increased traffic and accessibility issues to the site if over 600 pupils were to attend the new school. However, it does state that a more detailed community impact assessment will be undertaken during the consultation period.

The report pays due attention to pupil numbers and places. It shows that surplus places in the new school would be lower than the three schools combined.

The proposer has provided a Welsh Language Impact Assessment and Supporting Evidence. The impact assessment recognises that there may be impacts as a result of this proposal on the development of the Welsh language in the community and on Welsh-medium schools in the area. Potential impacts are highlighted in the impact assessment along with proposed actions to mitigate against possible negative impacts, as well as identifying additional steps to reinforce positive impacts.

Educational aspects of the proposal

The proposer has considered the outcomes of recent Estyn inspection reports and provided its view on current performance of each school. The focus of the proposal is primarily on improved provision because of greater sharing of expertise. The local authority notes that pupils' learning will benefit from a more stimulating environment and having greater access to wider range of staff expertise.

The three schools were judged good for standards in their last Estyn inspection. For Alltwen Primary school, last inspected in 2018, the local authority judges standards in the foundation phase as adequate over three years. At key stage 2, pupil outcomes are adequate in all three core subjects over three years. Godre'r graig Primary school was last inspected in 2017 under Estyn's previous framework. The local authority judges standards at the Foundation phase as adequate over the last three years and the same for standards at key stage 2. Llangiwg Primary School was last inspected in 2019 where standards were judged as good. Again, the local authority judges standards at foundation phase and key stage 2 as being adequate. The proposer has provided an evaluation of the current quality of teaching in each school based on their last Estyn inspection. This was judged good overall in each school.

In their evaluation of leadership and management, the proposer notes the judgement of Estyn in their last inspection reports. It also provides its own judgement based on core visits in 2019. The authority believes that headteachers provide generally strong leadership and set clear strategic direction for their schools.

The proposer has considered the continuing delivery of the curriculum for all pupils appropriately. It is predicted the proposal will benefit the delivery of the curriculum and provide pupils with better learning experiences that come with a larger pupil population and purpose built facilities.

The proposer has considered the impact of the proposals on vulnerable groups well. The report notes that the level of support for pupils with special educational needs will continue. Pupils attending the proposed learning support centre within the new school will benefit from being taught by specialist staff.

The plan involves the transfer of pupils to a new single site. It is noted that pupils will benefit from a stimulating teaching and learning environment in a state of the art building. This should impact positively on the self-esteem and wellbeing of pupils. However, the risks identified by the proposer include a resistance to change by pupils, increased travel time and less effective wellbeing support in a larger school.

The proposer will need to demonstrate how they plan to mitigate against these risks.

Mae'r dudalen hon yn fwriadol wag



Welsh Language Impact Assessment and Supporting Evidence

Prepared in accordance with Welsh Language Standards 88-92, this assessment should be considered as part of Neath Port Talbot Council's proposal to establish an English-medium 3-11 School to replace Alltwen, Godre'rgraig and Llangiwg Primary Schools

19th April 2023

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Introduction

As part of its Strategic School Improvement Programme, the Council propose to establish a new-build English-medium school for the age range 3-11 to replace the existing Alltwen, Godre'rgraig and Llangiwig Primary Schools.

As a general rule, if a new or updated policy has the potential to impact on people, it will impact in some way on Welsh speakers and therefore on the Welsh language. Though this proposal concerns English-medium education provision, the potential secondary effect (positive, negative or neutral) on Welsh-medium provision and the Welsh language in general must also be taken into account.

This is due to not only the regulations on bilingual Education provision and considerations under **Cymraeg 2050**, but the requirements of the **Welsh Language (Wales) Measure 2011**, under which the Welsh Language Standards require policy decisions of any kind to be assessed as to their effect on the Welsh language in the policy and/or geographic area in question. The same policy-making standards apply to both Welsh Government and Neath Port Talbot Council.

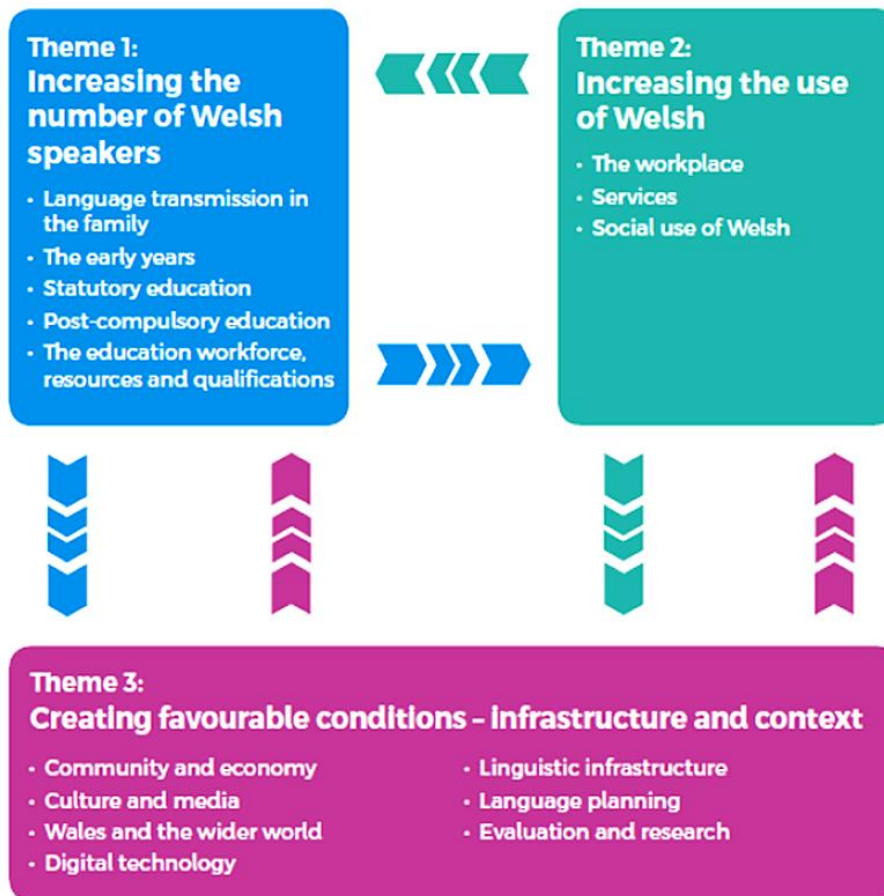
i) **The Cymraeg 2050 Strategy**

This is the Welsh Ministers' strategy for the promotion and facilitation of the use of the Welsh language. It sets out the Welsh Government's long-term approach to achieving the target of a million Welsh speakers by 2050.

Education is central to the Welsh Government's vision with young people coming out of the education system ready and proud to use the language in all contexts. The aim of the Strategy is to reach a position where the Welsh language is an integral element of all aspects of everyday life. Neath Port Talbot Council's WESP and Welsh Language Promotion Strategy directly support this Welsh Government vision.

This assessment includes the relevant requirements of a Welsh language impact assessment and the three themes of Cymraeg 2050, the Welsh Government's strategy to achieve a million Welsh speakers by 2050.

Some of the standard questions within a more straightforward Welsh language impact assessment, and two of the three themes of Cymraeg 2050, are not as *directly* relevant to this proposal, due to the linguistic nature of the schools in question, but as the possibility of other Welsh-medium schools being affected exists, they will be considered.



As can be seen from the infographic above, all three Cymraeg 2050 have the possibility of being relevant as the proposal concerned will affect the three English-medium schools and has the possibility of affecting Welsh-medium schools within the area. As a result, all schools possibly affected will be considered when referring to the impacts and mitigating factors associated with this proposal.

This assessment pulls together a range of relevant Welsh language data sources, statistics, information from Welsh Government and existing Council and Welsh Government policies and legislation, which must be considered in context, and more importantly as mitigating factors, as the Council determine whether to proceed with the proposal.

1. The English-Medium 3-11 School Proposal

The Council is proposing to establish a new build, 21st century English-medium 3-11 school to replace Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary, all of which will close on 31st August 2025.

It is proposed to also include a new Learning Support Centre (LSC) for up to 16 primary aged pupils with Autistic Spectrum Disorder (ASD) with a statement of Special Educational Needs (SEN).

It is proposed that the school will be built on Council owned land at Parc Ynysderw, in close proximity to Cwmtawe Community School and Pontardawe Leisure Centre. It is expected to open on 1st September 2025.

Additionally, as part of the new build scheme it is proposed to build a new 25m pool and teaching pool on the site to replace the existing Pontardawe Swimming Pool. The pool will provide an additional facility alongside Pontardawe Leisure centre, revitalising and increasing the health and well-being facilities in the area.

The combined new build school, specialist ASD provision and leisure facilities will form part of a learning, health and wellbeing community campus at the Parc Ynysderw site.

2. Consultation Process

The **School Organisation Code November 2018**, para. 1.4 states that "Where proposals affect schools where Welsh is a medium of instruction (for subjects other than Welsh) for some or all of the time, local authorities should carry out a Welsh Language Impact Assessment." As there is the possibility that this could affect Welsh-medium schools in the area, a Welsh Language Impact Assessment must be produced.

Consultation on this proposal commenced on 5th December 2022 and closed on 24th January 2023. The consultation document was made available by e-mail to consultees, with the schools managing distribution to their school communities. It was also available on the Council's website. Hard copies were available on request.

A pupil version of the consultation document was also made available to schools to distribute as appropriate.

Responses to the consultation were submitted by email, post and via the Council's online consultation portal. Details of how to respond were included in the consultation document and links to the online consultation portal were included on the website and on the Council's social media channels.

During the consultation period face to face meetings were held with staff, governors and parents to answer questions and clarify aspects of the proposal.

Meetings were also held with pupils of Alltwen, Godre'rgraig and Llangiwg primary schools to gather their views on the proposal. Notes of the comments made and officer responses given at the meeting are included in the consultation report

Online responses	482
Emails	114

Paper forms/letter	23
In total	619

Additionally Alltwen Primary School pupils completed consultation forms in school with their teachers, Key stage 2 pupils completed individual forms and Foundation Phase pupils completed whole class responses, totalling 127 responses. 70 pupils from YGG Pontardawe pupils also completed individual consultation forms in school with staff.

Including these the responses totalled 816,

Against the proposal	576
In support of the proposal	201
Unsure	39
Total	816

The proposal and the consultation report will be considered by elected Members of the Council and should it be agreed to proceed with the plans consulted upon then the next stage of the process will be to publish a statutory notice outlining the proposal. This would be published for a period of 28 days during which written objections may be submitted.

Where objections are received, an objection report will be published summarising the objections and the Council's response to those objections. Elected Members of the Council will consider the proposal in light of objections received when taking a decision as to whether or not the proposal is to be implemented.

The list of consultees includes Welsh language partner organisations, and the local authority consulting with all of its schools including Welsh-medium schools. The consultation document will also be sent directly to the office of the Welsh Language Commissioner.

Comments have been received which state that a new English-medium school will negatively impact on the Welsh-medium schools in the locality and that pupil numbers will drop in Welsh-medium schools.

The suggestion that the condition of the building and available facilities are a more important factor than the language medium of education when parents are choosing a school for their children is debatable. Data reveals that new build English-medium schools in Neath Port Talbot which have opened in the last 10 years have had no significant impact on nearby Welsh-medium schools.

Potential impacts have been noted and mitigating actions have been included in the table at the end of this assessment.

A number of comments have been received which specifically relate to the concern that the proposal will damage the development of the Welsh language in the area.

Mitigating actions that have been considered include establishing a local Swansea Valley working group to consider thematic issues e.g. marketing Welsh-medium education, community involvement and Welsh-language opportunities within the community. Further actions refer to close and effective engagement with Menter Iaith, Urdd and Tŷ'r Gwrhyd to provide opportunities to promote the benefits of the Welsh language within the community and ensuring provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education.

Specific actions will be further supported by targets outlined in Neath Port Talbot's Welsh in Education Strategic Plan, with specific reference to Outcome 5.

3. Linguistically Sensitive Areas, the LDP and TAN 20

A Council's policy framework is an interlinked set of documents and so, even when driven by a primary policy or legislative requirement, other policies and legislative requirements have to be acknowledged and considered, even if they do not ultimately change the final decision that is made.

This proposal concerns the closure of 3 schools, and is driven by the Strategic School Improvement Programme and the Council's aim to have the right schools in the right places, ensuring that they are 'fit for purpose'. No policy or decision is made in isolation however, and only under one legislative requirement.

Defining and providing context to the term 'linguistic sensitivity'

The term 'linguistic sensitivity' is used to define those areas in Wales which require targeted and additional support where the language is deemed to be in a weakened state and where the number of speakers are in serious decline, and where the linguistic community may face challenges around the daily use of their language.

According to the 2011 Census, around 15.3% of the county borough's population could speak Welsh, which equates to 20,698 individuals. The vast majority of these speakers lived in the top of the Swansea and Amman Valleys with some communities such as Gwaun Cae Gurwen, Cwmllynfell and Lower Brynamman amongst the highest percentage of Welsh speaking areas in Wales. However, these are the areas that saw the greatest decline in terms of percentage and numbers of Welsh speakers between 2001 and 2011.

The Neath Port Talbot Welsh Language Promotion strategy highlights the importance of the area between Trebanos to Cwmllynfell and Rhos to Gwaun Cae Gurwen as possibly the *'most important in the county borough in terms of its linguistic significance as it contains the highest numbers and percentages of Welsh speakers.'*

The table below shows decline in the number of Welsh speakers in these communities over 10 years. In 2011 the Welsh Language Board established a specific language promotion scheme for the Aman Tawe area in an effort to halt the decline of the Welsh language in this area.

Community (LLSOA)	Number of Welsh speakers (2011)	Number of Welsh speakers (2021)	Change (No.)	Comparable change (%)
Cwmllynfell	669	600	-69	-5.2
Lower Brynamman	776	672	-104	-9.7
Gwaun Cae Gurwen	1576	1314	-262	-8.4
Ystalyfera	1339	952	-387	-10.3
Trebanos	459	418	-41	-2.8
Godre'r Graig	473	538	65	-3.1
Pontardawe	1624	1469	-155	-4.9
Alltwen	664	634	-30	-5.4
Rhos	588	542	-46	-3.1

Factors that contribute to linguistic erosion include:

- Lack of language transmission at home
- Out-migration / Immigration
- Negative perception of the inherent value of the language
- Lack of awareness of the advantages of bilingualism
- Lack of confidence in Welsh speakers
- The spread of English into traditional Welsh languages
- Mixed language marriages
- The power of Anglo-American influence on the interests of children and young people
- More deaths than births among Welsh-speaking families

An independent consultant commissioned by Welsh Government to support the development of the WLIA has highlighted to the Council that 'It is the lack of linguistic confidence, however, which is the most obvious feature of linguistic erosion. *Diw Nghymrag i ddim digon da* (My Welsh is not good enough) is a common phrase used by Welsh speakers in the area, despite this being obviously untrue! Promoting greater levels of linguistic confidence does therefore involve giving the language special attention and providing positive discrimination at times as the linguistic field for an individual is not a level playing field.'

LDP and TAN 20

Technical Advice Note (TAN) 20 provides guidance on how the Welsh language may be given appropriate consideration in the planning system via the Local Development Plan (LDP) process, and on compliance with the requirements of planning and other relevant legislation. That consideration concerns determining whether there are areas of linguistic sensitivity or significance within the boundaries of the local planning authority.

These are areas where a significant proportion of the population speak Welsh, either compared with the local area in general or where the percentage is equal or higher to the

national average.

Each local planning authority's areas of linguistic sensitivity or significance will therefore be different.

Section 2.1.2 of Neath Port Talbot's Council's [Development and the Welsh Language: Supplementary Planning Guidance \(July 2017\)](#) document, which sits under its 2011-2026 LDP, notes the following:

2.1.2 Within the communities of Cwmllynfell, Gwaun Cae Gurwen and Lower Brynamman more than half of the population speak Welsh and these are widely regarded as traditional Welsh speaking areas. In addition, the Swansea Valley area is also considered to be a stronghold of the language locally with the Pontardawe area and Crynant in the Dulais Valley containing communities where more than the Welsh average of residents speak the language.

The map overleaf is taken from Appendix A of the supplementary planning guidance and shows the defined area in question, covering the communities that are involved in this English-medium schools' proposal and also YGG Pontardawe, where the investment there is noted in Section 4 of this assessment as being a relevant mitigating factor.

Neath Port Talbot Council's Defined Area of Linguistic Sensitivity



In the case of this proposal, just as the Welsh Language Standards (88, 89 and 90 - see Appendix A) require us as a Local Authority to consider the impact of proposals on the Welsh language, the requirements of TAN 20 would also need to be considered and noted **as far as it is material** during the planning application stages of the new build and any subsequent use of the 3 former school sites.

4. Welsh-Medium Education Provision within the area

There are currently two Welsh-medium primary schools and one 3-18 middle school providing Welsh-medium education within the Swansea Valley, YGG Pontardawe, YGG Trebannws and Ysgol Gymraeg Ystalyfera Bro Dur-Ystalyfera campus. YGG Pontardawe and YGG Trebannws are in proximity to Llangiwg and Alltwen Primary and Ysgol Gymraeg Ystalyfera Bro Dur's campus at Ystalyfera is in closer proximity to Godre'r Graig Primary (prior to move to Cwmtawe campus). Significant investment has been made in the three Welsh-medium provisions.

5. Welsh-Medium Education Projects - Background

In 2018 the Council successfully applied for 2 WG funded grants – Infant Class Size Reduction capital grant and Increasing Welsh-medium Provision capital grant. 5 of the 6 successful schemes put forward were for WM schools, 3 in the south of the borough (YGG Castell-nedd, YGG Tyle'r Ynn and YGG Rhosafan) and 2 in the north (YGG Pontardawe and YGG Cwmllynfell).

The breakdown is as follows –

- | | |
|--------------------|----------|
| • YGG Castell-nedd | £325k |
| • YGG Rhosafan | £1.34m |
| • YGG Tyle'r Ynn | £1.14m |
| • YGG Cwmllynfell | £640k |
| • YGG Pontardawe | £2.19m . |

YGG Tyle'r Ynn has also benefitted from additional funding from the community learning grant of £414k

A further Welsh-medium capital grant of £550,000 was approved by Welsh Government in October 2022 with the aim of opening a new Welsh-medium school with childcare provision in the Neath Abbey area. This scheme will see the former Abbey Primary School junior site refurbished, re-modelled and adapted to establish a new Welsh-medium started school and a 12 place childcare provision (equating to 24 places throughout the day). This new Welsh-medium starter school will open for Nursery pupils in January 2023 with the first cohort of Reception pupils attending the new school in September 2023. This scheme will allow nursery and reception aged children in the Skewen area to access Welsh-medium education in their local area.

There has also been significant investment in a Welsh-medium immersion provision in YGG Pontardawe, established in September 2022.

Ysgol Gynradd Gymraeg Pontardawe

YGG Pontardawe is a 3 - 11 Welsh-medium school with 286 F/T and 53 P/T pupils currently on roll (November 2022).

The school roll had been steadily increasing, and was nearing its capacity of 335 and 59 nursery places. There was very little available space for providing extra classrooms to meet anticipated future demand within the current accommodation footprint.

The £2.19 m project funded through the Increasing Welsh-medium Provision grant has enabled the school to increase capacity and improve current provision.

The completed scheme has provided remodeled and extended childcare and nursery facilities, providing 10 extra Welsh-medium childcare places, along with 2 new build FP classrooms, a new entrance way, staffroom, meeting room and office and additional play areas, fencing and pathways, along with medium refurbishment of the hall.

As well as providing increased capacity the main entrance and reception has been relocated to the front of the school creating a new and more visible front of school which can be clearly seen by the road and nearby housing estate. With careful landscaping and signage of the site, the school now appears more attractive to parents who may be considering a WM education in their local area.

Works undertaken at the school has been a contributing factor to encourage parents of pre-school children in the area to opt for Welsh-medium education by providing seamless transition from childcare through to full time primary education - and beyond to Welsh-medium secondary education at Ystalyfera – Bro Dur (north campus). It has also assisted with meeting the Childcare Offer for Wales as it allows greater scope for providing wraparound childcare opportunities.

The scheme has further strengthened Welsh-medium education in the Pontardawe area, enabling the school to further develop as a thriving and sustainable provision which in turn will impact positively on the transfer rate from primary to secondary phase, supporting the Council's Band B development of providing further accommodation at YG Ystalyfera – Bro Dur (north campus).

An immersion provision for latecomers to the Welsh language has also opened in YGG Pontardawe in September 2022. The name of the provision is 'Y Cwm'. The hub provides face to face intensive, cross-curricular Welsh language immersion provision over a 10 week block from experienced and effective language teachers. When at full capacity, it will provide immersion and intensive language support to a maximum of 16 pupils per 10 week block on a termly basis. Currently, there are 10 pupils attending the first language immersion teaching and learning provision during the Autumn term with a further 13 pupils on the waiting list for immersion and intensive language support in the Spring term 2023. This location is assisting in developing the language in a linguistically sensitive area as well as potentially improving confidence and the transition rates to Welsh-medium secondary. This immersion provision is enabling more learners to access Welsh-medium education at the primary stage within the LA.

YGG Trebannws

Ysgol Gynradd Gymraeg Trebannws is a 3 - 11 Welsh-medium school situated in the Swansea Valley and currently has 86 full-time and 13 part-time nursery pupils on roll (November 2022). The school also has an English-medium (EM) Learning Support Centre (LSC) with places for 8 pupils. The school's condition has been assessed as Category B with circa £279K of backlog maintenance and accessibility works being identified.

This scheme involves remodelling and improvement works to the school to facilitate the development of a new WM LSC. Additionally it seeks to create a new 12 place WM childcare provision and improved foundation phase facilities. A Welsh-medium capital grant of

£460,000 was approved by Welsh Government for the project with the aim of increasing the number of pupils on roll and ensuring Welsh-medium wrap around provision for parents in the area.

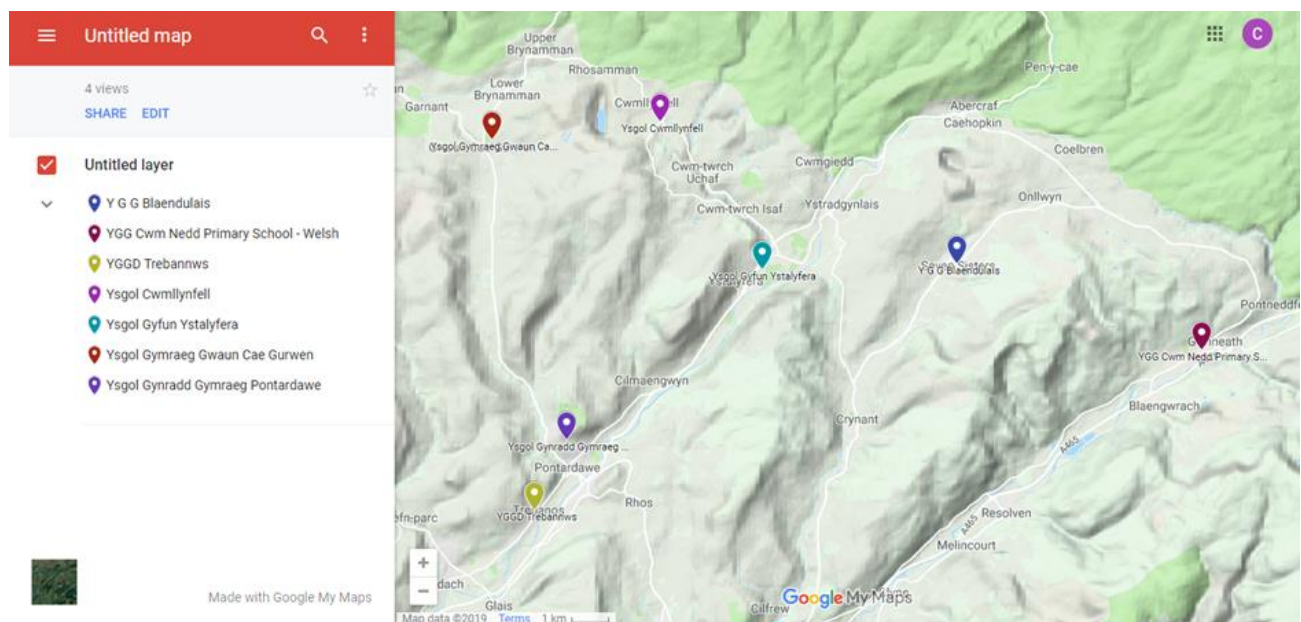
YG Ystalyfera- Bro Dur 21st Century School Funding

Phase 1- Band A funding (north and south) £37m (new build 11-16 school in south; new teaching block and new primary phase building in north). The primary phase currently has 127 F/T pupils and 17 P/T pupils on roll (November 2022)

Phase 2- Band B funding (north) £9m Complete remodelling of the 3-19 campus, with a new hall, dining facilities and classrooms, alongside improved sports facilities, providing the school with the facilities to meet ambitious pupil number growth in future years

Phase 3 – Significant modifications to 'Nedd' teaching block £1.5m (complete refurbishment to the 2 floor building).

The map below demonstrates the location of YG Ystalyfera (blue) in relation to its primary feeder schools, YGG Blaendulais, YGG Cwm Nedd, YGG Cwmllynfell, YGG Gwaun Cae Gurwen, YGG Pontardawe and YGG Trebannws. In addition to these YG Ystalyfera has a 3-11 cohort on site.



Primary aged children living in the Godre'rgraig and Ystalyfera areas will have the option of experiencing education in 21st century school environments in either Welsh or English medium, either by choosing the proposed new school at Pontardawe should the proposal progress, or by choosing the new build primary phase at Ystalyfera.

The proposed permanent closure of Godre'rgraig Primary School would mean that there would no longer be an English –medium primary school in the north of the Swansea Valley area in Neath Port Talbot. Parents wishing for a local school in the area may therefore opt for the primary phase at Ystalyfera rather than travel out of the area, again suggesting a positive impact on the Welsh language. Should the proposal be agreed, the local authority will need to monitor this to establish the longer-term impact.

Ysgol Gynradd Gymraeg Cwmllynfell

Although YGG Cwmllynfell is outside the immediate area of this proposal it is nonetheless important and still part of the wider Swansea Valley group of schools.

YGG Cwmllynfell, is a 3 - 11 Welsh-medium school in the Twrch valley with 48 F/T and 7 P/T pupils on roll (November 2022).

The £640k scheme was funded through the Increasing Welsh-medium Provision grant and has provided 1 extra classroom space and a Welsh-medium childcare offer at YGG Cwmllynfell. This has increased the capacity of the school, improved Foundation Phase provision and provided space to develop pre-school Welsh-medium provision.

Its aim is to prevent drift to other schools in neighbouring authorities, strengthening the development of Welsh language in the area and to impact positively on the Council's Band B proposal at YG Ystalyfera – Bro Dur (north campus) by increasing the number of children from the area choosing secondary education through the medium of Welsh.

Work was completed in September 2021.

6. The Welsh Language in Neath Port Talbot

Welsh language impact assessments must reference a range of factors including links to legislation and details of supporting evidence and mitigating factors.

This section of the assessment therefore pulls together additional supporting evidence from a number of sources of information, from relevant Council policies and strategies to national regulations and Census data, and information from Welsh Government in order to support Neath Port Talbot Council as it decides on the proposals regarding Alltwen, Godre'rgraig and Llangiwig Primary Schools.

By evidencing this information on wider Welsh language matters, the Council will be able to demonstrate due regard to, and proper consideration of such matters in the decision-making process.

This evidence also highlights the mitigating factors in Section 8 in balancing out any potential negative implications, or negative perceptions that may exist.

i) Welsh in Education Strategic Plan (WESP)

Section 84 of The School Standards and Organisation Act 2013 requires Local Authorities to prepare a Welsh in Education Strategic Plan (WESP). Neath Port Talbot's draft WESP details the plan to support and further develop Welsh language education in schools, both Welsh and English medium, and in the wider communities and planning for future growth. The plan details how further development will be secured over the next 10 years, January 2022 - January 2032.

The WESP 2022-32, is the cornerstone for the Council's vision for increasing and improving the planning of the provision of Welsh medium education in Neath Port Talbot, to enable all learners to develop their Welsh language skills and to use the

language confidently in everyday life. It both complements and assists in facilitating the National vision for the Welsh language, to have 1 million Welsh speakers by 2050.

The plan has been developed through close working with partners including Neath Port Talbot schools, Menter Iaith, RhAG, Muddiad Meithrin, Neath Port Talbot College, Academi Hywel Dda Swansea University, the Urdd and with Welsh Government.

The draft WESP was submitted to Welsh Government ministers following approval by full Council on 2nd February 2022. In May 2022, in line with Section 85(5)(a) of the School Standards and Organisation (Wales) Act 2013 ("the 2013 Act"), Welsh Government consulted with officers regarding modifications to the plan. Following further discussions the majority of modifications were agreed and the WESP was amended. Formal approval of the WESP was then granted by the Minister for Education and Welsh Language in July 2022, and Council approval was granted on September 28th 2022.

Welsh Government approval has also been given for the WESP 5 year action plan, and annual plans are currently being developed.

Compliance with these regulations (in the form of Neath Port Talbot Council's current and future plans for Welsh-medium and English-medium education) provides a series of mitigating factors that contribute towards (along with other plans and policies) the possible negative impact on the Welsh language that these proposals may have.

Relevant mitigating factors in terms of Welsh medium-education (including information from Welsh Government) are provided in more detail in the 'Mitigating Actions' Section, however specifically in terms of the WESP, the 2022-2032 document notes the following:

"All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. It aims to support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales."

And under **Outcome 5: More opportunities for learners to use Welsh in different contexts in school** there are a number of targets listed to increase the attainment levels in respect of Welsh Second Language pupils. These include:

- Siarter Iaith/ Cymraeg Campus will be an integral part of planning for the Curriculum for Wales within all schools, with an emphasis on a whole school progression approach (supported by our Welsh in Education officer and Curriculum Development Officer (Welsh in English-medium). This will increase learner and staff confidence in using the Welsh language and impact positively on the ethos of all schools.
- Siarter Iaith/ Cymraeg Campus action plans/strategies will be used to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history. This will lead to an increased awareness of the relevance/ importance of Welsh in their everyday lives. This will be monitored and supported by our Welsh in Education

- officer and Curriculum Development Officer (Welsh in English-medium).
- Continue to build on the huge success of our annual 'Gig Gymraeg' within the YGYBD cluster for Y6 and Y7 learners. We will aim to roll this out across the LA, ensuring that all Y6 pupils in WM and EM schools have access to a contemporary WM music festival on an annual basis. This will be supported by Menter Iaith CNPT.
 - The NPT schools website, created by learners, to promote modern Welsh culture, history and local area will be launched and added to on a regular basis in all Welsh medium schools and rolled out to all English medium schools.
 - All schools will be encouraged to use the Urdd Residential Centres to promote the Welsh language in a fun and relaxed environment.
 - All schools will be encouraged to partake in Urdd Eisteddfod activities with the aim of increasing confidence in the language and increasing awareness of Welsh literature, music and the arts.
 - Work closely with partners including Academi Hywel Teifi, Tŷ'r Gwrhyd, Menter Iaith, Urdd to ensure provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education. This will be in conjunction with the NPT Welsh Language Promotion Strategy, Priority 1.
 - Listen to our learners across all sectors and ages to obtain views and ideas on promoting the Welsh language, contemporary culture, history and a feeling of belonging. Pupil voice will be essential in reviewing and setting our annual action plan.

The WESP is also particularly relevant in terms of supporting the Welsh-medium schools in the area, given that Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gynradd Gymraeg Trebannws are in the same area as the three schools being considered for closure.

ii) Welsh Language Promotion Strategy

Under Welsh Language Standard 145 (see Neath Port Talbot Council's [compliance notice](#)), local authorities had to develop and implement 5-year promotion strategies, working with partner organisations to promote the Welsh language and to facilitate the use of the Welsh language more widely in their respective areas. Amongst other matters the strategy had to include the following:

- a target (in terms of the percentage of speakers in the area) for increasing or maintaining the number of Welsh speakers in the area by the end of the 5-year period concerned;
- a statement setting out how they intend to reach that target; and conduct a review of the strategy and publish a revised version on their website within 5 years of publishing a strategy (or of publishing a revised strategy).

Welsh-medium education, whether in the form of full Welsh-medium provision via Welsh schools, or the teaching of Welsh as a second language in English-medium schools, directly supports this aim and intrinsically links this strategy with the WESP.

The council are currently developing a new Welsh Language Promotion strategy which is currently in draft form.

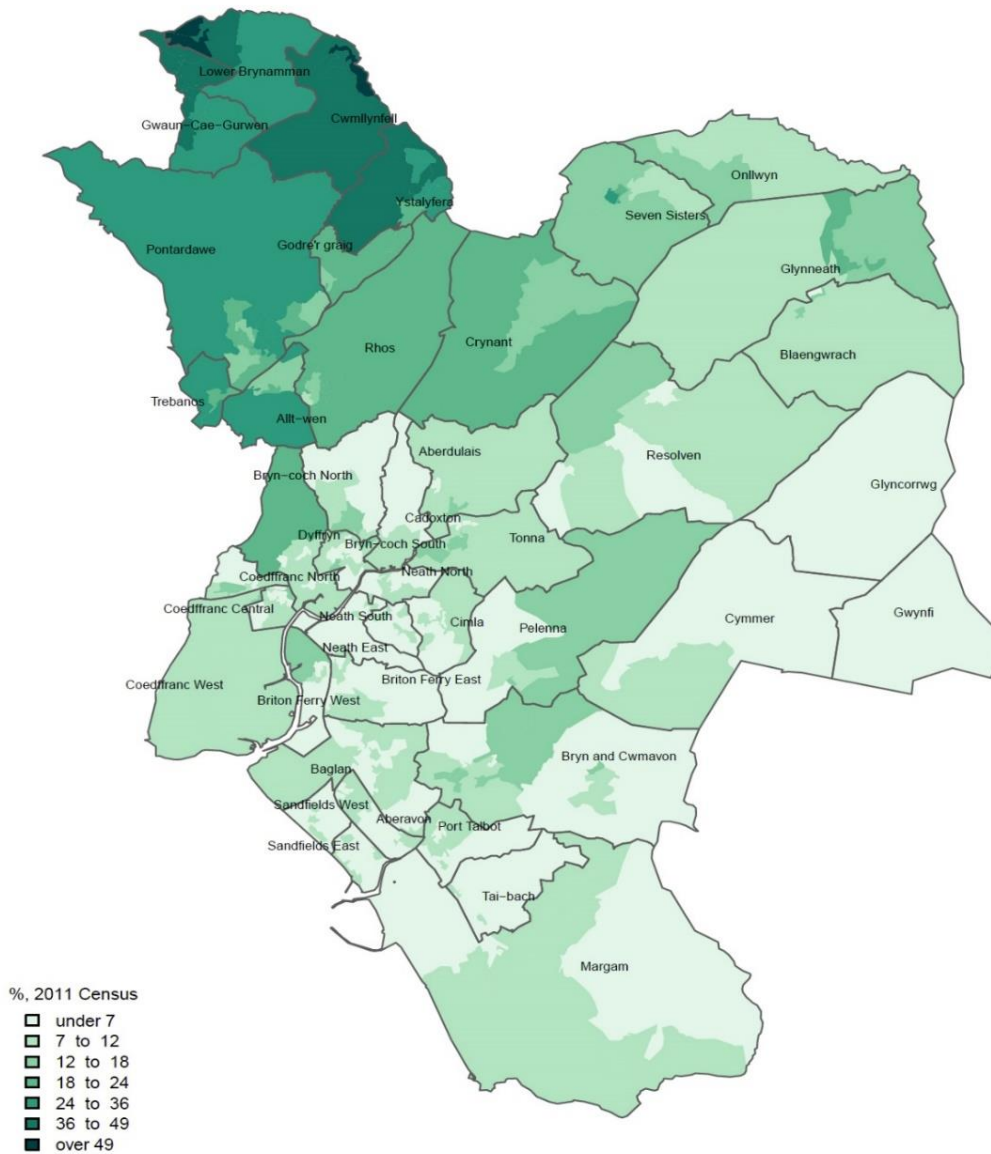
iii) Map of fluent Welsh speakers by Ward

Tudalen128

The [map](#) below provides 2011 Census data demonstrating the Welsh language skills of people in the Neath Port Talbot area and is therefore relevant to the considerations being addressed in this assessment.

Neath Port Talbot

Table: Welsh language skills
KS207WA0014 (Can speak, read and write Welsh)



The maps show percentages within Census 2011 output areas, within electoral divisions

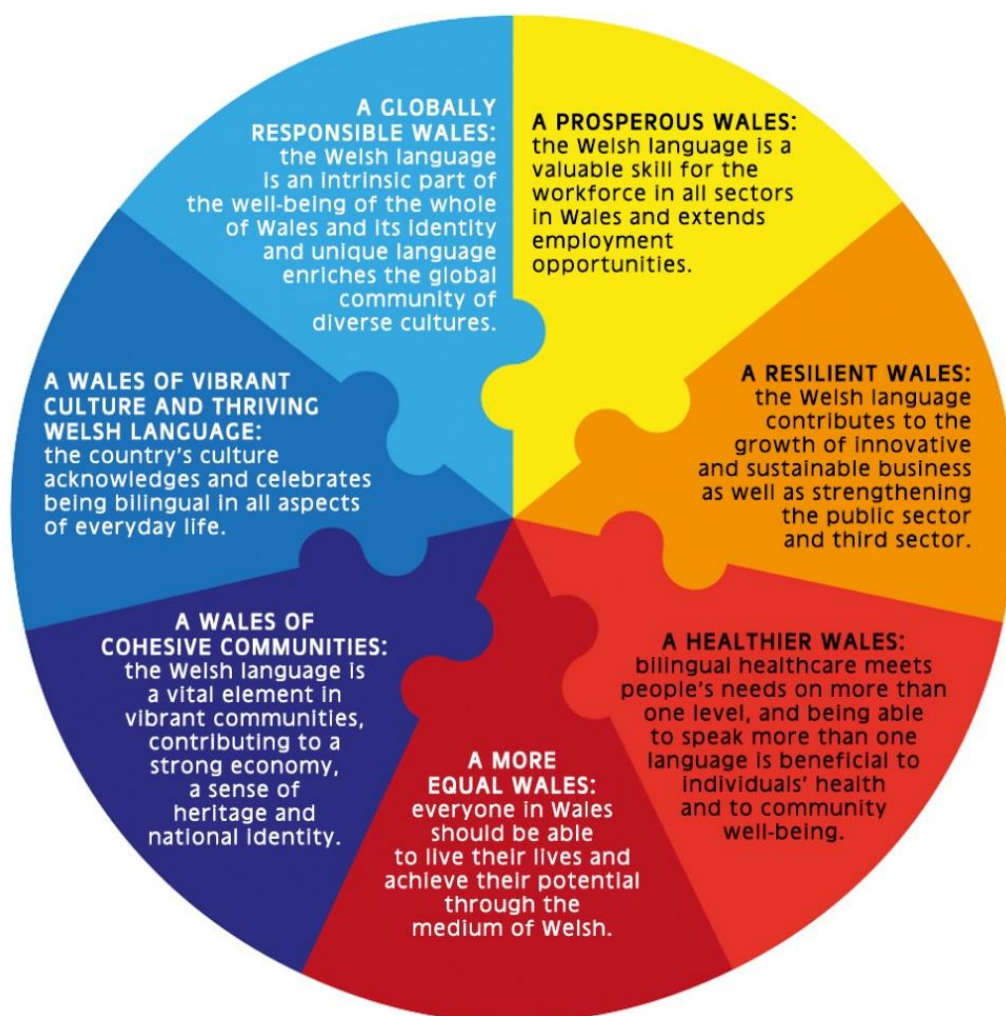
Map created by Hywel Jones. Variables KS208WA0022-27 corrected

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iv) The Welsh Language and Future Generations

In order to achieve the desired growth in terms of the numbers of Welsh language speakers contained within Welsh Government's Cymraeg 2050 national strategy and Neath Port Talbot's own Welsh Language Promotion Strategy, looking at each of the 7 aims of the Well-being "wheel" from a Welsh language perspective provides a useful perspective of how the language is an intrinsic part of each aim, and therefore all aspects of the Council's work, not simply part of the aim in which the Welsh language is explicitly referenced.

The adapted wheel below shows how the Welsh language forms a part of, and plays a part in all aspects of education, health and social care, community cohesion, the economy and so much more.



It is included in this assessment therefore in order to be considered as a general principle and as part of the decision-making process with regard to this proposal.

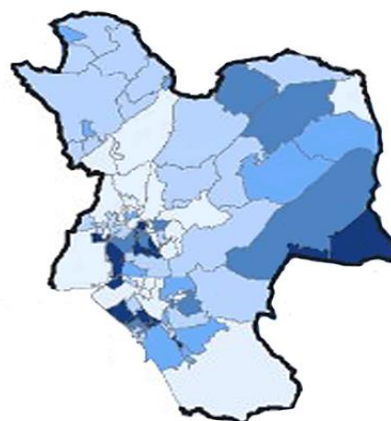
7. Social Deprivation Considerations

In the Welsh Index of Multiple Deprivation 2019 report, Neath Port Talbot was one of the 4 local authorities with the highest concentration of areas in the most deprived 10% of Lower-Level Super Output Areas.

Comparison of the map below (sourced from the 2019 report) with the map of Welsh speakers in Section 5 iii) earlier, shows that the area of the borough with the highest number of Welsh speakers (the north west of the county borough) for the most part falls into the range of 30-50% most deprived.

The proposal to merge three English-medium schools into one new-build site in the same area could have an impact on the accessibility of Welsh-medium education, and parental choice in terms of the perceived positive opportunities that a brand-new school might offer their children; this possible issue has been identified in the Council's "Integrated Impact Assessment - first stage" document.

There are both Welsh language and socio-economic considerations to consider therefore, however as shown in Section 8, a number of Welsh-medium proposals across the county borough could possibly mitigate any adverse effects, in particular the investment in, and expansion of, Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gymraeg Trebannws, which is broadly in the same geographical area as the current Alltwen, and Llangiwg Primary Schools, and at Ysgol Gymraeg Ystalyfera-Bro Dur which is near to Godre'rgraig Primary School.



by Lower Level Super Output Areas

Rank	Most Deprived
1 - 191	10% most deprived
192 - 382	10-20% most deprived
383 - 573	20-30% most deprived
574 - 955	30-50% most deprived
956 - 1909	50% least deprived

Least Deprived

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Cartographics • Welsh Government • ML/45/19.20
November 2019

8. Impacts and Possible Mitigating Actions

It can be seen therefore that the proposal to establish a new English-medium 21st school in an area of linguistic sensitivity does need to be carefully considered.

An independent consultant commissioned by Welsh Government to support the development of the WLIA has highlighted to the Council that 'In bilingual communities, languages increasingly become a matter of choice. To support bilingualism within these communities, bilingualism must be an easy choice. This proposal takes away that easy choice.' They go on to indicate that 'no mitigating actions in the context of the future of the Welsh language in the Swansea Valley will compensate for continuing with this proposal as it stands'.

There are many possible educational and community impacts, both negative and positive arising from the proposal, as can be seen in the following table...Officers are in regular communication with Welsh Government officials

Impacts	Negative/ Positive	Possible mitigating Actions
1.Pupil numbers will decrease in Welsh-medium schools due to the attraction of new build English-medium school in the area	Negative	<ul style="list-style-type: none"> - evidence in NPT of previous new build English-medium schools in areas where there are Welsh-medium schools have not shown any decline in pupil numbers -large investment in improving facilities and capacity in Welsh-medium schools including YGG Pontardawe, YGG Trebannws and YG Ystalyfera Bro Dur (north campus) have been made in order to attract more pupils (see section 5) -‘Y Cwm’ Welsh language immersion provision opened in YGG Pontardawe for up to 16 pupils per term to increase parent and pupil confidence in Welsh-medium education at all staged of primary education -new childcare facility to open in YGG Trebannws to provide Welsh-medium wraparound childcare -additional Welsh-medium childcare places in YGG Pontardawe -possibility of pupils in Godre’r Graig area choosing Ystalyfera Bro Dur Primary Phase Welsh-medium education due to it being the closest school - establish working groups to consider thematic issues e.g. marketing Welsh-medium education -greater promotion of Welsh-medium schools in the area, particularly the small ‘village school’ of YGG Trebannws which may be popular with many parents looking for a smaller school environment
2.Welsh language in the community would decline because English-medium school established	Negative	<ul style="list-style-type: none"> - establish working groups to consider thematic issues relating to the Welsh language in the community e.g. provision and take up of Welsh for adults, language confidence building events, Promoting the use of Welsh by private and voluntary organisations, activities and entertainment for young people and young adults, employment and economic development -implement targets set out in the WESP, Outcome 5, promoting and facilitating the use of the Welsh language and increase its use in everyday life within schools and the wider community -ensure that targets within the Welsh Language Promotion Strategy assists with promoting the Welsh language within the community -ensure close and effective engagement with Menter Iaith, Urdd, Tŷr Gwrhyd to provide opportunities and promote the benefits of the Welsh language within the community
3.Larger school would attract more pupils and as school is English-medium the English language would become more dominant	Negative	<ul style="list-style-type: none"> -as in impact 1, large investment in improving facilities and capacity in Welsh-medium schools including YGG Pontardawe, YGG Trebannws and YG Ystalyfera Bro Dur (north campus) have been made in order to attract more pupils to Welsh-medium education(see section 5) -as in impact 1, ‘Y Cwm’ Welsh language immersion provision

		<p>opened in YGG Pontardawe for up to 16 pupils per term to increase parent and pupil confidence in Welsh-medium education at all stages of primary education with the aim of increasing the number of pupils within the authority receiving Welsh-medium education</p> <ul style="list-style-type: none"> -as in impact 1, a new childcare facility is to open in YGG Trebannws to provide Welsh-medium wraparound childcare (no childcare facility available in proposed new school) -as in impact 1, there are additional Welsh-medium childcare places in YGG Pontardawe providing wrap around care (no childcare facility available in proposed new school) - increase the current 20% of Welsh speaking staff within the 3 English-medium schools in line with Outcome 7 of the WESP in order to develop a Welsh language community within the school - ensure that Cymraeg Campus action plans/strategies will be used within the proposed school to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history. This will lead to an increased awareness of the relevance/ importance of Welsh in their everyday lives. This will be monitored and supported by the Local Authority's Welsh in Education officer and Curriculum Development Officer (Welsh in English medium).
4. Less opportunities for promoting and growing the Welsh language as this is an English-medium school	Negative	<ul style="list-style-type: none"> -as in impact 3, the Local Authority would aim to increase the current 20% of Welsh speaking staff within the 3 English-medium schools in line with Outcome 7 of the WESP in order to develop a Welsh language community within the school -as in impact 3, and in line with Outcome 5 of the WESP, Cymraeg Campus action plans/strategies will be used within the proposed school to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history. This will lead to an increased awareness of the relevance/ importance of Welsh in their everyday lives. This will be monitored and supported by the Local Authority's Welsh in Education officer and Curriculum Development Officer (Welsh in English medium). - the proposed new school would be encouraged to work closely with partners including Academi Hywel Teifi, Tŷ'r Gwrhyd, Menter Iaith, Urdd to ensure provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education.
5. More pupils choosing English-medium	Negative	- support and strengthen the work of the YG Ystalyfera Bro Dur cluster and parents' confidence in the Welsh language

secondary education		<p>-as in impact 1, 'Y Cwm' Welsh language immersion provision opened in YGG Pontardawe for up to 16 pupils per term. Its aim is to increase parent and pupil confidence in Welsh-medium education at all stages of primary education with the aim of increasing the number of pupils within the authority receiving Welsh-medium education and making Welsh-medium education accessible at all stages of primary and secondary statutory education</p> <p>- as a result of Curriculum Developments for Wales, there will be Local Authority level support for the proposed new school to develop the visibility of the new curriculum with the focus on confidence in the Welsh language.</p>
6.More parents choosing English-medium childcare	Negative	<p>-as in impact 1, a new childcare facility is to open in YGG Trebannws to provide Welsh-medium wraparound childcare (no childcare facility available in proposed new school)</p> <p>-as in impact 1, there are additional Welsh-medium childcare places in YGG Pontardawe providing wrap around care (no childcare facility available in proposed new school)</p> <p>-continue to monitor data in order to ensure that there are sufficient Welsh-medium childcare places to meet the demand (and to create the demand where needed)</p>
7.Better facilities being created for English-medium than Welsh-medium pupils through provision of a new school	Negative	<p>-large investment in improving facilities and capacity in Welsh-medium schools including YGG Pontardawe, YGG Trebannws and YG Ystalyfera Bro Dur (north campus) have been made in order to attract more pupils (see section 5 for details)</p> <p>-as in impact 1, a new childcare facility is to open in YGG Trebannws to provide Welsh-medium wraparound childcare (no childcare facility available in proposed new school)</p> <p>-as in impact 1, there are additional Welsh-medium childcare places in YGG Pontardawe providing wrap around care (no childcare facility available in proposed new school)</p>
8.Location more prominent so better choice for parents therefore favouring English-medium over Welsh-medium school	Negative	<p>-the proposed location is not a prominent position in Pontardawe and it is likely that only parents of pupils attending there or Cwmtawe Community school would have reason to see it regularly. In contrast the Welsh-medium schools are far more prominently situated - YGG Pontardawe within a large housing estate and YGG Trebannws on the main road through the village</p>
9.Greater number of Welsh speaking staff members will better promote Welsh second language in the new school	Positive	<p>In order to improve the positive impact:</p> <p>-increase the current 20% of Welsh speaking staff within the 3 English-medium schools in line with Outcome 7 of the WESP in order to develop a Welsh language community within the school</p> <p>-as in impact 3, and in line with Outcome 5 of the WESP, Cymraeg Campus action plans/strategies will be used within</p>

		<p>the proposed school to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history. This will lead to an increased awareness of the relevance/ importance of Welsh in their everyday lives. This will be monitored and supported by the Local Authority's Welsh in Education officer and Curriculum Development Officer (Welsh in English medium).</p> <ul style="list-style-type: none"> - the proposed new school would be encouraged to work closely with partners including Academi Hywel Teifi, Tŷ'r Gwrhyd, Menter Iaith, Urdd to ensure provision and promotion of learning opportunities for non-Welsh speaking staff/ learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education.
10.Greater opportunities for community, including Welsh language groups, to make use of facilities	Positive	<p>In order to improve the positive impact:</p> <ul style="list-style-type: none"> - establish working groups to consider thematic issues relating to the Welsh language in the community e.g. provision and take up of Welsh for adults, language confidence building events, Promoting the use of Welsh by private and voluntary organisations, activities and entertainment for young people and young adults, employment and economic development. The proposed school could facilitate meetings and events as a result of the working groups. -implement targets set out in the WESP, Outcome 5, promoting and facilitating the use of the Welsh language and increase its use in everyday life within schools and the wider community. The proposed school could facilitate opportunities and events promoting the use of the Welsh language. -ensure that targets within the Welsh Language Promotion Strategy assists with promoting the Welsh language within the community. The proposed school could facilitate opportunities and events promoting the use of the Welsh language within the community. -ensure close and effective engagement with Menter Iaith, Urdd, Tŷ'r Gwrhyd to provide opportunities and promote the benefits of the Welsh language within the community. The proposed school could facilitate these opportunities and events.
11.Increased pupil numbers at YG Ystalyfera primary phase due to lack of English-medium school in close proximity	Positive	<ul style="list-style-type: none"> -The proposed permanent closure of Godre'rgraig Primary School would mean that there would no longer be an English –medium primary school in the north of the Swansea Valley area in Neath Port Talbot. Parents wishing for a local school in the area may therefore opt for the primary phase at Ystalyfera rather than travel out of the area

<p>12. Draw of a new English-medium school would erode the Welsh language in a strong Welsh speaking community</p>	<p>Negative</p>	<ul style="list-style-type: none"> -bespoke Welsh Language Awareness Training could be provided in the Swansea Valley for workplaces in the education and leisure workplaces as well as for a range of other work-related establishments -Develop Ty'r Gwrhyd Pontardawe as a thriving Welsh Language Centre for a range of partners to meet the needs of the higher percentage speakers of the Swansea Valley - arrange language awareness courses and family activities which target parents and children -work closely with Menter Iaith and Tŷ'r Gwrhyd to plan a varied programme of social activities to bring Welsh speakers and learners together - create a social media campaign including video and leaflet and use social media to encourage parents to use Welsh with their children - ensure that fitness clubs including yoga, spinning and keep-fit are available through the medium of Welsh and that Welsh language swimming lessons can be accessed - develop a designated page on internal communications to advertise jobs and apprenticeships that require Welsh language skills within the area - increase the provision of adult learning courses for Welsh speakers and learners within the community and local area -develop a designated webpage to include information on opportunities for learning/using Welsh, links to other organisations and websites including Tŷ'r Gwrhyd and Menter Iaith -produce resources, promotional material and visual impacts that promote language use and fosters respect for the Welsh language and bilingualism - weekly social activities and 'sesiynau sgwrs' to increase confidence and fluency levels -ensure that there are enough translations sets available for community groups
<p>13. New English-medium school would reduce Welsh language development in the community</p>	<p>Negative</p>	<ul style="list-style-type: none"> - as in impact 12, bespoke Welsh Language Awareness Training could be provided in the Swansea Valley for workplaces in the education and leisure workplaces as well as for a range of other work-related establishments -as in impact 12, work closely with Menter Iaith and Tŷ'r Gwrhyd to plan a varied programme of social activities to bring Welsh speakers and learners together - arrange family focussed Welsh/ bilingual events to coincide with Christmas, Santes Dwynwen and St David's Day celebrations - establish homework clubs in Welsh medium schools to support parents who are non- Welsh speaking -as in impact 12, ensure that fitness clubs including yoga, spinning and keep-fit are available through the medium of Welsh and that Welsh language swimming lessons can be accessed

	<p>-increase and promote the a provision of adult Welsh language immersion courses for non-Welsh speakers and learners within the community and local area</p> <p>-as in impact 12, develop a designated webpage to include information on opportunities for learning/using Welsh, links to other organisations and websites including Tŷ'r Gwrhyd and Menter Iaith</p> <p>-as in impact 12, produce resources, promotional material and visual impacts that promote language use and fosters respect for the Welsh language and bilingualism</p> <p>-as in impact 12, weekly social activities and 'sesiynau sgwrs' to increase confidence and fluency levels</p>
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Appendix A - Relevant Welsh Language Standards

Number	Policy-making Standard	Compliance Date
88	When you formulate a new policy, or review or revise an existing policy, you must consider what effects, if any (whether positive or adverse), the policy decision would have on - (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.	30/09/2016
89	When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would have positive effects, or increased positive effects, on - (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.	30/09/2016
90	When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would not have adverse effects, or so that it would have decreased adverse effects, on - (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.	30/09/2016
91	When you publish a consultation document which relates to a policy decision, the document must consider, and seek views on, the effects (whether positive or adverse) that the policy decision under consideration would have on - (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.	30/09/2016
92	Policy Making When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would have positive effects, or increased positive effects, on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.	30/09/2016

Appendix B - Relevant Policies and Legislation

Below is a hyperlinked list of Council, Welsh Government and other relevant policies, legislation and information, as noted throughout this assessment.

Neath Port Talbot Council Welsh Language Policies and Strategies

- [NPT Welsh in Education Strategic Plan](#)
- [NPT Welsh Language Promotion Strategy](#)
- [NPT Welsh Language Standards Compliance Notice](#)
- [NPT Development and the Welsh Language: Supplementary Planning Guidance \(July 2017\)](#)

Welsh Government Legislation and Regulations

- [Welsh-medium and bilingual education](#)
- [Welsh Language \(Wales\) Measure 2011](#)
- [Welsh in Education Strategic Plans \(Wales\) Regulations 2019](#)
- [Well-being of Future Generations Act 2015](#)
- [Cymraeg 2050](#)
- [Planning Policy Wales: TAN 20](#)

Other Information

- [Stats Wales: Welsh language 2011 by Local Authority](#)
- [Stats Wales: Pupils being taught Welsh as a first language](#)
- [Stats Wales: WIMD 2019 Local Authority Analysis](#)

Appendix C - Welsh Language Partner Organisations

This is a list of organisations who support and promote the Welsh language and Welsh-medium education, either voluntarily or through their corporate governance and/or strategic role in ensuring compliance with legislative requirements.

Many are partners on Neath Port Talbot's Strategic Language Forum.

- [Menter Castell-nedd Port Talbot](#)
- [Menter Iaith Abertawe](#)
- [Mudiad Ysgol Meithrin](#)
- [Neath Port Talbot Public Services Board](#)
- [Rhieni dros Addysg Gymraeg](#)
- [Urdd Gobaith Cymru – West Glamorgan](#)
- [ERW \(the Regional Education Consortium for Powys, Ceredigion, Carmarthenshire, Pembrokeshire, Swansea, Neath Port Talbot\)](#)
- [Estyn](#)
- [Welsh Language Commissioner](#)
- [Cymdeithas yr Iaith Gymraeg \(the Welsh Language Society\)](#)

Mae'r dudalen hon yn fwriadol wag

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

1. Details of the initiative

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	<p>Title of the Initiative: Proposal to establish an English-Medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwig Primary Schools</p>
1a	<p>Service Area: Strategic School Improvement Programme</p>
1b	<p>Directorate: ELLLS</p>
1c	<p>Summary of the initiative: The Council is proposing to establish a new build, 21st century English-medium school for 630 full time and 140 part time nursery pupils aged 3-11 to replace Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary, all of which would close on 31st August 2025. It is proposed to also include a new Learning Support Centre (LSC) for up to 16 primary aged pupils with Autistic Spectrum Disorder (ASD) with a statement of Special Educational Needs (SEN).</p> <p>It is proposed that the school would be built on Council owned land at Parc Ynysderw, in close proximity to Cwmtawe Community School and Pontardawe Leisure Centre. It would open on 1st September 2024.</p> <p>Additionally, part of the new build scheme is to construct a new 25 metre, 6 lane swimming pool with additional learner pool on the site to replace the existing Pontardawe Swimming Pool. The pool would provide an additional facility alongside Pontardawe Leisure Centre, revitalising and increasing the health and well-being facilities in the area.</p> <p>The combined new build school, specialist ASD provision and leisure facilities would form part of a learning, health and wellbeing community campus at the Parc Ynysderw site</p>

1d	<p>Is this a 'strategic decision'?</p> <p>Yes - forming part of the Council's Strategic School Improvement Programme and included within Band B of Welsh Government's Sustainable Communities for Learning</p>
1e	<p>Who will be directly affected by this initiative?</p> <p>All staff, pupils, parents/carers/guardians of pupils and governors at Alltwen, Godre'rgraig and Llangiwg Primary schools.</p>
1f	<p>When and how will people be consulted?</p> <p>This school organisation proposal is being brought forward under the Council's Strategic School Improvement Programme. Formal consultation is required in line with the Welsh Government's School Organisation Code, November 2018, which specifies the procedures to be followed, including the content of the consultation document and those to be consulted.</p> <p>Consultation on this proposal commenced on 5th December 2022 and closed on 24th January 2023. The consultation document was made available by e-mail to consultees, with the schools managing distribution to their school communities. It was also available on the Council's website. Hard copies were available on request.</p> <p>A pupil version of the consultation document was also made available to schools to distribute as appropriate.</p> <p>Responses to the consultation were submitted by email, post and via the Council's online consultation portal. Details of how to respond were included in the consultation document and links to the online consultation portal were included on the website and on the Council's social media channels.</p>

2. Evidence

What evidence was used in assessing the initiative?

Consultation Report has been prepared summarising the comments received and officer responses. This should be read alongside this impact assessment.

Respondents were asked to complete an Equalities Monitoring form included in the consultation document, the data collected is included as appendix A to this assessment

A number of comments were received relating to the impact on age, particularly relating to nursery age children who are not eligible for free transport. However comments were also received which welcomed the proposal and the perceived positive impact a new build school and pool would have on pupil education, health and well-being.

Comments relating to the LSC provision for pupils with ASD were mainly positive, welcoming the addition of a purpose build facility for specialist teaching. It was also noted that a new build would ensure better accessibility for disabled users, although it was felt by some that the additional travel time would be a barrier.

Comments were received which stated that pregnant mothers would be disadvantaged by this proposal due to longer distances to walk to school. However while this would be the case for some, for others the distance to school could be closer, or children would be entitled to transport assistance.

92% of respondents define themselves as White British. No comments were received which identified any impact on ethnicity or race.

No comments were received relating to gender Reassignment, marriage and civil partnership, religion or belief, sex or sexual orientation.

Community impacts have been fully considered in the consultation report; in summary many comments were received which state that the proposal would negatively impact on the community with the loss of the schools. A community impact assessment has been undertaken and has found that many community based activities and events are not reliant on the schools. Therefore there should be no adverse effect on community activities or events if the schools were to close.

A great deal of information is available with relation to the population within Neath Port Talbot. This can be accessed from the following sources.

Household projections by local authority <https://gov.wales/subnational-household-projections-2018-based>

<https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2018-based/populationprojections-by-localauthority-year>

<https://gov.wales/sites/default/files/statistics-and-research/2020-05/summary-statistics-regions-wales-2020-629.pdf>

Pupil Level Annual School Census (PLASC) data has also been used along with the Local Authority data relating to school staff

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Tudalen 146

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	√			<p>The Equality Duty covers the protected characteristic of age, which refers to a person having a particular age or being within an age group. Due to the nature of this proposal it could impact on children who currently attend Alltwen, Godre'rgraig and Llangiwig Primary schools, and children who might attend the proposed new school.</p> <p>According to Pupil Level Annual School Census (PLASC) carried out in January 2020, pupil numbers in the three schools combined are 454 full time and 66 part time. The proposal, if implemented, is also likely to have an impact on children under 3 who access childcare facilities.</p> <p>The proposal would provide an English-medium school for 630 full time and 140 part time nursery pupils aged 3-11 with a specialist learning support centre, in new build premises. It would offer the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that would impact positively on the self-esteem and well-being of pupils and aim to further improve the learning outcomes for all children across the ability range. With a new school comes more choices and improved opportunities because there is more space and better facilities. In the Estyn report of 2007, 'An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises', it is reported that the attainment and achievement of pupils improves significantly</p>

when they move into new or significantly refurbished buildings. In this respect the proposal can be expected to have a positive impact on pupils aged 3-11 who will attend the new school.

For many of the primary aged pupils the proposed location of the new school on the site at Parc Ynysderw would remain within 2 miles travel distance for homes in the catchment area. Should the proposal be implemented, support with home to school travel would be made available in line with the Council's Home to School Travel Policy. This policy is applicable to all pupils across Neath Port Talbot and in this respect the proposal has a neutral impact.

Nursery education is classified as non-statutory provision under the Welsh Government's Learner Travel Measure. The Council's current Home to School Travel Policy reflects this and there is no entitlement to travel assistance for nursery children. In some circumstances and where opportunities present, under temporary discretionary arrangements, parents of nursery age pupils are able to request the use of a vacant seat on a contracted vehicle which travels along a relevant route and which is suitable for nursery aged pupils.

These arrangements could be available to parents of nursery aged pupils attending the new school and are no less favourable than those applying to other parents of nursery age children across the County Borough and in this respect the proposal if implemented would have a neutral impact.

No childcare provision has been included in the proposed new school and this could be seen as detrimental to preschool pupils as well as school aged pupils who access wrap around care. As a result of considering the current sufficiency of childcare within and around the catchment area of the proposed new build primary at Parc Ynysderw, the need for a childcare setting within the school was dismissed due to the fact that the area is already well served with childcare provision, with a number of settings offering full day and sessional care, and approximately 8 childminders with the capacity to take 65 children, all within reasonable distance of the proposed school site. It is expected that existing childcare provisions could easily adapt their transportation of children

			<p>plans to enable children from the proposed new school's location to access/continue to access their provision. It was also felt that should the proposed new school include extra childcare provision then the required tender for any new childcare services within schools would potentially unsettle and disrupt the successful and established childcare in place in and around the area.</p> <p>Alltwen Primary School has a childcare facility on site. It may be possible to retain the provision on the Alltwen Primary site, or for the provision to relocate elsewhere if appropriate. The proposal therefore should have a neutral impact on preschool children.</p>
Disability	✓		<p>The Council's arrangements for education across the county borough include those children and young people with a disability.</p> <p>Currently 27% of pupils who attend either Alltwen, Llangiwg or Godre'rgraig are recorded as having an additional learning need (ALN). Of these 17% have their needs met by the school they attend, 7% receive additional support from other agencies and 2% have a statement of Special Educational Need (SEN).</p> <p>Data indicates that there are currently 434 pupils with Autistic Spectrum Disorder (ASD) in Neath Port Talbot, an increase of almost 47% since 2012. (PLASC Jan 2019). This proposal seeks to address the needs of these pupils and future pupils identified as having ASD by providing a provision designed to meet their needs.</p> <p>There are no specialist units for children with statements of SEN at any of the three schools included in this proposal, i.e. provision recognised by the Council as reserved for pupils with SEN. Pupils with ALN, including children with statements of SEN, are supported in a mainstream setting with appropriate funding for this purpose. The new school would continue to offer this level of support and therefore have a neutral impact on these pupils should the proposal proceed.</p>

			<p>Data analysis suggests that a number of pupils within the Swansea Valley travel to gain additional learning support in specialist units elsewhere within Neath Port Talbot. Creating a new provision in the proposed new school would provide additional places in an area where need has been identified, potentially making transition easier and allowing the pupils to integrate with their friendship groups and peers within the mainstream classes whenever possible. The proposal would therefore have a positive impact on this group of pupils if implemented.</p> <p>Pupils attending the proposed LSC provision within the new school would benefit from being taught by specialist staff, experienced in working with pupils with ASD needs. There is also the possibility that mainstream pupils with ASD could also benefit from the expertise available as the specialist knowledge and skills-set of the staff employed to work at the proposed LSC would be available to share with mainstream staff and, as such, would indirectly benefit SEN provision at the new school, resulting in a positive impact for mainstream ALN pupils should the proposal proceed.</p> <p>It is also envisaged that the LSC provision would be able to provide support and training for other mainstream primary schools across Neath Port Talbot, building skills, competencies, expertise and capacity of all staff working with children with ASD.</p> <p>The Council is required to have regard for the needs of disabled learners and learners with learning difficulties when assessing transport needs. The Home to School Travel Policy 2017 remains unaffected by the proposal and the Council would make suitable arrangements for learners with special needs to attend school including arrangements, as necessary, for home to school travel. An assessment of a learner's level of travel need would inform the type/level of transport that may need to be provided. The entitlement would be reviewed on an annual basis as outlined in the current policy. If implemented, the proposal would therefore have a neutral impact on these learners.</p> <p>Larger schools often have more capability of addressing specific learning needs. Estyn in their 'School size and educational effectiveness' report, December 2013</p>
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found that that 'Large and medium sized primary schools are better able to identify pupils' additional learning needs at an early stage and make the necessary adjustments in the provision for those pupils. The report continued to suggest this is because they often have teachers with specific additional needs knowledge and understanding either working with these pupils directly or providing guidance and support to other teachers and support staff. Within the scope of this proposal, it is expected therefore that moving to a larger school should have at least a neutral impact upon ALN pupils.

Careful planning and management of any transitional arrangements would be necessary to mitigate the challenges suggested by respondents and to ensure no disadvantage to pupils moving to the new school or negative impact on pupil performance.

Data reveals that less than 1% of staff across the three existing schools have indicated that they have a disability. Some staff and pupils of the current schools may be affected by a potential move to a different location. A new build 21st Century school will have greatly enhanced facilities which should improve provision for all disabled users.

Consideration of all the protected characteristics of the pupils, staff and governing body would be reflected in the development and design of the proposed new building for example via the provision of fully accessible building in compliance with Building Regulations. Protection under the Equalities Act 2010 would continue to support the staff at the new school and all people using the building would benefit from its fully accessible design.

The proposed new school would be designed to have flexible spaces which could be adapted by the use of furniture for specific activities, small group/intervention rooms and would include quiet areas for individual learning. A condition of Welsh Government Grant stipulates that the proposed new school building will need to comply with current acoustic standards. The proposed scheme will have to comply with current Building Regulations for accessibility both internally and externally.

			<p>Natural daylight and ventilation will be a key design feature of the new learning environment.</p> <p>It is therefore expected that the proposal would have a positive impact on all users identified within this protected characteristic as they would have access to a fully accessible school premises managed and maintained by the senior leadership team at the school on appointment.</p>
Gender reassignment		√	<p>Gender reassignment is not recorded for Primary age pupils however individual pupils requiring to live in a gender other than their birth gender are supported within all Neath Port Talbot primary schools. All children would continue to receive a high quality education at the proposed new school. The new building would have suitable facilities in place to accommodate pupils of any gender; no pupil would need to consider changing schools due to gender reassignment. Pupils and staff have the right to access the facilities that correspond to their gender identity. Any pupil or staff member who has a need for increased privacy would be provided access to a single cubicle toilet, but no pupil or staff member shall be required to use such a toilet. The new building would provide individual cubicles that could be used by all, albeit separate facilities would be available for adults and children.</p> <p>The use of changing rooms by transgender pupils and staff would be assessed on a case by case basis in discussion with the individual concerned. The proposed new school would maximise social integration and promote an equal opportunity to participate in physical education classes and sports, ensuring the safety and comfort, and removing any adverse impact for the individual. Transgender pupils or staff would be treated in accordance to their preferred gender identity.</p> <p>It is intended the new school site would therefore have a neutral impact on individuals protected under the gender reassignment characteristic.</p> <p>Staff would continue to receive protection under the Equalities Act 2010.</p>

			<p>Non-binary people, including staff, governors and members of the community accessing the facilities would benefit from the gender neutral provisions to the school that have been identified above.</p> <p>The proposal is likely to have a neutral impact on this aspect.</p>
Marriage & civil partnership		√	<p>Pupils at the school are below the legal marriage age. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the new Governing Body and Council in order to support the staff at the school.</p> <p>The proposal is designed to have a neutral impact on those with protected characteristics accessing the new school.</p>
Pregnancy and maternity		√	<p>It is not considered that there would be a negative impact on pupils in this protected group as there is a minimal likelihood of pupils falling within this protected group due to the age range of the proposed new school. The provision of education for any pupil identified as being within this protected group would remain unaltered by the proposal.</p> <p>Existing staff from all three schools who are on maternity leave or are pregnant at the point of the proposed timescale would be protected under the Equalities Act 2010 in terms of employment and must be afforded the same opportunities for redeployment.</p> <p>The proposal is likely to have a neutral impact on this aspect.</p>
Race		√	<p>All Neath Port Talbot schools are inclusive for pupils of all ethnic groups and ethnicity is not a criterion under the Council's Admissions Policy.</p> <p>The majority of pupils in Alltwen, Godre'rgraig and Llangiwig primary schools are white British, however 6% of pupils identify with other ethnic groups.</p>

			<p>Data from schools indicates that the proportion of pupils from ethnic minority backgrounds (non-white British) is 4.6% compared to the Wales average of 8.2% (SEP evidence)</p> <p>Under the proposal the existing pupils would be moving to a new school building so it is unlikely that there would be any significant change to the ethnic profile of the school, although this could change should the wider community demographic change in the future.</p> <p>Race is not a criterion that is considered when employing staff currently or for the proposed new school.</p> <p>98% of staff employed at the present time at the three schools identify as white British, with the remainder preferring not to indicate ethnic origin.</p> <p>All staff, pupils and governors would continue to receive protection under the Equalities Act 2010, which would be referred to by the Governing Body and Council</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Religion or belief		√	<p>Alltwn, Godre'rgraig and Llangiwig primary schools are non-faith schools and admit pupils of all religions/beliefs who wish to attend. Religion or belief is not a criterion under the Council's Admissions Policy which is applicable to all three schools. Admission to the new school would be in line with this policy.</p> <p>Religion/belief is not a criterion that is considered when staff are employed currently and that position will remain unchanged for all staff employed at the proposed new school. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the newly established Governing Body and Council in order to support the staff at the new school.</p>

			<p>Respect for all religious and non-religious beliefs would not change as a result of implementing this proposal. Similarly, the aspect of the curriculum relating to religion and belief would not change because of this proposal. The proposal does not seek to reduce the number of faith school places and increase the number of community (not-faith based) school places.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Sex		√	<p>Children of both sexes would be treated and taught equally at the proposed new school. There would be no different methods of teaching or curricula for either sex. The school would aim to reduce, as far as possible, segregating pupils and students by gender.</p> <p>All three schools within the scope of this proposal admit boys and girls currently and the proposed new school would also admit both sexes. The three schools combined currently have 275 (52.88%) male pupils and 245 (47.12%) are female –this is a similar percentage as the authority wide primary aged pupil population (51.24% boys and 48.76% girls) therefore there is no perceived negative impact.</p> <p>Male and female staff are employed at all three existing schools and it is expected that the proposed new school would have a similar balance of male and female employees. Current data indicates that 88% of staff employed at the existing schools are female and are disproportionately represented compared to the general population but not in relation to numbers employed in the primary education sector nationally in Wales which is 84.6% female.</p> <p>Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>

Sexual orientation			√	<p>Inclusivity and respect of others is an intrinsic element of the National Curriculum, and the proposed new school would seek to provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation. The Estyn School Inspection Handbook also details how inspection would evaluate how well individual pupils benefit from the school and states it may be relevant to pay particular attention to those with protected characteristics, therefore including transgender pupils. Under spiritual, moral, social and cultural development Estyn would look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation and disability.</p> <p>Under the revised 2017 Framework Inspectors would also consider types, rates and patterns of bullying and the effectiveness of the school's actions to prevent and tackle all forms of bullying and harassment – this includes cyber bullying and prejudice-based bullying related to special education need, sexual orientation, sex, race, religion and belief, gender reassignment or disability.</p> <p>Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.</p> <p>Based on the policies in place that would not change as a result of the proposal, this proposal would have a neutral impact on people with this protected group.</p>
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What action will be taken to improve positive or mitigate negative impacts?

This proposal, if implemented would be closely monitored with information gathered regarding characteristics and circumstances of the individuals involved. From the evidence currently available the proposal should have mainly positive or neutral impacts on the protected characteristics due to the following actions-

- The leadership team of the proposed new school would promote an inclusive ethos where everyone is valued, with support from local authority Education Development Service (EDS) and Inclusion teams
- Policies and procedures would be in place to support the school with inclusive practice; local authority policies would be adopted and adhered to
- Monitoring of pupil and staff well-being would take place by the leadership team of the school; a school review would be undertaken by the Strategic School Improvement Programme (SSIP) team in the first 2 years of opening
- Design processes would ensure accessibility is planned for and delivered
- Engagement with school communities throughout process to encourage collaboration and involvement
- Support provided for pupils and staff to ensure smooth transition prior to and during first term of opening

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Tudalen156

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	√			<p>This proposal will have a positive impact upon the protected characteristics of Age and Disability. It is anticipated that the proposed new school would impact positively on pupils aged 3-11 due to the improved facilities for teaching and learning, leading to better attainment and achievement.</p> <p>It is also expected that the proposal would impact positively on the protected characteristic of disability as users of the building would have access to a fully accessible school.</p>
To advance equality of opportunity between different groups	√			<p>This proposal would impact positively on pupils aged 3-11 as it provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that would impact positively on the self-esteem and well-being of pupils and aim to further improve the learning outcomes for all children across the ability range.</p> <p>The proposal would also impact positively on disability. Data indicates that there are currently 434 pupils with (ASD) in Neath Port Talbot (PLASC Jan 2019). This</p>

			<p>proposal seeks to address the needs of these pupils and future pupils identified as having ASD by providing a provision designed to meet their needs.</p> <p>The proposal will seek to bring together three different school communities, ensuring that pupils from Alltwen, Godre'rgraig and Llangiwg primary schools all have the same opportunities to benefit from the proposed 21st century new build school and health and well-being campus.</p>
To foster good relations between different groups	✓		<p>The proposal is likely to provide the opportunities for relationships between pupils with ASD and mainstream pupils due to the proposed provision of the LSC as part of the new school build. By situating a specialist provision in a mainstream school opportunities exist for integration and the development of an inclusive learning community.</p>

What action will be taken to improve positive or mitigate negative impacts?

- A Strategic Equality Plan would be developed by the school leadership team informed as a result of engagement and consultation with all stakeholders.
- The LSC provision will provide opportunities for greater integration both for LSC pupils into mainstream but also for mainstream pupils to learn from staff and pupils in the LSC; it is expected that the LSC would provide support and training for other mainstream primary schools across Neath Port Talbot, building skills, competencies, expertise and capacity of all staff working with children with ASD.
- Prior to the new school opening the new school leadership team will be supported to undertake activities to bring together the three school communities, including joint training days for staff, transition days for pupils where year groups from each of the schools undertake activities together (such as trips or sporting events) to enable pupils to meet new classmates, and joint parents meetings to support meeting staff and each other
- Transition events will be planned for LSC pupils to get to know staff and pupils; preparations will be made before hand to support pupils with the move to a new school community including transition booklets to include photographs of the new environment

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>The proposal, if implemented, should have a positive impact on groups who experience socio economic disadvantage. A new 21st Century school would provide greater opportunities for pupils from all socio economic groups, due to the better facilities available. In the Estyn report of 2007, 'An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises', it is reported that the attainment and achievement of pupils improves significantly when they move into new or significantly refurbished buildings, particularly when schools are in areas with high levels of social and economic deprivation. The proposal would therefore have a positive impact in this regard.</p> <p>A larger school would mean that there is a wider number of staff, with diverse interests, and as a result extracurricular provision can often be extended and improved for pupils moving from smaller schools with a smaller number of staff. This would therefore result in a positive impact, giving pupils opportunities for new experiences and broader learning.</p> <p>The enhanced leisure facilities in the close vicinity of the proposed new school should offer increased opportunities for improving health and well-being for pupils and the wider community.</p>
Negative/Disadvantage	<p>Implementation of this proposal could mean that for some pupils the proposed new school is further away than their current school and for some this may be further than 2 miles. Support with home to school travel would be made available in line with the Council's Home to School Travel Policy, however separate transport for before or after school activities will not be provided. This could result in some pupils not being able to access extracurricular activities or breakfast club, particularly those from families who do not have access to a car.</p>
Neutral	<p>For many of the primary aged pupils the proposed location of the new school on the site at Parc Ynysderw remains within 2 miles travel distance for homes in the catchment area. Support with home to school travel would be made available in line with the Council's Home to School Travel Policy. This policy applies for all pupils across Neath Port Talbot and in this respect the proposal, if implemented, would have a neutral impact.</p>

What action will be taken to reduce inequality of outcome

- Breakfast Club has been successfully operated at all three of the current schools, promoting the Welsh Government aim of giving all children a flying start through encouraging healthy eating and social interaction. Should the proposal be implemented then it will be the Headteacher and Governing Body's decision to provide a breakfast club. Support will be provided to the school to enable them to address any difficulties arising from pupils arriving on school transport not being able to access the provision – for example they may wish to consider a later start to breakfast club so all transported pupils are able to participate.
- Arrangements for extra-curricular activities can be managed to ensure that all pupils have equal opportunities to participate and the proposed new school leadership team will be strongly encouraged to consider all opportunities - potential solutions could include arrangements with transport companies for all pupils to finish later on 1 or more days of the week, arranging activities at lunchtime or other times during the school day or facilitating car shares with parents; prior to opening opportunities for facilitating extracurricular provision will be explored with the Headteacher and Governing Body of the proposed new school

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	√			A Community Impact Assessment (CIA) has been undertaken for the purpose of providing information on the impact of the proposal on the local community's access to facilities and services currently available at the three schools. It has been prepared in line with the requirements of the Welsh Government's School Organisation Code. The CIA has been prepared using a range of sources and evidence, including discussion with various partner organisations in the Swansea Valley and the schools and provides further information all of which enables decision makers to have a fuller understanding of the possible consequences on communities as a result of the potential closure of the three schools linked to this proposal.

			<p>The CIA states 'The proposal to establish a learning campus with modern day health and leisure facilities at Parc Ynysderw will further channel amenities into the town of Pontardawe. Pupils that might be displaced from Godre'rgraig Primary school (3.2 miles distant), Llangiwig Primary (1.3 miles distant) and Alltwen Primary school (0.7 miles distant) would benefit from the rich mix of sporting, artistic, cultural and social activities within walking distance of their new teaching and learning environment.'</p> <p>The proposed new school would provide an LSC for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). It would also provide the opportunity to become a community hub for the area, building on the work already being undertaken by other well established primary school LSCs.</p> <p>In addition community facilities are included within the scope of this project so that the proposed new school would be able to provide an important complementary role within the community and act as a catalyst for creating a wider local community focus. It is proposed that the new school would be built on Council owned land at Parc Ynysderw, in close proximity to Cwmtawe Community School and Pontardawe Leisure Centre. The proposal includes for a new 25 metre, 6 lane swimming pool with additional learner pool to replace the existing Pontardawe Swimming Pool. The proposed new pool would provide an additional facility co-located alongside Pontardawe Leisure Centre, revitalising and increasing the health and well-being facilities in the area thus increasing the connectedness of learners and non-learners from different communities in the Swansea valley. The combined proposal of a new build school, specialist ASD provision and leisure facilities would form part of a learning, health and wellbeing community campus. This would have a positive impact on community cohesion</p>
Social Exclusion	√		<p>The Welsh Index of Multiple Deprivation (WIMD) data states that six out of the eight LLSOA's that serve the Swansea Valley are in the 50% most deprived areas of Wales, including the employment, health, education and access to services domains. This proposal, with the creation of the learning campus would provide all members of the Swansea Valley community with modern, fit for purpose educational, health and leisure facilities that could potentially offer a catalytic community focal point for intergenerational health, wellbeing and cohesion in the wider Pontardawe area. It would assist in delivering the Council's aim of improving</p>

			<p>the health and wellbeing of all people living in Neath Port Talbot and reducing the gap between the least and most healthy.</p> <p>The proposed new school would provide an LSC for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). Including this provision within the new build would ensure that pupils are provided with purpose built, 21st century standard facilities, with the aim of ensuring best possible outcomes for pupils.</p> <p>Data analysis suggests that a number of pupils within the Swansea Valley have to travel to gain additional learning support in specialist units elsewhere within Neath Port Talbot. Creating a new provision in the proposed new school would provide additional places in an area where need has been identified.</p> <p>The proposed new build school, specialist ASD provision and leisure facilities would be accessible to pupils and the wider community regardless of any specific socio-economic disadvantage and could offer a focal point for local, stimulating, sustainable learning, health and wellbeing.</p> <p>The proposal should have a positive impact on reducing social exclusion</p>
Poverty		✓	<p>Poverty has a significant impact on the educational experience and attainment of many children growing up in the UK. New data (May 2021) published by the <i>End Child Poverty Coalition</i> shows that 31% of children in Wales live in poverty.</p> <p>Education can be a route out of poverty, equipping children and young people with the necessary skills and qualifications which will support them to secure employment. This proposal seeks to improve educational attainment and achievement. A new build school would provide the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that should impact positively on the self-esteem and well-being of pupils, targeting improved learning outcomes for all children across the ability range.</p> <p>In the Estyn report of 2007, 'An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises', it is reported</p>

that the attainment and achievement of pupils improves significantly when they move into new or significantly refurbished buildings, particularly when schools are in areas with high levels of social and economic deprivation. It is anticipated that the proposal would therefore have a positive impact in this regard.

Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary all have lower than average number of pupils in receipt of free school meals when compared to other schools in Neath Port Talbot and similar numbers when compared to all Wales.

School	FSM
Alltwen Primary	17%
Godre'rgraig Primary	21%
Llangiwg Primary	22%
NPT	24%
All Wales	20%

The proposal would have a neutral impact upon the number of children eligible for free school meals, although the enhanced 21st century school facilities would improve the educational experience for all pupils.

For many of the primary aged pupils the proposed location of the new school on the site at Parc Ynysderw would remain within 2 miles travel distance for homes in the catchment area. An estimate of the numbers of pupils who live further than 2 miles away from the proposed new school site at Parc Ynysderw, based on the numbers and addresses of the pupils currently in the three existing schools suggests that approximately 176 pupils could potentially be eligible for assistance with transport, which would remove the need for parents to transport pupils to school by car. Should the proposal be implemented, support with home to school travel would be made available in line with the Council's Home to School Travel Policy. This policy is applicable to all pupils across Neath Port Talbot and in this respect the proposal has a neutral impact.

			<p>The remaining pupils live on routes that have been assessed as safe, although these routes will be reassessed should the proposal progress and when details of the pupils who will be attending the new school are known. At that time the Neath Port Talbot Road Safety Officers will be available to assist and support schools, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance.</p> <p>These arrangements are the same for every school in Neath Port Talbot including Alltwen, Godre'rgraig and Llangiwig primary schools. It is the case that some pupils will have further to travel to the proposed new school than to previous schools, while others will be closer. For those families living further away this may mean that travel costs are increased but others may have reduced costs or be eligible for travel assistance. In this respect the proposal has an overall neutral impact.</p>
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What action will be taken to improve positive or mitigate negative impacts?

- Support would be provided to ensure that opportunities are taken to create a new school community, involving pupils from the three schools, along with staff, governors, parents/carers and wider community groups including community and town councillors, childcare providers, local businesses etc. with the aim of improving community cohesion; this could involve open days, joint meetings across the three school communities etc.
- Prior to opening the Headteacher and Governing Body will be supported by EDS officers to investigate the opportunities available to enrich the curriculum within walking distance of the new school
- The proposed new school Leadership team will be encouraged to support and promote community engagement and events in the three villages of Alltwen, Godre'rgraig and Llangiwig where appropriate, to ensure links are maintained and developed
- The development of enhanced health and well-being facilities alongside the proposed new school would promote healthy lifestyles; prior to opening discussions should take place with the operator to ensure that pupils and families are able to access amenities and that these are affordable
- Prior to opening Neath Port Talbot Road Safety Officers will be available to assist and support schools, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance

6. Welsh

Tudalen 164

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on:	√			A detailed Welsh Language Impact Assessment has been undertaken and demonstrates that this proposal will have a positive impact on the Welsh language
- people's opportunities to use the Welsh language				
- treating the Welsh and English languages equally	√			

What action will be taken to improve positive or mitigate negative impacts?

- Support from local authority EDS staff for proposed new school staff to develop Welsh language provision in line with the new curriculum prior to opening
- Raise parental awareness of the choice of schools available in the Pontardawe area including those offering Welsh-medium education so parents are able to make an informed decision when choosing a school
- Continue to support preschool and childcare Welsh-medium provision in the area to enable non Welsh speaking parents to feel confident about choosing a Welsh-medium school
- Raise awareness of improvements work undertaken at YGG Pontardawe, YGG Trebannws and at other Welsh-medium schools in the Swansea Valley and monitor impact on pupil numbers

7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Tudalen165

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			✓	<p>Neath Port Talbot County Borough Council (NPTCBC) has a legal duty to maintain and enhance biodiversity, and in so doing, promote the resilience of ecosystems under the Environment (Wales) Act 2016. The Council's Biodiversity Duty Plan demonstrates how we will fulfil that duty and will act as a driver for conservation activities throughout Neath Port Talbot (NPT).</p> <p>The Biodiversity Duty Plan not only delivers our statutory duties with regards to biodiversity but also explains how, through meeting the Biodiversity Duty, we are delivering well-being objectives and the ways of working under the Well-being of Future Generations (Wales) Act 2015.</p> <p>Should the proposal be implemented, the vacated sites would be declared surplus to the operational requirements of the Director of Education, Leisure and Lifelong Learning. Ongoing management of the non-operational land and building would subsequently transfer to the Director of Environment and Regeneration. Any potential future use would be considered within the context of the Council's corporate asset management process. Should the vacated sites (in full or part) be sold, monies raised would be reinvested into the general education budget. Any successive change of use by a potential new owner or tenant would be subject to the Council's adopted Biodiversity Duty Plan and the Biodiversity and Geodiversity Supplementary Planning Guidance.</p>
To promote the resilience of ecosystems, i.e. supporting protection of the wider			✓	<p>Biodiversity Supplementary Planning Guidance (SPG) – the Authority adopted the Biodiversity and Geodiversity SPG in 2018. The SPG sets out the basic framework for dealing with Biodiversity in the planning process in Neath Port Talbot. It provides guidance on how to conserve and enhance important habitats and species as part of development. This Supplementary Planning Guidance (SPG)</p>

<p>environment, such as air quality, flood alleviation, etc.</p>			<p>provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest, focussing on the full range of biodiversity and geodiversity features and interests within Neath Port Talbot and sets out the measures that will be taken through the planning system to meet the relevant objectives set out in the Local Development Plan (LDP).</p> <p>https://www.npt.gov.uk/7315 https://www.npt.gov.uk/media/9003/spg_biodiversity_geodiversity_may18.pdf</p> <p>In line with the Council's recently adopted Decarbonisation and Renewable Energy Strategy, this proposal, if progressed, would not only provide a safe and healthy building for effective educational delivery but it would also be designed and operated as close to zero energy/carbon as practically possible.</p> <p>In line with Welsh Government's conditions of grant, the proposed new school and leisure complex (as a minimum) must attain a Building Research Establishment Environmental Assessment Method (BREEAM) Excellent rating.</p> <p>The proposed community focussed learning campus would be designed and built on the core principles of sustainable development that would encourage the following embedded principles for many generations of future pupils within NPT:</p> <ul style="list-style-type: none"> • Care for oneself - our health and well-being • Care for each other - across cultures, distances and generations • Care for the environment – local and far <p>The new school and leisure complex would demonstrate the aims of integrating the ethos of energy efficiency and low/zero carbon design principles. The design intent would provide an energy/carbon efficient and sustainable school that prepares young people for a lifetime of sustainable living, through their teaching, their learning environment and through the example of their day-to-day practices demonstrated by their school building.</p> <p>To deliver a sustainable energy efficient /low carbon - community focussed learning campus and attain the project's energy and carbon performance targets of:</p> <ul style="list-style-type: none"> • Reduction in combined gas and electricity consumption to 190 kWh/m² by September 2025 • Reduction in CO₂ emissions to 50.5 kg/m² by September 2025
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Extra traffic on the road will increase levels of emissions. Neath Port Talbot Council's Road Safety team collect modes of transport data from all Neath Port Talbot schools on an annual basis. Based on data collected in 2019, Alltwen and Llangiwig primaries have a high percentage of pupils who travel to school by car or taxi, 56% of Alltwen Primary pupils and 70% of Llangiwig Primary pupils. The majority of Godre'rgraig Primary pupils (85%) now travel by bus, as expected due to the increased distance to travel to the temporary site. However prior to moving to Parc Ynysderw the percentage of pupils travelling to school by car or taxi was 47%.

Overall, the data indicates that the number of pupils who walk, cycle or scooter to school is relatively small compared to the number who use cars or taxis, and this appears to have been the case over the last four years. All three of the existing schools have pupils from outside their catchment area – 44% of pupils attending Alltwen Primary live outside the school catchment area, 37% of Llangiwig Primary pupils live outside the Llangiwig catchment area and 24% of Godre'rgraig Primary pupils live outside of the Godre'rgraig catchment area, suggesting that the current schools already contribute significantly to the traffic flow in the area.

Should this proposal be approved, based on the numbers and addresses of the pupils currently in the three existing schools, approximately 176 pupils could potentially be eligible for assistance with transport, which would remove the need for parents to transport those pupils to school by car. Pupils travelling to school on relatively few school buses will have less environmental impact than pupils travelling in numerous cars. It is recommended that pupils who are entitled to free home to school travel should use the buses provided.

What action will be taken to improve positive or mitigate negative impacts?

The following key design and operational considerations would be evaluated/implemented:

- Undertake feasibility to formulate an energy positive design solution (focused on regulated and unregulated energy consumption) for the school aligned to practicality and viability.

- From an energy/carbon perspective the design would consider the proposed campus site & built form; orientation, layout thermal mass, green walls/roofs, site access, surrounding elements, thermal response, insulation levels, minimising overheating, adaptability of windows and glazing
- Particular emphasis would be placed on the integration of the campus site into the surrounding external environment and topography, ensuring where practicable that green spaces are very much a key focus and central to the final design solution
- Implement **passive** design strategy with specific focus on natural daylight, ventilation, thermal mass and solar engineering
- Adoption of an energy/carbon & water hierarchy:
 - a) Establish base energy & water demand
 - b) Reduce energy & water demand by effective and passive design processes
 - c) Provision of low/zero and renewable technologies
 - d) Enablement of the design for effective energy/carbon & water management by building management and occupant/users
 - e) Assess the energy balance of the school optimising the design solution through:
 - Minimise - Energy Demand
 - Maximise - Energy Generation
 - Balance - Energy Storage (Electricity and Heat)
- Undertake energy/carbon computer modelling to determine performance providing informed decisions to enable refinement and enhance the design process
- Carryout detailed feasibility assessment of low & zero energy/carbon technologies
- Due to the heat demand of the pool facility within the Low & Zero energy/carbon technology assessment carryout detailed focus on Combined Heat and Power (CHP) assessing cost, carbon and energy benefits of this solution
- Formulate a strategy for effectively managing unregulated energy, determine within the conceptual design stage determining how the school would achieve effective management of unregulated energy (catering, ICT & Office Equipment etc.)
- Review ICT within the proposed campus in relation to energy efficiency
- Controls & Building Management System Strategy
- Sub-metering strategy, automated energy & water sub monitoring system measuring 100% of the buildings energy usage and generation through sub-metering
- Incorporate water efficient services to ensure the school achieves highest levels of water efficiency performance

- Management Issues: Effective handover period: Training, commissioning (6 & 12 months after handover), provision of a log book and succinct instruction for building management and occupants how the building is supposed to operate and function

In addition to the educational teaching resource, the contractor will be required to provide guidance documentation on how the overall design and operation of the community focussed learning campus delivers and embraces the principles, aims and objectives of the Future Generation Act over the design, construction and operational lifetime of the facility

Should the proposal be implemented, the vacated sites would be declared surplus to the operational requirements of the Director of Education, Leisure and Lifelong Learning. Ongoing management of the non-operational land and building would subsequently transfer to the Director of Environment and Regeneration. Any potential future use would be considered within the context of the Council's corporate asset management process. Should the vacated sites (in full or part) be sold, monies raised would be reinvested into the general education budget. Any successive change of use by a potential new owner or tenant would be subject to the Council's adopted Biodiversity Duty Plan and the Biodiversity and Geodiversity Supplementary Planning Guidance.

Pupils who are entitled to free home to school travel should use the buses provided.

8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	The proposal if implemented is expected to positively impact on pupils aged 3-11 who would attend the new school, and on older children and adult users including parents, staff, Governors and members of the local community. The enhanced education and leisure facilities would improve wellbeing, not just when the school opens but also into the future, and would provide a valuable resource and legacy for the local community.
ii. Prevention – preventing problems occurring or getting worse	If implemented the proposal would provide new 21 st century teaching and learning facilities for 770 primary aged pupils. It is believed that a new 21st century school will greatly enhance teaching and learning experiences, which in turn can positively impact on pupil outcomes. The increased skills and knowledge will provide greater life chances for pupils, enabling them to become as adults more prosperous, more resilient and more equal. By providing access to improved facilities and by broadening social and cultural experiences the proposal contributes to healthier individuals and more cohesive communities.

<p>iii. Collaboration – working with other services internal or external</p>	<p>Full consultation will take place for this proposal where views from stakeholders, including services and organisations will be gathered and reported. Should the proposal be approved then further work would be undertaken with relevant stakeholders, with professional colleagues across the Council including Education Development Service, Inclusion and Support for Learning Services, and Architectural and Construction colleagues. Additionally further work would be undertaken with external agencies including relevant ALN partners such as the National Autistic Society (NPT branch), NPT Special Needs Support Group, SNAP and Action for Children.</p>
<p>iv. Involvement – involving people, ensuring they reflect the diversity of the population</p>	<p>Full consultation will take place for this proposal where views from all stakeholders including other services and organisations will be gathered and reported. The consultation will follow the procedures required under the Welsh Government’s School Organisation Code which specifies the type of school organisation activity on which the Council is required to consult and the process to be followed in conducting consultation. Throughout the consultation period the consultation document and associated papers will be available on the Council’s website located on the Council’s Strategic School Improvement Programme webpage ensuring a wide audience will be able to access information about the proposal. A range of options are presented in the consultation document, giving sufficient reasons to allow consultees to give intelligent consideration and response. It is recognised the consultation process should be undertaken when proposals are still at a formative stage. This is the case with this consultation as the Council would conscientiously take into account the responses before finalising its decision. As such the views of consultees are able to influence the decision making process.</p>
<p>v. Integration – making connections to maximise contribution to:</p>	<p style="background-color: #cccccc;"></p>
<p>Council’s well-being objectives</p>	<p>The Council’s well-being objectives and the supporting improvement priorities are set out in the Council’s Corporate Plan. This proposal directly supports wellbeing objective – ‘to ensure all children get the best start in life’ through the provision of a 21st century school for current and future generations of primary aged pupils. With the inclusion of a 16 place LSC for primary aged pupils with ASD in the proposal further support for the plan is evidenced, through ensuring that pupils with ALN are also give opportunities to benefit from new purpose built facilities.</p>

	<p>Through creating facilities that can be used by the community the proposal also contributes to wellbeing objective –‘all communities are thriving and sustainable’.</p> <p>To obtain Welsh Government approval of the business plan it has been essential to ensure that community benefits are fully explored and implemented throughout the construction phase. Part of this work will ensure that local businesses are used to supply labour and materials whenever feasible, local people will benefit from employment schemes and the local economy will benefit due to an increased number of people working in the area. This contributes to well-being objective 4 - ‘Working with our partners we create the conditions for more secure, well paid and green work in the area and support local people into those jobs’</p>
<p>Other public bodies objectives</p>	<p>This proposal directly impacts upon the Public Services Board priority to support children in their early years and indirectly supports the priority to promote well-being through and in the workplace, by creating a 21st century new build with enhanced facilities.</p>

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9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

If the proposal is approved and subsequently progresses then a project plan for this scheme would be initiated. This would include reference to this document. Any changes in outcomes resulting from this ongoing analysis would be used to update this Integrated Impact Assessment, including any mitigating actions which may be required.

The proposed new school’s senior leadership team would be responsible for monitoring the progress and well-being of pupils to ensure the expected positive impacts were being realised and that mitigating actions were being undertaken to minimise any identified negative impacts.

Neath Port Talbot County Borough Council works closely with Governing Bodies of schools to ensure that the highest standards are robustly maintained, that teaching and learning is of a high quality and that leadership and governance is strong. The Local Authority works with Estyn in order to monitor the performance of schools and to support school improvement. Monitoring would t

take place on a regular basis by Support for Learning and Inclusion officers, Education Development Service officers and outside bodies including Estyn.

Longer term monitoring would also be required to ascertain any impact on wider community Welsh language issues.

If this proposal is approved then the construction process would ensure that all contractual commitments including biodiversity and community benefits are monitored and delivered. In line with their conditions of grant, WG would also monitor progress against the stipulated benefits and would require a full project evaluation on completion of the scheme.

Should the proposal be implemented, the vacated sites would be declared surplus to the operational requirements of the Director of Education, Leisure and Lifelong Learning. Ongoing management of the non-operational land and building would subsequently transfer to the Director of Environment and Regeneration. Any potential future use would be considered within the context of the Council's corporate asset management process. Should the vacated sites (in full or part) be sold, monies raised would be reinvested into the general education budget. Any successive change of use by a potential new owner or tenant would be subject to the Council's adopted Biodiversity Duty Plan and the Biodiversity and Geodiversity Supplementary Planning Guidance.

10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	<p>The proposal should have a positive impact on Age and Disability, and a neutral impact on all other protected characteristics. From the evidence currently available the proposal should have mainly positive or neutral impacts on the protected characteristics due to the following actions-</p> <ul style="list-style-type: none"> • The leadership team of the proposed new school would promote an inclusive ethos where everyone is valued, with support from local authority EDS and Inclusion teams • Policies and procedures would be in place to support the school with inclusive practice; local authority policies would be adopted and adhered to • Monitoring of pupil and staff well-being would take place by the leadership team of the school; a school review would be undertaken by SSIP in the first 2 years of opening • Design processes would ensure accessibility is planned for and delivered

	<ul style="list-style-type: none"> • Engagement with school communities throughout process to encourage collaboration and involvement • Support provided for pupils and staff to ensure smooth transition prior to and during first term of opening <p>There is no real risk of direct or indirect discrimination as the Council is pursuing a legitimate aim (namely improving the capacity and efficiency of education) and the decision to publish the proposals to make regulated alterations is a proportionate means of achieving that aim.</p>
Socio Economic Disadvantage	<p>A new build 21st Century school would impact positively on pupils from all socio economic groups, due to the significantly improved facilities available. In this respect the proposal would have a positive impact.</p> <p>Change of location may mean some pupils live further away from the proposed new school and may result in difficulties accessing extracurricular activities. This will have a negative impact, however mitigating actions could be implemented to address this.</p>
Community Cohesion/ Social Exclusion/Poverty	<p>The combined proposal of a new build school, specialist ASD provision and leisure facilities would form part of a learning, health and wellbeing community campus. This would have a positive impact on community cohesion. The proposed facilities would be accessible to pupils and the wider community regardless of any specific socio-economic disadvantage and could offer a focal point for local, stimulating, sustainable learning, health and wellbeing. The proposal therefore should have a positive impact on reducing social exclusion.</p> <p>The proposal should have a neutral impact on poverty. While some pupils will have further to travel to school support with home to school travel would be made available in line with the Council's Home to School Travel Policy. This policy is applicable to all pupils across Neath Port Talbot.</p>
Welsh	<p>Standards of Welsh in the three current schools are good; it is expected that the good practice that already exists would transfer to the proposed new school and that this would be improved upon due to having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh. This is therefore likely to have a positive impact on opportunities to use the Welsh language.</p> <p>This proposal is expected to have a neutral impact on treating the Welsh and English languages equally. Evidence from previous new build school projects in Neath Port Talbot suggests that a new</p>

	build English-medium school is unlikely to discourage parental preferences for Welsh-medium education and mitigating actions will ensure consistency should this proposal proceed.
Biodiversity	<p>The proposal is likely to have at least a neutral impact on biodiversity. NPTCBC has a legal duty to maintain and enhance biodiversity, and in so doing, promote the resilience of ecosystems under the Environment (Wales) Act 2016. The Council's Biodiversity Duty Plan demonstrates how that duty is fulfilled and will act as a driver for conservation activities throughout the County Borough.</p> <p>The Biodiversity Duty Plan not only delivers our statutory duties with regards to biodiversity but also explains how, through meeting the Biodiversity Duty, the Council delivers well-being objectives and the ways of working under the Well-being of Future Generations (Wales) Act 2015.</p> <p>The Council has a variety of policies which support and inform biodiversity. Additionally should the proposal progress then Welsh Government conditions of grant have environmental stipulations that also seek to ensure important aspects of safeguarding the wider environment would be supported e.g. adherence to Building Research Establishment Environmental Assessment Method (BREEAM) and the Waste and Resources Action Programme (WRAP).</p>
Well-being of Future Generations	The proposal directly supports the Council's wellbeing objectives through the provision of a 21 st Century school and health and well-being campus, for current and future generations of primary aged pupils and the community.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

The comments received during consultation relate to impacts on the protected characteristics of age, disability and pregnancy and maternity. Comments have also been received relating to community impact and biodiversity. Mitigating actions have been included below.

The proposal would create a new build, 21st Century school for pupils which would enhance well-being, and would provide the conditions to improve standards. The addition of an LSC for primary aged ASD pupils would address the need for additional provision in Neath Port Talbot and would seek to improve opportunities for these pupils as well as provide training and development for mainstream staff in the proposed school and the wider area. The proposed new pool would complement current provision and enhance the health and wellbeing offer for pupils and the wider community.

The proposal can be seen to have positive impacts on Age and Disability and a neutral impact on all other protected characteristics. A new build 21st Century school would impact positively on pupils from all socio economic groups, due to the significantly improved facilities provided and would also positively impact on community cohesion, and social exclusion.

With the implementation of mitigating actions the proposal should have at least a neutral impact on the Welsh language and biodiversity.

The Wellbeing of Future generations has been considered and the proposal directly supports the Council's wellbeing objectives.

As a result it is recommended that this proposal should continue as planned.

11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Ensure all appropriate policies and procedures are in place prior to the proposed new school opening	School Leadership team (including Governing Body) with support from Education Development Service	September 2025	Polices in place and adopted

Engagement with pupils, staff and wider school community to facilitate transition to proposed new school	SSIP Officers	January 2023 ongoing	Smoother transition creating a successful start to the new school
Develop links with the local communities to support the development of the proposed new school	SSIP Officers Project Manager , Community Benefits Officer (Environment) and Main Contractor when appointed)	January 2024	Creation of a strong and supportive school community Aims of community benefits plan met
Support provided to proposed new school to consider how extracurricular provision can be provided	SSIP Officers	September 2025	Extracurricular provision including Breakfast club (subject to Governing Body decision) is accessible to all pupils
Assistance provided to support the proposed new school, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance	NPT Road Safety Officers	September 2025	Safe routes identified
<ul style="list-style-type: none"> • Raise parental awareness of the choice of schools available in the Pontardawe area including those offering Welsh-medium education so parents are able to make an informed decision when choosing a school • Monitor parental choice of school i.e. Welsh/English-medium and take action if Welsh –medium admission 	WESP Forum	Ongoing	Actions implemented and contributing to development of Welsh language

rates drop significantly as a result of the new build			
Support from local authority EDS staff for proposed new school staff to develop Welsh language provision in line with the new curriculum prior to opening	EDS Officers	Ongoing	Expected standards in Welsh language met or exceeded

12. Sign off

	Name	Position	Signature	Date
Completed by	Rhiannon Crowhurst	Head of Service		24.3.23
Signed off by	Andrew Thomas	Director of ELLs		24.3.23

Mae'r dudalen hon yn fwiadol wag

Legal Implications

Education Act 1996: General Duties

1. Part 1 of the Education Act 1996 (“the 1996 Act”) imposes a number of general duties on all local authorities in Wales. The general duty in section 13 of the 1996 Act is to contribute (so far as the Council’s powers enable them to do so) towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their area.
2. Section 13A(3) of the 1996 Act states that a local authority in Wales must ensure that their relevant education functions and their relevant training functions are exercised by the authority with a view to promoting high standards, and promoting the fulfilment of learning potential by every person to whom the subsection applies, including those who are of compulsory school age or are below school age and are registered as pupils at schools maintained by the authority.
3. Section 14 of the 1996 Act then provides that the Council shall secure that sufficient schools for providing primary education and secondary education are available in the Council’s area. Schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity for appropriate education. Appropriate education means education which offers such variety of instruction and training as may be desirable in view of (a) the pupils’ different ages, abilities and aptitudes; and (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.

School Standards and Organisation (Wales) Act 2013

4. Part 3 of the School Standards and Organisation (Wales) Act 2013 (“the 2013 Act”) is concerned with school organisation. The Welsh Ministers have issued the School Organisation Code (“the Code”)¹. Local authorities must, when exercising functions under Part 3 of the 2013 Act, act in accordance with any relevant requirements contained in the Code, and must have regard to any relevant guidelines contained in it. The key provisions are summarised in the section on the Code below.
5. Chapter 2 of Part 3 of the 2013 Act deals with school organisation proposals. A maintained school in Wales can only be discontinued in accordance with Part 3 of the 2013 Act.
6. A local authority has the power to make proposals to discontinue various types of schools, including a community school. Section 48(2) of the 2013 Act provides that before publishing such proposals, a proposer (in this case, the Council) must consult on its proposals in accordance with the Code. The consultation document must be issued during the term time of the schools affected and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days.
7. The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the

¹ Welsh Government - School Organisation Code: November 2018

<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>

proposal or rejection of the concerns, with supporting reasons; and setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal.

8. If a local authority decides to proceed with a proposal to discontinue a maintained school, it must publish proposals to that effect in accordance with the Code (section 48). The proposal must be published by way of statutory notice. Chapter 4 of the Code sets out specific requirements as to how statutory proposals must be published. Proposals must be published on a school day and the objection period must include 15 school days (in addition to the day on which it is published).
9. Section 49 of the 2013 Act makes provision for any person to object to proposals published under section 48 within the objection period of 28 days. The Council must then publish a summary of all objections made to the proposal and its response to those objections before the end of 7 days beginning with the day of the Council's determination.
10. The local authority proposer must then determine whether the proposals should be implemented. Where a local authority's proposals have received objections, and require determination, those objections must be carefully considered before a final determination is made. A further report to Cabinet will be prepared before any such determination is made. This determination must take place before the end of 16 weeks beginning with the end of the objection period.

The Code

11. The Code contains the following elements:

- It imposes requirements in accordance with which relevant bodies (including all local authorities in Wales) must act. Where mandatory requirements are imposed by the Code or by the 2013 Act or another statute or statutory instrument, it is stated that the relevant bodies must comply with the particular provision. Where practices are prohibited, it is stated that the relevant bodies must not use this practice.
 - It includes statutory guidance to which the Council must have due regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals. Where guidance is given by the Code, it is stated that relevant bodies should follow this guidance unless they can demonstrate that they are justified in not doing so.
12. Paragraph 1.1 of the Code sets out the key background principles and policies, which should be taken into account by the Council in developing school organisation proposals. These include:
- United Nations Convention on the Rights of the Child;
 - A living language: a language for living – Welsh Language Strategy 2012-2017
 - Welsh- medium Education Strategy;
 - One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy;
 - Child Poverty Strategy for Wales (issued February 2011 Information document number 95/2011), or any successor strategy;
 - Faith in Education.

13. In addition, when developing school organisation proposals, the local plans to which Council should have regard include the following:
- Local plans for economic or housing development;
 - Welsh in Education Strategic Plans (made under part 4 of the 2013 Act);
 - Children and Young People’s Plans (or successor plans)
 - 21st Century Schools – Capital Investment Programme and the relevant wave of investment.
14. Finally, the Council should have regard to the following Welsh Government Guidance on related matters:
- Learner Travel Operational Guidance²
 - Measuring the capacity of schools in Wales, Circular³.
15. Chapter 1 then lists a number of factors, which should be taken into account by relevant bodies, including the Council, when exercising their functions of preparing and publishing school organisation proposals or approving/determining them. These factors include:
- Quality and standards in education (looking at outcomes, provision, leadership and management) at the school which is the subject of the proposals, and at any other school or educational institution which is likely to be affected. The Code states that local authorities should place the interests of learners above all others. Where proposals involve the transfer of learners to alternative provision, there should normally be evidence that the alternative would deliver outcomes and offer

² Learner Travel Statutory Provision and Operational Guidance: 2014 - <http://gov.wales/docs/det/publications/140616-ltogg-en.pdf>

³ Measuring the capacity of schools in Wales, Circular - <https://gov.wales/docs/dcells/publications/111104measuringcapacityen.pdf>

provision at least equivalent to that which is currently available to those learners.

- The need for places and the impact on accessibility of Schools (whether alternative school based provision will have suitable capacity and provide accommodation of at least equivalent quality and is sufficient to meet existing demand and projected demand and the nature of journeys to alternative provision and resulting journey times for pupils, including SEN pupils. In particular, whether primary school pupils will have one way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour.
- Resources of education and other financial implications. This involves a consideration of a number of factors set out in the Code, including whether proposals ensure a fairer and more equitable distribution of funding between mainstream schools, what effect proposals will have on surplus provision, the costs of proposals (including additional transport costs), any projected net savings, any budget deficits of schools affected and whether the proceeds of sales of redundant sites remain in the education budget.

16. The Code also lists other general factors which should be taken into account, namely educational attainment, equality issues, charitable interests (paragraph 1.6). A list of specific factors in the consideration of school closures is at paragraph 1.7. This states that there is no presumption in favour or against the closure of any type of school. The case for closure should be robust and in the best interests of educational provision in the area. A Community Impact Assessment should be obtained. When considering whether closure is appropriate, special attention should be given to the matters set out on pg 12 of the Code, including :

- considerations of alternatives to closure, including multi-site schools, clustering/collaboration/federation with other schools
 - the overall effect of closure on the local community
 - how parent's and pupil's encouragement with the alternative school and any facilities it may offer could be supported
17. In addition to the usual considerations in relation to standards of provision, the Council should also consider
- whether proposals will improve standards of accommodation for pupils with SEN, including building accessibility;
 - how proposals will address any health, safety and welfare issues;
 - how proposals, where appropriate, will support increased inclusion; and
 - the impact of proposals on other SEN provision within the immediate and wider local authority area including out of county where appropriate
 - whether there is a need for a particular type of SEN provision within the area;
 - whether there is surplus SEN provision within the area;
 - whether SEN provision would be more effective or efficient if regional provision were made; and
 - the impact of proposals on the transportation of learners with SEN
18. The list of factors to be taken into account in approving/determining school organisation proposals is listed at paragraph 1.15.

Public Sector Equality Duty

19. The public sector equality duty (see section 149 of the Equality Act 2010) came in to force in April 2011. Public authorities like the Council are required, in carrying out their functions, to have due

regard to the need to three equality needs set out under s149 of the Equality Act 2010 to:

- eliminate discrimination (both direct and indirect discrimination), harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

20. Direct discrimination occurs if, because of a protected characteristic, a local authority treats a person less favourably than it treats or would treat others.

21. Indirect discrimination occurs if a local authority applies to a person a provision, criterion or practice, which is discriminatory in relation to a relevant protected characteristic of that person (“B”). A provision, criterion or practice is discriminatory if –

- The local authority applies, or would apply, it to persons with whom B does not share the characteristic,
- It puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it;
- It puts, or would put, B at that disadvantage, and
- The local authority cannot show it to be a proportionate means of achieving a legitimate aim.

22. In short, indirect discrimination would arise if a local authority applies the same provision, criterion or practice to everyone, but it puts those in a certain protected group at a “particular disadvantage” when compared with persons who are not in that

protected group. Even if a “particular disadvantage” arises, indirect discrimination does not arise if the provision, criterion or practice can be justified – i.e. if it is a proportionate means of achieving a legitimate aim. Members must pay due regard to any obvious risk of such discrimination arising in respect of the decision before them. These matters are examined in Appendix E and summarised in the Equality Impact Assessment section of the Cabinet report.

23. Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life.
24. The steps involved in meeting the needs of disabled persons include steps to take account of the persons’ disabilities.
25. Having due regard to ‘fostering good relations’ involves having due regard to the need to tackle prejudice and promote understanding.
26. Complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.
27. The equality duty arises where the Council is deciding how to exercise its statutory powers and duties under the 1996 Act and the 2013 Act. The Council’s duty under Section 149 of the Act is to have ‘due regard’ to the matters set out in relation to equalities when considering and making decisions in relation to its statutory duties under those Acts. Accordingly due regard to the need to eliminate discrimination, advance equality, and foster good

relations must form an integral part of the decision making process. Members must consider the effect that implementing a particular decision will have in relation to equality before making a decision. The council must have an adequate evidence base for its decision-making. This can be achieved by means including engagement with the public and interest groups, and by gathering details and statistics on those who use the schools currently school currently, and how the schools are used. A careful consideration of this assessment is one of the key ways in which members can show “due regard” to the relevant matters.

28. Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then adjustments should be made to avoid that effect (mitigation).
29. Members should be aware that the duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its public functions (which includes the functions relating to school reorganisations). “Due regard” means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. There must be a proper regard for the goals set out in s.149. At the same time, Members must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Improving the quality of education in the Council’s area, making schools more efficient, budgetary pressures and practical factors will often be important. The weight of these countervailing factors in the decision making process is a matter for members in the first instance.
30. The duty covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or

belief, sex and sexual orientation. However, section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to pupils in schools (see paragraph 1 of Schedule 18 to the 2010 Act).

31. The Council must also comply with the specific equality duties imposed by the Equality Act 2010 (Statutory Duties)(Wales) Regulations 2011, SI 2011/1064 (“the Regulations”), particularly regulation 8 (imposing specific duties to make arrangements for assessing the impact of its policies/practices and monitoring of the same).

Economic Duty

32. The Socio Economic Duty forms Part 1 of the Equality Act 2010; Welsh Government commenced the Duty on 31 March 2021. The Duty requires us, when taking strategic decisions, such as ‘deciding priorities and setting objectives’, to consider how their decisions might help to reduce the inequalities associated with socio economic disadvantage.
33. The aim of the Duty is to deliver better outcomes for those who experience socio economic disadvantage.
34. Socio-economic disadvantage can be disproportionate in both communities of interest and communities of place, leading to further inequality of outcome, which can be further exasperated when considering intersectionality.
 - Communities of interest - those who share one or more of the protected characteristics; who share an experience, for example, people who have experienced homelessness; who share an identity, for example, lone parents and carers.
 - Communities of place - people who are linked together because of where they reside, work, visit or otherwise spend a substantial portion of their time.

- Intersectionality – the way in which characteristics such as gender, race or class, can interact and produce unique and often multiple experiences and disadvantages in specific situations. One single form of discrimination cannot and should not be understood in isolation from one another.

Wellbeing of Future Generations (Wales) Act 2015

35. The Well-being of Future Generations Act 2015 (“the 2015 Act”) requires the Council to think about the long-term impact of their decisions, to work better with people, communities and each other and to prevent persistent problems such as poverty, health inequalities and climate change.
36. To make sure we are all working towards the same purpose, the 2015 Act puts in place seven well-being goals on the Council . The 2015 Act makes it clear the listed public bodies must work to achieve all of the goals, not just one or two, these being:
 - A prosperous Wales
 - A resilient Wales
 - A healthier Wales
 - A more equal Wales
 - A Wales of cohesive communities
 - A Wales of vibrant culture and Welsh Language
 - A globally responsible Wales
37. The 2015 Act imposes a duty on all public bodies in Wales to carry out “sustainable development”, defined as being, "The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." The action that a public body takes in carrying out sustainable development includes setting and publishing well-

being objectives, and taking all reasonable steps in exercising its functions to meet those objectives.

38. The 2015 Act sets out five ways of working needed for the Council to achieve the seven well-being goals, these being:
- The importance of balancing short –term needs with the needs to safeguard the ability to also meet long-term needs
 - Considering how the Council’s objectives impact upon each of the wellbeing goals listed above
 - The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the Council services
 - Acting in collaboration with other persons and organisations that could help the Council meet its wellbeing objectives
 - Acting to prevent problems occurring or getting worse.

Mae'r dudalen hon yn fwriadol wag

**This Statutory Notice is published by
Neath Port Talbot County Borough Council, Civic Centre, Port Talbot. SA13 1PJ**

NOTICE is given in accordance with Section 41 and 43 of the School Standards and Organisation Act (Wales) 2013 and the School Organisation Code that Neath Port Talbot County Borough Council (hereinafter referred to as “the Council”) having consulted such persons as required, propose to:

- Discontinue Alltwen Primary School, Alltwen Hill, Pontardawe, Swansea, SA8 3AB, a school currently maintained by the Council.
- Discontinue Godre’rgraig Primary School, Graig Road, Godre’rgraig, Ystalyfera, Swansea, SA9 2NY, a school currently maintained by the Council.
- Discontinue Llangiwg Primary School, New Road, Ynysmeudwy, Pontardawe, Swansea, SA8 4PJ, a school currently maintained by the Council.
- Establish a primary school for boys and girls aged 3-11 years a specialist Learning Support Centre for 16 primary age pupils with a statement of Autistic Spectrum Disorder at Ffordd Parc Ynysderw, Pontardawe, SA8 4EG. This school will be maintained by the Council.

The Council undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees, the Council’s response to these queries and the views of Estyn is available on the Council’s website under the Strategic School Improvement Programme reports page or via the link <https://www.npt.gov.uk/1890>

It is proposed to implement the proposal on **1st September 2025**.

Should the new school building not be available for occupation on 1st September 2025 the new school will be established in the existing buildings until the date upon which the new school building becomes available for occupation.

The proposed new school will be an English-medium, community primary school and include a specialist Learning Support Centre for 16 primary age pupils with a statement of Autistic Spectrum Disorder.

The Council will be the admission authority. It is not proposed that the admission arrangements to the new primary school will make any provision for selection by aptitude or ability.

Admission arrangements for pupils entering the specialist Learning Support Centre will be via a special admission panel of Neath Port Talbot County Borough Council.

The new primary school will provide for 630 full-time pupils and 140 part-time (70 a.m./70 p.m.). The specialist Learning Support Centre will provide for 16 full time primary pupil places.

The admission number for pupils aged 4 years at the new primary school in the first year in which the proposal has been implemented is 90.

Pupils admitted to the Learning Support Centre will be in addition to the admission number for the relevant age group at the school.

Admission to the new primary school will be via automatic transfer for full-time pupils on roll at the point of closure at Alltwen Primary School, Godre'rgraig Primary School and Llangiwig Primary School (subject to parental preference). All other admissions will be via the Council's School Admission Policy.

Admission arrangements for pupils entering the specialist Learning Support Centre will be via a special admission panel of Neath Port Talbot County Borough Council.

Transport arrangements will be in line with the Council's Home to School Travel Policy.

Within a period of 28 days after the date of publication of this proposal, that is to say by the **22nd May 2023**, any person may object to the proposal.

Objections should be sent to the Director of Education, Leisure and Lifelong Learning (for attention of the Strategic School Improvement Programme team) at Civic Centre Port Talbot. SA13 1PJ or e-mailed to ssip@npt.gov.uk

Signed:



Andrew Thomas, Director of Education, Leisure & Lifelong Learning

Dated: 25th April 2023

Explanatory Notes:

(This note does not form part of the Notice but is offered by way of explanation)

- (i) It is intended that the three schools will all close on 31st August 2025 and as from 1st September 2025, full-time pupils attending Alltwen, Godre'rgraig and Llangiwig primary schools will, at the point of closure, transfer to the new primary school to be established at Ffordd Parc Ynysderw, Pontardawe, SA8 4EG (subject to any parental preference). Prospective pupils (including nursery pupils transferring to full-time education) will need to apply for a place at the new primary school in line with the Council's Admission Policy.

- (ii) It is intended that the new school will open in a new building located at Ffordd Parc Ynysderw, Pontardawe, SA8 4EG on 1st September 2025. If there is a delay in the new school build and occupation of the new building is not possible on that date the new school will be established in the existing buildings until such time that the new school build is ready and available for occupation.
- (iii)** The reasons for the proposal are set out in the consultation document which is available on the Council's website under the Strategic School Improvement Programme consultation page or via the link: <https://www.npt.gov.uk/1891>
- (iv) The Authority's School Transport policy is available from the Council's website: www.npt.gov.uk or from the Civic Centre Port Talbot, SA13 1PJ.
- (v) Hard copies or alternative versions of all documentation may be obtained upon request from the Strategic School Improvement Team, Education Department, 2nd Floor Port Talbot Civic Centre, Port Talbot.

Mae'r dudalen hon yn fwriadol wag