



## **Y CABINET**

**YN SYTH AR ÔL  
CYFARFOD AR Y CYD Y CABINET/ PWYLLGOR CRAFFU ADDYSG,  
SGILIAU A HAMDDEN  
DYDD MERCHER 16 MEHEFIN 2021**

**O BELL DRWY TEAMS**

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

### **Rhan 1**

1. Penodi Cadeirydd
2. Croeso a galw'r rhestr
3. Cyhoeddiad (au) y Cadeirydd
4. Datganiadau o fuddiannau
5. Rhaglen Strategol Gwella Ysgolion - Cynnig i sefydlu ysgol cyfrwng Saesneg 3-11 oed i ddisodli ysgolion cynradd Allt-wen, Godre'r-graig a Llangiwg y bydd pob un ohonynt yn cau ar 31 Awst 2024 (*Tudalennau 3 - 38*)
6. Atodiad A - Adroddiad Ymgynghori (*Tudalennau 39 - 102*)
7. Atodiad B - Dogfen Ymgynghori (*Tudalennau 103 - 154*)
8. Atodiad C - Adroddiad y Cabinet 21.10.20 (*Tudalennau 155 - 200*)
9. Atodiad Ch - Adroddiad y Cabinet 24.09.2008 (*Tudalennau 201 - 216*)

10. Atodiad D - Asesiad Effaith yr Iaith Gymraeg (*Tudalennau 217 - 240*)
11. Atodiad Dd - Asesiad Effaith Integredig (*Tudalennau 241 - 306*)
12. Atodiad E - Asesiad Risg (*Tudalennau 307 - 316*)
13. Atodiad F - Asesiad Effaith Cymunedol (*Tudalennau 317 - 340*)
14. Atodiad Ff - Hysbysiad Statudol Drafft (*Tudalennau 341 - 344*)
15. Atodiad G - Goblygiadau Cyfreithiol (*Tudalennau 345 - 358*)
16. Eitemau brys  
Unrhyw eitemau brys (boed yn gyhoeddus neu wedi'u heithrio) yn ôl disgresiwn y Cadeirydd yn unol ag Adran 100b (4)(B) o Ddeddf Llywodraeth Leol 1972.

**K.Jones**  
**Prif Weithredwr**

**Canolfan Ddinesig**  
**Port Talbot**

**Dydd Iau, 10 Mehefin 2021**

**Aelodau'r Y Cabinet:**

Y Cynghorwyr C.Clement-Williams, D.Jones, E.V.Latham,  
A.R.Lockyer, P.A.Rees, P.D.Richards, A.Wingrave, L.Jones a/ac  
M.Harvey

## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

**Cabinet**  
**16<sup>th</sup> June 2021**

### **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 ALL OF WHICH WILL BE DISCONTINUED 31<sup>ST</sup> AUGUST 2024**

#### **Purpose of report**

1. To obtain Cabinet 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 <sup>1</sup>on 31<sup>st</sup> August 2024.
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.
3. This Cabinet report needs to be read in conjunction with the consultation report (appendix A), the consultation documents (appendix B) and the Cabinet report of 20<sup>th</sup> October 2021 (appendix C)

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

## Executive summary

4. 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.
5. Neath Port Talbot 's 21<sup>st</sup> Century Schools Band B Strategic Outline Plan included a proposal for a new build 3-16 middle school for the area, however following informal discussions with stakeholders it was decided that the scheme should be amended.
6. It is proposed therefore 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 Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary, all of which would close on 31<sup>st</sup> August 2024. 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.
7. The new build will be funded jointly from Welsh Government 21<sup>st</sup> Century School Programme capital grant monies and from the Council's prudential borrowing capacity. Welsh Government 21<sup>st</sup> Century Schools Programme capital grant funding has been approved, in principle.
8. At its meeting of 20<sup>th</sup> October 2020 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 Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary, all of which would be discontinued on 31<sup>st</sup> August 2024.
9. 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 28<sup>th</sup> May 2021.

## Background

10. 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 21<sup>st</sup> 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.
11. 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.
12. Following consideration of the **Strategic School Improvement Programme Principles Paper: September 2008**, attached as appendix J , the Council 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 Proposal

13. It is proposed 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 Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary, all of which would be discontinued on 31st August 2024.
14. 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 would 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. Matters concerning the proposed new swimming pool will be subject to a separate report to be considered by Members.

15. 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.
16. 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.
17. 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 .
18. Additionally the new school will provide support for pupils through the establishment of an LSC for 16 pupils with a statement of Autistic Spectrum Disorder (ASD). The LSC 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.
19. The new build will be funded jointly from Welsh Government 21st century School Programme capital grant monies and from the Council's prudential borrowing capacity.
20. The scheme is planned to 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.
21. 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 3-16 and for wider community use.

22. 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**

23. 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.
24. Consultation on this proposal commenced on 3<sup>rd</sup> November 2020 with comments invited until 19<sup>th</sup> January 2021. 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.
25. A pupil version of the consultation document was also made available to the schools to distribute as appropriate.
26. 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.
27. During the consultation period Welsh Government imposed both local and national lockdown periods due to the Covid 19 pandemic. Restrictions meant that it was not possible to hold face to face meetings during consultation, however in every other respect the consultation proceeded as expected despite imposed restrictions. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments. Additionally officers were available to answer queries by email and telephone should consultees require more information to enable them to respond to the consultation, and a 'Frequently Asked Questions' section

was also added to the Council's website to address more general queries on the proposal.

## **Pupil Consultation meetings**

28. During the consultation period and before schools moved to online learning on 15th December 2020, face to face meetings were held with pupils of Alltwen, Godre'rgraig and Llangiwg primary schools to gather their views on the proposal. Arrangements allowing the meetings to take place were managed by the schools, in line with Welsh Government's Operational guidance for schools and settings

Meetings were held as follows

Alltwen	2nd December 2020
Llangiwg	3rd December 2020
Godre'rgraig	4th December 2020

29. Pupils at all three schools gave their views on their current schools and voiced concerns over moving to a new school. 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	161, of which 14 support the proposal
Emails	26, 1 in support
Paper forms/letter	47, 6 in support
Online petition	413 signatures,

In total 234 responses (not counting petition)

31. The petition is headed '  
*We, the People of Pontardawe, Alltwen, Llangiwg, Cilmaengwyn, Godre'rgraig and Ystalyfera, strongly disagree with the proposal to build a new, large 3-11 school at Parc Ynysderw. We are strongly against the plan to close Godre'rgraig, Alltwen and Llangiwg Primary Schools. We petition the SSIP to invest in our existing schools, and to preserve the many benefits of our children's small smaller school environment rather than spend millions of pound of public money investing in an unwanted and unnecessary new build school. The location chosen*



*discriminates against the communities in the north of the Swansea Valley. Village schools are the centre point and lifeblood of our communities. Children need to feel important members of a small community. This will be lost in the enormity of a school environment serving more than 700 pupils. Important safeguarding opportunities will be missed. We do not believe that our communities' children will benefit from this development.*

*In addition, Parc Ynysderw cannot support the additional traffic this will create in an already congested area. Our children's lives will be put at risk. There have already been incidents in which Cwmtawe children have been knocked down. The consultation is flawed and should be reviewed because it does not contain accurate information about all of the relative costs involved.*

32. The petition is signed by 413 individuals from a wide geographical area, some from outside the UK, all of who oppose the proposal. 50 respondents also made a comments on the proposal, which are considered within the consultation report.

33. A count of the responses is shown below.

Table 1

Pupils	0	Pupils' relatives	4
Parents/Carers	118	Members of the Community	61
Staff	8	Others	24
Governors	2	Unspecified	6

34. Additionally the following responses were also received.

Table 2

Governing Bodies x3 (tween Primary School, YGG Trebannws and YGG Pontardawe)	Trade Unions x 1
Pontardawe Town Council	Councillor Chris Jones Town Councillor Andrew Nicholson
Community Councils x 2 (Cilybebyll and Ystalyfera)	Jeremy Miles Member for the Senedd of Neath Dr David Lloyd Member for the Senedd South Wales West
ESTYN	

35. A report on the consultation document has also been submitted by a member of the community. The report comprises of 3 parts, the first pointing out the perceived flaws in the consultation document, the second suggesting alternative options and the third the results of a survey which has asked various questions broadly relating to the proposal and to schools more generally.
36. Prior to the commencement of the formal consultation period queries were received from local Councillors and Tegwch.
37. Additionally officers received a request from Members to undertake further investigations into the feasibility of retaining a school in the Godre'rgraig/Ystalyfera community. This has been undertaken and details are contained in the Consultation report pg. 49 and 50.
38. The consultation period ended on January 19<sup>th</sup> 2021. Further to this correspondence has been received which raises additional queries and concerns relating on the whole to matters around the reasons for the relocation of Godre'rgraig Primary school from its Graig Road site. For clarity, these queries and concerns are responded to in the section below relating to Godre'rgraig Primary School, Graig Road site.
39. Copies of all written responses have been made available to Members prior to the meeting of the Council's Cabinet at which the proposal and consultation report will be considered.
40. 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.
41. 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 response**

42. Comments received relating to the proposal include broadly relating to the following

- Education including quality of education, pupil wellbeing, size of school, staffing, and Additional Learning Needs,
  - Proposed site and traffic management
  - Transport and travel,
  - Wider community including leisure amenities, childcare, the impact on Welsh language development and the impact on other schools
  - Consultation process
  - Well-being of Future Generations
  - Backlog maintenance
  - Finance and pupil numbers
  - Godre'rgraig Primary school, Graig Road site
  - Alternative options
43. A summary of officer responses is set out under each of these headings. Members should also read the fuller responses set out in the consultation report.

– ***Education, pupil wellbeing, size of school, staffing and Additional Learning Needs***

44. Comments received relate to the quality of education and the concerns that this could not be improved in a larger school, that pupil well-being would suffer and that places for pupils with Additional Learning Needs (ALN) in the new school would be insufficient to accommodate pupils currently in the schools which the proposed new school would replace.
45. The proposed new school will build on and develop the progress made by the existing 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 state that ‘this proposal is likely to at the least maintain the present provision for English medium primary education in the area’.
46. There is no reason to assume that pupil well-being would suffer 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.
47. 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.

48. 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. The LSC will be managed by the school and be under the school's governance. However it will be a facility recognised by the Council as reserved for pupils with ALN/SEN and pupils admitted to the proposed LSC would be in addition to the admission number of the school. Children attending the proposed new school will not automatically be allocated a place at the LSC even if they have statement of SEN. Admission to the provision would be via a special admission panel of the Council and specific entry and exit criteria will apply, as detailed in the policy document 'Entry/Exit Criteria for Specialist Provision Catering for Communication and Interaction Difficulties- B: Autism Spectrum Disorders'.
49. Additional commentary relating to education can be found on pages 19-25 of the Consultation Report (appendix A)

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

50. Concerns have been raised relating to the proposed site of the new school and the possibility of increased traffic in the area.
51. 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.
52. 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.

53. Additional commentary relating to the proposed site and traffic management can be found on pages 26 of the Consultation Report (appendix A)

– ***Transport and Travel***

54. Comments have been received which suggest that pupils will struggle to attend the proposed new school due to its location. It is also stated that there are no safe walking routes and that nursery pupils will be deprived of the chance of early education.

55. 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.

56. 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 schools suggests that approximately 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 fall within reasonable limits for primary age pupils. The School Organisation Code states that local authorities should consider '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'. Journey times for pupils living within the catchment area of the proposed new school are estimated to be no more than 20 minutes. drive

57. 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.

58. It is accepted that where some schools are further away than the 2 mile travel distance for primary aged pupils, there is a likelihood that travel assistance will need to be considered. When considering pupil travel, reference must always be made to guidance under the Learner Travel 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.

59. 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 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.
60. These arrangements will be available to parents of nursery aged pupils travelling to the new school and are no less favourable than those applying to other parents of nursery age children across the County Borough.
61. Comments have also been received which query whether extra transport will be provided so that pupils will be able to access breakfast club and extra-curricular provision
62. Extra transport for pupils to access breakfast club and after school activities will not be provided. 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. Officer support in the form of identifying good practice elsewhere or facilitating discussions with relevant parties, 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.
63. 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 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.

64. Additional commentary relating to transport and travel can be found on pages 27-29 of the Consultation Report (appendix A)

– **Wider Community**

65. Concerns have been raised by consultees that the new school will damage the communities of Alltwen, Godre'rgraig and Llangiwg through the closure of the local schools situated there. There is no evidence 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 existing schools and so these activities could continue. 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.
66. 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 progress. Following reviews of school reorganisation in other areas of the county borough it has been the case that community interaction has not ended and that pupils continue to take part in community events.
67. Additional commentary relating to the wider community can be found on pages 32-34 of the Consultation Report (Appendix A)
68. 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 however that the funding for the pool and the school has been secured as part of the 21<sup>st</sup> Century schools 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.
69. 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. Backlog maintenance costs for the current pool are estimated at £1,221,783.

70. It is anticipated that the proposed new pool will be housed in a new build adjoining the current leisure centre, meaning that some remodelling of the leisure centre will be required. However current facilities, including the bowls hall will not be affected or lost as a result of this proposal.
71. Additional commentary relating to leisure amenities can be found on pages 34-35 of the Consultation Report (Appendix A)
72. 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 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 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.
73. Additional commentary relating to childcare can be found on pages 35-36 of the Consultation Report (appendix A)
74. A Welsh Language Impact Assessment (appendix E) has been carried out by an independent consultant which recognises that while this proposal relates to the establishment of an English-medium school there may be direct or indirect impacts on the development of the Welsh language in the area.
75. The impact assessment states 'A common theme in the consultation comments was that a new English-medium school would negatively impact on the Welsh-medium schools in the locality. However, data/evidence held by the Council indicates that new build English-



medium schools in Neath Port Talbot, that have opened in the last 10 years, have had no significant impact on nearby Welsh-medium schools which suggests there is low if any impact on Welsh Medium schools in the locality with the proposal.'

76. Additional commentary relating to the impact on Welsh language development can be found on page 36 of the Consultation report (appendix A).
77. Comments have been received which state that this proposal will negatively impact on other schools, both English and Welsh- medium.
78. It is the case that English-medium schools Rhos Primary and Rhydyfro Primary could have been considered for inclusion in this proposal, however both were ruled out for reasons including building condition and additional new build housing developments.
79. It has also been stated that a new build school in the Parc Ynysderw area will attract pupils who would otherwise have attended local Welsh-medium schools. Previous new build English-medium school projects in Neath Port Talbot have not shown that this has been the case and data gathered on pupil numbers across the local authority demonstrate that in fact Welsh-medium pupil numbers have actually increased in areas where new build English-medium schools have been established.
80. Additional commentary relating to possible impacts on other schools can be found on pages 30-32 of the Consultation Report (appendix A)

– ***Consultation process***

81. Comments have been received which express the view that this consultation process has not provided consultees with sufficient information to enable an intelligent consideration and response, and that it is an unlawful process in that it has not followed proper policies and procedures, and has not complied with fairness and equality rules. This consultation has followed the procedures set down by the Welsh Government under the School Standards and Organisation (Wales) Act 2013 and School Organisation Code.
82. Throughout the consultation period the consultation document and associated papers were available on the Council's website located on the Council's Strategic School Improvement Programme webpage.

83. Responses to the consultation were submitted by email, post and via the Councils 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.
84. During the consultation period Welsh Government imposed both local and national lockdown periods due to the Covid 19 pandemic. Restrictions meant that it was not possible to hold face to face meetings during consultation, however in every other respect the consultation proceeded as expected despite imposed restrictions. The Code specifies that there is no requirement to hold consultation meetings. Meetings are not a substitute for written responses – where meetings have been held in the past attendees have still been urged to respond in writing to the consultation, as notes taken at meetings do not constitute formal responses.
85. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments. Additionally officers were available to answer queries by email and telephone should consultees require more information to enable them to respond to the consultation, and a 'Frequently Asked Questions' section was also added to the Council's website to address more general queries on the proposal.
86. Despite Covid 19 this consultation has been conducted following Welsh Government guidelines and has adhered fully to the Code. In some aspects this consultation process has given consultees greater opportunities to engage as the option to respond online has not been used previously.
87. Comments have been received which assert that the Council has considered only the preferred option. 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.
88. 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 will conscientiously take into account the responses before finalising its decision.

89. Additional commentary relating to the consultation process can be found on pages 37-39 of the Consultation Report (appendix A)

– ***Well-being of Future Generations***

90. 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.

91. 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.

92. Commentary relating to the Well-being of Future Generations can be found on page 39 of the Consultation Report (appendix A)

– ***Backlog maintenance***

93. 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 the condition report for Pontardawe Swimming Pool was undertaken by an independent external consultant.

94. 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 don't allow for improving or upgrading which would provide schools with better facilities for teaching and learning.
95. 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.
96. Additional commentary relating to backlog maintenance can be found on pages 29-30 of the Consultation Report (appendix A)

– ***Finance and Pupil Numbers***

97. 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.
98. Additional commentary relating to finance can be found on pages 37 of the Consultation Report (appendix A)
99. 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.
100. The document contains actual pupil numbers in the three schools, a five year forecast of the combined pupil numbers in the schools and a prediction of the pupil numbers which the new build school size is based upon.
101. 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.

102. 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.
103. Additional commentary relating to pupil numbers can be found on pages 39-42 of the Consultation Report (appendix A).

– ***Godre’rgraig Primary school and the Graig Road site***

104. Numerous consultees have made reference to Godre’rgraig Primary School’s temporary relocation from Graig Road, Godre’rgraig to land adjacent to Cwmtawe Community School. Some consultees said that information about the reasons for the relocation have not been included in the consultation document and that this information was needed to allow for informed responses.
105. Further comments suggest that the relocation of the school to the temporary site due to concerns about the quarry spoil tip above the school was a deliberate act to facilitate permanent closure.
106. Officers believe these criticisms to be incorrect. Before considering them the background is set out.
- Background**
107. The background is that this school reorganisation proposal is being brought forward under the Council’s Strategic School Improvement Programme principles and aims, as noted in para.13 above and not directly as result of the report on the quarry spoil. Permission to develop a scheme for a new 21<sup>st</sup> Century school in the Swansea Valley was approved by Members in their Cabinet meeting of 4<sup>th</sup> October 2017 and Godre’rgraig Primary was included in this scheme at that time.
108. The process of developing a scheme from the initial outline plan to a proposal which is considered suitable to bring forward for consultation is complex and will involve exploring many configurations before

embarking on the one which officers consider to be the best option. The proposal is then tested through a rigorous consultation process, which follows the requirements set out in the School Organisation Code and recognises the fact that the consultation process should be undertaken when proposals are still at a formative stage.

109. As to the quarry spoil issue, in May 2019 a desktop survey was commissioned to gather further information on the condition of the mountain above the school, due to previous concerns relating to a landslide at Panteg situated just a little way north of the school.
110. Results from this work identified a risk to the mountain above the school and further urgent investigations were commissioned. In July 2019 the subsequent report identified a medium level risk and as a result the school staff and pupils were temporarily relocated from Graig Road, Godre'rgrraig to Parc Ynysderw, Pontardawe. (For clarity this relocation was not a school closure – no school can be closed without the necessary statutory processes being undertaken, as is clearly explained in the School Organisation Code, November 2013 and revised Code 2018.)
111. It is important to note that this consultation is not about whether Godre'rgrraig 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'rgrraig Primary is one. Whether the location of the school remained at Graig Road, Godre'rgrraig or in its temporary location at Parc Ynysderw the current consultation would still be undertaken in the same way and the principles for embarking on consultation would remain unchanged.
112. 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 applicable to pupils of Godre'rgrraig as for pupils of Alltwen and Llangiwig. Specifically the proposed new school will create more favourable conditions for teaching and learning. It will have spacious, light and airy classrooms, with access to a range of high quality and appropriate spaces for social interaction
113. The new buildings will facilitate easier delivery of the new curriculum for Wales, and will provide greater opportunities for an inclusive, skill based approach to teaching and learning.

114. With a new school comes more choices and improved opportunities because there is more space and better facilities. The 2015 report, 'Clever Classrooms', found that well designed schools can significantly boost children's academic performance in reading, writing and maths.
115. The new school will ensure that pupils have adaptable ICT facilities, suitable for learning in the 21st century. Mobile technology will be integrated with a sound pedagogical base to provide pupils with enhanced learning experiences, equipping them with the key skills and motivation needed to raise standards.
116. The proposal which has been consulted upon therefore is in the opinion of officers considered to be the best option for all of the schools, including for pupils currently attending Godre'rgraig Primary.
117. At this point in time it is correct to say that Godre'rgraig Primary school staff and pupils cannot return to their original location. The most recent report on the quarry spoil tip investigation above the school has found that the medium level risk remains, and it is therefore deemed unsafe for pupils and staff to return to the site at the current time. A feasibility study to investigate design options and produce budget estimates for works associated with the remediation has been commissioned. However, even if mitigation work is possible and staff and pupils are able to safely return to the Graig Road site, the case remains that substantial work to address both backlog maintenance issues and remodelling to deliver 21st century school provision for the future will still be required. A new purpose built school with state of the art facilities will provide better opportunities for teaching and learning than the Graig Road site, even if remodelling of the buildings is affordable and achievable within the confines of the site. Should further studies indicate that it is safe for pupils to return, either with mitigation measures put in place or for other reasons, then the stated benefits of including the school in this proposal would not change.
118. However the issue of the risk to the school community through the quarry spoil is an additional factor to be considered, as should further feasibility studies identify that the risks remain then the pupils will need to be educated in a permanent location elsewhere, giving a further reason for the school to be included in this proposal from an early stage, allowing opportunity for better planning and stakeholder involvement in the proposed new school.

119. The consultation period ended on January 19<sup>th</sup> 2021. Further to this correspondence has been received which raises additional queries and concerns relating on the whole to matters around the reasons for the relocation of Godre'rgraig Primary school from its Graig Road site. Against that background, the criticism referred to at paragraph 103-104 are now considered.

120. Some consultees said that insufficient information was given about the Godre'rgraig site and the quarry spoil risk. This was mentioned in the consultation document (page 8), as follows:-

*"In July 2019 Godre'rgraig Primary was relocated temporarily from Godre'rgraig to Parc Ynysderw, adjacent to Cwmtawe Community School after geological experts found there was a potential landslide risk to the school's playground.*

*Earth Science Partnership (ESP), the experts commissioned by Neath Port Talbot Council, reported a medium level risk from a quarry spoil tip near the school after the Council asked them to extend their extensive landslide risk investigation work carried out in nearby Panteg, Ystalyfera.*

*Further work reported in 2020 has revealed that the risk remains and that it would be unsafe for staff and pupils to return to the school. The new build school provides the opportunity for Godre'rgraig Primary pupils to be permanently relocated and to benefit from the 21st century facilities provided."*

32. This was sufficient information to provide in the consultation. As stated, the issue in the consultation was not about the temporary siting of Godre'rgraig Primary School, and whether and how it might be feasible to return to the Graig Road site. It was about the proposal for a new 3-11 primary school to replace three primary schools, including Godgre'rgraig. The merits of that proposal exist independently of the issue of the Graig Road site.

121. Godre'rgraig Primary School is a part of this proposal because its inclusion meets the recognised principles of the Strategic School Improvement Programme. However the issue of the risk to the school community through the quarry spoil is an additional factor to be considered, as should further feasibility studies identify that the risks remain then the pupils will need to be educated in a permanent location elsewhere, giving a further reason for the school to be included in this



proposal from an early stage, allowing opportunity for better planning and stakeholder involvement in the proposed new school.

122. Some consultees also said that the location chosen for the temporary siting of Godre'rgraig primary School means that the proposal for the new 3-11 primary school would inevitably progress, or that it was a deliberate act to ensure that Godre'rgraig Primary School would be discontinued and the new 3-11 primary school would be approved. This is not correct.
123. The location of the temporary school buildings at Parc Ynysderw was selected after a long list of suggestions had been drawn up, moving to a shortlist of 4 possible locations which then were further investigated for suitability. The criteria for selection included proximity to the Graig Road site, linkages to services and facilities, and importantly expediency and speed of delivery, given the aim to deliver a suitable operational facility in time for the start of school term in September 2019.
124. The option chosen after careful consideration, was both available for immediate use, capable of accommodating the development at short notice, and suitable in terms of highway and pedestrian access, ensuring the pupils and staff could be accommodated safely, with minimal disruption. The site also benefitted from linkages with the existing school at this site, such as catering/ dining, and outdoor facilities.
125. It was also the case that Godre'rgraig Pupils transfer to Cwmtawe Community School in Year 7 and strong links already existed between the two schools. This was seen as apposite for the staff, pupils and for parents, many of whom were already familiar with the location and the school itself, and so would ease the transition from Graig Road to the new location.
126. It should be noted that to date no decision has been made on any matter other than to allow a consultation to take place on the scheme that officers believe is the best option for pupils in the three current schools. The Consultation report will be considered by Members before any further decision is taken on this proposal and if Members determine that this proposal is not the best option then they will recommend that the proposal is either amended or stopped completely. The decision will be taken with the knowledge that the results of the consultation must be conscientiously considered and that the stringent requirements of the School Standards Code 2018 in respect of school reorganisation proposals have been meticulously adhered to.

127. Last, since the closure of the consultation period on January 19<sup>th</sup> 2021, the Council has received a number of items of correspondence raising additional queries and concerns about the reasons for the relocation of Godre'rgraig Primary School from its Graig Road site. This arose from the fact that on 5th March 2021, a recording was placed on social media by a local campaign group opposed to the reorganisation proposal. The recording is an extract of a meeting of the Pontardawe' Labour Group. The former Leader of Council (Cllr Rob Jones), Cllr Jones discussed a number of matters surrounding school reorganisation and his comments include "If I had my way, all schools would be 3-16".
128. Resulting correspondence has suggested that this mean that he prejudged the proposal for the 3-11 primary school at Pontardawe. It is not clear why this is stated, since the proposal is not for a school from 3-16. However, as a precautionary measure, Cllr Jones has taken no further part in decision making in relation to the proposal.
129. Additional commentary relating to Godre'rgraig Primary School and the Graig Road site can be found on pages 42-43 of the Consultation Report (appendix A).

– ***Alternative options***

130. Consultees have responded with alternative suggestions which are responded to in the Consultation Report pages 44- 52(attached as appendix A)

**Impact on special needs education provision**

131. There are no specialist units for children with statements of special educational needs at either of the three schools, i.e. provision recognised by the Council as reserved for pupils with SEN. Pupils with additional learning needs, including children with statements of special educational needs, are supported in a mainstream setting with appropriate funding for this purpose. The new school will continue to offer this level of support.
132. 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. The data also shows increasing demand for specialist support at primary age for pupils in NPT with ASD.

133. Pupils attending the proposed LSC provision within the new school will 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 will be available to share with mainstream staff and, as such, will indirectly benefit SEN provision at the new school.

134. It is also envisaged that the LSC provision will 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.

## Financial impact

135. The cost of the new build is estimated at c. £22,705,000 apportioned as per table 6 below.

Table 3

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

136. Welsh Government 21<sup>st</sup> Century Schools Programme capital grant funding has been approved

137. Combined backlog maintenance and accessibility costs for the existing schools amounts to circa. £2m 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. Additionally backlog maintenance costs for the current pool amounting to £1,221,783 would also be removed by this proposal.

138. 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.

139. Most of the revenue budget allocation to Alltwen, Godre'rgraig and Llangiwg Primary schools is generated by pupil numbers. Similarly, the new primary school's budget will be based mainly on the combined pupil roll. Savings will occur 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 effective management of its education budget and promotes the more equitable distribution of funding across local schools.

140. 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.
141. Additional recurring revenue costs associated with this proposal such as potential additional transport costs may be incurred. Similarly there will be revenue efficiency savings associated with this proposal.
142. Based on the funding delegated to schools in the 2020/2021 financial year, per pupil funding for Alltwen Primary school is £3,685 whilst for Llangiwig Primary school per pupil funding is £3,965 and for Godre'rgraig Primary school £3,886. This compares with the average for NPT primary schools at £3,941.
143. Prior to the new primary school opening on 1<sup>st</sup> September 2024 Alltwen, Godre'rgraig and Llangiwig primary schools will receive their annual school budget shares for the 5/12<sup>ths</sup> of the financial year 2023/2024. When the new school opens on 1<sup>st</sup> September 2024 it will receive a budget share based on the number of pupils on roll at that time.

## **Integrated Impact Assessment**

144. An Integrated impact assessment, attached at appendix D, has been undertaken. The proposal would create a new build, 21<sup>st</sup> 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.
145. 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.

146. With the implementation of mitigating actions the proposal should have at least a neutral impact on the Welsh language and biodiversity.
147. The Wellbeing of Future generations has been considered and the proposal directly supports the Council's wellbeing objectives.
148. Members are reminded that in response to the Well-being of Future Generations (Wales) Act 2015 the Council has set three 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'.
149. 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 1 – 'to improve the wellbeing of children and young people' through the provision of a 21st century school for current and future generations of primary aged pupils.
150. Through creating facilities that can be used by the community the proposal also supports wellbeing objective 2 – 'to improve the wellbeing of all adults who live in the county borough'.
151. Wellbeing objective 3 'to develop the local economy and environment so that the well-being of people can be improved' is also directly relevant to this proposal. To obtain WG approval of the business plan involves ensuring 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.

## **Welsh in Education Strategic Plan**

152. The Council recognises that language and culture are essential parts of an individual's identity and is committed to promoting and celebrating the Welsh language and culture in a pro-active and inclusive way. The Council's Welsh in Education Strategic Plan (WESP) details how it

intends to support and further develop Welsh language education in schools.

153. WESP objective ' To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner' is of particular relevance to this proposal.
154. Alltwen, Godre'rgraig and Llangiwg primary schools teach Welsh as a second language and this will also be the case for the new school. 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. Currently 25% 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.
155. The Swansea Valley area is a linguistically significant area as it contains the highest number and percentages of Welsh speakers in Neath Port Talbot, and is amongst the highest in Wales as a whole.
156. Primary education through the medium of Welsh is available at Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gynradd Gymraeg Trebannws. Additionally Ysgol Gymraeg Ystalyfera –Bro Dur, which is approximately 5 miles from the proposed site, provides all through 3-19 education through the medium of Welsh.
157. Significant investment has taken place at Ysgol Gymraeg Ystalyfera – Bro Dur through projects in both Band A (circ. £17.5m) and Band B (circ. £9m) of the 21st Century Schools Capital Funding Programme.
158. In addition funding of £1.6m has been secured to improve provision at Ysgol Gynradd Gymraeg Pontardawe, including extended and enhanced childcare and Foundation Phase facilities. Work is expected to be completed in 2021.
159. A Welsh Language Impact Assessment has been undertaken by an independent consultant. This has concluded that the proposal will have a positive impact on people's opportunities to use the Welsh language and a neutral impact on treating the Welsh and English languages equally.

The Welsh Language Impact Assessment is included as Appendix E to this document.

## **Workforce impacts**

### **– School staff**

160. The proposal will mean changes that impact on the employment of school staff as the existing schools will be discontinued on 31<sup>st</sup> August 2024. 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.
161. A temporary governing body will be established before the opening of the new 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.
162. The new primary school will open on 1<sup>st</sup> September 2024 and school staff will be employed by the new governing body for the primary school (albeit appointed by the temporary governing body).
163. 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.

### **– Centrally employed staff**

164. 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**

165. 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**

166. Members are referred to appendix F which sets out in detail the relevant legislation and legal implications relating to a decision on this proposal.
167. 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.
168. 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.
169. 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.
170. The management of staff affected by the proposal will follow the relevant school policy and procedure requirements.
171. The legislation referred to above is available using the electronic links in the section on background papers, below.

## **Community Impact assessment**

172. 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.

173. The Community Impact Assessment 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 interaction between the community and the pupils 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 for example Pontardawe Library and Yr Hwb already work with all three schools and there is no reason why this couldn't continue, or even be enhanced under this proposal as working with one school management team should prove to be easier than working with three separate management teams. .
174. There is general perceived apprehension about the proposal to establish the new 21<sup>st</sup> Century 3-11, English- medium school at Parc Ynysderw. There is a view that the proposal may be detrimental or damaging to the three communities under review.
175. Should this proposal be implemented then the proposed new school with its additional facilities will be available for use by all the communities in its extended catchment area. Additionally the proposal includes the provision 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.
176. Whereas the need to understand and mitigate the impact of a school reorganisation proposal on a community is a right and proper consideration, the Code states that in determining school organisation proposals the Council should place the interest of learners above all others.
177. The community impact assessment is attached to this report as appendix H.

### **Fields in Trust**

178. The Council hold freehold title to the land required for the proposed new school and swimming pool part of which is leased to Parc Ynysderw Sports Association.

179. The Sports Association has agreed to enter into an Option agreement allowing for the surrender of the land required and consent for the drainage improvement works to the retained underutilised pitch if and when the proposal proceeds, legal formalities for which should be completed shortly.
180. 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 for the proposal. Fields in Trust have advised the Council that it is happy to consider releasing the land required and positive discussions are ongoing to agree the location and extent of replacement land to be provided in exchange in line with its aims and objectives. It is anticipated that the Council will submit its formal application shortly and it is hoped that formal approval will be forthcoming as soon as possible
181. Funding for drainage works, if required, 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 trustees are in full agreement with the proposal. The playing fields at Parc Ynysderw are one of 471 King George Fields established as a memorial to King George V.

## **Risk management**

182. A risk assessment has been carried out under the Council's Risk Management Policy 2018.
183. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.
184. 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 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
- Welsh language not developed further
- discrimination against protected characteristics
- loss of community facilities
- increased governance and staff responsibilities

185. 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
- providing additional purpose built facility for pupils aged 3-11 with Autistic Spectrum Disorder
- pupils accessing a wider range of staff expertise
- 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

186. The benefits of implementing the proposal outweigh 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.

187. The full risk assessment is attached to this report as appendix G.

## **Recommendation**

188. It is recommended that giving due regard to the responses to consultation, the integrated 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'rgraig Primary and Llangiwg Primary, all of which will be discontinued on 31<sup>st</sup> August 2024.

(b) The proposed date of implementation to be 1<sup>st</sup> September 2024.

(c) Notice of the proposal to be published on 17<sup>th</sup> June 2021, 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**

189. This decision is necessary to comply with the formal publication requirements of the School Organisation Code and associated legislation. A draft statutory notice is attached as appendix I. 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**

190. The decision is proposed for implementation after the 3-day call-in period.

## **Appendices**

Appendix A: Consultation report

Appendix B: Consultation document

Appendix C: Education, Skills and Culture Cabinet Board report

Appendix D: Integrated Impact Assessment

Appendix E: Welsh language impact assessment

Appendix F: Legal implications  
Appendix G: Risk assessment  
Appendix H: Community impact assessment  
Appendix I: Draft statutory notice  
Appendix J: Principles Paper September 2008

## List of background papers

- a. Cabinet Report:  
<http://moderngov.npt.gov.uk/ieListDocuments.aspx?Cid=158&MId=7426&Ver=4>
- 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. Welsh Government - School Organisation Code: November 2018  
<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>
- d. School Standards & Organisation (Wales) Act 2013  
[http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw\\_20130001\\_en.pdf](http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf)
- e. Well-being of Future generations (Wales) Act 2015  
<https://gov.wales/well-being-future-generations-wales-act-2015-guidance>
- f. 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://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf)  
<http://gov.wales/docs/det/publications/140616-ltogg-en.pdf>
- g. Home to School Travel Policy: 2017  
[https://www.npt.gov.uk/media/4231/npt\\_home\\_to\\_school\\_travel\\_policy\\_2017.pdf?v=20170627002146](https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf?v=20170627002146)
- h. Corporate Plan 2019-2022  
<https://www.npt.gov.uk/media/11925/2019-20-corporate-plan-eng-3.pdf?v=20190920114145>
- i. Estyn  
<https://www.estyn.gov.wales/inspection/search>

## Officer Contact

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Mae'r dudalen hon yn fwriadol wag



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**



# **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 21<sup>st</sup> October 2020, 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 3<sup>rd</sup> November 2020 to 19<sup>th</sup> January 2021. 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 size (pupil numbers) of the proposed new school, the traffic management of the proposed site, transport and the impact on the community.

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.

## ***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 close on 31<sup>st</sup> August 2024.

## ***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 21<sup>st</sup> 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 close on 31st August 2024.

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 21st century School 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. £2m of backlog maintenance costs across the three 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 21<sup>st</sup> October 2020, 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 3<sup>rd</sup> November 2020 to 19<sup>th</sup> January 2021. 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 Councils 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 Welsh Government imposed both local and national lockdown periods due to the Covid 19 pandemic. Restrictions meant that it was not possible to hold face to face meetings during consultation, however in every other respect the consultation proceeded as expected despite imposed restrictions. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments. Additionally officers were available to answer queries by email and telephone should consultees require more information to enable them to respond to the consultation, and a 'Frequently Asked Questions' section was also added to the Council's website to address more general queries on the proposal.

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.

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.

### ***Pupil Consultation meetings***

During the consultation period and before schools moved to online learning on 15th December 2020, face to face meetings were held with pupils of Alltwen, Godre'rgraig and Llangiwig primary schools to gather their views on the proposal. Arrangements allowing the meetings to take place were managed by the schools, in line with Welsh Government's Operational guidance for schools and settings

Meetings were held as follows

Alltwn 2<sup>nd</sup> December 2020  
 Llangiwg 3<sup>rd</sup> December 2020  
 Godre'rgraig 4<sup>th</sup> December 2020

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 A.

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 161, of which 14 support the proposal  
 Emails 26, 1 in support  
 Paper forms/letter 47, 6 in support  
 Online petition 413 signatures, 50 of which have included comments

In total 234 responses (not counting petition)

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 1*

Pupils	0	Pupils' relatives	4
Parents/Carers	118	Members of the Community	61
Staff	8	Others	24
Governors	2	Unspecified	6

Additionally the following responses were also received.

*Table 2*

Governing Bodies x3 (Alltwn Primary School, YGG Trebannws and YGG Pontardawe)	Trade Unions x 1
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Pontardawe Town Council	Councillor Chris Jones Town Councillor Andrew Nicholson
Community Councils x 2 (Cilybebyll and Ystalyfera)	Jeremy Miles Member for the Senedd of Neath Dr David Lloyd Member for the Senedd South Wales West
ESTYN	

Prior to the commencement of the formal consultation period queries were received from local Councillors and Tegwch. Direct responses have been provided and points raised have also been addressed in this report.

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.

### - ***Summary of comments received***

In order to reflect the sentiment and feelings expressed by respondents, extracts from the responses to the consultation are included below. These are a sample of the views expressed. Individual concerns and queries have been addressed either directly or indirectly in the officer response to each of the main themes arising from the consultation.

- *I support all of the proposal as it will be a big benefit to the children.*
- *A new modern school with greater opportunities is in the best interests of all children.*
- *More collaborative approach*
- *The old school buildings were not designed for children with disabilities. With the new curriculum coming in education is changing. Multi functional spaces with outside spaces are a must. I understand that issues around transport and traffic could be a concern but I trust these will be addressed through the planning stage if this consultation is successful.*
- *Totally support the principle to provide an EM 21st Century Primary school with Specialised Unit for children with Special Needs and specifically designed to help children and teachers etc. deliver the new NC.*
- *I think its a awesome idea that my child may get the Oppurtunity to learn in a state of the art modern school. And yes my current school where*

*daughter attends is at the bottom of my road however if it means waking up ten mins early for my child's future Lets do it.*

- There is an already good to excellent standard of education at all schools and combining into a larger organisation is unlikely to improve this, indeed some evidence is that larger schools in fact reduce the effectiveness of education.*
- Education will be diluted and children will not receive the one to one learning they do now.*
- This proposal is not in the interest of the children or their parents. We believe it will have a detrimental effect on their young lives and general wellbeing.*
- Adverse behaviour in younger children may escalate and take longer to identify in a larger school environment.*
- The document states that 21st c facilities impact positively on the self-esteem and wellbeing of pupils. I believe self-esteem / wellbeing is determined by the adults who look after, care and nurture our children not state of the art facilities.*
- It would cause additional change and distress to the children who are already living through a unprecedented worldwide pandemic.*
- As a former secondary school teacher I know that, even for an 11 year old, entering large school can be a traumatic, overwhelming experience. How much more so than for a 3 year old.*
- Feedback on super schools has been negative. Merging the individual primary schools into 1 will have a negative affect on our communities and our children*
- Local schools in communities give children the opportunity to socialise and play with people who they know in their immediate and local area, such as neighbours and friends etc. The new Super School would disadvantage the children, as they will be immersed into a very large mix of children from around a much larger area, than they would otherwise be socialising in.*
- I also feel that children as old as 16 are better off not being mixed in the same area as little children.*
- Many parents enjoy the communication with other parents and staff in the mornings. Parents form good relationships with the parents of the pupils within their child's class. This is going to be nearly impossible with so many pupils entering the proposed school.*
- I choose a small school so that each teacher knew each child and each teacher knew each parent I do not want my children to be a number.*
- Large buildings and classes with more staff seems at odds with a child centred approach.*
- The new curriculum for Wales emphasises learning about social influences, pupil directed learning based on their local area. The aim is to*

*support learners to become citizens of Wales who are knowledgeable about their culture, community, society and the world. The curriculum asks that pupils are involved in investigation and exploration of the human experience in their own localities, discover their heritage and develop a sense of place and 'cynefin'. Moving children away from a school that is based within the community will significantly reduce the possibilities for doing this and negatively impact on the deliverability of the new curriculum and sense of belonging within the villages of Godre'rgraig, Ystalyfera and Cilmaengwyn.*

- Having spoken to staff at schools that have previously gone through this process, I am concerned that the existing staff at the schools will move on as they will not be happy teaching in this new environment.*
- There would be a loss of employment opportunities in the area.*
- How many of the total employed staff will be employed at the new site? How will the loss of staff numbers be covered?*
- Should a separate ASD unit be established, it needs to be much larger than what is currently proposed. Based on current and predicted statements of educational need, Alltwen Primary alone could fill the proposed spaces; there is a lack of future-proofing regarding the increasing number of pupils being identified with ASD.*
- I do not support the creation of a new LSC - children will be stigmatised by this, and evidence points to maintaining the demographic involved within a normal classroom has far more beneficial effects on a child's cognitive developmental process than segregation.*
- Whilst I am in favour of additional provision for SEN pupils, I am not in favour of this when it discriminates against disadvantaged pupils to the north of the valley, nor when it creates traffic chaos and increases the risk of further injury to children during drop off and pick up times.*
- The choice of location for the new school is inappropriate. The traffic in Parc Ynysderw area is already terrible.*
- The addition of the new proposed Super School will mean a further 770 pupils will be travelling to Parc Ynysderw, in addition to the approximate 1283 pupils that already attend Cwmtawe School, and which already causes a rush hour nightmare. This is not to mention the new proposed swimming pool which will also be located at the site further increasing the volume of traffic travelling to Parc Ynysderw.*
- The access road to the Leisure Centre is used by many people, Will this be controlled to reduce speed of vehicles especially during school hours?*
- What will happen if no suitable walking routes are found from all areas?*
- As a parent of a child at Cwmtawe School, I see near misses between pupils and cars on an almost daily basis.*

- *This proposal will also cause problems for the parents and grandparents regarding childcare. At the moment we can walk to the school to pick up our granddaughter, it will be impossible for us to do this at the proposed location of the new school.*
- *The School Organisation Code (011/2018)) also states that likely walking routes should be assessed prior to bringing forward proposals. It also states that pupils should not have to travel for more than 45 minutes to school. How long would it take the very youngest pupil to walk the 2 miles?*
- *It is thought that many of the pupils from Alltwen and Llangiwg schools live within walking distance of Pontardawe. The new proposal would therefore heavily discriminate against the upper valley communities.*
- *Children would have to get a bus or be dropped off by car. This would have health implications for the children as they would get less exercise than if they walked to school as well as being bad for pollution and the environment.*
- *Nursery pupils are not entitled to transport to school. In an area of deprivation, it is particularly the nursery age pupils who need the early language and socialisation development that comes with school attendance. Yet it is these pupils who would be unlikely to be able to access the proposed new school and who probably need it the most. They potentially could miss out on 2 years of education as a result.*
- *Home-to school transport does not transport pupils in time for Breakfast Club, and does not provide transport home from after school clubs, resulting in a negative impact on their educational and social development.*
- *The School Organisation Code (011/2018) states that alternative provision should remain accessible to pupils in the local area and that account should be taken of the impact of proposal on educational attainment among children from economically deprived backgrounds.*
- *The new school will not be accessible to pupils from the lower end of the catchment for Godre'rgraig School who do not qualify for free transport.*
- *Younger children are sharing journeys with older children and are therefore being exposed to conversations above their years at far too young an age. I imagine the journey to be traumatic for many.*
- *I also feel that attendance of pupils would suffer, as on days' parents and children alike maybe too tired to walk the journey.*
- *Even if there is a school bus, what will happen if they miss the bus? A parent/grandparent/carer trying to get 3 children ready for school will know this does easily happen. What happens if the child is taken ill in school? How do parents without transport collect them?*
- *The three existing schools are ideally located, well attended, good quality of teaching and in solid buildings that are designed for minimum maintenance.*



- *These primary schools are also part of the history of Pontardawe, they have been there for multiple generations and it would be historically and culturally sad to lose them.*
- *What would happen to the current Godre'r Graig school building as well as the 2 other current primary school buildings if the proposed project went ahead. It is feared that they may be left to become unoccupied ruins.*
- *The repairs for Llangiwig total £701,000.00 - to the best of my knowledge no-one associated with school (Headteacher or Governing Body) has seen this repair quotation.*
- *If the current plans were rejected following the consultation, would all the outstanding planned work be carried out on the Pool and Primary Schools?*
- *The figures stated in order to get the three current schools up to scratch were not large sums of money compared to the building of a new school.*
- *My view is that public funds will be better spent on improving the existing primary schools that are concerned in the proposal and also that public funds will be better spent on improving the existing Pontardawe Swimming Pool, if improvement is needed.*
- *Maintain the school as it stands and continue to improve the sport and leisure facilities in the local area, so many more can enjoy the new improved leisure centre and swimming pool all under one roof.*
- *The issue with the quarry tip in Godre'r Graig should be further investigated. If the tip can be removed, then the current issue at the school could be rectified and the school could be re-instated.*
- *Had any other areas for the relocation within the Godre'graigi area? i.e. former Tirenny tip site?*
- *It was suggested that keeping Alltwen School the way it is currently but with an additional building built within the grounds to house a unit specifically designed for children with additional learning needs would be a preferred option.*
- *The three existing schools have large outdoor play areas and a learning needs centre could be accommodated in one of the existing school grounds.*
- *Alternative sites for the Super School, such as Riverside in Pontardawe, had not been reviewed*
- *Merge just Alltwen and Godregraig because these are the two primary schools closest to the new site.*
- *It was assumed that to split the children from Godrergraig school would be divisive however many children from the Godrergraig catchment area resided closer to Ystalyfera. It was therefore suggested that there may be a case for the children to be split and amalgamated partly into one of the*

current Pontardawe Schools and partly into schools in Ystalyfera with the other schools remaining in their current positions.

- *I would support the creation of two 400max pupil schools. One in the northern end of the valley covering Godrergraig, Graig Newydd, IPanteg and Ystalyfera and a second one based in the southern end. The southern school could be established on the land adjacent to the existing Alltwen school. It could cater for pupils from Llangiwig and Alltwen.*
- *It is undisputable that the primary schools within local communities are the identity, heart and soul of the community.*
- *Empirical evidence has shown that once a community school is closed the ‘soul’ of the community is lost. The current pandemic has identified the vital role that communities play in helping people through life.*
- *The lack of After-school and Wraparound provision at the proposed new school is a cause for significant concern.*
- *I doubt that the community and parents will have access to the proposed new school.*
- *The impact on local businesses also needs to be included in the consultation.*
- *It was not clear if some of the current sports fields, children’s play areas etc would be lost during the relocation*
- *The proposed leisure improvement is absolutely needed for the local area but I think it should be considered as a separate development and not used to try and gain support for the super school proposal.*
- *I appreciate the reasons for this consultation being carried out over the internet instead of in person because of the Covid 19 pandemic, but I am concerned that as a result this consultation may be discriminating against members of the public who have not got internet such as the elderly members of the community etc. It is important that their views are also listened to.*
- *I have huge concerns about the timing of this proposal, whilst the country is in the grip of a pandemic and struggling to cope, this is seemingly being pushed through under the radar. We need to discuss this proposal and the positives and the negatives associated with it without external distraction - now is not that time.*
- *I believe the consultation document is inherently flawed and does not supply stakeholders with all the facts needed to make informed comment.*
- *The consultation has so many inaccuracies it cannot be relied on as a fair and unbiased document. The proposal is completely against the national policies on well-being, climate change and active travel. The proposal requires large borrowing which is unnecessary and not supported by the community.*

- *This proposal is fundamentally flawed and far too narrow in its focus - possibly illegally so. It is heavily shaped by the councils dual obsessions of financial savings and educational outcomes only. What it fails to do is address the wider legal requirements under the Future Generations Act which shifts the focus on public bodies like NPT council away from gains in service output (like financial savings or educational results) to a much stronger link to outcomes that enhance the quality of life of citizens and communities both now and in the future.*
- *The council has a legal duty, under the Act, to carry out any developments in line with the 'sustainable development' principle - namely the process of improving the economic, social, environmental and cultural well-being of Wales, in order to achieve ALL of the seven well-being goals set out within the Act, not just one or two as this consultation document clearly does.*
- *I strongly argue that this proposal, which would see the closure of several important community schools, fatally undermines the councils duty, under the act, to ensure "a Wales of cohesive communities" by ripping the very heart of the communities out from under them.*
- *The consultation is in no way fair and neutral which is expected and demanded by the Welsh Assembly. Throughout the report, every other option is discarded without fair process. Figures are adapted in order to make the councils desired outcome appear appealing and any other option impossible. There are instances within the report where this borders on fraudulent.*
- *I feel that a new, honest, transparent consultation is needed in order for anyone to make a clear suggestion.*
- *As a community we feel that these proposals are being put forward and it is being made difficult for us to oppose, by only giving us a very difficult PDF form to fill in. It feels as though this is being done as quietly as possible so that the minimum amount of people can object.*
- *It seems to be the choice either accept or reject the offer in its entirety. Shouldn't the case of each school be dealt with separately – by that the concerns and context for each school are different?*
- *What happens should the response be to reject this proposal?*
- *There is no option to review the re-opening of Godre'rgraig. Why is this not an option?*
- *Why haven't NPT written to local communities about such a significant proposal?*
- *The vast majority of the community already feel that the council have already made their minds up and our voices will not be heard.*
- *This is a money saving exercise. Please reconsider keeping our communities bursting with life by allowing these community schools to receive the money you will have for the super school.*

- *This clearly a financial decision but although economies may be made, there can be no doubt that this will have a hugely detrimental effect on the education of these young people. I urge you to reconsider a decision the only merit of which lies in saving money rather than a consideration of the needs and well-being of young children.*
- *There were inconsistencies in the number of projected future pupil numbers between the three separate schools and the Super School. This seemed to indicate an over capacity at the proposed Superschool that would not be cost effective.*

### **Governing Body Responses**

The governing body of Alltwen Primary School have responded and state *‘There are too many questions currently unanswered as there is insufficient detailed information contained within the consultation report. As such, we cannot form an opinion to support or oppose the proposal at the current time.’*

The response comprises of concerns also raised by other consultees and also includes the results of surveys undertaken by the Governors on the views of staff and pupils at the school. Additionally concerns have been raised regarding Hoots childcare provision which operates from the Alltwen primary schools site.

Governors also request further clarification and assurance around the following:

- How would a large school manage with a pandemic such as COVID?
- The commitment to the delivery of a new pool for Pontardawe
- Will the pupils benefit from additional opportunities to utilise the new pool, particularly families from low-income backgrounds?

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.

Additionally the following specific points were raised

- Is there a consideration for all schools within the vicinity that are remaining open to have financial input in order to improve facilities for 21st century education?
- We believe it is important that every pupil in the area is treated equally. We would like you to consider a strategic plan to ensure that each school in the area is suitable for education in the 21<sup>st</sup> century.
- There are no Welsh-medium units within the authority and the proposal does not address this need which is growing rapidly within the sector.

- With the proposal of another two English medium additional units to those that NPT offer already, how can this possibly treat Welsh and English equally?

### **Trade Unions**

A response has been received from Undeb Cenedlaethol Athrawon Cymru (UCAC) stating

*'We support the opportunity to improve educational provision within the area and welcome the associated opportunities for staff development and career progression. We as a union request that there be no compulsory staff redundancies as a result of these proposals.'*

The response also outlines the following concerns,

- The perception among pupils, parents and the wider community of the greater importance placed on English medium provision, as opposed to Welsh medium provision.
- The impact of its close proximity on pupils accessing Welsh medium education at YGG Trebannws.
- There would follow a disparity in accommodation and facilities between Welsh and English medium facilities. The new school would be centrally located and close to community and leisure facilities of a high standard.
- The likely impact the new building and facilities at the new school would have on pupils accessing Welsh medium education at YGG Pontardawe.
- The possible long term impact on numbers at YG Ystalyfera Bro Dur.
- The impact of the development on Neath Port Talbot's targets in its Welsh in Education Strategic Plan (WESP) and the Welsh Assembly Government's Million Welsh speakers target and its commitment to the priorities within the Future Generations Act , namely 'a Wales of thriving culture and vibrant Welsh language'.

### **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 around the impact of the proposed new school on the community of Rhos and Rhos Primary school. Clarification was also sought on the following points

- The potential size of the plot needed
- It was stated that there will be a significant investment in IT in the proposed new school - why this couldn't instead be invested into the 3 primary schools to bring them up to date.

Ystalyfera Community Council raised concerns on the impact on the community should Godre'rgraig close, along with concerns about distance to travel, deprivation in the area and concerns with the impact on the Welsh language. It was also noted 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, which is discriminatory.

Pontardawe Town Council noted that while they understood there would be some benefits to the creation of a larger newer school with additional facilities, they felt the downside far outweighed benefits. Concerns were noted with the size of the proposed new school, potential job losses, how transport would be decided, the impact on community facilities including the playing fields at Parc Ynysderw, and the possible decrease in availability of the pool should it be used more by pupils.

The following query was also noted 'If the creation of a Super School was educationally superior, why had Rhyd y Fro and Rhos Primary school been removed from the proposals?'

### ***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 B.

### ***Local elected Members, Town Councillors and Members of the Senedd***

**Jeremy Miles, Member of the Senedd for Neath** states '*I welcome the investment in English medium education in the Swansea Valley, as I welcomed the investment in Welsh medium provision*'.

The response also notes a commitment to summarise the views of attendees at an online meeting held by Jeremy Miles to discuss the proposal which include remedial work on the existing sites, school size, flood plain area, and mode, distance and safety of travel. It was also noted that '*Support was expressed by some participants for modern, purpose-built facilities on a larger campus. It was felt this offered flexible space, designed for the needs of contemporary education, rather than the expectations of school life and teaching in the era when the current three schools were constructed.*'

Queries were also submitted regarding the pupil numbers at the proposed school, clarity around transport provision and on site arrangements for traffic management, and further details on active travel.

The view was also put forward that the Council should have held an online public meeting to answer the range of questions and make the case for the proposal.

**Dr Dai Lloyd, Member of the Senedd for South Wales West** raised the following questions, following a virtual meeting to hear the views of the public. A number of questions were raised including

- Why was this option preferable to the others? -What work has been done in replacing Godre'r Graig Primary School in Godre'r Graig?
- How will the Authority safeguard vulnerable pupils, ensuring that they have access to Breakfast and After School Clubs?
- What assessments have been made regarding impact on neighbouring schools?
- Why was the location – at the southernmost point of the catchment area – chosen?

Allt-wen Councillor Christopher Jones submitted a response which echoed the views of Alltwn Primary Governing Body and noted there should be greater consideration of the following alternatives

- Reinvesting in the existing sites
- Building on one or more existing school sites
- Alternative sites in the area
- Alternative combinations of schools

Pontardawe Town Councillor Andrew Nicholson submitted a range of queries including the following

- What happens should the response be to reject this proposal?
- The proposal for a new build Swimming pool at this site does not state if it will be built attached to the existing Pontardawe Leisure Centre or will be **built within** part of the existing building?
- If the plan is to include it within part of the existing building what loss of existing facilities (i.e. Indoor Bowls area,) will this cause?

### ***Report on NPTCBC Public Consultation***

A report on the consultation document has also been submitted by a member of the community. The report comprises of 3 parts, the first pointing out the perceived flaws in the consultation document, the second suggesting alternative options and the third the results of a survey which has asked various questions broadly relating to the proposal and to schools more generally.

In response to part one – data is contained in this submission which has been gathered from an independent survey of households in the area (the survey was not provided with the submission, therefore officers have not had the opportunity to review the data referred to). It is not clear who has conducted the survey or which households were involved, neither is it clear how many responses were received, however this data has been used to justify and reinforce statements made in the submission. In contrast the consultation document contains Neath Port Talbot pupil data gathered from each school; all pupil data held by the Council is routinely checked and verified, and is also submitted to Welsh Government as required. As a result the submitted report with its limited data cannot be relied on to provide accurate information overall. It also contains a number of inaccurate and misleading statements, for example “the Council will ‘use funds raised from the sale of the old school sites to clear the prudential borrowing’ and ‘the transfer of a swimming facility from the public to the schools’. Both statements are incorrect and are responded to elsewhere in this report.



It has been noted elsewhere in this report that this consultation process has adhered to Welsh Government guidance and is comparable to other consultations under 21st Century school reorganisation proposals brought forward in Neath Port Talbot which as part of the processes involved have been scrutinised and accepted by Welsh Government .

In response to part 2 – this section relates to the opinion that enhancing the three schools on their current sites would be preferable to a new build 21st century school. Again this section contains many inaccuracies and makes assumptions that do not appear to be based on any factual evidence. It should be noted that the example cited in this submission of Hen Ysgol in Carmarthenshire is unhelpful as it is an example of a redundant school building which has been extensively renovated and is now used as a residential dwelling and training centre. The relatively small cost of this project quoted ignores the fact that the developer spent 6 years of their own time and savings to convert the property, therefore the £600k quoted does not truly reflect the cost of their labour (including that of family and friends). The power and heating needs of a school are incompatible with that of Hen Ysgol (log burners, photovoltaics for power, etc.). It would also appear to be a much smaller footprint than any of the three schools in this proposal. It is perhaps also worth noting that this conversion took place because it was a school which was closed and sold on by Carmarthenshire Council with pupils from this village and neighbouring villages moving to a newly constructed school. Details on why enhancing the current schools is not the preferred option of officers are contained elsewhere in this report.

In response to Part 3 – this section contains the results of an independent survey ‘conducted of residents in the Pontardawe area on their thoughts of the proposed new school’, and is reported to have ‘reached approximately 300 households’, although it is not clear how many households responded, or whether the respondents were aware of the consultation document or were directly affected by the proposal, (as stated the survey was not provided for officers to scrutinise).

## ***Officer responses***

### ***– Quality and Standards of Education***

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 state that ***‘this proposal is likely to at the least***

***maintain the present provision for English medium primary education 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', and 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.

### – ***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, and that it is people who impact in this way. Whilst it is true that people can make a difference it is also true that 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.

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***

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, and in just 3% of small 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 both 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.

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 21<sup>st</sup> 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.

Concerns have been noted around managing larger schools under current Covid restrictions. Experience to date has shown that the larger 21<sup>st</sup> century new build schools have in general found it easier to operate under current operational guidelines and regulations than older schools. This is due in part to having more space available to manage staff and pupils, including larger classroom spaces, wider corridors and more available and flexible circulation spaces. Outdoor facilities are purpose built in new schools and support outdoor learning, which is encouraged to help prevent infection. New schools generally have numerous pupil entry and exit points, including direct access to outdoors from classrooms so avoiding congestion at start and finish times. It is also the case that facilities are generally better with more toilets, appropriately positioned across the school building. Additionally almost all

primary classrooms in new builds are equipped with sinks making handwashing with younger pupils easier to manage.

### — **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 2024. 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***

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 proposed provision will be managed by the school and be under the school's governance. Staff will be employed by the school and form part of the school teaching team. Pupils at the proposed provision will benefit from being taught by specialist staff, experienced in working with pupils with ASD needs and also allow opportunities for children to access learning within their local community. There is also the possibility that mainstream pupils with ASD could also benefit from the expertise available from within the LSC to aid teaching and learning throughout the school, and in particular the well-being of those pupils that require extra support.

Comments have been received which state that the proposed LSC would not be big enough even to support ALN pupils in Alltwn. 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. Data shows that as of PLASC 2020 there would be sufficient space for all Statemented ASD pupils, within the primary age, residing in the Swansea Valley to have a space in the new LSC planned within the proposal if appropriate. This includes pupils in Swansea Valley schools not currently in the proposal. However pupils from outside the area could also be placed at the LSC if the need arises.

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. Should the need for a Welsh-medium LSC be identified then a separate process would need to be undertaken, including full consultation with relevant stakeholders.

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

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

The proposal currently under consultation 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.

In respect of the potential highway impact for the proposed school, a Transport Impact Assessment (TIA) would be required together with a rigorous Travel Plan.

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 2019, Alltwen and Llangiwg primaries have a high percentage of pupils who travel to school by car or taxi, 56% of Alltwen Primary pupils and 70% of Llangiwg Primary pupils. The majority of Godre'rgraig 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 schools have pupils from outside their catchment area – 44% of pupils attending Alltwen live outside the school catchment area, 37% of Llangiwg primary pupils live outside Llangiwg catchment area and 24% of Godre'rgraig pupils live outside of Godre'rgraig catchment area, suggesting that the current schools already contribute to the traffic in the 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 schools 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 Transport 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 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 transport policy, an escort 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 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 and 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.

Comments have also been received which state that a new English-medium school will negatively impact on the Welsh-medium schools in the locality, and comparisons have been made with the impact on Ysgol Gyfyn Ystalyfera when Cwmtawe Community School opened in 1996. It has been stated that at this time greater numbers were attracted to Cwmtawe Community School due to it being a new building and subsequently pupil numbers dropped at Ysgol Gyfyn Ystalyfera.

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 2021 to 381 in 2020. 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 230 in 2020, 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 20 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 21<sup>st</sup> century schools grants for new build projects.

In the last 2 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 £1.62m 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 will provide space for an additional 60 pupils, and the extended childcare facilities will allow the current provision to increase to 28 places. It is estimated that additional works identified as the scheme has progressed will bring the final cost of the scheme to circa. £2m. The scheme aims to strengthen Welsh-medium education in the Pontardawe area, enabling the school to further develop as a thriving and sustainable provision.

### – ***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.

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 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***

The Council hold freehold title to the land required for the proposed new school and swimming pool part of which is leased to Parc Ynysderw Sports Association.

The Sports Association has agreed to enter into an Option agreement allowing for the surrender of the land required and consent for the drainage improvement works to the retained underutilised pitch if and when the proposal proceeds, legal formalities for which should be completed shortly.

The Council 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 the proposal. Fields in Trust have advised the Council that it is happy to consider releasing the land required and positive discussions are ongoing to agree the location and extent of replacement land to be provided in exchange in line with its aims and objectives. It is anticipated that the Council will submit its formal application shortly and it is hoped that formal approval will be forthcoming as soon as possible

Funding for drainage works, if required, 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 trustees are in full agreement with the proposal.

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 however that the funding for the pool and the school has been secured as part of the 21<sup>st</sup> Century schools



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. 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. Backlog maintenance costs for the current pool are estimated at £1,221,783.

It is anticipated that the proposed new pool will be housed in a new build adjoining the current leisure centre, meaning that some remodelling of the leisure centre will be required. However current facilities, including the bowls hall will not be affected or lost as a result of this proposal.

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 easily 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

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

A Welsh Language Impact Assessment has been carried out by an independent consultant which recognises concerns that while this proposal relates to the establishment of an English-medium school there may be direct or indirect impacts on the development of the Welsh language in the area.

Alltwen, Godre'rgraig and Llangiwig primaries teach Welsh as a second language and this will also be the case for the new school. Currently 25% 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.

The WESP objective 'To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner' is of particular relevance to this proposal.

The impact assessment states 'A common theme in the consultation comments was that a new English-medium school would negatively impact on the Welsh-medium schools in the locality. However, data/evidence held by the Council indicates that new build English-medium schools in Neath Port Talbot, that have opened in the last 10 years, have had no significant impact on nearby Welsh-medium schools which suggests there is low if any impact on Welsh Medium schools in the locality with the proposal.'

As a result of the consultation and consideration of existing data and evidence the following mitigating actions are recommended for consideration and implementation should the proposal be approved.

- Longer term monitoring is required to ascertain any impact on wider community Welsh language issues; this could be planned for as part of the updated WESP actions (See Section 5.1)
- Monitor parental choice of school i.e. Welsh/English medium

## – **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 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.

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.

## – **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.

Throughout the consultation period the consultation document and associated papers were available on the Council's website located on the Council's Strategic School Improvement Programme webpage.

Information about the consultation has appeared on the Council's website, and on the Council's Facebook page and Twitter account, both at the start of

the consultation and at points throughout, and local media publications have also reported on the proposal at various times through the consultation period.

Alltwen, Godre'rgraig and Llangiwig Primary schools ensured that parents, staff and Governors were informed, giving both the online link to the documents as well as making paper copies available if needed and displaying information on each of their websites.

The consultation document contained clear information on how to respond, and this information was repeated on the Council's website, Twitter and Facebook pages. Consultees were able to respond via the online 'have your say' portal, by email or by post. A response form was available for downloading if required, although there was no obligation to use this. Additionally officers have been available throughout the consultation period to respond to telephone or email queries regarding any aspect of the proposal and consultation document. Responses have been received in many formats including email, by post and via the portal.

Comments have been received which express the view that this consultation process has not provided consultees with sufficient information to enable an intelligent consideration and response, and that it is an unlawful process in that it has not followed proper policies and procedures, and has not complied with fairness and equality rules. This consultation has followed the procedures set down by the Welsh Government under the School Standards and Organisation (Wales) Act 2013 and School Organisation Code. All requests for extra information have been met by officers and queries received have been responded to.

Despite Covid 19 this consultation has been conducted following Welsh Government guidelines and has adhered fully to the Code. In some aspects this consultation process has given consultees greater opportunities to engage as the option to respond online has not been used previously.

It is recognised that the current restrictions in place have prevented face to face meetings, however this has been mitigated by officers being available to answer queries and concerns by email or phone, enabling consultees with individual concerns to have specific answers. The Code specifies that there is no requirement to hold consultation meetings. Meetings are not a substitute for written responses – where meetings have been held in the past attendees have still been urged to respond in writing to the consultation, as notes taken at meetings do not constitute formal responses.

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.

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 will 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 will be 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 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.

The document contains actual pupil numbers in the three schools, a five year forecast of the combined pupil numbers in the schools and a prediction of the pupil numbers which the new build school size is based upon.

The figures in the five year forecast in the consultation document are derived from a combination of current numbers in the Foundation Phase of the three schools, and a 3 year average of early years pupils multiplied by the number of years to the school opening. It is not the combined total of the number of pupils who are in the 3 schools currently; many of these pupils will have left for secondary school by the time the proposed new school would open.

However while the method used to calculate this figure shows a decline, knowledge and experience of the pupil numbers in the area demonstrate that pupil numbers are actually increasing. 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.

The following table indicates where the pupil numbers have been derived from, as of January 2021. Pupils attending Welsh-medium schools in this authority or neighbouring authorities have **not** been included in calculations.

Table 3

	Pupil Numbers
Pupils living in the catchment area of Alltwen, Llangiwig or Godre'rgraig attending an EM school elsewhere in NPT	117
Pupils attending neighbouring EM schools outside NPT (Swansea and Powys)	107 (updated Jan 2021)
Total number of pupils	224

Officers are not suggesting that every child who is attending a school elsewhere will automatically return to claim a place in the proposed new school, neither is there a suggestion that every new build home will house

primary aged children who will wish to attend the new school. However it is important to make sure that any new school is able to accommodate those children who live within the catchment area both at the time of opening and for the future as it is not acceptable to plan to open a new school which will not allow local pupils to access their education in their nearest suitable school. Combining all the above factors indicated that building a school to solely accommodate the numbers that are currently in the three named schools would not be sufficient.

It is also important to take into account experiences from past new school projects. Pupil data gathered from other new build schools in Neath Port Talbot indicates that pupil numbers rise in the first two years of opening, on average by 15%, as pupils who have left the original schools return to claim a place. In schools where the population is already known to be growing that percentage can be higher, for example data indicates that prior to opening Awel y Mor Primary in 2013, 252 children were on roll at Tirmorfa Primary and Glan y Mor Primary. By 2015 331 pupils were on roll at the new school, an increase of 79 pupils.

The estimated number of pupils who would need to be accommodated in the proposed new build school combines all of the above factors to reach the figure of 630 full time pupils.

As the proposed school isn't expected to open until 2024 predicting nursery/reception class pupils is even more difficult as children who will be 3 or 4 in 2024 have not yet been born. However a nursery admission number of 140 part time pupils allows for both first year and second year nursery pupils to attend, ensuring that every child is able to access at least three terms of nursery education before entering full time school.

An additional estimate of 30 pupils (based on the maximum number of pupils in a class) has been added to the calculation to allow for unknowns including increased number of preschool pupils and additional housing, which provides the 725 figure contained in the document.

Data for pupils who reside in Neath Port Talbot but attend schools elsewhere is not held by this authority. The latest information received (January 2021) indicates that an additional 15 pupils are attending Ysgol Bryntawe and a further 55 are attending Ysgol Golwg –y Cwm which were not accounted for in the initial calculations. If these pupils are added to the calculations then the predicted numbers would rise to 795 and should all pupils wish to attend then the proposed new school would be over capacity.

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.

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

Numerous consultees have made reference to Godre’rgraig Primary School’s temporary relocation from Graig Road, Godre’rgraig to land adjacent to Cwmtawe Community School.

Comments have been received which state that detailed information about the reasons for the relocation have not been included in the consultation document and that ‘essential details’ are missing which are needed to allow for an informed decision to be made.

Further comments 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 Alltwn 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.

At this point in time it is correct to say that Godre’rgraig Primary school staff and pupils cannot return to their original location. The most recent report on the quarry spoil tip investigation above the school has found that the medium level risk remains, and it is therefore deemed unsafe for pupils and staff to return to the site at the current time. A feasibility study to investigate design options and produce budget estimates for works associated with the remediation of has been commissioned. However, even if mitigation work is possible and staff and pupils are able to safely return to the Graig Road site,



the case remains that substantial work to address both backlog maintenance issues and remodelling to deliver 21st century school provision for the future will still be required. A new purpose built school with state of the art facilities will provide better opportunities for teaching and learning than the Graig Road site, even if remodelling of the buildings is affordable and achievable within the confines of the site.

If Godre'rgrraig staff and pupils are not able to safely return to the Graig Road site then the school will continue to operate from the temporary location adjacent to Cwmtawe Community School until either the proposed new school opens in 2024 and pupils transfer there, or until a different solution is found if the proposal is dismissed.

The proposal if approved would still provide English-medium education for the children who reside in the Godre'rgrraig and Ystalyfera area, albeit at a location outside of the immediate area, a distance of 3.6 miles from the Graig Road site at Godre'rgrraig. Parents who choose not to send their children to the proposed new school will still have English-medium schools within a reasonable distance to choose from, both in Neath Port Talbot at Rhydyfro Primary and Rhos Primary, and also across the county border in Powys. Data indicates that over 60 pupils from Neath Port Talbot already attend English-medium schools in Powys, at Ysgol Bro Tawe and further afield at Ysgol Golwg y Cwm. Additionally parents have the choice of a number of Welsh-medium schools, the nearest being YG Ystalyfera-Bro Dur at Ystalyfera, but also YGG Pontardawe, YGG Cwmllynfell and YGG Trebannws in Neath Port Talbot and YGG Dyffryn Y Glowyr in Powys. It is clear therefore that there is a wide choice of English and Welsh-medium schools all within a radius of 5 miles from the Godre'rgrraig Primary Graig Road site.

It has been suggested by consultees that non Welsh speaking families would have no choice but to opt for an English-medium school, thus meaning they have to travel out of their immediate area for primary education. However a number of Neath Port Talbot Welsh-medium primary schools exist in areas where families do not speak Welsh and additionally where high levels of deprivation are evident. There is no evidence to suggest that Welsh language acquisition is unsuccessful in these areas, and in fact data suggests some of the greatest increases in primary pupil numbers, and the highest transition rates from primary to secondary school are shown in these localities. It is therefore not clear why this is felt to be a challenge, particularly in an area where the Welsh language is already recognised to be strong.

### **- *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. 19,884m<sup>2</sup>. Additional land would be required of circa. 14, 320m<sup>2</sup> to accommodate sufficient playing fields, however this can be omitted as playing fields already exist at Parc Ynysderw. A different site without such provision would need 34,204m<sup>2</sup> 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. Total backlog maintenance and accessibility costs for all three schools and the swimming pool amounts to amount to some £3.274m.

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.

Additionally, 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) whilst Godre'rgraig would need to extend their occupation of the temporary accommodation at Parc Ynysderw until works were completed.

There are major financial and logistical implications associated with the hire of temporary accommodation and pupil transportation all of which would be "lost" money that undermines any notion that public funds would be better spent by simply addressing the backlog maintenance and accessibility work identified on each premises.

It is also the case that if Godre'rgraig Primary were to return to the Graig Road site additional remediation work would need to be considered to mitigate the landslip risk and thus ensure staff and pupil safety. This work is currently estimated at circa £4m. A feasibility study to investigate design options and produce budget estimates for works associated with the remediation of has been commissioned.

As far as the Swimming pool is concerned then business continuity would be compromised for however long works would take resulting in the suspension of all swimming activities for the duration.

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 by some consultees advocating that it would be a better use of public funds to simply undertake backlog maintenance works.

It is also the case that all three 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 one would ordinarily expect to see in a brand new 21st Century school.

The existing shortcomings of each building would remain as is and to all intents and purposes the opportunity of creating 21st Century facilities would be missed.

Despite investing over £120m during Band A of Welsh Government's 21st Century Schools' Programme the Council still has an ageing school building stock. Latest estimates suggest that there is still a backlog of maintenance and accessibility costs across the school portfolio of circa £76m (this is not a situation unique to Neath Port Talbot and is reflected across many Welsh Councils).

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.

Without Welsh Government's 65% contribution to the costs of construction of a new school,, 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.

With this in mind and even if as suggested the Council only addressed the notional £3.274m of backlog maintenance costs at Alltwen, Godre'rgraig, Llangiwg Primary schools and Pontardawe Swimming Pool 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.

Such a situation would be untenable and to the detriment of all schools in Neath Port Talbot and not a direction the Council would choose to embark upon, therefore meaning that if this proposal does not progress then the backlog maintenance for each of the buildings will remain and in all probability only be addressed on a phased basis as and when elements deteriorate to such an extent that interruptions to teaching and learning becomes imminent.

## **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 21<sup>st</sup> 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' 21<sup>st</sup> 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 21<sup>st</sup> Century Schools 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.

Accurate calculations of the number of pupils in the catchment area of each school who may attend a new school in the future have not been carried out at this stage, but in order to allow for the predicted increase in pupil numbers across the area as a whole an additional 50 pupils have been added to each school.

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.

Table4

<b>EXISTING SCHOOLS</b>	<b>SITE AREA m2</b>	<b>BB99 M2</b>	<b>PUPIL FTE (incl N)</b>
<b>ALLTWEN PRIMARY</b>	11629	14,536	269
<b>GODRE'RGRAIG PRIMARY</b>	4397	11,236	194
<b>LLANGIWG PRIMARY</b>	3262	12,556	224
	1345		

## **Alltwen Primary School**

### **- New Build on current site**

As shown above it is clear that an alternative site for Alltwen Primary would be required to accommodate a new build school that meets Welsh Government 21<sup>st</sup> century standards as the existing site is undersized.

### **- New build on alternative site**

There is no suitable land in Alltwen in Council ownership to accommodate a site area of the required 14,536m<sup>2</sup>.

### **- 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 Llangiwg Primary, and only has limited space to expand should its own catchment pupil numbers increase as predicted.

## **Godre'rgraig Primary School**

### **- New build on Graig Road site**

As shown in Table 4 the Graig Road site is significantly undersized to accommodate a new build school that meets Welsh Government 21<sup>st</sup> century standards for Godre'rgraig pupils.

### **- 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.

#### **Gnoll Road**

Much of the land available adjacent to Gnoll Road is on a steep gradient and is identified as being within a high risk flood plain area 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 a mix of low and high risk development. The land is also outside settlement limits.

However, subject to further site investigations sufficient space could be available to build a new school at the highest part of the land adjacent to Gnoll for Godre'rgrraig pupils.

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'rgrraig and Ystalyfera pupils would be able to remain in their immediate local area. It could also address the perceived disadvantages for Godre'rgrraig pupils having to travel to the proposed site at Parc Ynysderw.

However if a new school was to be considered for Godre'rgrraig pupils it is unclear what is suggested for pupils at Llangiwg 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.

## **Llangiwg Primary School**

### **– New Build on current site**

As indicated in Table 4 neither of the current Llangiwg Primary school sites would be sufficient in size to accommodate a new build school to 21<sup>st</sup> century standards.

### **– New build on alternative site**

Officers have not been able to locate any suitable alternative site within Council ownership in the Llangiwg 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 21<sup>st</sup> 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.

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 21<sup>st</sup> 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

<b>List of Consultees</b>	
Alltwen, Godre'rgraig and Llangiwig 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 (for Neath) – Christina Rees
	Member of the Senedd for Neath – Jeremy Miles
Trade Unions	Regional Assembly Members
Estyn	SEN Partners
Regional Education Consortium (ERW)	Children and Young Person Partnership (inc. Early Years Development and Childcare)
NPTCBC Integrated Transport	Police and Crime

Unit	Commissioner
Communities First Partnership	NPTCBC Officers

In addition to the statutory consultees, notice of the consultation was also sent to the following:

Child care settings and registered childminders in the area  
Tegwch Community group  
Welsh Language Commissioner

## **Summary of Pupil Consultations – Alltwen Primary School, Llangiwg primary School and Godre’rgraig Primary school**

Neath Port Talbot Council met with the pupils (20) from Alltwen Primary school on 2<sup>nd</sup> December 2020, the pupils (24) from Llangiwg Primary school on the 3<sup>rd</sup> December 2020 and the pupils (13) from Godre’rgraig Primary School on the 4<sup>th</sup> December 2020. A selection of pupils from each year group from each school, along with their Headteacher, was present on each occasion when pupils were consulted, to ensure 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.

57 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. A summary of the joint views with some responses are below.

### **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.

### **What will it be like in the new school?**

Some children stated they looked forward to having new facilities and new activities to take part in, while others were concerned that the building could be too large, especially the nursery, and that they would get lost and that it would be too crowded, loud and busy. Some children felt that as the school would be larger than their current school it would be harder to organise for teachers and that

making new friends may be difficult, or that they would be mixed with pupils they would not know, or in big classes. One or two pupils did say it would be a chance to make new friends and have a new play yard with lots of space. Other children stated they wanted to know how the school day would be managed for such a large school, e.g. start and finish times, breakfast club, lunchtimes, break-times, etc. They were also concerned that there would be bullying at the school and more opportunities for boys and girls to be nasty and it would go unnoticed. Some pupils were worried that they might not get the chance to represent their school as lots of children would be going for school council, eco-committee, football side, etc. or be able to take part in musical events or shows as there would be too many children. They were also keen to ensure that they had a hall big enough for concerts and lunches.

*They were told that although it would be bigger than their current school it would not be so large that they wouldn't be able to find their way around after a little while of getting used to it and that it would be well set out with plenty of space. It was also made clear that the school would be built to WG standards for size of rooms, halls and toilets and that they would probably spend time in the building before the school opens so that it would not be totally unfamiliar to them. The new school would be a safe environment and that their well-being and safety is always a school's top priority and that there would be policies and procedures within the new school to make sure that children feel safe and secure. The new head teacher and staff would organise class size and plan activities as they do now. It is expected that work will take place with all three schools, should the proposal be approved, so that the children have plenty of time to get to know each other before the new school opens.*

*There would be potentially new opportunities for them with extra-curricular clubs depending on the interests and skillset of the staff. They would also have some input into the facilities as work progresses.*

*There would be a new kitchen for the cooks so it was unlikely things would be any different in the new school to their current school regarding the quality of breakfast and lunches.*

### **What will the outdoor Space look like and how will we use it?**

Many of the children were keen to ask what would be included as part of the outside space, playgrounds, and yards. They were keen to have a 'Learning Garden' and 'Trim-Trail' as part of any new school as it is an important part of their school. They also asked about the playing fields, paths and wildlife areas and would people be allowed to walk dogs, use the fields and if the park would still be there?

*The pupils were told the WG set minimum standards for schools when they are now built and the children were reassured that there would be lots of new opportunities for them to use the outdoor space and the proposed new school could possibly have a MUGA, key stage play-yards and a 'wild area' and that the*

*leisure centre and new pool would also be next door for extra space. The public play area and park would hopefully be built into the new Parc Ynysderw complex.*

### **What will happen to all the Staff?**

While some children generally welcomed the possibility of having new teachers, they also felt that it was important that their current teachers, TA's and cook moved to the new school with them and not lose their jobs. It was important to them that new staff were not too strict and that there were adults who knew them in the new school when it opens. Children all wanted their current head teacher to be the head teacher of the new school.

*Pupils were pleased to hear that every effort would be made to ensure that current staff could transfer to the new school should the proposal progress and that all the staff would be spoken to ask what they would like to do and how the council could help them.*

### **What will happen to our old school buildings?**

The children wanted to know what would happen to their old school buildings, suggesting that they should not be knocked down and still be used by people in the village. Many pupils stated how they liked a small school and the safety, security and comfort that it brings. It was mentioned by many that their parents and grandparents do not want a new school because of the history of the village schools.

*It was explained that there were no plans at the moment for their current schools and that the community would be asked about what they wanted to happen to the buildings before any decision would be made.*

### **How will this affect where we live?**

All the children stated how they like coming to their school and did not know how they would feel if the school closed and they would like their younger brothers and sisters to go there. It was also mentioned that they felt that closing their school could affect the community with less people going to the local shop and less people feeling part of their village – one pupil did say that a new community would be started at the new school. They also asked about after school clubs and what would happen if too many children wanted to join them and there was a limit and concerns around getting home if they attend after-school clubs were raised. A number of pupils asked about the playing fields and what would happen to these as they play football and rugby there and Cwmtawe need it for their sport and PE lessons.

*The children were told that their communities would still be there and it would be important the teachers reflected on the rich heritage and culture of each village when teaching at the proposed school. Any extra-curricular sessions would be organised by the school and would be offered to all pupils who were interested. The sports fields would be redesigned so that there was no loss of playing fields at Parc Ynysderw for Cwmtawe or the local sports clubs.*

### **The roads will be busy so how will we get to school safely?**

Busy roads and traffic was a concern for every group spoken to in all schools. Some of the children said it would be nearer their home, whilst others expressed the opposite view and would find it difficult to walk because the new school would be much further away than their current school and would have to be driven. Children accepted that this would be the case regardless of where a new school was sited. They were concerned about the amount of traffic near Cwmtawe School and the road near the shops and how little children like nursery would get to school and some children were concerned about the amount of traffic and strangers using the leisure centre close to their school.

*It was explained that they would not have a bus to take them to school unless any of the children would need to travel further than two miles to the new school, although this would become clearer as the proposal progresses. They were also told that the walking or cycling route to the school would be checked to make sure it was safe to use and that there would be emphasis on making sure all routes would be safe for pupils. It was explained to the pupils that a traffic plan would have to be made that would include leisure centre users, parent drop-off points and safe parking, again to ensure their safety.*

**Appendix C**

**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 Llangiwig Primary School, all of which will close.**

This report has been prepared by Her 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 Llangiwig Primary, all of which will close on 31st August 2024.
- 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 alternative options to the recommended proposal that include different permutations:

- Option 1: Maintaining the current situation
- Option 2: Establishing a federation, maintain the pool and not to establish a new ASD provision
- Option 3: Close two schools and transfer all pupils to one remaining school.
- Option 4: Close one school and transfer remaining pupils to the other two
- Option 5: Close all three schools and build on one of the existing school sites.
- Option 6: Close all three schools, build a school on new site and establish an LSC with a new swimming pool
- Option 7: Close all three schools, build a school on new site and establish an LSC but without a new swimming pool
- Option 8: Build three new replacement primary schools on the existing sites and establish ASD provision on one of the sites

Option 6 is the proposal recommended. 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 clearly that surplus places in the new school at 7%, would be significantly lower than the three schools combined, currently at 17.1%

The proposer has taken appropriate account of the impact of the proposal on the Welsh language. It is believed that the new provision could impact positively on Welsh language provision through having a more concentrated group of Welsh speaking staff able to support development of the language. A Welsh language impact assessment will be undertaken during the consultation.

### **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



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## Education, Leisure & Lifelong Learning Service Strategic School Improvement Programme

### **CONSULTATION DOCUMENT**

#### **Proposal to establish an English-medium 3-11 school to replace:**

##### **Alltwen Primary School**

*Alltwen Hill, Pontardawe SA8 3AB*

##### **Godre'rgraig Primary School**

*Graig Road, Godre'rgraig, SA9 2NY*

##### **Llangiwg Primary School**

*New Road, Ynysmeudwy SA8 4PJ*

**all of which will close**

Large print and alternative format or language versions of this document are available on request

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## **Introduction**

### ***What is this report about?***

This document is for pupils, parents/carers, school staff, school governors and others who have an interest in education in the Swansea Valley and Neath Port Talbot.

The Council has produced this consultation document as it is proposing to establish a new build, 21<sup>st</sup> century English-medium 3-11 school to replace Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary, all of which will close on 31<sup>st</sup> August 2024.

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 1<sup>st</sup> September 2024.

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.

### ***The background to the proposal***

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. This will include ensuring suitable provision for those pupils with special educational needs/additional learning needs.

Implementing the 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. It will also involve re-organising education provision to ensure pupils gain access to and benefit from the specialist support, skills and expertise available within the County Borough.

The Council has decided 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

On October 21<sup>st</sup> 2020 the Council's Cabinet gave permission to consult on the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools. The Council wishes to receive the views of pupils, parents, staff, Governing Bodies and other key stakeholders.

### ***The proposal and why change is being proposed***

The Council is proposing to build a new, 21<sup>st</sup> century primary school for the Swansea Valley to replace Alltwen, Godre'rgraig and Llangiwg Primary schools, all of which will close on 31<sup>st</sup> August 2024.

It is 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 21st century School 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.£2m of backlog maintenance costs across the three schools, and will also remove a split site arrangement at Llangiwg 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.

**Details of the schools affected by this proposal**

**Alltwen Primary School**

Alltwen Primary School is an English-medium community school serving boys and girls aged 3-11 years. It is situated in the village of Alltwen approx. 0.7miles from the possible site of the proposed new school.

**Pupil Numbers**

As at January 2020 there were 200 full-time and 31 part-time (nursery) pupils on roll. With the physical capacity to accommodate 239 full-time and 30 (30a.m/ 30pm) part-time (nursery) pupils, the school has a surplus capacity of 16% (39 full-time pupil places). Forecasts, based on current school admission trends, from January 2020 to January 2021 suggest a slight increase in pupil numbers.

Table 1

<i>Alltwen Primary School</i>				
		<i>Jan 2020</i>		<i>Jan 2021</i>
	School capacity	Actual Pupil Numbers	Surplus places	Projected Pupil Numbers
<i>Full-time</i>	239	200	16% (39)	203
<i>Part-time (Nursery)</i>	30	31	-3% (-1)	33

The table below shows pupil numbers over a 5 year period:

Table 2

<i>Alltwen Primary School</i>						
<i>School Census Jan 2016 – 2020 + Sept. '20 roll</i>						
<i>Year</i>	<i>16</i>	<i>17</i>	<i>18</i>	<i>19</i>	<i>20</i>	<i>Sept.20</i>
<i>Pupil numbers</i>	215	223	234	240	231	211
<i>Full Time</i>	184	179	197	208	200	203
<i>Part Time</i>	31	44	37	32	31	8

Notes:

- Capacity: Taken from 19-20 Capacities
- Actual Pupil numbers: Taken from PLASC Report Jan 2020
- School Census Data '16-'19: Taken from PLASC – Actual.

**Quality and standards in education**

Alltwen Primary School was last inspected in October 2018 and Estyn reported that it was a school with many good features, awarding good

judgements in the 5 inspection areas. The school has shown further improvement and the National Categorisation System placed the school in the yellow support category in 2016/17 and 2017/18, with an upward move in 2018/19 and 2019/20, which recognises it as an effective school which has secured good levels of learner outcomes in key performance indicators.

### **Standards**

The All Wales Core Data '*Academic-Achievement-pupils-aged-4-14-core-subjects-2019*' indicates that the Alltwen Primary school has a lower than average number of children in receipt of free school meals (15%) when compared to other schools in Neath Port Talbot (23%). There are also a higher than average number of children who have been identified as having additional learning needs (39%) when compared with Neath Port Talbot (24%).

Standards at the end of Foundation Phase are adequate in all areas of learning over three years, with 56% of pupils attaining the Foundation Phase indicator in 2019 (outcome 5 or higher in all three core areas of learning). This is lower than schools across Neath Port Talbot at 68% and all Wales at 80%.

At Key Stage 2 pupil outcomes are deemed to be adequate with all subjects over three years, with 76% of pupils attaining level 4 or higher in all three core subjects in 2019. This was lower than schools across Neath Port Talbot at 82% and all Wales at 88%.

### **Wellbeing and attitudes to learning**

Wellbeing and attitudes to learning of pupils was judged to be 'good' in the recent Estyn report (October 2018) which states: 'Pupils' wellbeing is a very strong aspect of the life of Alltwen School. Nearly all pupils feel safe, happy and secure in school.'

Attendance has been consistent, with current data showing a percentage of 94.7% for 2019/20, where nearly all pupils and their parents understand the importance of regular attendance at school. (Estyn October 2018).

### **Teaching and Learning**

Estyn, in 2018, report that across Alltwen Primary School effective teaching promotes pupils' good progress and as a result, relationships are

positive and respectful, many classrooms are productive and orderly, and most pupils want to learn.

The quality of teaching and learning experiences in Alltwen Primary was judged to be good overall and there are well-planned opportunities to develop pupil's oracy and reading skills in a wide range of contexts across the curriculum. There are also carefully-thought-through opportunities to develop pupils' ICT skills and Welsh language skills effectively, although numeracy skills need to be developed through other subjects.

### ***Care, Support and Guidance***

Estyn also reported that care, support and guidance were good, noting that the Headteacher has established an inclusive and caring ethos that permeates the daily life of the school. This has improved pupils' wellbeing very effectively.

Estyn also report that there is a wide range of valuable provision to meet the needs of pupils who have additional needs.

Alltwen Primary currently has skilled teaching assistants providing high quality care and support to ensure that pupils with a range of additional needs integrate seamlessly into the daily life of the school, this led Estyn to report that, 'Adults know and care for their pupils well, particularly those who may be vulnerable to underachievement.'

### ***Leadership and Management***

In 2018, Estyn judged Alltwen Primary school's leadership and management to be good, reporting that: 'The Headteacher is a well-motivated leader who provides a clear, shared and strategic vision for the school.'

In 2019, the Autumn Core Visit report also found that: 'The headteacher is a well-motivated leader who provides a clear, shared and strategic vision for the school. This focuses on ensuring the wellbeing of pupils and staff in a supportive and positive learning environment.'

The most recent Estyn inspection report can be viewed at:

<https://www.estyn.gov.wales/inspection-reports>

### **Quality of accommodation**

Alltwen Primary school occupies a prominent elevated position on Alltwen Hill, Alltwen, Pontardawe and whilst contained within a single enclosed site, operates between two separate buildings (a short distance apart within the site boundary).

The most recent building condition survey (November 2018) reports that the building is overall in a fair condition, with investment needed internally and externally.

Overall the site is graded C+ for condition i.e. the building is operational but major repairs or replacement will be needed including a heating distribution system which is old and inefficient and has exceeded its practical and recommended life span.

Backlog maintenance and accessibility costs amount to £611,000.

Plans for the vacated site have not yet been developed. The site is owned by the Council and any future use will be considered within the context of the Council's corporate asset management process.

### **Godre'rgraig Primary School**

Godre'rgraig Primary School is an English-medium community school serving boys and girls aged 3-11 years. It is situated in the village of Godre'rgraig approx. 3.2 miles from the possible site of the new school.

In July 2019 Godre'rgraig Primary was relocated temporarily from Godre'rgraig to Parc Ynysderw, adjacent to Cwmtawe Community School after geological experts found there was a potential landslide risk to the school's playground.

Earth Science Partnership (ESP), the experts commissioned by Neath Port Talbot Council, reported a medium level risk from a quarry spoil tip near the school after the Council asked them to extend their extensive landslide risk investigation work carried out in nearby Panteg, Ystalyfera.

Further work reported in 2020 has revealed that the risk remains and that it would be unsafe for staff and pupils to return to the school. The new build school provides the opportunity for Godre'rgraig Primary pupils to be permanently relocated and to benefit from the 21st century facilities provided.

## Pupil Numbers

As at January 2020, there were 135 full-time and 18 part-time (nursery) pupils on roll. With the physical capacity to accommodate 162 full-time and 19 (19 am/ 19 pm) part-time (nursery) pupils, the school has a surplus capacity of 17% (27 full-time pupil places). Forecasts, based on current school admission trends, from January 2020 to January 2021 suggest a slight increase in pupil numbers.

Table 3

Godre'rgraig Primary School				
		Jan 2020		Jan 2021
	School capacity	Actual Pupil Numbers	Surplus places	Projected Pupil Numbers
Full-time	162	135	17% (27)	134
Part-time (Nursery)	19	18	5% (1)	22

The table below shows pupil numbers over a 5 year period:

Table 4

Godre'rgraig Primary School						
School Census Jan 2016 – 2020 + Sept. '20 roll						
Year	16	17	18	19	20	Sept. 20
Pupil numbers	138	147	156	159	153	144
Full Time	114	122	134	134	135	136
Part Time	24	25	22	25	18	8

Notes:

- Capacity: Taken from 19-20 Capacities
- Actual Pupil numbers: Taken from PLASC Report Jan 2020
- School Census Data '16-'19: Taken from PLASC – Actual.

## Quality and Standards in Education

Godre'rgraig Primary School was last inspected in June 2017 and Estyn reported that it was a school with many good features, awarding good judgements in the three inspection areas and awarded a good for current standards and a good for prospects for improvement. The school is showing improvement and the National Categorisation System continues to place the school in the Yellow support category since 2015/16 through to 2019/20, which recognises it as an improving school which is securing good levels of learner outcomes in key performance indicators.

## Standards

Godre'rgraig Primary school has 159 pupils on roll. The All Wales Core Data 'Academic-Achievement-pupils-aged-4-14-core-subjects-2019' indicates that the school has a lower than average number of children in



receipt of free school meals (21%) when compared to other schools in Neath Port Talbot (21%). There are also a higher than average number of children who have been identified as having additional learning needs (35%) when compared with Neath Port Talbot (24%).

Standards at the end of Foundation Phase are adequate in all areas of learning over three years. 68% of pupils attained the Foundation Phase indicator in 2019 (outcome 5 or higher in all three core areas of learning). This is equal to schools across Neath Port Talbot at 68% but below Wales at 80%.

At Key Stage 2 pupil outcomes are deemed to be adequate with all subjects over three years. However, in 2019, 93% of pupils attained level 4 or higher in all three core subjects which was above the local authority at 82% and all Wales at 88%.

### ***Wellbeing and attitudes to learning***

Wellbeing was judged to be 'good' in the latest Estyn report (June 2017) in that: 'Pupils are confident that all staff care for them and will sort any issues quickly and fairly;' and '.....a real strength of pupils, throughout the school, is the way that they work collaboratively and interdependently'.

Attendance has steadily improved. Current 2019/20 data is at a five year high showing a percentage of 94.7%. Estyn in June 2017 stated that, 'staff promote the importance of good attendance thoroughly. Pupils benefit from a range of strategies and rewards to encourage good attendance.'

### ***Teaching and Learning***

Estyn in 2017 report that Godre'rgraig Primary School provides adequate learning experiences across the school. The quality of teaching in Godre'rgraig Primary was judged to be good overall with nearly all teachers matching work well to the wide range of needs and abilities in their class. This is a strength of teaching across the school.

Care, support and guidance were also judged 'good' with Estyn (June 2017) stating that, 'the school promotes a caring environment that develops pupils' health and wellbeing effectively,' with 'the school's attention to ensuring that pupils attain high levels of emotional wellbeing is central to its caring ethos. New pupils to the school settle quickly and feel secure. This is a strength of the school.'

Provision for pupils who have additional learning needs at Godre'rgraig Primary School is strong. Effective procedures enable staff to identify pupils' needs at an early stage. The school makes successful use of the expertise of staff to implement a wide variety of useful intervention strategies. As a result, pupils with additional learning needs make good progress against their targets.

### ***Leadership and Management***

In 2017, Estyn judged Godre'rgraig Primary school's leadership and management to be good, reporting that: 'The headteacher has a clear vision for the school and she shares this effectively with all stakeholders. All staff work together successfully to ensure that standards and pupils' wellbeing improve continually.'

In 2019, the Autumn Core Visit report also found that, 'The headteacher, supported by the deputy headteacher provide strong leadership for the school. The school development plan is a detailed, useful document. There is an appropriate balance between development and monitoring activities.'

The most recent Estyn inspection report can be viewed at:

<https://www.estyn.gov.wales/inspection-reports>

### ***Quality of Accommodation***

Godre'rgraig Primary school occupies a prominent elevated position on Graig Road, Godre'rgraig and whilst contained within a single enclosed site operates between two separate buildings (a very short distance apart within the site boundary) for Foundation Phase and KS2

The most recent building condition survey (November 2018) reports that the buildings are in poor to fair condition and are categorised as condition grade C-.

The school is circa 100 years old. Externally hard play surfaces require resurfacing and works are required to the covered play area. Internally the building requires general refurbishment to lift the dated appearance. The school kitchen also requires upgrading and refurbishing whilst the boiler and heating distribution systems have reached the end of their lifespan and require renewal.

The combined total backlog maintenance and accessibility costs for Godre'rgraig Primary School amount to £740,050.

Plans for the vacated site have not yet been developed. The site is owned by the Council and any future use will be considered within the context of the Council's corporate asset management process.

### Llangiwg Primary School

Llangiwg Primary School is an English-medium community school serving boys and girls aged 3-11 years. It is situated in the village of Ynysmeudwy approx. 1.3 miles from the possible site of the new school.

#### Pupil Numbers

As at January 2020, there were 119 full-time and 17 part-time (nursery) pupils on roll. With the physical capacity to accommodate 147 full-time and 53 (53 am/ 53 pm) part-time (nursery) pupils, the school has a surplus capacity of 19% (28 full-time pupil places). Forecasts, based on current school admission trends, from January 2020 to January 2021 suggest a slight decrease in pupil numbers.

Table 5

<i>Llangiwg Primary School</i>				
		<i>Jan 2020</i>		<i>Jan 2021</i>
	School capacity	Actual Pupil Numbers	Surplus places	Projected Pupil Numbers
<i>Full-time</i>	147	119	19% (28)	109
<i>Part-time (Nursery)</i>	53	17	68% (36)	16

The table below shows pupil numbers over a 5 year period:

Table 6

<i>Llangiwg Primary School</i>						
<i>School Census Jan 2016 – 2020 + Sept. '20 roll</i>						
<i>Year</i>	16	17	18	19	20	<i>Sept.20</i>
<i>Pupil numbers</i>	152	150	136	138	136	127
<i>Full Time</i>	130	124	120	124	119	109
<i>Part Time</i>	22	26	16	14	17	18

Notes:

Capacity: Taken from 19-20 Capacities

Actual Pupil numbers: Taken from PLASC Report Jan 2020

School Census Data '16-'19: Taken from PLASC – Actual.

### Quality and standards in education

Llangiwg Primary School was last inspected in January 2019 and Estyn reported that it was a school with many good features, awarding good judgements in four out of five inspection areas. The school has shown

continued improvement. The National Categorisation System placed the school in the Red category in 2015/16 moving it to the Amber support category in 2016/17 through to 2018/19, with a further upward move in 2019/20 to the Yellow support category. ERW recognise it as an effective school which has secured good levels of learner outcomes in key performance indicators.

### **Standards**

The All Wales Core Data Data ‘*Academic-Achievement-pupils-aged-4-14-core-subjects-2019*’ indicates that the school has a slightly lower than average number of children in receipt of free school meals (22%) when compared to other schools in Neath Port Talbot (24%). There are also a slightly lower than average number of children who have been identified as having additional learning needs (22%) when compared with Neath Port Talbot (24%).

Standards at the end of Foundation Phase are adequate in all areas of learning over three years, with 57% of pupils attaining the Foundation Phase indicator in 2019 (outcome 5 or higher in all three core areas of learning). This is lower than schools across Neath Port Talbot at 68% and all Wales at 80%.

At Key Stage 2 pupil outcomes are deemed to be adequate with all subjects over three years, with 71% of pupils attaining level 4 or higher in all three core subjects in 2019. This was lower than schools across Neath Port Talbot at 82% and all Wales at 88%.

### **Wellbeing and attitudes to learning**

Wellbeing and attitudes to learning of pupils was judged to be ‘adequate and needs improvement’ in the recent Estyn report (January 2019) but stated that, ‘Most (pupils) show high levels of engagement and approach tasks with enthusiasm..... and engage constructively with other pupils.’

Attendance has shown a steady improvement with current data for 2019/20 displaying a percentage of 94.5%. Estyn (January 2019) stated that ‘most pupils are aware of the importance of attending school regularly and punctually.’

### ***Teaching and Learning Experiences***

Estyn in 2019 report that Llangiwg Primary School provides a broad, balanced curriculum enhanced by a range of experiences, activities and visits that consolidate and enrich learning.

The quality of teaching and learning experiences in Llangiwg Primary was judged to be good overall (Estyn January 2019). Estyn state that, 'most teachers set appropriate expectations for pupils' achievement and motivate them to work hard.'

### ***Care Support and Guidance***

Estyn also reported that care, support and guidance were good, noting that, 'The school is a happy, inclusive and caring community, where pupils and staff show high levels of respect for each other.' Estyn also report that all staff responded sensitively to the social and emotional needs of pupils.

Estyn commented that, 'the school's provision for pupils with additional learning needs is good .... with well-focused learning plans with clear targets for pupils' development.'

The school has effective links with parents and carers and 'parents feel that the school's inclusive ethos nurtures all pupils and builds their confidence and self-esteem well.' (Estyn January 2019)

### ***Leadership and Management***

In 2019, Estyn judged Llangiwg Primary school's leadership and management to be good, reporting that: 'Leaders at all levels plan appropriately for the strategic development of the school and bring about worthwhile improvements.'

The Autumn Core Visit report, in 2019, also found that: 'The headteacher provides strong and purposeful leadership for the school and sets a clear strategic direction for improving the school. Senior leaders use an effective range of self-evaluation activities to evaluate the school's performance and plan for improvement.'

The most recent Estyn inspection report can be viewed at:

<https://www.estyn.gov.wales/inspection-reports>

### ***Quality of accommodation***

Llangiwg Primary School holds a prominent kerbside position on New Road, Ynsymudwy and operates across two distinct sites approximately 100m apart along the same road.

The main teaching block is constructed of stonework with concrete detailing and concrete cladding to the front whilst the separate nursery is housed in a demountable type building.

The most recent building condition survey (November 2018) reports that the nursery block has received moderate investment over recent years and is categorised as condition grade B, i.e. the building is sound, operationally safe and exhibits only minor deterioration.

The main block overall is in poor to fair condition and is categorised as condition grade C. The boiler system and distribution has reached the end of its practical and economic lifespan and needs to be replaced. Internally, timber floor coverings and kitchen areas require upgrading.

Overall the combined total condition and accessibility costs for Llangiwg Primary school across both sites amount to £701,550.

Plans for the vacated site have not yet been developed. The site is owned by the Council and any future use will be considered within the context of the Council's corporate asset management process.

### ***Other schools that might be affected by this proposal***

#### **Cwmtawe Community School**

Cwmtawe Community School is an English medium, 11-16 school situated at Parc Ynysderw, in close proximity to the suggested site of the proposed new school and swimming pool. This school is not a subject of the proposal and is not considered to be directly affected, however it is expected that the new and improved facilities on the site will be of benefit to pupils attending Cwmtawe Community School. It is also the secondary school to which pupils from Alltwen, Godre'rgraig and Llangiwg currently transfer at the end of year 6, and this would also be the case for pupils in the proposed new school.

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. It will also enhance and improve the sporting facilities currently enjoyed by Cwmtawe Community School pupils.

A new build 3-11 primary school at this site can offer opportunities for achieving many of the benefits of a 3-16 all through school model including continuity across the key stages, access to a wider range of expertise and specialist facilities, removal of transition performance dip, single management and leadership structures, shared vision and common purpose, and cost efficiencies.

### ***What options have been considered?***

***Option 1 – Status quo: maintain Alltwen, Godre'rgraig and Llangiwg Primary Schools, maintain the pool in its current position, do not establish a new ASD provision.***

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 opportunities for children and young people.

Maintaining the three schools at their present sites is not considered to be the best use of resources or facilities.

Llangiwg Primary is currently located over two sites and has combined total backlog maintenance and accessibility costs of £701,550. The main school has terraced, hard surface playgrounds and is on a confined site.

Alltwen Primary has a number of demountable buildings and requires backlog works for condition and accessibility amounting to £611,000.

Maintaining these schools on separate sites would lead to cost inefficiency and would mean that the potential benefits afforded by a new school 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 as well as addressing surplus places and providing a 'state of the art' 21st Century teaching and learning environment delivering a positive impact on pupil outcomes.

As a result of the landslide risk Godre'rgraig Primary is currently housed in temporary demountable classrooms which are leased to the local authority, adjacent to Cwmtawe Community School. Maintaining status quo is not an option in this situation as although the temporary buildings are of a good standard and suitable for the purpose of accommodating primary aged pupils, the school could not remain in temporary, leased buildings indefinitely.

There is no direct capital cost associated with this option currently, although Godre'rgraig Primary would not be able to remain in temporary accommodation and a more permanent solution would be needed. It is likely that any permanent solution would incur significant capital costs.

If all three schools were to remain on their current sites the opportunity for a new, purpose built LSC would not present itself. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

This option is not recommended as a basis for consultation

***Option 2 – Establish a federation of Alltwen, Godre'rgraig and Llangiwig Primary schools, maintain the pool in its current position, do not establish a new ASD provision***

In a federation schools are managed by a single governing body which takes decisions about matters such as staffing structures and expenditure. Under a single leadership and governance there are potential teaching and learning benefits, staff development opportunities and efficiencies that can arise from a federated arrangement. A single governing body will be able to pool resources, maximise staff expertise and share facilities.

A federation also presents the opportunity to co-ordinate curriculum provision and employ whole school teaching/learning strategies that will improve school performance and enhance educational experiences. In a



federation schools remain separate legal entities retaining their name, registered pupils and budget, and can retain their existing sites.

Because of this, the federation would not necessarily achieve efficiencies through removing duplication, for example all three schools would be inspected separately by Estyn and there would be separate expenditure trails to manage and audit.

This option would also not resolve the need for Godre'rgraig Primary to be permanently relocated from the temporary buildings it currently occupies.

There is no direct capital cost associated with this option, although a permanent location would need to be found for Godre'rgraig Primary School which is likely to incur capital costs.

Whilst there is a significant cost to building a new primary school, the benefits of a purpose built 21st Century school outweigh any potential teaching and learning benefits and modest funding efficiencies that can arise from a federated arrangement between the three schools. In addition, federation would not remove the issues of surplus capacity, confined and restricted sites and significant repair and maintenance costs, or remove the need for a permanent solution to Godre'rgraig Primary School's need for relocation.

A federation does not provide the opportunity for a new, purpose built LSC. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

This option is not recommended as a basis for consultation.

***Option 3 – Close two of the schools and transfer all pupils to the remaining school, maintain the pool in its current position, do not establish a new ASD provision.***

This option would prevent pupils and staff from benefitting from a new, purpose built school, meaning that recognised advantages from a modern learning environment would not be realised.

Additionally Llangiwg and Alltwen Primary schools are on confined and restricted sites and have significant repair and maintenance costs.

There is insufficient space at Llangiwg Primary school site to accommodate all the pupils from Alltwen and Godre'rgraig primaries.

Llangiwg Primary is located over two sites and neither site would be able to accommodate the necessary additional buildings and external areas that a larger school would require.

There is insufficient space at Alltwen Primary School to accommodate all the pupils from Llangiwg and Godre'rgraig Primary schools.

Godre'rgraig Primary has been relocated from its original site due to the risk of landslide and so would not be a suitable choice for accommodating pupils from any of the schools. It would also not be feasible to consider accommodating extra pupils from Llangiwg and Alltwen in Godre'rgraig Primary School's temporary building.

There is no direct capital cost associated with this option.

This option does not provide the opportunity for a new, purpose built LSC. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

This option is not recommended as a basis for consultation.

***Option 4 –Close one of the three schools and transfer pupils to the remaining two schools, maintain the pool in its current position, do not establish a new ASD provision.***

This option would prevent pupils and staff from benefitting from a new, purpose built school, meaning that recognised advantages from a modern learning environment would not be realised.

Additionally Llangiwg and Alltwen Primary schools are on confined and restricted sites and have significant repair and maintenance costs.

Godre'rgraig Primary has been relocated from its original site due to the risk of landslide and so would not be a suitable choice for accommodating pupils from any of the schools. It would also not be feasible to consider accommodating extra pupils from Llangiwg or Alltwen in Godre'rgraig Primary School's temporary building.

There is insufficient space at Alltwen Primary School to accommodate all the pupils from Godre'rgraig Primary School. PLASC 2020 data indicates that combining Alltwen and Godre'rgraig Primaries on the site of the current Alltwen Primary would require 335 pupil places (R-Yr6) which is 97 pupils over capacity.

There is insufficient space at Llangiwg Primary school site to accommodate all the pupils from Godre'rgraig Primary. PLASC 2020 data indicates that combining Llangiwg Primary and Godre'rgraig Primary pupils on the site of Llangiwg Primary would require 254 pupil places (R-Yr6) which would be 107 pupils over capacity.

Currently the majority of pupils attending Godre'rgraig Primary School are from its catchment area. It could be possible to close Godre'rgraig Primary and split the current catchment area so that pupils could be allocated to either Llangiwg Primary or Alltwen Primary, but this could be potentially divisive for the pupils and the Godre'rgraig community as a whole.

There is no direct capital cost associated with this option.

This option does not provide the opportunity for a new, purpose built LSC. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

This option is not recommended as a basis for consultation.

***Option 5 – Close Alltwen, Godre’rgraig and Llangiwg Primary schools and build a new replacement primary school on one of the existing school sites, maintain the pool in its current position, do not establish a new ASD provision***

There is a significant capital investment cost associated with this proposal for which Welsh Government grant funding would be needed.

All three schools are on confined and restricted sites which would not allow the benefits of a new school build and facilities to be fully realised, including access to grant funding. The potential cost of temporary accommodation to house pupils during the construction phase would incur further costs.

Additionally Godre’rgraig Primary school site is deemed unsafe due to the risk of landslide which would further rule out the possibility of building on this site.

This option does not provide the opportunity for a new, purpose built LSC. As the three schools currently are on restricted or temporary sites it would not be desirable to increase the footprint of the school in order for it to accommodate the extra provision.

It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

This option is not recommended as a basis for consultation.

***Option 6 - Close Alltwen, Llangiwg and Godre’rgraig Primary schools and build a new school in Parc Ynysderw to accommodate 630 pupils (plus 140 nursery pupils) from the catchment areas of Alltwen,***

***Llangiwg and Godre'rgraig, establish a new LSC provision and build a new pool.***

Whilst there is a significant cost to building a new primary school, the existing schools on their current sites are hindered through lack of space for implementing improvements. Land is available at Parc Ynysderw which will enable the new school to have access to large outdoor play areas and improved physical activity and wellbeing opportunities, and will offer far more space to accommodate a greater number of pupils in a purpose built school appropriate to the requirements of the modern curriculum.

The new 21<sup>st</sup> century school will accommodate 630 full-time pupils and 140 part-time (70 a.m. /70 p.m.) nursery age pupils and will create significant teaching and learning benefits for pupils, staff and the community. New builds have been shown to have a positive impact on standards and pupil wellbeing, and can improve many aspects of curriculum delivery. Combining the three schools can deliver more effective curriculum provision and greater teaching and learning opportunities.

Increasing pupil numbers at a single site school by combining the three schools in a brand new purpose built facility would provide a far more effective, long-term use of public money, addressing surplus places and providing a purpose built 'state of the art' 21<sup>st</sup> century teaching and learning environment which will improve pupil outcomes.

The new build will be funded jointly from Welsh Government 21<sup>st</sup> century School Programme capital grant monies and from the Council's prudential borrowing capacity.

The new build will also remove existing maintenance and repair liabilities at the three current sites.

Including an LSC provision in the new build will ensure that pupils are provided with purpose built, 21<sup>st</sup> century standard facilities, with the aim of ensuring best possible outcomes for pupils, and will address identified need for further provision for primary aged pupils with ASD.

The pool will provide an additional facility alongside the leisure centre, revitalising and increasing the health and well-being facilities in the area. The pool is currently used by some schools in the area but this scheme aims to increase usage by schools and by the wider community due to its improved location.

This option is recommended by officers.

***Option 7 - Close Alltwen, Llangiwig and Godre'rgraig Primary schools and build a new school on another site to accommodate 630 pupils (plus 140 nursery pupils) from the catchment areas of Alltwen, Llangiwig and Godre'rgraig Primaries, establish a new LSC provision and maintain the pool in its current location***

The benefits of a 21<sup>st</sup> Century school teaching and learning environment would be realised and significant backlog maintenance and repair liabilities would be removed.

However identifying a second site which would be large enough to accommodate all the requirements of a 21<sup>st</sup> century school in an area within reasonable travelling distance for all pupils is very difficult as there is very little suitable land available.

Additionally the benefit of being in Parc Ynysderw with the improved leisure offer and close proximity to Cwmtawe Community School would not be realised if the school was built elsewhere.

If a large enough site could be identified then it would be possible to include an LSC for primary aged pupils with a statement of ASD. Including this provision in the new build will ensure that pupils are provided with purpose built, 21<sup>st</sup> century standard facilities, with the aim of ensuring best possible outcomes for pupils, and will address identified need for further provision for pupils with ASD, specifically primary aged pupils.

If the pool was not to be located at Parc Ynysderw then the opportunity to create a complementary facility alongside the leisure centre would be lost. The vision of a community learning, health and wellbeing campus would also not be realised if the Parc Ynysderw site is not utilised.

This option is not recommended as a basis for consultation

***Option 8 - Build 3 new, replacement primary schools on the existing sites of Alltwen, Llangiwg and Godre'rgraig Primary schools, maintain the pool in its current position, establish a new ASD provision on one of the sites***

All three schools are on confined and restricted sites which would not allow the benefits of a new school build and facilities to be fully realised, and could increase costs significantly. Building three schools rather than one would not be cost effective and access to grant funding is unlikely to be successful. There are potentially significant additional costs associated with the need to provide temporary accommodation to decant pupils whilst the construction phase progresses.

Additionally a new site would need to be identified for Godre'rgraig Primary, and suitable land of the appropriate size is not available within the catchment area.

This option does provide the opportunity for a new, purpose built LSC on one of the sites, should a space large enough be found in the area. However including this provision would further increase the costs of the option.

It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

This option is not recommended as a basis for consultation.

***Preferred Option – Option 6***

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 21<sup>st</sup> 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.

### ***Information about the proposed new primary school***

The proposed new, 21<sup>st</sup> century build primary school will provide for up to for 630 full-time pupils and 140 part-time (70 a.m. / 70 p.m.) nursery pupils, and 14 pupils in the LSC. This will deliver sufficient accommodation for the total combined forecasted pupil number of the existing three primary schools and for growth in pupil population. For the purpose of consultation, the proposed admission number for the primary school will be 90.

The table below shows a five year forecast of pupil numbers.

*Table 7*

School	Jan 2021	Jan 2022	Jan 2023	Jan 2024	Jan 2025	Jan 2026
Alltwen Primary (exc. nursery)	203	199	191	193	187	189
Alltwen Primary nursery only	33	32	32	32	32	32
Godre'rgraig Primary (exc. nursery)	134	131	120	119	118	119
Godre'rgraig Primary nursery only	22	22	20	21	21	21
Llangiwig Primary (exc. nursery)	109	107	93	90	87	89
Llangiwig Primary nursery only	16	16	16	16	16	16
New Primary (exc. nursery)	446	437	404	402	392	397
New Primary nursery only	71	70	68	69	69	69

Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary schools have a combined surplus capacity of 17.1% (94 full-time pupil places). Based on a three form entry new build and forecasted pupil numbers at 2020, the new school would have approx. 7% surplus capacity (43 full-time pupil places).



Table 8

New Primary School Swansea Valley			
Jan 2024			
	School capacity	Forecasted Pupil Numbers	Surplus places
Full-time	<b>630</b>	<b>587</b>	<b>7% (43)</b>
Part-time (Nursery)	<b>140places</b> (70am/70pm)	<b>138</b> (69am/69pm)	<b>1% (2)</b>

The new build school will be an exciting place for pupils and staff both internally and externally. It will have spacious, light and airy classrooms, with access to a range of high quality and appropriate spaces for social interaction

The new buildings will facilitate easier delivery of the new curriculum for Wales, and will provide greater opportunities for an inclusive, skill based approach to teaching and learning.

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, particularly when schools are in areas with high levels of social and economic deprivation. The 2015 report, ‘Clever Classrooms’, found that well designed schools can significantly boost children’s academic performance in reading, writing and maths.

The new school will ensure that pupils have adaptable ICT facilities, suitable for learning in the 21st century. Mobile technology will be integrated with a sound pedagogical base to provide pupils with enhanced learning experiences, equipping them with the key skills and motivation needed to raise standards.

**Information about the proposed LSC**

The new school will include an LSC which will provide learning support for pupils with ASD for up to 16 pupils who are in receipt of a Statement of SEN.

The provision will be managed by the school and be under the school's governance. However it will be a provision recognised by the Council as reserved for pupils with ALN and pupils admitted to the provision would be in addition to the admission number of the school. Admission to the provision would be via a special admission panel of the Council and specific entry and exit criteria would apply.

Pupils at the proposed provision will 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.

The provision will alleviate the current pressure to address demand for places for pupils with more complex needs, avoiding potential costly out of county placements and allowing opportunities for children to access learning within their local community and will complement the specialist provision and support already available within the County Borough.

### **Information about the proposed pool**

In addition to the new build primary school and specialist ASD provision it is also proposed to include as part of the scheme a new build 25 metre, 6 lane swimming pool, with additional learner pool to replace the existing Pontardawe Swimming Pool. The pool will provide an additional facility alongside the 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, complementing the existing Cwmtawe Community School and Pontardawe Leisure Centre provision. The pool is currently used by some schools in the area but this scheme aims to increase usage by schools and by the wider community due to its improved co-location.

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. Given the relative 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 school will further enhance the physical activity and wellbeing opportunities open to pupils who will attend the new school as well as those at Cwmtawe Community School, and those of other nearby schools including YGG Trebannws and YGG Pontardawe.

The facility will also provide sustainable opportunities for swimming lessons and participation to residents of all ages within the nearby communities. This campus will provide modern leisure facilities where people can enjoy physical activity, and where physical, mental health and wellbeing is positively promoted throughout local communities.

### ***The expected benefits of the proposal***

The proposal seeks to provide the Swansea Valley community with improved educational and health and wellbeing facilities, through creating a learning, health and wellbeing community campus for children and adults of all ages.

The proposal will lead to the more efficient and effective use of resources, resulting in revenue savings for reinvestment in the education budget - similarly, for any capital receipts accruing. In this regard, the proposal supports the Council's effective management of its education budget and promotes the more equitable distribution of funding across local schools.

Creating a primary school with a larger pupil population can:

- 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

### ***Potential Risks and Risk Management***

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

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

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 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
- 21<sup>st</sup> 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

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
- 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

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.

### ***What is the impact on pupils and parents?***

The new primary school will serve the combined catchment areas of Alltwen, Godre'rgraig and Llangiwg Primary schools. The proposed new school will provide 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 improve the learning outcomes for all children across the ability range. The new school will have sufficient playing fields and green space available on site which is not the case with the existing schools and which can be made available for community use.

The arrangements for admission to the new primary school will allow full-time pupils on roll at Alltwen, Godre'rgraig and Llangiwg Primary schools at the point of closure to transfer to the roll of the new school, subject to the wishes of parents or unless pupils are transferring to secondary education. Prospective pupils (including nursery pupils transferring to full-time education) will need to apply for a place at the primary school, in line with the Council's school admissions policy.

Class sizes at the new primary school will be set by the head teacher and governing body. When setting the class sizes the relevant Welsh Government legislation and guidelines will be followed, including the recommendation that classes are no larger than 30 pupils.

Admission to the proposed LSC would be via a special admission panel of the Council and specific entry and exit criteria would apply.

### ***What is the impact on the workforce?***

The proposal will mean changes that impact on the employment of school staff. All of the existing schools will close on 31st August 2024. 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.

The primary school will open on 1st September 2024 and school staff will be employed by the new governing body for the primary school (albeit appointed by the temporary governing body).

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.

### ***What is the impact on governors?***

If the proposal goes ahead a temporary governing body will be established prior to the opening of the primary school. The temporary governing body will take important decisions about the new school including the appointment of a head teacher, agreeing a staffing structure and adopting operating procedures. The temporary governing body will also resolve other issues including school uniform which, in line with good practice, will be determined following consultation with pupils and parents.

The temporary governing body is likely to be made up of existing governors from Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary schools as this ensures continuity that will place the new school on a sound footing.

Each school will continue to exist, managed by their respective governing bodies, until all three schools are closed. During this period the existing and temporary governing bodies will undertake their duties in parallel.

When the new school is opened, it will be managed by the temporary governing body until a permanent governing body is established. The governing bodies of Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary schools will cease to exist once the new school is opened.

### ***What is the impact on travel arrangements?***

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. Home to school journey times from within the catchment area fall within reasonable limits for primary age pupils. Prior to the new school opening suitable walking routes will be assessed.

Support with home to school travel will be made available in line with the Council's Home to School Transport 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.

Under the School Travel Plan requirements, all schools, together with the Council's Road Safety Team, are committed to:

- improving road safety within the local community

- raising awareness about travel issues
- encouraging walking, cycling and public transport for the school journey where applicable
- encouraging independent travel where applicable

Both the School Admissions Policy and Home to School Travel Policy are available on the Council's website: [www.npt.gov.uk](http://www.npt.gov.uk)

### ***What is the impact on special educational needs provision?***

There are no specialist units for children with statements of special educational needs at either of the three schools, i.e. provision recognised by the Council as reserved for pupils with SEN. Pupils with additional learning needs, including children with statements of special educational needs, are supported in a mainstream setting with appropriate funding for this purpose. The new school will continue to offer this level of support.

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. The data also shows increasing demand for specialist support at primary age for pupils in NPT with Autistic Spectrum Disorder.

Pupils attending the proposed LSC provision within the new school will 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 will be available to share with mainstream staff and, as such, will indirectly benefit SEN provision at the new school.

It is also envisaged that the LSC provision will 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.



**What is the financial impact?**

The cost of the new build is estimated at c.£22,705,000 apportioned as per table 6 below.

Table 9

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

Welsh Government 21<sup>st</sup> Century Schools Programme capital grant funding has been approved, in principle. The full business case will be considered by Welsh Government in due course.

Combined backlog maintenance and accessibility costs for the existing schools amounts to circa. £2m 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 leased accommodation. Additionally backlog maintenance costs for the current pool amounting to £1,221,783 would also be removed by this proposal

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.

Most of the revenue budget allocation to Alltwn, Godre’rgraig and Llangiwg Primary schools is generated by pupil numbers. Similarly, the new primary school’s budget will be based mainly on the combined pupil roll. Savings will occur 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 effective management of its education budget and promotes the more equitable distribution of funding across local schools.

The proposed new school will receive additional funding to manage the 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.

Additional recurring revenue costs associated with this proposal such as potential additional transport costs may be incurred. Similarly there will be revenue efficiency savings associated with this proposal.

Based on the money delegated to schools in the 2020/2021 financial year, per pupil funding for Alltwen Primary school is £3,685 whilst for Llangiwig Primary school per pupil funding is £3,965 and for Godre'rgraig Primary school £ 3,886. This compares with the average for NPT primary schools at £3,941.

Prior to the primary school opening on 1<sup>st</sup> September 2024, Alltwen, Godre'rgraig and Llangiwig primary schools will receive their annual school budget shares for the 5/12<sup>ths</sup> of the financial year 2023/2024. When the new school opens on 1<sup>st</sup> September 2024 it will receive a budget share based on the number of pupils on roll at that time.

### ***Impact on community usage***

The proposal for the new build school also includes the creation of a learning, health and wellbeing community campus through the addition of a new build pool on the Parc Ynysderw site, with the aim of providing opportunities for all members of the Swansea Valley community to benefit from modern, fit for purpose facilities. The new build school and pool's co-location alongside the existing Cwmtawe Community School and Pontardawe Leisure Centre will provide opportunities to further develop and integrate community provision with delivery partners for indoor and outdoor sporting activities. The pool is currently used by some schools in the area but this scheme aims to increase usage by schools and by the wider community due to its improved location

Cwmtawe Comprehensive School has a range of facilities that can be used by community groups including hard tennis courts, meeting spaces, specialist facilities and performance spaces. These facilities will continue to be available and can be fully utilised by the community, and the primary school facilities will complement and extend these, providing a wide range of activities, services and experiences for pupils, families and the wider community.

Early years and childcare facilities are already available within walking distance of the new school, and it is expected that wrap around care will be easier to facilitate due to the location.

Additionally Pontardawe has a rich cultural heritage, and is known for promoting and developing the arts both through the medium of Welsh as well as English. The close proximity of the new learning campus to the heart of Pontardawe town would ensure pupils and families are able to both benefit from and contribute to this heritage.

This proposal will help to deliver the Council's aim of improving the health and wellbeing of all people living in Neath Port Talbot and reducing the gap between the least and most healthy.

A more detailed community impact assessment will be undertaken during the consultation period and the findings reported following the end of the consultation process.

### **Fields in Trust**

The playing fields at Parc Ynysderw are one of 471 King George Fields established as a memorial to King George V.

Fields in Trust is the sole trustee of the King George's Fields Foundation and as such its consent is needed for any disposals or changes of use. Fields in Trust works to protect parks, playing fields and other spaces and as part of the planning process supports Sport Wales in its role as the statutory consultee on developments affecting playing fields.

Fields in Trust has stated that it is responsive to local change and flexible in its dealings with landowners and will be happy to consider a possible exchange of land to accommodate the new school.

### ***Integrated Impact Assessment***

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the well-being of

Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment has indicated that a more in depth assessment is required if the proposal proceeds as it is likely to have an impact on pupils, staff and other potential users of the school. The proposal may also impact on opportunities to use the Welsh language. It is unknown whether the proposal would impact on biodiversity. Further consideration of how the proposal embraces the sustainable development principle is needed.

In response to the Well-being of Future Generations (Wales) Act 2015 the Council has set three 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'. This proposal directly supports wellbeing objective 1 – 'to improve the wellbeing of children and young people' through the provision of a 21st century school for current and future generations of primary aged pupils and also supports wellbeing objective 2 – 'to improve the wellbeing of all adults who live in the county borough' and wellbeing objective 3 'to develop the local economy and environment so that the wellbeing of people can be improved', through the creation of jobs during the construction phase and beyond.

Following full consultation where views of all stakeholders will be gathered, greater information will be available which will further help to inform the full assessment.

A fully completed IIA will be considered by the Council before any final decision is taken on whether or not the proposal is to be implemented.

### ***What is the impact on the Welsh Language?***

The Council's Welsh in Education Strategic Plan (WESP) details how it intends to support and further develop Welsh language education in schools.

Alltwen, Godre'rgraig and Llangiwig primaries teach Welsh as a second language and this will also be the case for the new school. Currently 25% 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.

The WESP objective ' To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner' is of particular relevance to this proposal.

The Swansea Valley area is a linguistically significant area as it contains the highest number and percentages of Welsh speakers in Neath Port Talbot, and is amongst the highest in Wales as a whole.

Primary education through the medium of Welsh is available at Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gynradd Gymraeg Trebannws. Additionally Ysgol Gymraeg Ystalyfera –Bro Dur, which is approximately 5 miles from the proposed site, provides all through 3-19 education through the medium of Welsh.

Significant investment has taken place at Ysgol Gymraeg Ystalyfera –Bro Dur through projects in both Band A (circ. £17.5m) and Band B (circ. £9m) of 21st Century Schools Capital Funding Programme.

In addition funding of £1.6m has been secured to improve provision at Ysgol Gynradd Gymraeg Pontardawe, including extended and enhanced childcare and Foundation Phase facilities. Work is expected to be completed in 2021.

It is not expected that this proposal would reduce Welsh language provision in the area, however a Welsh language impact assessment will be undertaken during consultation.

### ***Legal process and Consultation Timetable***

The School Standards & Organisation (Wales) Act 2013 (the Act) provides the legislative framework by which the Council may implement a 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. The Council's procedures are in line with legislative requirements.

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, 2017.

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.

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

Neath Port Talbot County Borough Council is the proposer and the Council wishes to hear the views of all interested parties before deciding whether to progress its proposal. All responses to this consultation will be considered when making its decision and a consultation report will be published following the end of the consultation period. The consultation report will summarise the issues raised by consultees and include a response. The consultation report will also set out Estyn's view on the proposal.

Having considered the views expressed by interested parties, if the Council decides to proceed with its plan it will publish a statutory proposal. Once the statutory proposal is published there will be a 28 day period to respond in writing, known as the 'objection period'. Only objections submitted during this period will be considered. If objections are received, an objection report will be published following the end of the objection period. The report will summarise objections raised and provide a response.

***Please note that only written objections submitted during the statutory notice period will be considered. Comments submitted as part of the consultation period will need to be re-submitted in writing during the statutory notice period if they are to be considered as objections.***

Following the conclusion of the objection period the Council is required to determine the proposal and the matter will go before the Council’s Cabinet for decision. In its decision making the Council’s Cabinet will give due consideration to any objections raised alongside the case for the proposal. The proposal will be determined in line with the requirements of the School Standards and Organisation (Wales) Act 2013 and associated School Organisation Code 2018.

### ***Process Timetable***

The main activities and actions, and the dates/periods that they are scheduled to take place is set out below

What	When
Consultation period	3 <sup>rd</sup> November 2020- 19 <sup>th</sup> January 2021
Consultation Report published	26 <sup>th</sup> February 2021
Decision to publish proposal (Cabinet)	7 <sup>th</sup> April 2021
Publication of Statutory Notice	13 <sup>th</sup> April 2021
Period for submitting objections	13 <sup>th</sup> April – 11 <sup>th</sup> May 2021
Determination	Within 16 weeks of the end of the objection period
Objection Report published and decision notification	At the same time as the determination decision is published and within 7 days
Proposed Implementation Date	1 <sup>st</sup> September 2024

### ***Consultation with children and young people***

It is important that when bringing forward proposals, suitable arrangements are made to consult with pupils. The Council will consult with pupils in Alltwn, Godre’rgraig and Llangiwig Primary schools and the information gathered in these sessions will be included in the final consultation report.

## ***Making comment on the proposal***

The purpose of this consultation document is to provide information and to invite views on the Council's proposal to open a new 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools.

Formal consultation will take place during the period: 3<sup>rd</sup> November 2020 to 19<sup>th</sup> January 2021. Comments on the proposal must be submitted in writing by letter, e-mail or on the comment form attached to this document.

Consultation responses can also be submitted using the Consultation Portal on the Council's web site or by email to [SSIP@npt.gov.uk](mailto:SSIP@npt.gov.uk).

Due to the ongoing public health situation there will be no face-to-face consultation events arranged for this consultation. Questions concerning the proposal can be submitted to [SSIP@npt.gov.uk](mailto:SSIP@npt.gov.uk).

**The closing date for responses to this consultation is 19<sup>th</sup> January 2021 at 12.00pm.** Unfortunately we will not be able consider any consultation responses received after this date.

Responses should be sent to the following address: **Aled Evans, Director of Education Leisure and Lifelong Learning, (marked for the attention of the SSIP Team), Civic Centre, Port Talbot SA13 1PJ** or e-mail to: [SSIP@npt.gov.uk](mailto:SSIP@npt.gov.uk)

A full list of those being consulted can be seen below:

<b>List of Consultees</b>	
Alltwen, 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	MP (for Neath) – Christina Rees
<ul style="list-style-type: none"> <li>- Diocese of Menevia, Swansea</li> <li>- Diocese of Llandaff, Vale of Glamorgan</li> </ul>	AM (for Neath) – Jeremy Miles
Trade Unions	Regional Assembly Members
Estyn	SEN Partners
Regional Education Consortium (ERW)	Children and Young Person Partnership (inc. Early Years Development and Childcare)
NPTCBC Integrated Transport Unit	Police and Crime Commissioner
Communities First Partnership	NPTCBC Officers

## Comment Form

### Consultation on a proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools.

Your views matter. Please tell us what you think about the proposal by completing this questionnaire. The closing date for the submission of responses to this consultation is midday on 19<sup>th</sup> January 2021. If additional space is needed comments can be sent to [SSIP@npt.gov.uk](mailto:SSIP@npt.gov.uk)

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

**Please indicate how you are associated with the schools affected by this consultation:**

(Required)

- Parent, carer or guardian
- Prospective parent, carer or guardian
- Governor
- Member of staff
- Member of the community
- Other

If other please specify

**Please indicate which school you are associated with**

- Alltwen
- Godre'rgraig
- Llangiwg
- Other

If other please specify

**Do you support the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary schools?**

Yes

No

**If Yes,** please use the box below to provide comments or explain which part of the proposal you support.

**If No,** please use the box below to provide comments or explain which part of the proposal you do not support.

**Do you have any alternative options that you would like us to consider?**

Please use the box below to provide comments

**Possible Impacts on the Welsh Language**

**Do you believe that the proposal will have a positive, negative or neutral impact on opportunities to use the Welsh language?**

Positive       Negative       Neutral

Please provide details of the impact and what steps we consider to lessen, reduce or remove this and improve positive impacts?

**Do you believe that the proposal will treat the Welsh and English languages equally?**

Yes       No       Neutral

Please use the box below to provide comments

**Possible Impacts on the Protected Characteristics**

**Will the proposal impact on the protected characteristic/s under the Equality Act 2010?**

The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation

Positive       Negative       Neutral

**Please provide details of the protected characteristic/s you consider will be affected by the proposal in the box below**

**Please provide details of the positive or negative impact you have identified as a result of the protected characteristic/s**

**If you have identified a positive impact based on the protected characteristic/s please provide details of how we could consider improving that impact.**

**If you have identified a negative impact based on the protected characteristic, please provide details of what we could consider to improve reduce or remove that negative impact.**

**At the end of the Consultation Period, the Council will publish a Consultation Report, summarising the issues raised in the consultation responses received and providing the Council's response to these issues.**

The report will be published on 26<sup>th</sup> February 2021

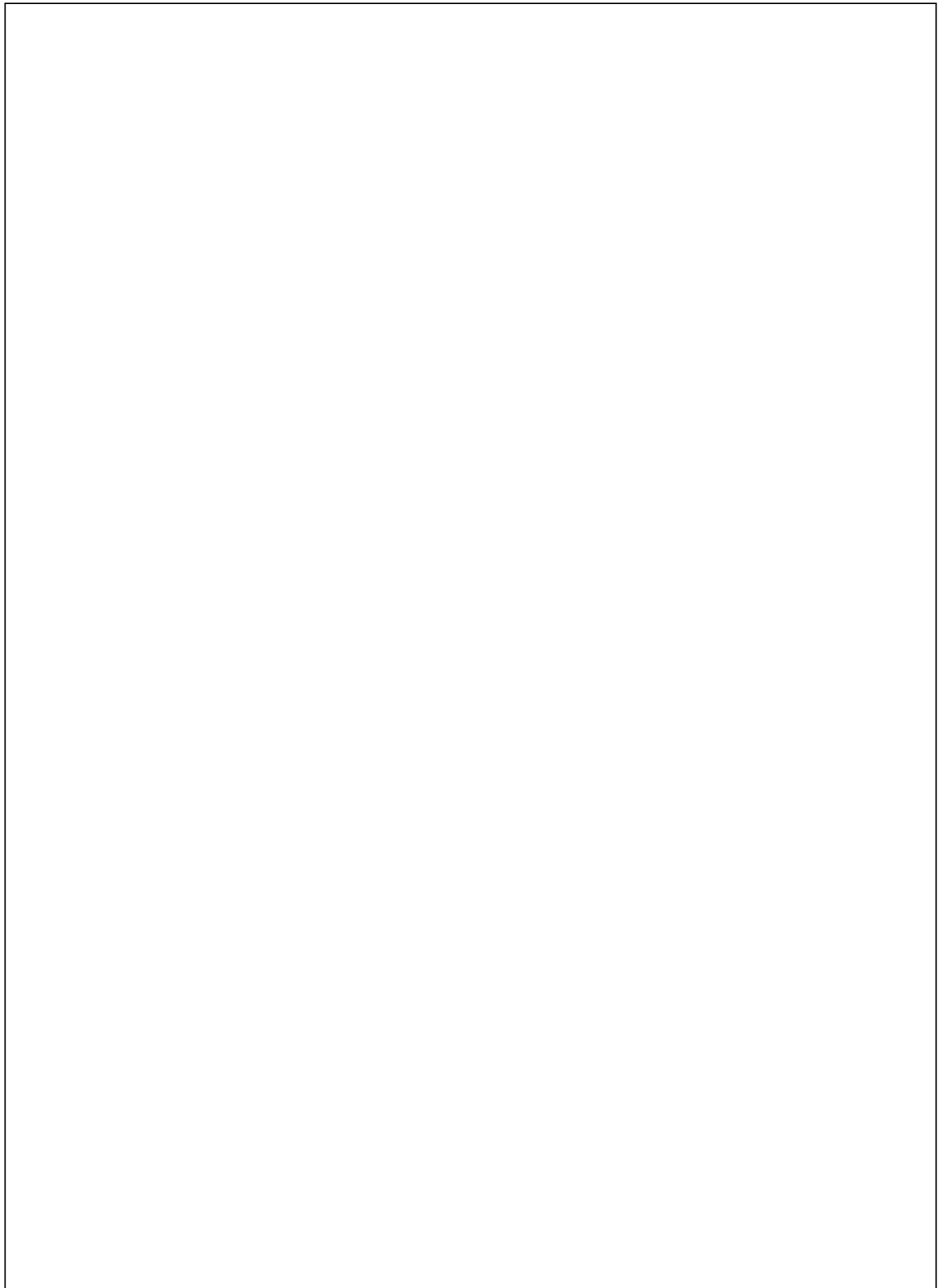
**If you wish to be notified of the publication of the consultation report please supply your contact details**

Name:

Email address:

Postal address:

Additional comments/suggestions



## About You

The Council operates equality policies that aim to ensure that everyone is treated fairly and equally. To make sure that people are not discriminated against when accessing our services we carry out monitoring and therefore would be grateful if you could answer the following questions. The information you provide is strictly confidential.

**Age:** (please ✓one answer)

- |                                   |                                |                                |  |
|-----------------------------------|--------------------------------|--------------------------------|--|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 30-39 | <input type="checkbox"/> 60-74 | <input type="checkbox"/> 86+               |
| <input type="checkbox"/> 16-24    | <input type="checkbox"/> 40-49 | <input type="checkbox"/> 75-85 | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> 25-29    | <input type="checkbox"/> 50-59 |                                |  |

**Welsh Language** – are you: (please ✓one answer)

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Fluent speaker & writer        | <input type="checkbox"/> Fluent speaker        | <input type="checkbox"/> Learner                |
| <input type="checkbox"/> Fairly fluent speaker & writer | <input type="checkbox"/> Fairly fluent speaker | <input type="checkbox"/> Little or no knowledge |

The Equality Act 2010 defines a person as disabled if they have a physical or mental impairment, which has a substantial and long term (i.e. has lasted or is expected to last at least 12 months) adverse effect on the person's ability to carry out normal day-to-day activities.

**Do you consider yourself to have a disability?** (please ✓one answer)

- |                              |                             |  |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Prefer not to say |
|------------------------------|-----------------------------|--|

**Ethnic origin:** (please ✓one answer)

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> White British                  | <input type="checkbox"/> Mixed: White & Asian | <input type="checkbox"/> Black: African    |
| <input type="checkbox"/> White Irish                    | <input type="checkbox"/> Indian               | <input type="checkbox"/> Black: Caribbean  |
| <input type="checkbox"/> Mixed: White & Black Caribbean | <input type="checkbox"/> Bangladeshi          | <input type="checkbox"/> Chinese           |
| <input type="checkbox"/> Mixed: White & Black African   | <input type="checkbox"/> Pakistani            | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> Other (please specify):        | <input type="text"/>                          |  |



**Sex** (please ✓one answer)

- Male                       Female                       Transgender                       Prefer not to say

**Religion/Belief:** (please ✓one answer)

- Christian                       Buddhist                       Hindu                       Jewish                       Muslim  
 Sikh                       No religion                       Prefer not to say                       Any other religion

Any other religion (please specify):

**Sexual Orientation** (please ✓one answer)

- Heterosexual                       Lesbian                       Gay                       Bisexual                       Prefer not to say

**Nationality** (please ✓one answer)

- Welsh                       Scottish                       English                       British  
 Irish                       Prefer not to say                       Other

Other (please specify):

**THANK YOU FOR YOUR TIME**

Mae'r dudalen hon yn fwriadol wag

## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

### Cabinet

21<sup>st</sup> October 2020

## REPORT OF HEAD OF TRANSFORMATION 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 obtain Cabinet approval to consult on a proposal 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 31<sup>st</sup> August 2024.

#### **Executive summary**

2. 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.
3. Neath Port Talbot 's 21<sup>st</sup> century schools Band B Strategic Outline Plan included a proposal for a new build 3-16 middle school,

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however following informal discussions with stakeholders it was decided that the scheme should be amended.

4. 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 31<sup>st</sup> August 2024.
5. 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 swimming pool on the site to complement the current health and wellbeing offer for pupils and the wider community.
6. The new build will be funded jointly from Welsh Government 21<sup>st</sup> century School Programme capital grant monies and from the Council's prudential borrowing capacity. Welsh Government 21<sup>st</sup> Century Schools Programme capital grant funding has been approved, in principle.

## **Background**

7. 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 21<sup>st</sup> 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.
8. 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.
9. The Council has determined to review its provision on the basis of:

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- educational standards
  - the need for places and the accessibility of schools
  - the quality and suitability of school accommodation
  - effective financial management
10. Neath Port Talbot Council's 21<sup>st</sup> Century Schools Band B 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 resulting in a reduction in backlog maintenance and accessibility costs of c. £2.7m with education for the pupils being provided at a whole new (primary phase) build on the site of the existing Cwmtawe Comprehensive school'.
  11. Additional scoping work has been undertaken, alongside a review of the number of pupils residing in the Swansea Valley area which now makes it necessary to reconsider the original planned scheme.
  12. As a result it is proposed that the original scheme is 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, all of which will close on 31st August 2024.

## **Reasons for the Amended Proposal**

### **– Informal Consultation with Stakeholders**

13. Informal consultation took place with local ward Members for the Swansea Valley area along with the AM and MP for Neath Constituency, and headteachers and Chairs of Governors for all of the schools in the area - Welsh and English-medium, primary and secondary.
14. The meetings were held to better understand the requirements of the different communities in the area and to gather information which could help shape the development of a proposal for the new school.

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15. Positive comments were received about the idea of a new build primary school although there were consistent concerns raised about a 3-16 (all through) model.
16. Further concerns were noted regarding the possible effect on nursery pupils, transport and travel arrangements, the management of traffic in and around the possible site, the effect that losing a school could have on its community and the size and composition of a new school.
17. Comments were also received about possible impacts on the Welsh-medium schools in the area and the impact on the development of the Welsh language as a whole.

– **A 3-16 Model**

18. The development of ‘all-through’ schools within Neath Port Talbot is a distinctive response to specific circumstances where school organisational change is required. As a concept, it has not been adopted as a political imperative nor is it a Council policy directive.
19. The ‘all-through’ school is recognised as a transformational model of education delivery that has potential teaching and learning benefits together with operational and financial efficiencies. Notwithstanding the benefits and efficiencies that can be achieved with this approach, it is acknowledged that there is no single ‘all-through’ model that is fit for purpose in all school organisation settings or that the ‘all-through’ approach is an appropriate solution for every situation.
20. The new proposed new build primary is likely to be situated on available land at Parc Ynysderw, Pontardawe in close proximity to Cwmtawe Community School.
21. To create an ‘all through’ school in this particular situation would require the closure of Cwmtawe Community School as well as the identified primary schools, and subsequently necessitate opening a new establishment for pupils aged 3-16 with a new Governing Body, new Headteacher and deputy head teacher(s) posts (which would need to be advertised nationally in line with Council policy) and with a suitable staffing structure to facilitate teaching and learning across both the primary and secondary phases.
22. Cwmtawe Community School is a successful and popular secondary school; reorganisation is likely to impact on the settled leadership

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structure that exists and may cause unnecessary uncertainty and anxiety for the school community.

23. The initial 'all through' proposal focussed on new build premises only for primary aged pupils and as such Cwmtawe Community School would remain in its current building. This would mean that the two phases would effectively be on a split site, making cross phase working more difficult than it would be in one building and so creating further logistical and leadership challenges.
24. No support was expressed during the informal consultation process for a 3-16 school in the Swansea Valley and there has been strong opposition to involving Cwmtawe Community Comprehensive in reorganisation proposals.
25. While it is recognised that an all through school can deliver many benefits, it is also the case that many of these benefits can be achieved through improving and strengthening partnership working between the primary and secondary phases. This can be achieved more easily when the schools involved are in close proximity as would be the case in this proposal.

### **The case for a 3-11 Model**

26. There are 7 primary schools in the Swansea Valley area. Alltwen, Llangiwig, Rhydyfro, Godre'rgraig and Rhos Primaries provide English-medium primary education while YGG Trebannws and YGG Pontardawe provide primary education through the medium of Welsh.
27. In the last 10 years pupil numbers have increased significantly in the Swansea Valley area, with over 160 extra primary aged pupils attending either Welsh or English-medium schools. The pupil population is transient across the primary schools. Data indicates that pupil numbers can alter significantly over a short period of time, with substantial numbers of pupils attending from outside their schools catchment area, but from within the wider Swansea Valley area.

**Table 1: Pupil Numbers**

<b>English-medium 3-11</b>	<b>Pupil numbers</b>
<b>Rhos</b>	150
<b>Alltwen</b>	231
<b>Llangiwig</b>	136
<b>Rhydyfro</b>	167
<b>Godre'rgraig</b>	153

PLASC 2020

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28. There is a risk that establishing a 750 place school would not create enough pupil places to accommodate all the pupils from the schools that were originally considered for inclusion in the ‘all through’ scheme, namely Alltwen, Llangiwg, Rhydyfro and Godre’rgraig Primary schools. There is also a need to ensure that there are sufficient places for pupils who reside in the catchment area of the proposed new school but attend elsewhere and who would be able to claim a place should they wish to return to their catchment school. This potentially further increases the size of the school.

Table 2: Schools and Catchment Pupil Percentages

English Medium Schools	Percentage of pupils in catchment				
	Alltwen	Llangiwg	Rhydyfro	Godre’rgraig	Rhos
Alltwen	58%	19	6	6	4
Llangiwg	13	66%	5	11	1
Rhydyfro	4	22	61%	5	1
Godre’rgraig	1	6	1	82%	0
Rhos	15	5	7	2	64%

Data source: PLASC 2019

29. The Local Development Plan contains details of a number of new housing developments, 14 of which are planned for the Swansea Valley areas which could generate over 700 units by 2026. This could see a further increase in pupil numbers in the area adding to the numbers of pupils the proposed new school would need to accommodate.
30. Generally the proposal for a new English-medium school was welcomed by consultees, but little support was expressed for an amalgamation of Alltwen, Llangiwg, Rhydyfro and Godre’rgraig Primary schools into one 750 place primary school.
31. Alltwen and Llangiwg Primary schools are the nearest schools to the prospective site, both within 2 miles. Godre’rgraig Primary School is approximately 3.2miles away from the prospective site.
32. Total backlog maintenance and accessibility costs for all three schools amounts to amount to over £2m. Additionally Llangiwg Primary operates across two sites a short distance apart.



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33. A new build school to accommodate pupils currently attending Alltwen, Godre'rgraig and Llangiwg Primary schools and those residing in the new school catchment attending English-medium schools in Neath Port Talbot or elsewhere who could claim a place would total 781 places (including part time nursery), should all pupils wish to attend.

### **The case for including a Learning Support Centre (LSC)**

34. The Council provides for the pupils of Neath Port Talbot who require specialist support for their educational needs at two community special schools and at learning support/ inclusion centres attached to community primary/secondary schools.
35. Recent work on reviewing the number and type of planned places and assessment provision across Neath Port Talbot has indicated that there is a need for extra places in the areas of Autistic Spectrum Disorder (ASD) and Social, Emotional and Behavioural Difficulties (SEBD), and for those early years pupils with identified additional learning needs which require further assessment.
36. It is proposed that the new school includes an LSC for up to 16 primary aged pupils with a statement of ASD. Including this provision in the new build will ensure that pupils are provided with purpose built, 21<sup>st</sup> century standard facilities, with the aim of ensuring best possible outcomes for pupils, and will also address identified need for further provision for pupils with ASD, specifically primary aged pupils.
37. Currently for primary age pupils with ASD who need specialist support or assessment, provision is made at Gnoll Primary (18 places), Maesmarchog Primary (18 places) and Waunceirch Primary (17 places). Secondary provision is available at Cwmtawe Community School (13 places), Ysgol Bae Baglan (29 places), Ysgol Hendrefelin (16 places) and most recently at a newly established provision at Dwr Y Felin Comprehensive school (14 places) . The high demand at both primary and secondary level is placing pressure on existing provisions which are consistently full
38. 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.

## The Proposal

39. Taking account of the above considerations it is proposed to 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 Alltwn Primary, Godre'rgraig Primary and Llangiwg primary, all of which will close on 31st August 2024.
40. 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.
41. 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.
42. The new school will serve the combined catchment areas of Alltwn, Llangiwg and Godre'rgraig primary schools. Pupils from the three existing schools will automatically transfer to the new school subject to parental preference.
43. 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 .
44. 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 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.
45. The new build will be funded jointly from Welsh Government 21st century School Programme capital grant monies and from the Council's prudential borrowing capacity.

46. 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.
47. 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.
48. 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.

### **Information about the proposed new school**

49. The proposed new, 21<sup>st</sup> 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.
50. A new build school provides 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 improve the learning outcomes for all children across the ability range.
51. 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

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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.

52. The new school will ensure that pupils have adaptable ICT facilities suitable for learning in the 21<sup>st</sup> century. Mobile technology will be integrated with a sound pedagogical base to provide pupils with enhanced learning experiences, equipping them with the key skills and motivation needed to raise standards.
53. The new build school will be an exciting place for pupils and staff both internally and externally. It will have spacious, light and airy classrooms, with access to a range of high quality and appropriate spaces for social interaction. The 2015 report, 'Clever Classrooms', found that well designed schools can significantly boost children's academic performance in reading, writing and maths. The school will allow for the delivery of a pupil centred, inclusive and skills based curriculum that extends to social and sporting activities. It will aim to promote equality and inclusion by providing facilities, sporting and cultural, which can be accessed by pupils and which the school can share with the community.
54. A new build of this kind is a significant investment in the future of the young people of the area and clearly signals that the Council is serious about making schools fit for purpose places of learning.

### **Information about the proposed LSC**

55. The new school will include an LSC which will provide learning support for pupils with ASD for up to 16 pupils who are in receipt of a Statement of SEN.
56. The provision will be managed by the school and be under the school's governance. However it will be a provision recognised by the Council as reserved for pupils with ALN and pupils admitted to the provision would be in addition to the admission number of the school. Admission to the provision would be via a special admission panel of the Council and specific entry and exit criteria would apply.
57. Pupils at the proposed provision will benefit from being taught by specialist staff, experienced in working with pupils with ASD needs.

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There is also the possibility that mainstream pupils with ASD could also benefit from the expertise available.

58. The provision will alleviate the current pressure to address demand for places for pupils with more complex needs, avoiding potential costly out of county placements and allowing opportunities for children to access learning within their local community and will complement the specialist provision and support already available within the County Borough.

### **Information about the proposed pool**

59. In addition to the new build primary school and specialist ASD provision, it is also proposed to include as part of the scheme a new build 25metre, 6 lane swimming pool with additional learner pool to replace the existing Pontardawe Swimming Pool. The pool will provide an additional facility alongside the leisure centre, revitalising and increasing the health and well-being facilities in the area.
60. 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, complementing the existing Cwmtawe Community School and Pontardawe Leisure Centre provision. The pool is currently used by some schools in the area but this scheme aims to increase usage by schools and by the wider community due to its improved co-location.
61. 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 exceed 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.
62. Given the relative 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

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community asset. Inclusion of a pool at the site will further enhance the physical activity and wellbeing opportunities open to pupils who currently attend Alltwen, Godre'rgraig and Llangiwig Primary schools as well as those at Cwmtawe Community School which is also closely located to the new build site, and those of other nearby schools including YGG Trebannws and YGG Pontardawe.

63. The facility will also provide sustainable opportunities for swimming lessons and participation to residents of all ages within the nearby communities. This campus will provide modern leisure facilities where people can enjoy physical activity, and where physical, mental health and wellbeing is positively promoted throughout local communities.
64. 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. The creation of the learning campus will provide all members of the Swansea Valley community with modern, fit for purpose educational, health and leisure facilities, providing a community focal point for intergenerational health, wellbeing and cohesion in the wider Pontardawe area. It will help to deliver the Council's aim of improving the health and wellbeing of all people living in Neath Port Talbot and reducing the gap between the least and most healthy.

## **Information about the existing schools**

### **Alltwen Primary School**

65. Alltwen Primary School is an English-medium community school serving boys and girls aged 3-11 years. It is situated in the village of Alltwen approx. 0.7miles from the possible site of the new school.

#### **– Pupil Numbers**

66. As at January 2020 there were 200 full-time and 31 part-time (nursery) pupils on roll. With the physical capacity to accommodate 239 full-time and 30 (30a.m/ 30pm) part-time (nursery) pupils, the school has a surplus capacity of 16% (39 full-time pupil places). Forecasts, based on current school admission trends, from January 2020 to January 2021 suggest a slight increase in pupil numbers.

*Table 1*

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Alltwen Primary School				
		Jan 2020		Jan 2021
	School capacity	Actual Pupil Numbers	Surplus places	Projected Pupil Numbers
Full-time	239	200	16% (39)	203
Part-time (Nursery)	30	31	-3% (-1)	33

67. The table below shows pupil numbers over a 5 year period:

Table 2

Alltwen Primary School						
School Census Jan 2016 – 2020 + Sept. '20 roll						
Year	16	17	18	19	20	Sept.20
Pupil numbers	215	223	234	240	231	211
Full Time	184	179	197	208	200	203
Part Time	31	44	37	32	31	8

Notes:

- Capacity: Taken from 19-20 Capacities
- Actual Pupil numbers: Taken from PLASC Report Jan 2020
- School Census Data '16-'19: Taken from PLASC – Actual.

### **Quality and standards in education**

68. Alltwen Primary School was last inspected in October 2018 and Estyn reported that it was a school with many good features, awarding good judgements in the 5 inspection areas. The school has shown recent improvement and the National Categorisation System placed the school in the yellow support category from 2016/17-2017/18, with an upward move in 2018/19 to the green category which continued into 2019/20, which recognises it as an effective school which has secured good levels of learner outcomes in key performance indicators.

### **Standards**

69. Alltwen Primary school has 231 pupils on roll. The 'Academic-Achievement-pupils-aged-4-14-core-subjects-2019' indicates that the school has a lower than average number of children in receipt of free school meals (17%) when compared to other schools in Neath Port Talbot (23%) and similar to schools across Wales (20%). There are also a higher than average number of children who have been identified as having additional learning needs (37%) when compared with Neath Port Talbot (24%) and all Wales (23%).

70. Standards at the end of Foundation Phase are adequate in all areas of learning over three years, with 56% of pupils attaining the Foundation Phase indicator in 2019 (outcome 5 or higher in all three

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core areas of learning). This is lower than schools across Neath Port Talbot at 68% and all Wales at 80%.

71. At Key Stage 2 pupil outcomes are deemed to be adequate in all subjects over three years, with 76% of pupils attaining level 4 or higher in all three core subjects in 2019. This was lower than schools across Neath Port Talbot at 82% and all Wales at 88%.
72. Wellbeing and attitudes to learning of pupils was judged to be 'good' in the recent Estyn report (October 2018) in that: 'Pupils' wellbeing is a very strong aspect of the life of Alltwen School. Nearly all pupils feel safe, happy and secure in school.'
73. Attendance has been consistent, with current data showing a percentage of 94.7% for 2019/20, where nearly all pupils and their parents understand the importance of regular attendance at school. (Estyn October 2018).

### ***Teaching and Learning***

74. Estyn, in 2018, reported that across Alltwen Primary School effective teaching promotes pupils' good progress and as a result, relationships are positive and respectful, many classrooms are productive and orderly, and most pupils want to learn.
75. The quality of teaching and learning experiences in Alltwen Primary was judged to be good overall and there are well-planned opportunities to develop pupil's oracy and reading skills in a wide range of contexts across the curriculum. There are also carefully-thought-through opportunities to develop pupils' ICT skills and Welsh language skills effectively, although numeracy skills needs to be developed through other subjects.

### ***Care, Support and Guidance***

76. Estyn reported that care, support and guidance were good, noting that the Headteacher has established an inclusive and caring ethos that permeates the daily life of the school. This has improved pupils' wellbeing very effectively.
77. Estyn also report that there is a wide range of valuable provision to meet the needs of pupils who have additional needs.
78. Alltwen Primary currently has skilled teaching assistants providing high quality care and support to ensure that pupils with a range of



additional needs integrate seamlessly into the daily life of the school, this led Estyn to report that, 'Adults know and care for their pupils well, particularly those who may be vulnerable to underachievement.' Increased staffing with a breadth of experience can be utilised to help target and support children as appropriate.

### ***Leadership and Management***

79. In 2018, Estyn judged Alltwen Primary school's leadership and management to be good, reporting that: 'The Headteacher is a well-motivated leader who provides a clear, shared and strategic vision for the school.'
80. In 2019, the Autumn Core Visit report also found that: 'The headteacher is a well-motivated leader who provides a clear, shared and strategic vision for the school. This focuses on ensuring the wellbeing of pupils and staff in a supportive and positive learning environment.'

### ***Quality of accommodation***

81. Alltwen Primary school occupies a prominent elevated position on Alltwen Hill, Alltwen, Pontardawe and whilst contained within a single enclosed site, operates between two separate buildings (a short distance apart within the site boundary).
82. The most recent building condition survey (November 2018) reports that the building is overall in a fair condition, with investment needed internally and externally.
83. A new boiler has recently been installed, however the heating distribution system is old and inefficient and has exceeded its practical and recommended life span, and will need to be renewed.
84. Overall the site is graded C+ for condition i.e. the building is operational but major repairs or replacement will be needed.
85. Backlog maintenance and accessibility costs amount to £611,000.

### **Godre'rgraig Primary School**

86. Godre'rgraig Primary School is an English-medium community school serving boys and girls aged 3-11 years. It is situated in the village of Godre'rgraig approx. 3.2 miles from the possible site of the new school.

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87. In July 2019 Godre'rgraig Primary was relocated temporarily from Godre'rgraig to Parc Ynysderw, adjacent to Cwmtawe Community School after geological experts found there was a potential landslide risk to the school's playground.
88. Earth Science Partnership (ESP), the experts commissioned by Neath Port Talbot Council, reported a medium level risk from a quarry spoil tip near the school after the Council asked them to extend their extensive landslide risk investigation work carried out in nearby Panteg, Ystalyfera.
89. Further work has revealed that the risk remains and that it would be unsafe for staff and pupils to return to the school. The new build school provides the opportunity for Godre'rgraig Primary pupils to be permanently relocated and to benefit from the 21st century facilities provided.

– **Pupil Numbers**

90. As at January 2020, there were 135 full-time and 18 part-time (nursery) pupils on roll. With the physical capacity to accommodate 162 full-time and 19 (19 am/ 19 pm) part-time (nursery) pupils, the school has a surplus capacity of 17% (27 full-time pupil places). Forecasts, based on current school admission trends, from January 2020 to January 2021 suggest a slight increase in pupil numbers.

Table 5

<i>Godre'rgraig Primary School</i>				
		<i>Jan 2020</i>		<i>Jan 2021</i>
	School capacity	Actual Pupil Numbers	Surplus places	Projected Pupil Numbers
<i>Full-time</i>	162	135	17% (27)	134
<i>Part-time (Nursery)</i>	19	18	5% (1)	22

91. The table below shows pupil numbers over a 5 year period:

Table 6

<i>Godre'rgraig Primary School</i>						
<i>School Census Jan 2016 – 2020 + Sept. '20 roll</i>						
<i>Year</i>	16	17	18	19	20	<i>Sept. 20</i>
<i>Pupil numbers</i>	138	147	156	159	153	144
<i>Full Time</i>	114	122	134	134	135	136
<i>Part Time</i>	24	25	22	25	18	8

Notes:

- Capacity: Taken from 19-20 Capacities
- Actual Pupil numbers: Taken from PLASC Report Jan 2020
- School Census Data '16-'19: Taken from PLASC – Actual.

– **Quality and Standards in Education**

92. Godre'rgraig Primary School was last inspected in June 2017 and Estyn reported that it was a school with many good features, awarding good judgements in the three inspection areas and awarded a good for current standards and a good for prospects for improvement. The school is showing improvement and the National Categorisation System continues to place the school in the Yellow support category since 2015/16 through to 2019/20, which recognises it as an improving school which is beginning to secure good levels of learner outcomes in key performance indicators.

### **Standards**

93. Godre'rgraig Primary school has 153 pupils on roll. The All Wales Core Data '*Academic-Achievement-pupils-aged-4-14-core-subjects-2019*' indicates that the school has a lower than average number of children in receipt of free school meals (21%) when compared to other schools in Neath Port Talbot (21%). There are also a higher than average number of children who have been identified as having additional learning needs (35%) when compared with Neath Port Talbot (24%).
94. Standards at the end of Foundation Phase are adequate in all areas of learning over three years 68% of pupils attained the Foundation Phase indicator in 2019 (outcome 5 or higher in all three core areas of learning). This is equal to schools across Neath Port Talbot at 68% but below Wales at 80%.
95. At Key Stage 2 pupil outcomes are deemed to be adequate with all subjects over three years. However, in 2019, 93% of pupils attained level 4 or higher in all three core subjects which was above the local authority at 82% and all Wales at 88%.
96. Wellbeing was judged to be 'good' in the latest Estyn report (June 2017) in that: 'Pupils are confident that all staff care for them and will sort any issues quickly and fairly;' and '.....a real strength of pupils, throughout the school, is the way that they work collaboratively and interdependently'.
97. Attendance had shown a steady improvement, and current 2019/20 data is at a five year high at 94.7%. Estyn in June 2017 stated that, 'staff promote the importance of good attendance thoroughly. Pupils benefit from a range of strategies and rewards to encourage good attendance.'

### **Teaching and Learning**

98. Estyn in 2017 report that Godre'rgraig Primary School provides learning experiences that are adequate across the school. The quality of teaching in Godre'rgraig Primary was judged to be good overall with nearly all teachers matching work well to the wide range of needs and abilities in their class. This is a strength of teaching across the school.
99. Care, support and guidance were also judged 'good' with Estyn (June 2017) stating that, 'the school promotes a caring environment that develops pupils' health and wellbeing effectively,' with 'the school's attention to ensuring that pupils attain high levels of emotional wellbeing is central to its caring ethos. New pupils to the school settle quickly and feel secure. This is a strength of the school.'
100. Provision for pupils who have additional learning needs at Godre'rgraig Primary School is strong. Effective procedures enable staff to identify pupils' needs at an early stage. The school makes successful use of the expertise of staff to implement a wide variety of useful intervention strategies. As a result, pupils with additional learning needs make good progress against their targets.

### ***Leadership and Management***

101. In 2017, Estyn judged Godre'rgraig Primary school's leadership and management to be good, reporting that: 'The headteacher has a clear vision for the school and she shares this effectively with all stakeholders. All staff work together successfully to ensure that standards and pupils' wellbeing improve continually.'
102. In 2019, the Autumn Core Visit report also found that, 'The headteacher, supported by the deputy headteacher provide strong leadership for the school. The school development plan is a detailed, useful document. There is an appropriate balance between development and monitoring activities.'

### ***Quality of Accommodation***

103. Godre'rgraig Primary school occupies a prominent elevated position on Graig Road, Ystalyfera and whilst contained within a single enclosed site operates between two separate buildings (a very short distance apart within the site boundary) for Foundation Phase and KS2

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104. The most recent building condition survey (November 2018) reports that the buildings are in poor to fair condition and are categorised as condition grade C-.
105. The school is circa 100 years old. Externally stonework surfaces are scaling, hard play surfaces require resurfacing and works are required to the covered play area. Internally the building requires general refurbishment to lift the dated appearance. The school kitchen also requires upgrading and refurbishing whilst the boiler and heating distribution systems have reached the end of their lifespan and require renewal.
106. The combined total backlog maintenance and accessibility costs for Godre'rgraig Primary school amount to £740,050
107. Since July 2019 Godre'rgraig Primary has been relocated from Godre'rgraig to temporary buildings at Parc Ynysderw. These buildings are of a good standard and suitable for the purpose of accommodating primary aged pupils, however they are not intended for permanent use in the longer term.

### **Llangiwg Primary School**

108. Llangiwg Primary School is an English-medium community school serving boys and girls aged 3-11 years. It is situated in the village of Ynysmeudwy approx. 1.3 miles from the possible site of the new school.

#### **– Pupil Numbers**

109. As at January 2020, there were 119 full-time and 17 part-time (nursery) pupils on roll. With the physical capacity to accommodate 147 full-time and 53 (53 am/ 53 pm) part-time (nursery) pupils, the school has a surplus capacity of 19% (28 full-time pupil places). Forecasts, based on current school admission trends, from January 2020 to January 2021 suggest a slight decrease in pupil numbers.

Table 3

<i>Llangiwg Primary School</i>				
		<i>Jan 2020</i>		<i>Jan 2021</i>
	School capacity	Actual Pupil Numbers	Surplus places	Projected Pupil Numbers
<i>Full-time</i>	147	119	19% (28)	109
<i>Part-time (Nursery)</i>	53	17	68% (36)	16

110. The table below shows pupil numbers over a 5 year period:

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Table 4

<i>Llangiwg Primary School</i>						
<i>School Census Jan 2016 – 2020 + Sept. '20 roll</i>						
<i>Year</i>	<i>16</i>	<i>17</i>	<i>18</i>	<i>19</i>	<i>20</i>	<i>Sept.20</i>
<i>Pupil numbers</i>	<i>152</i>	<i>150</i>	<i>136</i>	<i>138</i>	<i>136</i>	<i>127</i>
<i>Full Time</i>	<i>130</i>	<i>124</i>	<i>120</i>	<i>124</i>	<i>119</i>	<i>109</i>
<i>Part Time</i>	<i>22</i>	<i>26</i>	<i>16</i>	<i>14</i>	<i>17</i>	<i>18</i>

Notes:

- Capacity: Taken from 19-20 Capacities
- Actual Pupil numbers: Taken from PLASC Report Jan 2020
- School Census Data '16-'19: Taken from PLASC – Actual.

### – **Quality and standards in education**

111. Llangiwg Primary School was last inspected in January 2019 and Estyn reported that it was a school with many good features, awarding good judgements in 4 inspection areas and 1 inspection area as adequate and needing improvement. The school has, however, shown improvement and the National Categorisation System placed the school in the Red category in 2015/16 moving to the Amber support category in 2016/17 through to 2018/19, with a further upward move in 2019/20 to the Yellow support category, which recognises it as an effective school which has secured good levels of learner outcomes in key performance indicators.

### **Standards**

112. Llangiwg Primary school has 136 pupils on roll. The All Wales Core Data Data 'Academic-Achievement-pupils-aged-4-14-core-subjects-2019' indicates that the school has a slightly lower than average number of children in receipt of free school meals (22%) when compared to other schools in Neath Port Talbot (24%). There are also a slightly lower than average number of children who have been identified as having additional learning needs (22%) when compared with Neath Port Talbot (24%).

113. Standards at the end of Foundation Phase are adequate in all areas of learning over three years, with 57% of pupils attaining the Foundation Phase indicator in 2019 (outcome 5 or higher in all three core areas of learning). This is lower than schools across Neath Port Talbot at 68% and all Wales at 80%.

114. At Key Stage 2 pupil outcomes are deemed to be adequate with all subjects over three years, with 71% of pupils attaining level 4 or higher in all three core subjects in 2019. This was lower than schools across Neath Port Talbot at 82% and all Wales at 88%.

### ***Wellbeing and attitudes to learning***

115. Wellbeing and attitudes to learning of pupils was judged to be 'adequate and needs improvement' in the recent Estyn report (January 2019) but stated that, 'Most (pupils) show high levels of engagement and approach tasks with enthusiasm..... and engage constructively with other pupils.'

116. Attendance has shown a steady improvement with current data for 2019/20 displaying a percentage of 94.5%. Estyn (January 2019) stated that 'most pupils are aware of the importance of attending school regularly and punctually.'

### ***Teaching and Learning Experiences***

117. Estyn in 2019 report that Llangiwg Primary School provides a broad, balanced curriculum enhanced by a range of experiences, activities and visits that consolidate and enrich the learning.

118. The quality of teaching and learning experiences in Llangiwg Primary was judged to be good overall (Estyn January 2019). Estyn state that, 'most teachers set appropriate expectations for pupils' achievement and motivate them to work hard.'

### ***Care Support and Guidance***

119. Estyn also reported that care, support and guidance were good, noting that, 'The school is a happy, inclusive and caring community, where pupils and staff show high levels of respect for each other.' Estyn also report that all staff responded sensitively to the social and emotional needs of pupils.

120. Estyn commented that, 'the school's provision for pupils with additional learning needs is good .... with well-focused learning plans with clear targets for pupils' development.'

121. The school has effective links with parents and carers and 'parents feel that the school's inclusive ethos nurtures all pupils and builds their confidence and self-esteem well.' (Estyn January 2019)

### ***Leadership and Management***

122. In 2019, Estyn judged Llangiwg Primary school's leadership and management to be good, reporting that: 'Leaders at all levels plan appropriately for the strategic development of the school and bring about worthwhile improvements.'

123. In 2019, the Autumn Core Visit report also found that: ‘The headteacher provides strong and purposeful leadership for the school and sets a clear strategic direction for improving the school. Senior leaders use an effective range of self-evaluation activities to evaluate the school’s performance and plan for improvement.’

– ***Quality of accommodation***

124. Llangiwg Primary School holds a prominent kerbside position on New Road, Ynsymudwy and operates across two distinct sites approximately 100m apart along the same road.

125. The main teaching block is constructed of stonework with concrete detailing and concrete cladding to the front whilst the separate nursery is housed in a demountable type building.

126. The most recent building condition survey (November 2018) reports that the nursery block has received moderate investment over recent years and is categorised as condition grade B, i.e. the building is sound, operationally safe and exhibits only minor deterioration.

127. The main block overall is in poor to fair condition and is categorised as condition grade C. The boiler system and distribution has reached the end of its practical and economic lifespan and needs to be replaced. Internally, timber floor coverings and kitchen areas require upgrading.

128. Overall the combined total condition and accessibility costs for Llangiwg Primary school across both sites amount to £701,550.

**Options that have been considered**

***Option 1 – Status quo: maintain Alltwen, Godre’rgraig and Llangiwg Primary Schools, maintain the pool in its current position, do not establish a new ASD provision.***

129. 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 opportunities for the children and young people.

130. Maintaining the three schools at their present sites is not considered to be the best use of resources or facilities.

131. Llangiwg Primary is currently located over two sites and has combined total backlog maintenance and accessibility costs of



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£701,550. The main school has terraced, hard surface playgrounds and is on a confined site.

132. Alltwen Primary has a number of demountable buildings and requires backlog works for condition and accessibility amounting to £611,000.
133. Maintaining these schools on separate sites would lead to cost inefficiency and would mean that the potential benefits afforded by a new school 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 as well as addressing surplus places and providing a 'state of the art' 21st Century teaching and learning environment delivering a positive impact on pupil outcomes.
134. As a result of the landslide risk Godre'rgraig Primary is currently housed in temporary demountable classrooms which are leased to the local authority, adjacent to Cwmtawe Community School. Maintaining status quo is not an option in this situation as although the temporary buildings are of a good standard and suitable for the purpose of accommodating primary aged pupils, the school could not remain in temporary, leased buildings indefinitely.
135. There is no direct capital cost associated with this option, although Godre'rgraig Primary would not be able to remain in temporary accommodation and a more permanent solution would be needed. It is likely that any permanent solution would incur significant capital costs.
136. If all three schools were to remain on their current sites the opportunity for a new, purpose built LSC would not present itself. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.
137. It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.
138. This option is not recommended as a basis for consultation

***Option 2 – Establish a federation of Alltwen, Godre'rgraig and Llangiwg Primary schools, maintain the pool in its current position, do not establish a new ASD provision***

139. In a federation schools are managed by a single governing body which takes decisions about matters such as staffing structures and expenditure. Under a single leadership and governance there are potential teaching and learning benefits, staff development opportunities and efficiencies that can arise from a federated arrangement. A single governing body will be able to pool resources, maximise staff expertise and share facilities.
140. A federation also presents the opportunity to co-ordinate curriculum provision and employ whole school teaching/learning strategies that will improve school performance and enhance educational experiences. In a federation schools remain separate legal entities retaining their name, registered pupils and budget, and can retain their existing sites.
141. Because of this, the federation would not necessarily achieve efficiencies through removing duplication, for example all three schools would be inspected separately by Estyn and there would be separate expenditure trails to manage and audit.
142. This option would also not resolve the need for Godre'rgraig Primary to be permanently relocated from the temporary buildings it currently occupies.
143. There is no direct capital cost associated with this option, although a permanent location would need to be found for Godre'rgraig Primary School which is likely to incur capital costs.
144. Whilst there is a significant cost to building a new primary school, the benefits of a purpose built 21st Century school outweigh any potential teaching and learning benefits and modest funding efficiencies that can arise from a federated arrangement between the three schools. In addition, federation would not remove the issues of surplus capacity, confined and restricted sites and significant repair and maintenance costs, or remove the need for a permanent solution to Godre'rgraig Primary School's need for relocation.

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145. A federation does not provide the opportunity for a new, purpose built LSC. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

146. It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

147. This option is not recommended as a basis for consultation.

***Option 3 – Close two of the schools and transfer all pupils to the remaining school, maintain the pool in its current position, do not establish a new ASD provision.***

148. This option would prevent pupils and staff from benefitting from a new, purpose built school, meaning that recognised advantages from a modern learning environment would not be realised.

149. Additionally Llangiwg and Alltwen Primary schools are on confined and restricted sites and have significant repair and maintenance costs.

150. There is insufficient space at Llangiwg Primary school site to accommodate all the pupils from Alltwen and Godre'rgraig primaries.

151. Llangiwg Primary is located over two sites and neither site would be able to accommodate the necessary additional buildings and external areas that a larger school would require.

152. There is insufficient space at Alltwen Primary School to accommodate all the pupils from Llangiwg and Godre'rgraig Primary schools.

153. Godre'rgraig Primary has been relocated from its original site due to the risk of landslide and so would not be a suitable choice for accommodating pupils from any of the schools. It would also not be feasible to consider accommodating extra pupils from Llangiwg and Alltwen in Godre'rgraig Primary School's temporary building.

154. There is no direct capital cost associated with this option.

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155. This option does not provide the opportunity for a new, purpose built LSC. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

156. It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

157. This option is not recommended as a basis for consultation.

***Option 4 –Close one of the three schools and transfer pupils to the remaining two schools, maintain the pool in its current position, do not establish a new ASD provision.***

158. This option would prevent pupils and staff from benefitting from a new, purpose built school, meaning that recognised advantages from a modern learning environment would not be realised.

159. Additionally Llangiwg and Alltwn Primary schools are on confined and restricted sites and have significant repair and maintenance costs.

160. Godre'rgraig Primary has been relocated from its original site due to the risk of landslide and so would not be a suitable choice for accommodating pupils from any of the schools. It would also not be feasible to consider accommodating extra pupils from Llangiwg or Alltwn in Godre'rgraig Primary School's temporary building.

161. There is insufficient space at Llangiwg Primary school site to accommodate all the pupils from Godre'rgraig Primary. PLASC 2020 data indicates that combining Llangiwg Primary and Godre'rgraig Primary pupils on the site of Llangiwg Primary would require 254 pupil places (R-Yr6) which would be 107 pupils over capacity.

162. There is insufficient space at Alltwn Primary School to accommodate all the pupils from Godre'rgraig Primary School. PLASC 2020 data indicates that combining Alltwn and Godre'rgraig Primaries on the site of the current Alltwn Primary would require 335 pupil places (R-Yr6) which is 97 pupils over capacity.

163. Currently the majority of pupils attending Godre'rgraig Primary School are from its catchment area. It could be possible to close

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Godre'rgraig Primary and split the current catchment area so that pupils could be allocated to either Llangiwg Primary or Alltwen Primary but this could be potentially divisive for the pupils and the Godre'rgraig community as a whole.

164. There is no direct capital cost associated with this option.

165. This option does not provide the opportunity for a new, purpose built LSC. It is unlikely that any of the three schools currently could accommodate the extra provision in the space available.

166. It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

167. This option is not recommended as a basis for consultation.

***Option 5 – Close Alltwen, Godre'rgraig and Llangiwg Primary schools and build a new replacement primary school on one of the existing school sites, maintain the pool in its current position, do not establish a new ASD provision***

168. There is a significant capital investment cost associated with this proposal for which Welsh Government grant funding would be needed.

169. All three schools are on confined and restricted sites which would not allow the benefits of a new school build and facilities to be fully realised, including access to grant funding.

170. Additionally the potential cost of temporary accommodation to house pupils during the construction phase would incur further costs.

171. Additionally Godre'rgraig Primary school site is deemed unsafe due to the risk of landslide which would further rule out the possibility of building on this site.

172. This option does not provide the opportunity for a new, purpose built LSC. As the three schools currently are on restricted or temporary sites there it would not be desirable to increase the footprint of the school in order for it to accommodate the extra provision.

173. It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

174. This option is not recommended as a basis for consultation.

***Option 6 - Close Alltwen, Llangiwg and Godre'rgraig Primary schools and build a new school in Parc Ynysderw to accommodate 630 pupils (plus 140 nursery pupils) from the catchment areas of Alltwen, Llangiwg and Godre'rgraig establish a new ASD provision and build a new pool.***

175. Whilst there is a significant cost to building a new primary school, the existing schools on their current sites are hindered through lack of space for implementing improvements. Land is available at Parc Ynysderw which will enable the new school to have access to large outdoor play areas and improved physical activity and wellbeing opportunities, and will offer far more space to accommodate a greater number of pupils in a purpose built school appropriate to the requirements of the modern curriculum.

176. The new 21<sup>st</sup> century school will accommodate 630 full-time pupils and 140 part-time (70 a.m. /70 p.m.) nursery age pupils and will create significant teaching and learning benefits for pupils, staff and the community. New builds have been shown to have a positive impact on standards and pupil wellbeing, and can improve many aspects of curriculum delivery. Combining the three schools can deliver more effective curriculum provision and greater teaching and learning opportunities.

177. Increasing pupil numbers at a single site school by combining the three schools in a brand new purpose built facility would provide a far more effective, long-term use of public money, addressing surplus places and providing a purpose built 'state of the art' 21<sup>st</sup> century teaching and learning environment which will improve pupil outcomes.

178. The new build will be funded jointly from Welsh Government 21<sup>st</sup> century School Programme capital grant monies and from the Council's prudential borrowing capacity.

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179. The new build will also remove existing maintenance and repair liabilities at the three current sites.
180. Including an LSC provision in the new build will ensure that pupils are provided with purpose built, 21<sup>st</sup> century standard facilities, with the aim of ensuring best possible outcomes for pupils, and will address identified need for further provision for pupils with ASD, specifically primary aged pupils.
181. The pool will provide an additional facility alongside the leisure centre, revitalising and increasing the health and well-being facilities in the area. The pool is currently used by some schools in the area but this scheme aims to increase usage by schools and by the wider community due to its improved location.
182. This option is recommended by officers.

***Option 7 - Close Alltwen, Llangiwg and Godre'rgraig Primary schools and build a new school on another site to accommodate 630 pupils (plus 140 nursery pupils) from the catchment areas of Alltwen, Llangiwg and Godre'rgraig Primaries, establish a new ASD provision and maintain the pool in its current location***

183. The benefits of a 21<sup>st</sup> Century school teaching and learning environment would be realised and significant backlog maintenance and repair liabilities would be removed.
184. However identifying a second site which would be large enough to accommodate all the requirements of a 21<sup>st</sup> century school in an area within reasonable travelling distance for all pupils is very difficult as there is very little suitable land available.
185. Additionally the benefit of being in Parc Ynysderw with the improved leisure offer and close proximity to Cwmtawe Community School would not be realised if the school was built elsewhere.
186. If a large enough site could be identified then it would be possible to include an LSC for primary aged pupils with a statement of ASD. Including this provision in the new build will ensure that pupils are provided with purpose built, 21<sup>st</sup> century standard facilities, with the aim of ensuring best possible outcomes for pupils, and will address identified need for further provision for pupils with ASD, specifically primary aged pupils.

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187. If the pool was not to be located at Parc Ynysderw then the opportunity to create a complementary facility alongside the leisure centre would be lost. The vision of a community learning and wellbeing campus would also not be realised if the Parc Ynysderw site is not utilised.

188. This option is not recommended as a basis for consultation

***Option 8 - Build 3 new, replacement primary schools on the existing sites of Alltwen, Llangiwig and Godre'rgraig Primary schools, maintain the pool in its current position, and establish a new ASD provision on one of the sites***

189. All three schools are on confined and restricted sites which would not allow the benefits of a new school build and facilities to be fully realised, and could increase costs significantly. Building three schools rather than one would not be cost effective and access to grant funding is unlikely to be successful. There are potentially significant additional costs associated with the need to provide temporary accommodation to decant pupils whilst the construction phase progresses.

190. Additionally a new site would need to be identified for Godre'rgraig Primary, and suitable land of the appropriate size is not available within the catchment area.

191. This option does provide the opportunity for a new, purpose built LSC on one of the sites, should a space large enough be found in the area. However including this provision would further increase the costs of the option.

192. It is also the case that if the pool remains in its present position the opportunity to create a complementary facility alongside the leisure centre would be lost. Without the pool the vision of a community learning and wellbeing campus would also not be realised.

193. This option is not recommended as a basis for consultation.

***Preferred Option – Option 6***

194. Having considered all the information gathered to date, it is the view of officers that closing Alltwen, Llangiwig and Godre'rgraig Primary



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schools and establishing a new community school for 630 pupils and 140 nursery pupils in a 21<sup>st</sup> century new build will deliver the greatest benefits to pupils, staff and the wider community as a whole.

195. 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,

196. 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.

### **Impact on pupils and parents**

197. The new primary school will serve the combined catchment areas of Alltwen, Godre'rgraig and Llangiwig Primary schools. The proposed new school will provide a stimulating teaching and learning environment in state of the art, 21<sup>st</sup> Century facilities that will impact positively on the self-esteem and well-being of pupils and will aim to improve the learning outcomes for all children across the ability range, including those pupils attending the LSC.

198. The new school will have sufficient playing fields and green space available on site which is not the case with the existing schools and which can be made available for community use.

199. The arrangements for admission to the new primary school will allow full-time pupils on roll at Alltwen, Godre'rgraig and Llangiwig Primary schools at the point of closure to transfer to the roll of the new school, subject to the wishes of parents or unless pupils are transferring to secondary education. Prospective pupils (including nursery pupils transferring to full-time education) will need to apply for a place at the primary school, in line with the Council's school admissions policy.

200. Class sizes at the new primary school will be set by the head teacher and governing body. When setting the class sizes the relevant Welsh Government legislation and guidelines will be followed, including the recommendation that classes are no larger than 30 pupils.

201. Admission to the proposed LSC would be via a special admission panel of the Council and specific entry and exit criteria would apply.

### **Impact on travel arrangements**

202. For many of the primary aged pupils the possible location of the proposed new school on the site at Ynysderw remains within 2 miles travel distance for homes in the catchment area. Home to school journey times from within the catchment area fall within reasonable limits for primary age pupils. Prior to the new school opening suitable walking routes will be assessed.

203. Support with home to school travel will be made available in line with the Council's Home to School Transport 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.

204. Under the School Travel Plan requirements, all schools, together with the Council's Road Safety Team, are committed to:

- improving road safety within the local community
- raising awareness about travel issues
- encouraging walking, cycling and public transport for the school journey where applicable
- encouraging independent travel where applicable

### **Impact on governors**

205. A temporary governing body will be established prior to the opening of the new school. The temporary governing body will take important decisions about the new school including the appointment of a head teacher, agreeing a staffing structure and adopting operating procedures and agreeing a name for the school. The temporary governing body will also resolve other issues including school uniform which, in line with good practice, will be determined following consultation with pupils and parents.

206. The temporary governing body is likely to be made up of existing governors from Alltwn, Godre'rgraig and Llangiwg Primary schools as this ensures continuity and will place the new school on a sound footing.

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207. Each school will continue to exist, managed by their respective governing bodies, until all three schools are closed on 31<sup>st</sup> August 2024. During this period the existing and temporary governing bodies will undertake their duties in parallel.

208. When the new school is opened, it will be managed by the temporary governing body until a permanent governing body is established. The governing bodies of Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary will cease to exist once the new school is opened.

### **Impact on special needs education provision**

209. There are no specialist units for children with statements of special educational needs at either of the three schools, i.e. provision recognised by the Council as reserved for pupils with SEN. Pupils with additional learning needs, including children with statements of special educational needs, are supported in a mainstream setting with appropriate funding for this purpose. The new school will continue to offer this level of support.

210. 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. The data also shows increasing demand for specialist support at primary age for pupils in NPT with Autistic Spectrum Disorder.

211. Pupils attending the proposed LSC provision within the new school will 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 will be available to share with mainstream staff and, as such, will indirectly benefit SEN provision at the new school.

212. It is also envisaged that the LSC provision will 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.

## Financial impact

213. The cost of the new build is estimated at c.£22,705,000 apportioned as per table 6 below.

Table 7

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

214. Welsh Government 21<sup>st</sup> Century Schools Programme capital grant funding has been approved, in principle. The full business case will be with the Welsh Government for decision in due course.

215. Combined backlog maintenance and accessibility costs for the existing schools amounts to circa. £2m 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. Additionally backlog maintenance costs for the current pool amounting to £1,221,783 would also be removed by this proposal.

216. 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.

217. Most of the revenue budget allocation to Alltwen, Godre'rgraig and Llangiwg Primary schools is generated by pupil numbers. Similarly, the new primary school's budget will be based mainly on the combined pupil roll. Savings will occur 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 effective management of its education budget and promotes the more equitable distribution of funding across local schools.

218. 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

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year. This annually presents a significant demand on the Council's education budget.

219. Additional recurring revenue costs associated with this proposal such as potential additional transport costs may be incurred. Similarly there will be revenue efficiency savings associated with this proposal.
220. Based on the funding delegated to schools in the 2020/2021 financial year, per pupil funding for Alltwen Primary school is £3,685 whilst for Llangiwg Primary school per pupil funding is £3,965 and for Godre'rgraig Primary school £ 3,886. This compares with the average for NPT primary schools at £3,941.
221. Prior to the new primary school opening on 1<sup>st</sup> September 2024 Alltwen, Godre'rgraig and Llangiwg primary schools will receive their annual school budget shares for the 5/12<sup>ths</sup> of the financial year 2023/2024. When the new school opens on 1<sup>st</sup> September 2024 it will receive a budget share based on the number of pupils on roll at that time.

### **Integrated Impact Assessment**

222. A first stage Integrated Impact Assessment (IIA) has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, and the Well-being of Future Generations (Wales) Act 2015 the Environment (Wales) Act 2016).
223. The first stage screening assessment is attached as appendix A. This indicates that the proposal is likely to have an impact on pupils, staff and other potential users of the new school. The proposal may also impact on opportunities to use the Welsh language.
224. Members should note that work on the IIA is an ongoing process and following full consultation where views of all stakeholders will be gathered, greater information will be available which will further help to inform the full assessment.
225. A fully completed IIA will be put before Members prior to any final decision being taken on whether or not the proposal is to be implemented. The impact on different protected groups, together with the three equality needs to which Members must have regard will be set out in the IIA.

226. As part of the IIA the impact on the proposal on people's opportunities to use the Welsh language and on treating the Welsh language no less favourably than English will also be fully assessed.
227. Members are reminded that in response to the Well-being of Future Generations (Wales) Act 2015 the Council has set three 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'.
228. 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 1 – 'to improve the wellbeing of children and young people' through the provision of a 21st century school for current and future generations of primary aged pupils.
229. Through creating facilities that can be used by the community the proposal also supports wellbeing objective 2 – 'to improve the wellbeing of all adults who live in the county borough' and wellbeing objective 3 'to develop the local economy and environment so that the wellbeing of people can be improved', through the creation of sustainable jobs.

### **Welsh in Education Strategic Plan**

230. The Council recognises that language and culture are essential parts of an individual's identity and is committed to promoting and celebrating the Welsh language and culture in a pro-active and inclusive way. The Council's Welsh in Education Strategic Plan (WESP) details how it intends to support and further develop Welsh language education in schools.
231. WESP objective 'To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner' is of particular relevance to this proposal.
232. Alltwen, Godre'rgraig and Llangiwig primaries teach Welsh as a second language and this will also be the case for the new school. Currently 25% 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

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impact on having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh.

233. The Swansea Valley area is a linguistically significant area as it contains the highest number and percentages of Welsh speakers in Neath Port Talbot, and is amongst the highest in Wales as a whole.
234. Primary education through the medium of Welsh is available at Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gynradd Gymraeg Trebannws. Additionally Ysgol Gymraeg Ystalyfera –Bro Dur, which is approximately 5 miles from the proposed site, provides all through 3-19 education through the medium of Welsh.
235. Significant investment has taken place at Ysgol Gymraeg Ystalyfera –Bro Dur through projects in both Band A (circ. £17.5m) and Band B (circ. £9m) of 21st Century Schools Capital Funding Programme.
236. In addition funding of £1.6m has been secured to improve provision at Ysgol Gynradd Gymraeg Pontardawe, including extended and enhanced childcare and Foundation Phase facilities. Work is expected to be completed in 2021.
237. It is not expected that this proposal would reduce Welsh language provision in the area, however further exploration of possible impacts on the Welsh language will be undertaken during consultation.

## **Workforce impacts**

### ***School staff***

238. 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.
239. The proposal will mean changes that impact on the employment of school staff as the existing schools will close on 31<sup>st</sup> August 2024. 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.
240. A temporary governing body will be established before the opening of the primary school. The temporary governing body will have the

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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.

241. The new primary school will open on 1<sup>st</sup> September 2024 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***

242. 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***

243. 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**

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

245. 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.



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246. 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.
247. 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.
248. The management of staff affected by the proposal will follow the relevant school policy and procedure requirements.
249. The legislation referred to above is available using the electronic links in the section on background papers, below.

### **Risk management**

250. A risk assessment has been carried out under the Council's Risk Management Policy 2018.
251. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.
252. 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 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
  - 21<sup>st</sup> 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
253. Failing to implement the proposal will result in the following

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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
- 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

254. 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.

255. The full risk assessment is attached to this report as appendix B.

### **Community usage impact assessment**

256. The proposal for the new build school also includes the creation of a learning, health and wellbeing community campus through the addition of a new build pool on the Parc Ynysderw site, with the aim of providing opportunities for all members of the Swansea Valley community to benefit from modern, fit for purpose facilities.

257. The new build school and pool co-location alongside the existing Cwmtawe Community School and Pontardawe Leisure Centre will provide opportunities to further develop and integrate community

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provision with delivery partners for indoor and outdoor sporting activities. The pool is currently used by some schools in the area but this scheme aims to increase usage by schools and by the wider community due to its improved location

258. Cwmtawe Community School has a range of facilities that can be used by community groups including hard tennis courts, meeting spaces, specialist facilities and performance spaces. These facilities will continue to be available and can be fully utilised by the community, and the primary school facilities will complement and extend these, providing a wide range of activities, services and experiences for pupils, families and the wider community.
259. Early years and childcare facilities are already available within walking distance of the new school, and it is expected that wrap around care will be easier to facilitate due to the location.
260. Additionally Pontardawe has a rich cultural heritage, and is known for promoting and developing the arts both through the medium of Welsh as well as English. The close proximity of the new learning campus to the heart of Pontardawe town would ensure pupils and families are able to both benefit from and contribute to this heritage.
261. This proposal will help to deliver the Council's aim of improving the health and wellbeing of all people living in Neath Port Talbot and reducing the gap between the least and most healthy.
262. A more detailed community impact assessment will be undertaken during the consultation period and the findings reported following the end of the consultation process.

### **Fields in Trust**

263. The playing fields at Parc Ynysderw are one of 471 King George Fields established as a memorial to King George V.
264. Fields in Trust is the sole trustee of the King George's Fields Foundation and as such its consent is needed for any disposals or changes of use. Fields in Trust works to protect parks, playing fields and other spaces and as part of the planning process supports Sport Wales in its role as the statutory consultee on developments affecting playing fields.

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265. Officers have formally engaged with Fields in Trust to seek their views on the proposal before progressing. Fields in Trust has stated that it is responsive to local change and flexible in its dealings with landowners and will be happy to consider a possible exchange of land to accommodate the new school. The proposal will be assessed against the relevant policy set out in Planning Policy Wales and consideration will also be given to the playing field needs of the school as set out in Building Bulletin 99: Building Framework for Primary School projects which is adopted by the Welsh Government's 21st Century Schools Programme.

## **Consultation**

266. 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.

267. Subject to approval, it is intended to consult on this proposal between 3<sup>rd</sup> November 2020 and 5<sup>th</sup> January 2021 - see timeframe below. This allows an extra 3 weeks in addition to the statutory 6 weeks for consultees to consider the proposal and submit a response. Responses to the consultation will be reported to Cabinet for consideration by Members in February 2021.

268. If, following consideration of the responses, Members decide to progress the proposal then a 28 day period will follow for the submission of objections.

Publication of consultation document	3 <sup>rd</sup> November 2020
Period for submitting responses	3 <sup>rd</sup> November 2020-5 <sup>th</sup> January 2021
Consultation report published	5 <sup>th</sup> February 2021
Proposed implementation date	1 <sup>st</sup> September 2024

269. When establishing a new school it is necessary to ensure that enough time is set apart to enable decisions to be made in a considered and timely manner, and additionally when building a new school there is a great deal of time needed for planning to ensure the

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final build meets the needs and desires of the pupils, staff and community who will be using it. As such it is necessary to start statutory processes at the current time to ensure that there is sufficient time available to complete all necessary processes.

270. Information on the proposal and the consultation document will be available on line on the Council's website and also on the websites of the affected schools. Hard copies will also be available on request.

271. All consultees, as directed by the Code will be sent the Consultation document via email. The Council's social media channels will also contain information on how to access the consultation document.

272. Consultation responses can also be submitted using the Consultation Portal on the Council's web page, or by email to [SSIP@npt.gov.uk](mailto:SSIP@npt.gov.uk), or in writing.

273. Due to the ongoing public health situation there will be no face-to-face consultation events arranged for this consultation. Questions concerning the proposal can be submitted to [SSIP@npt.gov.uk](mailto:SSIP@npt.gov.uk).

274. It is the intention of officers to meet with pupils during the course of the school day, either remotely or in person depending on the views of the schools and parents, and on the Public Health Wales guidelines in place.

## **Recommendation**

275. Having given due regard to the impact assessments in relation to equality, risk, community usage and Welsh language, and to the Wellbeing of Future Generations Act (Wales 2015), together with the legal implications, it is recommended that, in line with Section 48 of the School Standards and Organisation (Wales) Act 2013, Members approve consultation on the proposal 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 31<sup>st</sup> August 2024.

276. The proposed date of implementation to be 1<sup>st</sup> September 2024

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## Reasons for proposed decision

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

278. 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

279. The decision is proposed for implementation after the three day call in.

## Appendices

Appendix A: Integrated Impact Assessment First Stage

Appendix B: Risk Assessment

Appendix C: Legal Implications

## 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. Welsh Government - School Organisation Code: November 2018  
<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>
- d. School Standards & Organisation (Wales) Act 2013  
[http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw\\_20130001\\_en.pdf](http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf)
- e. Well-being of Future generations (Wales) Act 2015  
<https://gov.wales/well-being-future-generations-wales-act-2015-guidance>
- f. 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://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf)  
<http://gov.wales/docs/det/publications/140616-ltogg-en.pdf>
- g. Home to School Travel Policy: 2017

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[https://www.npt.gov.uk/media/4231/npt\\_home\\_to\\_school\\_travel\\_policy\\_2017.pdf?v=20170627002146](https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf?v=20170627002146)

h. **Corporate Plan 2019-2022**

<https://www.npt.gov.uk/media/11925/2019-20-corporate-plan-eng-3.pdf?v=20190920114145>

i. **Estyn**

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

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Mae'r dudalen hon yn fwriadol wag



**CABINET**

**24 SEPTEMBER 2008**

**EDUCATION, LEISURE & LIFELONG LEARNING SERVICES**

**REPORT OF THE DIRECTOR OF EDUCATION, LEISURE AND  
LIFELONG LEARNING – K A NAPIERALLA**

**INDEX OF ITEMS**

**PART 1 – Doc. Code: CAB-240908-REP-EL-KN**

<b>SECTION A – MATTERS FOR DECISION</b>		
<b>Report Item</b>	<b>Page Nos</b>	<b>Wards Affected</b>
A Strategic School Improvement Programme (Principles Paper)	2 - 16	ALL WARDS

## ITEM 1

### A STRATEGIC SCHOOL IMPROVEMENT PROGRAMME PRINCIPLES TO UNDERPIN CHANGE

#### **1. Purpose of Report**

To recommend to Council to approve an approach to strategic school improvement based on a programme for change underpinned by the principles set out in this report.

#### **2. Background**

School reorganisation is an evolving process, driven by events both locally and nationally. It is the means by which a local education authority responds to changing circumstances that impact upon its ability to meet its duty to secure efficient primary and secondary education in its area and to promote high standards and the fulfillment of every child's potential (Education Act 1996).

This paper sets out the principles underpinning the process of school reorganisation in Neath Port Talbot County Borough. The principles have been developed to support an overarching strategy for school improvement that aims to provide 'fit for purpose' schools capable of delivering high quality educational experiences for all pupils. It is in this context that the principles are to be applied. They provide clarity of purpose and transparency of approach, and determine the main factors that will be taken into account in considering all proposals for change, including, where necessary, school closures. Full and effective implementation of a school improvement programme will need a long term strategy for delivery, one that maps out proposals for change over an elongated period, delivered by means of a rolling programme reviewed annually.

To ensure a coherent and integrated County Borough wide approach to the strategic school improvement programme, there is a strong and explicit relationship between the principles articulated in this document and corporate policies and priorities. The principles reflect the priorities of the Community Plan 2005 - 2015, the Unitary Development Plan 2001 – 2016, the Western Valleys Strategy, the Children and Young People's Plan 2008 – 2011, the Single Education Plan, the ELLLS statement document – One Direction and One Wales, a progressive agenda for the government of Wales. They also draw upon the Welsh Assembly Government guidance document 'School Organisation Proposals' (Circular No: 23/02) which requires prime

consideration be given to the effect of any proposed change on the standards of teaching and attainment in schools.

Embodied in the principles is the vision for education articulated in the Community Plan; a vision that enhances achievement through continued school improvement and places education at the centre of community development. Delivering change that will allow all the citizens of Neath Port Talbot the opportunity to access services of the highest standard is an aim of the Community Plan that is supported by the principles. Similarly, the principles, guided by a sustainable development theme that is central to the Unitary Development Plan, promote a long term perspective in planning for future interests, whilst recognising the demands of today's needs.

Within this context, the Education, Leisure and Lifelong Learning Service (ELLS) is well placed to take forward a strategic school improvement programme. It already has school improvement as the cornerstone of its delivery and making a positive difference to the lives of children and young people within Neath Port Talbot, both now and in the years ahead, is a core function of the Service.

The Service holds detailed information on educational performance, pupil numbers, school organisation and capacities, and the suitability and sufficiency of building stock. This combined with contextual information from other services enables the ELLS to develop plans for the future of education within the County Borough from an informed base.

### **3. Contextual Information**

#### **i) General**

Neath Port Talbot County Borough Council is a unitary authority sharing borders with 5 other authorities. The County Borough covers an area of about 44,217 hectares and is economically and linguistically diverse. The proportion of the working population that is unemployed is about 4.4%, which is above the national average. Neath Port Talbot has the fourth highest percentage of communities in the most deprived ten percent in Wales, for overall deprivation.

The County Borough has a population of around 135,000, 22% of which is Welsh speaking. The highest concentration of Welsh speakers is located mainly in the northern rim of the local authority area. Significantly, an analysis of Welsh speakers by age groups shows that the highest percentage, 36%, is attributed to 10-15 year olds compared to the

traditionally higher 75+ year old category which is only 25%. This data clearly shows that Welsh language learning is already successful in the authority.

## **ii) Schools**

Currently, Neath Port Talbot County Borough Council, the local education authority, maintains 86 schools: 72 primary schools, 11 secondary schools, three special schools and three pupil referral units. Within this structure the authority also supports 21 learning support centres located within our mainstream schools and 1 within a special school.

Currently 98% of three-year-olds and 98.7% of four-year-olds access the authority's early years' provision. The school population is around 21,500 pupils.

The percentage of pupils entitled to free school meals is 21.1%, which is above the Wales average of 17.4% and the fifth highest in Wales. The proportion of pupils from ethnic minority backgrounds (non-white British) is 4.8% in comparison with the Wales average of 7.7%.

## **iii) Surplus Places**

The Welsh Assembly Government defines significant surplus capacity as 25% or more of a school's capacity and at least 30 unfilled places.

It is generally accepted that the term 'small school', in relation to primary schools, is applied to schools with fewer than 90 pupils and, in relation to secondary schools, is applied to schools with fewer than 600 pupils (700 pupils for schools with a 6<sup>th</sup> Form).

- **NPT Primary Schools**

There are 2190 surplus places within the primary school sector. Currently, 20 of the 72 primary schools have significant surplus capacity.

18 primary schools fall into the category of being 'small schools' and half of these have significant surplus capacity.

- NPT Secondary Schools

There are 1726 surplus places within the secondary school sector. 3 of the 11 secondary schools have significant surplus capacity.

2 secondary schools fall into the category of being ‘small schools’, 1 of which has significant surplus capacity.

Pupil population predictions indicate that, for the period April 2008 to April 2013, primary school pupil numbers will fall by 702 and secondary school pupil numbers by 824. However, these (which exclude 6<sup>th</sup> form pupils) are subject to change and will, therefore, need to be reviewed annually.

In the financial year 2008/09, the impact of falling rolls on schools should have amounted to a reduction in schools’ budget of £1,540,000. However, the effect of this was mitigated by the action of the Authority which bore 50% (£770,000) of the cost of the loss of revenue.

#### **4. The Principles**

The principles underpinning the process of developing and implementing school improvement proposals are set out below.

##### **i) Standard of educational provision**

School improvement proposals will have a positive impact upon:

- the standard of education provision in schools within the County Borough
- the continued development in curricular provision and delivery
- the outcomes for children and young people

##### **ii) Need for places and the accessibility of schools**

School improvement proposals will have a positive impact upon:

- reducing surplus provision in the County Borough

- addressing current or future need for additional places
- addressing demand for particular provision, such as Welsh medium education and faith school provision
- addressing demand for specialist provision, for example additional learning needs, inclusive education provision
- access for disabled pupils in accordance with statutory disability discrimination and SEN requirements
- the length and nature of school journeys

**iii) Standard and suitability of school accommodation**

School improvement proposals will have a positive impact upon:

- the standard of school accommodation
- the condition and suitability of school places in the County Borough

**iv) Finance**

School improvement proposals will have a positive impact upon:

- the cost-effective use of public funds
- reducing the budgetary impact of falling school rolls
- the effective management of school budgets

**5. Applying the principles**

In determining school improvement proposals the following factors will be taken into account.

**i) Standard of provision**

Consideration will be given to:

- whether the proposals are likely to improve the standard of education provision in schools within the County Borough
- whether the proposals will ensure delivery of a broad and balanced curriculum, including all the required elements of the curriculum for all affected age groups
- the standard of education currently provided and the continuing ability of schools to maintain satisfactory standards. When deciding on proposals, Monitoring School Performance (MSP) and ESTYN inspection reports will be taken into account
- the effect of the proposals on other schools

**ii) Need for places and the accessibility of schools**

Consideration will be given to:

- whether there is surplus provision in the area and the effect of the proposal on that surplus. When deciding on proposals to resolve a problem of surplus capacity, Monitoring School Performance (MSP) and ESTYN inspection reports will be taken into account
- whether there is a current or future need for additional places in the area or demand for a particular type of provision, for example Welsh medium provision or provision for particular faiths or denominations
- the need to integrate separate infant and junior school provision
- whether the length and nature of journeys to alternative provision are appropriate; in particular whether primary school pupils will have journeys one-way in excess of 45 minutes or, in the case of secondary school pupils, journeys of over an hour (Welsh Assembly Government guidance: 23/02)

- whether there are safe walking, cycling and bus routes to the proposed site
- whether the proposal will improve access for disabled pupils in accordance with statutory disability discrimination and SEN requirements

**iii) Standard and suitability of school accommodation**

Consideration will be given to:

- whether provision is ‘fit for purpose’ and appropriately located
- the improvements needed to bring to the standard of school accommodation to an appropriate level
- the suitability and sufficiency of school places in the County Borough

**iv) Finance**

The Authority accepts that the proceeds from sales of redundant sites should be made available to offset the cost of implementing a proposal and savings in revenue costs should be retained in the authority's local schools' budget.

Consideration will be given to:

- the financial implications for both revenue and capital costs
- whether the proposals represent a cost-effective use of public funds, including consideration of long term transport needs
- environmental factors, and building maintenance and repair costs
- whether capital funding needed for the project will be available at the level required and at the right time
- whether the necessary revenue funding is available, including consideration of whether, without the proposals, the school(s) would face budget deficits



- the scale of any projected net savings over a period of at least three years

v) **Other considerations**

In applying the principles, consideration will also be given to alternatives to school closure and community impact, in particular to:

- whether alternatives to closure have been actively considered, in particular, whether revised catchment areas and amalgamation options have been looked at (taking account of the scope for use of ICT links between school sites) and the reasons for not pursuing these as an alternative to closure
- whether the possibilities of making fuller use of the existing buildings as an educational/community resource within the locality have been explored
- emerging priorities of the Children Act 2004 as articulated in the NPT Children and Young People's Plan 2008 – 2011

In addition, the views of interested parties will be sought, in particular:

- the views of parents and other local residents, including those relating to parental choice and the impact on the local community
- the concerns of other LEAs affected by the proposals
- the concerns of any diocese affected by the proposals
- the views of other schools, playgroups or other providers in the area
- other interested parties

**6. Developing a Strategic School Improvement Programme**

This principles paper is the first stage in the development of a comprehensive improvement programme for Neath Port Talbot schools. It forms the basis of a structured approach to the rationalisation of educational provision in the County Borough, an approach that will be evidenced based and one that will draw upon

data and information from a variety of sources in order to reach informed conclusions about the nature of provision and the need to add, remove or relocate school places. As necessary, school improvement proposals will use the Authority's statutory powers to establish, transfer, alter the character of and discontinue schools.

Legislative processes apply to the significant alteration or closure of a school which includes statutory consultation periods. Even without allowing for planning, development and building construction work it is advisable to allow 18 to 24 months in which to undertake the necessary statutory processes.

The purpose of the strategic school improvement programme is to set out the context in which decisions on the organisation of school places in Neath Port Talbot are made and to plan the delivery of a managed programme for change. The nature of change in school organisation will mean that some schemes can be effected within a short timescale whilst others will only be achieved over an extended period.

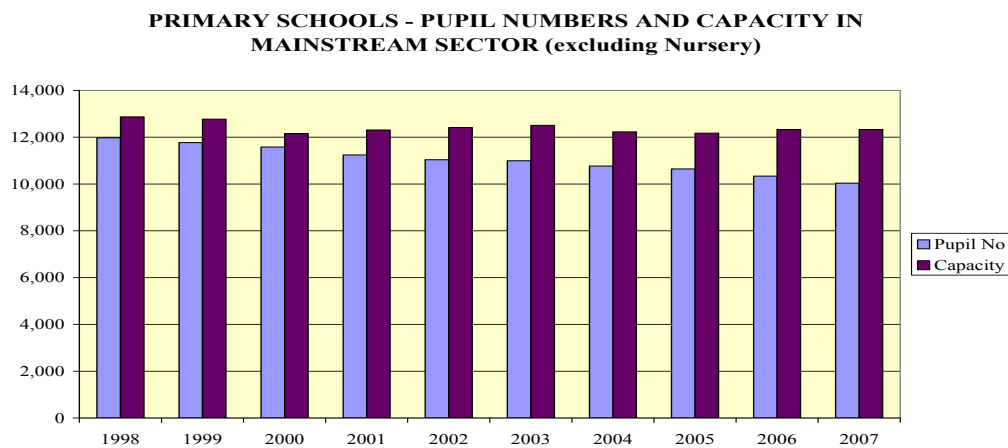
Proposals will be clearly linked to corporate priorities articulated in the Authority's plans and policies. They will focus upon making the most effective, efficient and flexible use of finite resources in order to raise educational standards and support continuous improvement. In developing proposals for 'fit for purpose' schools that will meet the educational demands of a modern society, consideration will need to be given to both the rationalisation and development of provision across the County Borough. Whereas reducing surplus places and managing building stock more efficiently will feature prominently in a strategic school improvement programme, in meeting the twin aspirations of raising educational standards and supporting continuous improvement an essential requirement is the provision of suitable and sufficient schools; that is - right school in the right place. A strategic school improvement programme will, therefore, need to address key issues at both primary and secondary levels in areas such as: Welsh medium provision, faith education, additional learning needs, curriculum developments, teaching and learning initiatives and a community focus for schools.

The successful development and implementation of the strategic school improvement programme will require a programme and project management approach. Under the direction of the Head of Support Services and Commissioning Development, the programme will be developed and overseen by a project manager supported by an internal specialist team.

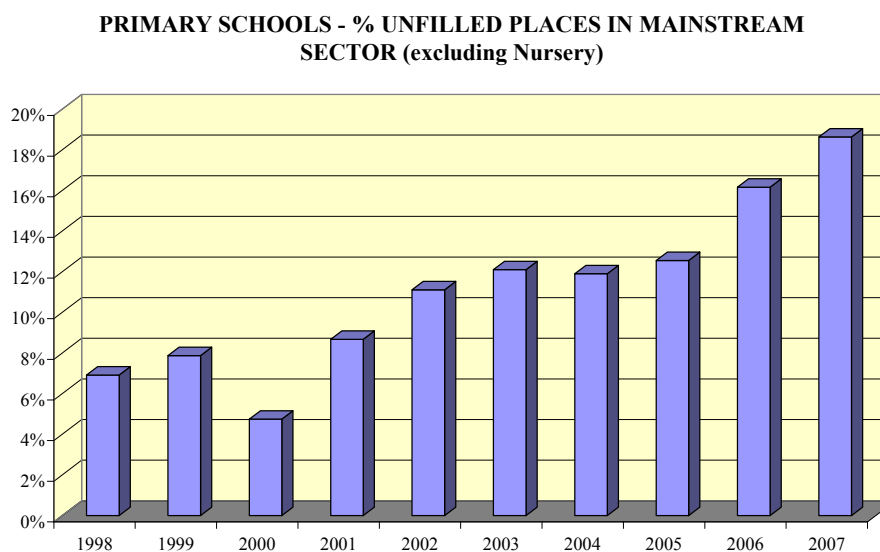
## 7. Evidence for change – Surplus Places

The following charts illustrate the relationship between capacity and pupil numbers and the increase in the extent of surplus capacity across NPT schools in the primary and secondary sectors. Also illustrated is the downward trend in pupil numbers projected over time. It should be noted that the following information is accurate at the date of print and will need to be updated continually.

- Primary Sector



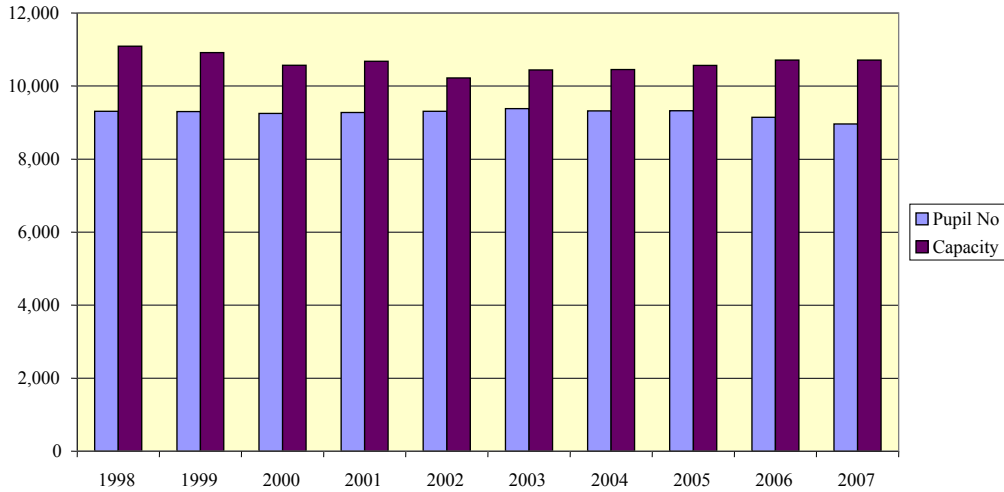
*The above chart illustrates a steady decline in primary sector pupil numbers over a 10 year period whilst capacity has remained relatively constant.*



*Further evidence of the disparity between pupil numbers and capacity can be seen in this chart which sets out the percentage increase of unfilled pupil places over a 10 year period.*

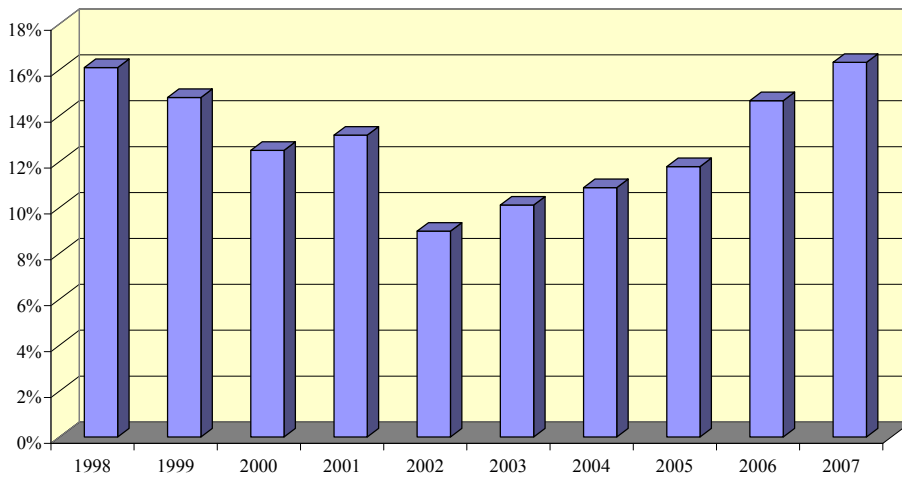
- Secondary sector

**SECONDARY SCHOOLS - PUPIL NUMBERS AND CAPACITY IN MAINSTREAM SECTOR**



*The effect of a 10 year period of over capacity in secondary schools, exacerbated in recent years by a fall in pupil numbers occurring alongside a slight rise in capacity is demonstrated by this chart. The recent decline pupil numbers is the effect of low primary school numbers over previous years impacting on the secondary sector.*

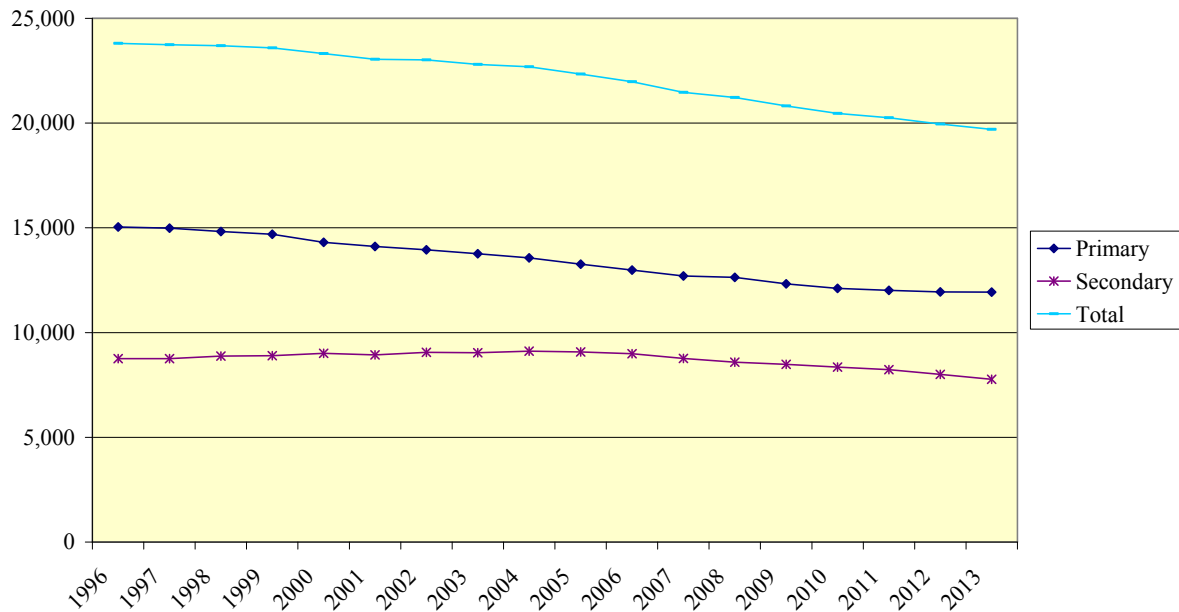
**SECONDARY SCHOOLS - % UNFILLED PLACES IN MAINSTREAM SECTOR**



*Illustrating percentage unfilled places, the effect of increased capacity and falling numbers over recent years is highlighted by this chart.*

- Pupil trends (April 1996 – April 2013)

## PUPIL NUMBER TRENDS



*Clearly illustrated in the above chart is the decline in pupil numbers at primary level (inc. nursery) and secondary level (excl 6<sup>th</sup> Form). Although projected figures for the next five years suggest the decline in the primary sector is levelling out, the continued fall at secondary level means that overall pupil numbers will continue to drop.*

## **8. Recommendations**

- That Council approve the following:
- The principles for change set out above be adopted
- Approval be given to develop a programme for strategic school improvement based on the principles set out above
- Approval be given to instigate programme management arrangements in order to facilitate the effective and efficient delivery of the programme for strategic school improvement. The arrangements to include the development of a cross-directorate programme management team and the appointment (by internal secondment) of a project manager. The project manager, working under the direction of the Head of Support Services and Commissioning Development, to be supported by an internal

specialist team with ‘back-filling’ arrangements for officers assigned to that team.

- Revenue costs associated with the management of the strategic school improvement programme, in particular back filling arrangements, will be offset by savings secured from the implementation of the programme.

## **9. Reason for the Proposed Decision**

To enable the Authority to respond to changing circumstances that impact upon its ability to meet its duty to secure efficient primary and secondary education in its area and to promote high standards and the fulfillment of every child’s potential.

## **10. List of Background Papers**

Education Act 1996  
School Standards and Framework Act 1998  
Education Act 2002  
Education and Inspections Act 2006  
NPT Community Plan 2005 – 2015  
NPT Unitary Development Plan 2001 - 2016  
NPT Western Valleys Strategy  
Single Education Plan  
One Direction – a statement document  
School Organisation Proposals, NAFW Circular No: 23/02  
Children Act 2004  
Children and Young People’s Plan 2008 – 2011  
One Wales, a progressive agenda for the government of Wales, WAG  
Excellent Schools: A vision for schools in Wales in the 21st century, ESTYN  
Welsh Education Scheme 2008 – 2013  
Trading Places: A review of progress on the supply and allocation of school places, Audit Commission 2002  
Planning School Places, WLGA – Jan 2008

## **11. Ward Affected**

All

**12. Officer Contact**

Mr Karl Napieralla, Director of Education, Leisure & Lifelong Learning.

## COMPLIANCE STATEMENT

### A STRATEGIC SCHOOL IMPROVEMENT PROGRAMME(PRINCIPLES)

**(a) Implementation of Decision:**

The decision is proposed for implementation immediately after consultation with the relevant Scrutiny Committee and determination by Council.

**(b) Sustainability Appraisal:**

**Community Plan Impacts**

Economic Prosperity	-	positive
Education, Leisure & Lifelong Learning	-	positive
Better Health & Well Being	-	positive
Environment & Transport	-	positive
Crime & Disorder	-	positive

**Other Impacts**

Welsh Language	-	positive
Sustainable Development	-	positive
Equalities	-	positive
Social Inclusion	-	positive

**(C) Consultation**

There has been no requirement under the constitution for external consultation of this item.





# 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

16th February 2021

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# Introduction

As part of its Strategic School Improvement Programme, Neath Port Talbot Council has proposed 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.

The Council's "Integrated Impact Assessment - first stage" document contained an initial overview of the possible impact on the Welsh language, in the communities affected by the proposed closure and the combining of the three schools into a single new site.

It identified and some possible considerations and mitigating factors, which the evidence presented in this assessment document supports and expands upon.

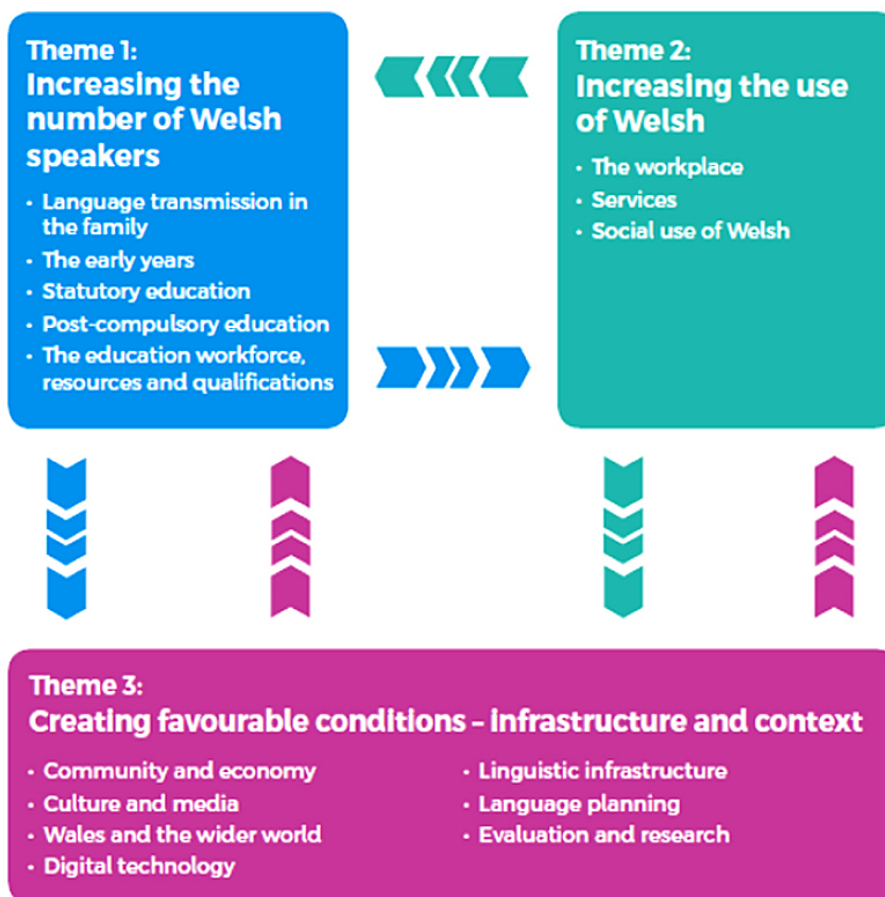
## i) The Cymraeg 2050 Strategy

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, and therefore although they have been covered, the main focus has been on matters where there is more direct connection to the proposal.



As can be seen from the infographic above, all three Cymraeg 2050 themes would be directly relevant if the proposal concerned Welsh-medium education.

Much of the impact on the Welsh language in terms of English-medium education would be indirect in comparison, though still important to consider. Welsh as a second language will be taught in the proposed new school as it currently is in the three primary schools that are part of this proposal.

The focus of themes 1 and 2, whilst still important to recognise, lies far more within the direct remit of the Welsh in Education Strategic Plan (WESP), within the Council's 5-year promotion strategy and within the Council's current plans for Welsh-medium education.

Theme 3 is the most directly relevant to these proposals, as the evidence shown later in this assessment demonstrates how Neath Port Talbot Council's wider work around the Welsh language, and its understanding of the area it serves, are geared towards, and already working towards, creating the required favourable conditions in terms of language planning. The supporting evidence is included in Section 5.

This assessment therefore pulls together a range of relevant Welsh language data sources, statistics and existing Council and Welsh Government policies and legislation, which must be considered in context, and more importantly as mitigating factors, by Neath Port Talbot Council as it determines whether to proceed with the proposal, and should be included as a background paper as the proposal moves ahead.

# 1. The English-Medium 3-11 School Proposal

The following background information is taken from the Council's consultation document.

"The Council ... is proposing to establish a new build, 21st century English-medium 3-11 school to replace Alltwen Primary, Godre'rgraig Primary and Llangiwg Primary, all of which will close on 31st August 2024.

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 2024.

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."

## ***Neath Port Talbot Consultation Document, November 2020***

The consultation ran from 3<sup>rd</sup> November 2020 to 19<sup>th</sup> January 2021. The consultation document does have a section noting the possible impact on the Welsh Language (noting the geographical area in questions as being linguistically sensitive - see definition/explanation of this overleaf) and makes reference to the teaching of Welsh as a second language in the current 3 schools and the proposed new, combined school.

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

This shows that overall, the consultation process to date has complied with the requirements of Welsh Language Standards 90 and 91. Including this assessment along with other background documents to the proposal will help inform the Council's decision-making process.

## 2. 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.

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.

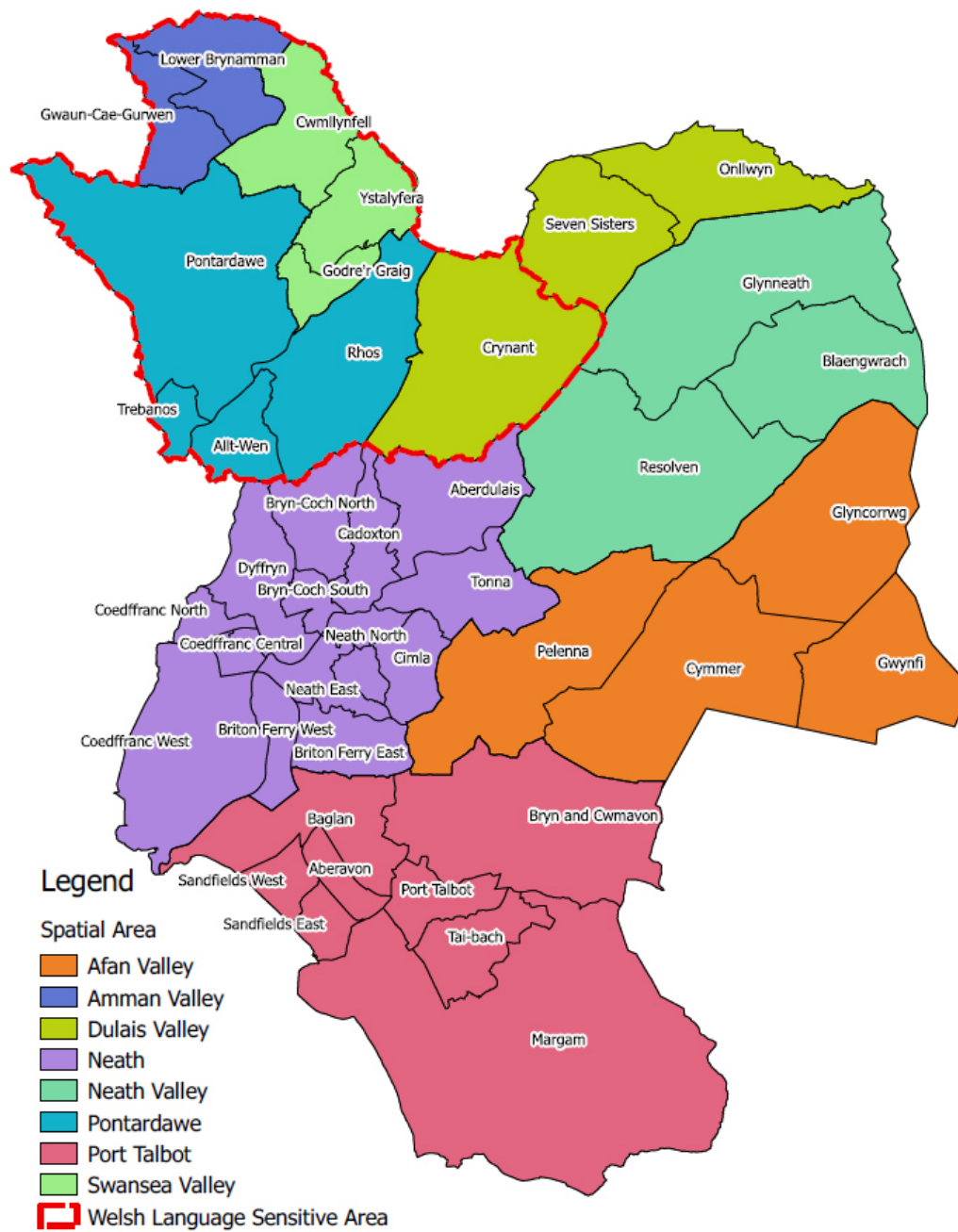
Section 2.1.2 of Neath Port Talbot's Council's [Development and the Welsh Language: Supplementary Planning Guidance \(July 2017\)](#) document, which sits under its 2011-2026 LDP, notes the following:

**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.

As a result, Neath Port Talbot Council's "Integrated Impact Assessment - first stage" document identifies the areas around the Alltwen, Godre'rgraig and Llangiwig schools as being of a linguistically sensitive nature (as is further supported by the ward data shown in map form on page 17), as they are within the Council's officially defined area.

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



Lastly, in the case of this proposal, just as the Welsh Language Standards (88, 89 and 90 - see Appendix A) require Neath Port Talbot Council 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.

### 3. Consultation Responses and Analysis

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.”

The requirements of the relevant Welsh Language Standards (88, 89 and 90 - see Appendix A) however are not specifically, or only, aimed at Education issues, but on the effects of policy decisions on the Welsh language in a broader sense, and the purpose of this assessment is to provide supporting information across many policy areas on that basis, not simply on Education matters.

The fact that this proposal is NOT a consultation on Welsh-medium education needs to be kept in mind when considering the consultation responses to the main proposal.

As part of the consultation process an online survey was undertaken to seek views on the proposal, and to gather information on how consultees felt the proposal may impact on the Welsh language and its further development in the area.

The medium of Education in the schools in question is English and so any impact on wider, community Welsh language issues may not be immediately identifiable and will require monitoring longer term.

The main questions asked were:

#### **Do you believe that the proposal will have a positive, negative or neutral impact on opportunities to use the Welsh language?**

- Negative (80) 49.7%
- Neutral (76) 47.2%
- Positive (5) 3.1%

#### **Do you believe that the proposal will treat the Welsh and English languages equally?**

- No (80) 49.7%
- Neutral (57) 35.4%
- Yes (24) 14.9%



Some respondents could not see any relevance in asking these questions when dealing with a proposal on English-medium schools, or felt that the question was unnecessary.

A common theme in the consultation comments was that a new English-medium school would negatively impact on the Welsh-medium schools in the locality.

However, data/evidence held by the Council indicates that new build English-medium schools in Neath Port Talbot, that have opened in the last 10 years, have had no significant impact on nearby Welsh-medium schools which suggests there is low if any impact on Welsh Medium schools in the locality with the proposal.

Some responses to the consultation also appeared to reflect a perception or misunderstanding that the question was being asked because teaching Welsh as a second language would be optional in some way in the new school, and had to be maintained or agreed upon, rather than that teaching of Welsh as a second language would continue unchanged as part of the curriculum, as such there is neither a negative or positive impact as there will be no change.

Current data on existing school staff reveal that 25% of staff across the three schools are fluent or fairly fluent Welsh speakers. Combining the three schools could improve Welsh language provision as there could be a greater impact as a result of having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh. This would indicate a positive impact.

Of the online consultation comments, only one referred to wider community usage of Welsh (unedited quote below):

“As a general principle efforts to encourage children to adopt the Welsh language outside the classroom setting are far more effective in a smaller, more homely, less intimidating setting. This is precisely what the smaller setting provided by our present model of Primary Education provides! The teaching of Welsh as a second language would therefore be far more effective under the present provision. In addition the local social focus by having a Primary School in the immediate community provides further opportunities for those Welsh speakers in the community who chose our school to use the language. Under the current proposals these opportunities would be dispersed/watered down.”

There is no evidence to suggest that a larger English Medium school would prevent Welsh speakers to continue to use the language.

The Estyn’s ‘School Size and educational effectiveness Report (Dec 2013) states that pupils’ standards are good or better in a higher proportion of large primary schools than small and medium-sized primary schools. The report suggests that may be because large schools tend to have more expertise and capacity to address the needs of more vulnerable pupils and the more able and talented pupils.

The Report goes on to identify that Foundation Phase assessment outcomes improve with school size for language, literacy and communication skills. There is little difference between schools of different sizes in terms of mathematical and personal and social

development, wellbeing and cultural diversity. The differences between schools of different sizes at the higher-than-expected level are also minimal.

Similarly at key stage 2, there is little difference in the percentage of pupils achieving the expected level 4 in the core subjects of English, mathematics and science at the end of key stage 2 in all sizes of schools. The percentage of pupils achieving the expected level in Welsh is higher in large schools.

Generally, a slightly greater proportion of pupils achieve the higher than expected level (level 5+) in English, mathematics and science in large schools compared to medium-sized and small schools. A higher proportion of pupils in small and large schools attain level 5+ in Welsh than in medium-sized schools

A larger school community could create greater opportunities for using Welsh, bringing more Welsh speakers together from the wider Pontardawe area for school events. This would result in a positive impact on the Welsh Language.

In the context of the proposal around the English-medium schools, the range of mitigating factors provided in Section 4 from Neath Port Talbot Council's Welsh-medium education plans, and the supporting evidence in Section 5, provides a balance that addresses many of the concerns raised.

#### **i) Distance of Travel and Potential Discrimination**

A number of comments around the impact of the proposals were based on the distance of travel to the new school location as it would be further for many English-medium pupils from communities where the current school is closer to home.

As part of those concerns, it was also noted that parents may choose to send their children to the new English-medium school rather than to the catchment Welsh-medium school as it would also be closer. This raises a number of issues that need to be considered, but as will be noted later, the resulting actions are best suited to being placed in the updated WESP.

Any school reorganisation proposal that includes a physical change of school location will result in some pupils having further to travel and others with less. This is the case in general, regardless of the language of education in question. This will result in a positive impact for those with less travelling time and a negative impact for those who will need to travel further however all children and young people will have access to the Councils Home to School transport provision (providing they meet the criteria laid out in the policy).

The provision of home-to-school transport by the Council will not change as a result of these proposals (being covered by the requirements of the **Learner Travel (Wales) Measure 2008** in terms of eligible children); what will change are the pupils who need to access that provision. Some may no longer need it as the new school is closer, others will inevitably require it for the first time.

It is also a related point to make that nowhere in Wales is there parity of catchment areas between English-medium and Welsh-medium schools and so distances of travel have (for the most part) always been further for pupils travelling to Welsh-medium schools.

It is inevitable that some parents will wish to send their children to their local school, regardless of the language of education. Others will choose the language of education over and above the distance of travel. These could also be factors affecting the numbers of pupils who transition to Welsh-medium secondary education in the area.

The proposal does not seek to make any alterations to the current Welsh medium schools in the Swansea Valley, however it does involve the closure of 3 English-medium schools. It is a possibility that some parents will choose not to send their children to a large primary and will instead opt for a smaller school, in which case the Welsh-medium schools may be preferable. Should this happen then the impact on the Welsh –language could be said to be positive. Should the proposal go ahead this will need to be monitored to establish the longer term impact.

The proposed permanent closure of Godre’rgraig Primary School would mean that there would no longer be an English –medium school in the north of the Swansea Valley area in Neath Port Talbot. However, there is a new build primary phase in Ysgol Gymraeg Ystalyfera-Bro Dur on the Ystalyfera site. Parents wishing for a local school in the area may therefore opt for this school 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.

A number of respondents to the consultation referred to *discrimination* when referring to Welsh language matters. This is a very technical, legal point but important to note. Actual discrimination can only happen when referring to protected characteristics under the **Equality Act 2010** and the **Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**.

The Welsh language is protected in different ways under the **Welsh Language (Wales) Measure 2011**, and though that legislation refers to rights around unfair or unequal treatment, it does not contain a situation of discrimination in the same way.

Welsh speakers or school pupils cannot therefore be *discriminated* against as such, simply on the grounds of language. Members of the public may and do use term more broadly in describing what they perceive to be unfair or unequal treatment.

## ii) **Consultation Responses and Links to the WESP**

As has been referred to already, and as a general point around the consultation exercise, it could be argued that respondents have in effect provided Neath Port Talbot Council with a range of suggestions that could be addressed in more detail with relevant targets, actions and high-level commitments in the updated WESP.

This is because a great deal of the consultation comments received have focussed specifically on Welsh-medium education issues rather than the main English-medium proposals.

Whilst needing to be acknowledged as an issue in this Welsh Language impact assessment, it is advised that this and the other issues raised need full consideration and inclusion in any updated/revised WESP.

See Section 5.1 for further information on the WESP in context.

#### **4. Mitigating Factors/Actions**

**As a result of the consultation and consideration of existing data and evidence the following mitigating actions are recommended for consideration and implementation should the proposal be approved.**

- Longer term monitoring is required to ascertain any impact on wider community Welsh language issues; this could be planned for as part of the updated WESP actions (See Section 5.1)
- Monitor parental choice of school i.e. Welsh/English medium

The following information was provided by Neath Port Talbot Council as supporting evidence of its ongoing work on Welsh-medium education in its area. This information provides a level of detail that is intended to show, together with actions in the Council's WESP, that the Council does and continues to develop the Welsh-medium education sector and is aware of the linguistically sensitive nature of the geographical area in question.

These are relevant mitigating factors in terms of Welsh-medium education, to balance against the proposals regarding Alltwen, Godre'rgraig and Llangiwg Primary Schools.

Though the entire set of proposals has been included, of particular relevance are the proposals to do with Ysgol Gynradd Gymraeg Pontardawe (see page 11), which is in proximity to Llangiwg and Alltwen primary schools. Godre'rgraig Primary is in closer proximity to Ysgol Gymraeg Ystalyfera –Bro Dur's campus at Ystalyfera which has undergone significant investment.

#### **Welsh-Medium Education Projects - Background**

In 2018 Neath Port Talbot 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   | £1.34m |

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

#### **Ysgol Gynradd Gymraeg Pontardawe**

YGG Pontardawe is a 3 - 11 Welsh-medium school with 289 F/T and 67 P/T pupils

currently on roll (Jan 2018 PLASC).

The school roll has been steadily increasing every year since 2014 - 336 to 356 in January 2018, and is nearing its capacity of 335 and 59 nursery places. There is now very little available space for providing extra classrooms to meet anticipated future demand within the current accommodation footprint.

The £1.62m project funded through the Increasing Welsh-medium Provision grant will enable the school to increase capacity and improve current provision by providing 3 extra classroom spaces and refurbishing an existing gymnasium area (a former secondary school legacy) to create a hall.

In response to demand in the locality for Welsh-medium childcare, a classroom at the school was refurbished in 2015/16 to provide Welsh-medium pre-school provision, Cylch Pontardawe. This has 14 childcare places, including 10 Flying Start places. The pre-school provision is targeted to grow from the current 14 places to 28 places by 2021 and the current space available is not large enough to allow for further growth or to provide suitable outdoor play facilities.

Managers of the setting have already requested extra space to meet requests from parents in the area for additional childcare, and to accommodate places to facilitate the Childcare Offer for Wales.

Works undertaken at the school would be 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 would also assist with meeting the Childcare Offer for Wales as it would allow greater scope for providing wraparound childcare opportunities.

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

Work commenced in 2019 and following more detailed discussion with the school the scheme was amended. At the schools request the current childcare provision and nursery/reception classes were relocated within the school to allow for work to take place without interruption, which necessitated remodelling 2 classrooms, providing extra toilet facilities and outdoor play area, converting the staffroom and office to provide childcare facilities and converting a reception area for storage.

Phase 2 will see the completion of the remodelled and extended childcare and nursery facilities 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. The school has ample outdoor space and the MUGA has therefore been omitted from the scheme.

It is estimated that the additional works will bring the final cost of the scheme to circa.

£2m and should be completed by summer 2021.

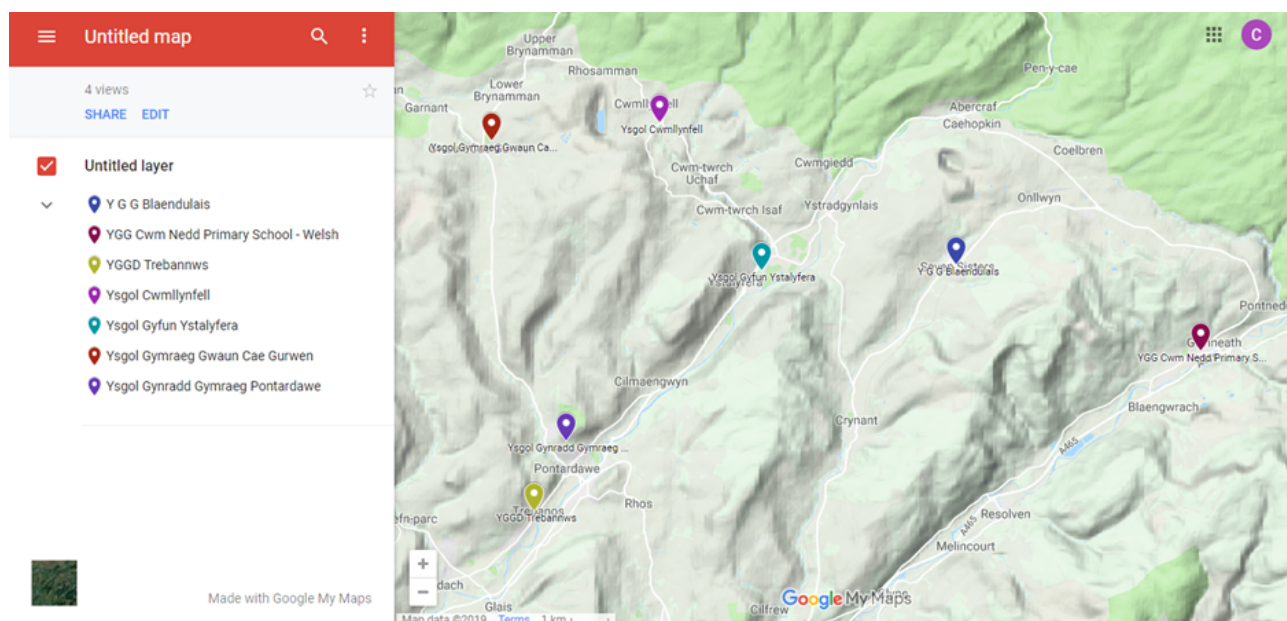
### **YG Ystalyfera- Bro Dur 21<sup>st</sup> Century School Funding**

**Band A funding (north and south) £37m** (new build 11-16 school in south; new teaching block and new primary phase building in north)

**Band B funding (north) £9m** (further remodelling of north campus with new teaching blocks, ATP and sports facilities)

The 21<sup>st</sup> century schools Band B scheme is currently ongoing at the Ystalyfera site to complete the 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.

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 21<sup>st</sup> 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 primary phase at Ystalyfera.

### **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 82 F/T and 10 P/T pupils on roll (Jan 2018 PLASC).

The £640k scheme is funded through the Increasing Welsh-medium Provision grant and will provide 1 extra classroom space and a Welsh-medium childcare offer at YGG Cwmllynfell. This would seek to increase the capacity of the school, improve Foundation Phase provision and provide space to develop pre-school Welsh-medium provision.

It would aim to prevent drift to other schools in neighbouring authorities, strengthening the development of Welsh language in the area and impacting 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 is expected to be completed by September 2021.

## 5. 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, in order to support Neath Port Talbot Council as it decides on the proposals regarding Alltwen, Godre'rgraig and Llangiwg Primary Schools.

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

This evidence also supports the mitigating factors in Section 4 in balancing out any potential negative implications, or negative perceptions that may exist.

### i) Welsh in Education Strategic Plan (WESP)

Welsh in Education Strategic Plans are a requirement under the **Welsh in Education Strategic Plans (Wales) Regulations 2019**. Neath Port Talbot's [current plan](#) under previous regulations (the **School Standards and Organisation (Wales) Act 2013**) ran from 2017-2020 but the new plans will need to be 10-year ones.

Compliance with these regulations (in the form of Neath Port Talbot Council's current and future plans for Welsh-medium education) provides a series of mitigating factors that should address any concerns raised regarding any possible negative impact on the Welsh language that these proposals may have.

Relevant mitigating factors in terms of Welsh medium-education (to balance out these English-medium proposals) were provided in more detail in Section 4 previously, however specifically in terms of the WESP, the 2017-2020 document notes the following:

"To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh

and that the provision develops a meaningful relationship between the language and the learner.”

And under **Outcome 5: More students with advanced skills in Welsh** there are a number of targets listed to increase the attainment levels in respect of Welsh Second Language pupils.

These are particularly relevant in terms of this proposal, given that Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gynradd Gymraeg Trebannws are in the same area as the three schools being considered for closure and the site of the new proposed new English-medium replacement school, and their numbers could be affected, particularly if those schools are at, or near, capacity and so unable to meet demand for places.

A number of issues that have been raised as being of possible concern, in terms of the knock-on effect on the Welsh language, are ideally best addressed in a new WESP rather than detailed in a Welsh language impact assessment on English-medium proposals, but they are summarised below for reference and to acknowledge that Neath Port Talbot Council is aware of the potential impact:

- Childcare provision in the area in either language – Continuing to map provision and numbers, and monitoring the situation in order to be able to identify and address any issues that emerge;
- Parental choice from Welsh-speaking families in the area; given the linguistically sensitive nature of the area what are the intentions of such parents and are they being swayed by the condition of the school and available facilities are a more important factor than the language medium of education;
- The “North-South” divide in the county borough where the south is seeing a growth in demand, in the areas where there are less Welsh speakers (see the map in Section 5 iii) - Neath Port Talbot Council recognises that a different approach may be needed in the north, linking in with the previous bullet point around parental choice in the areas where there are far more Welsh speakers;
- Transition to secondary Welsh-medium education in the North of the county. This has also been identified as an issue to be addressed and there are many factors involved, possibly linked to the above points and those made under the Section 3 i) Distance of Travel comments.
- Are these issues also linked to social deprivation issues in some way (see the map in Section 6) and the perceptions noted by some that new build means investment in one language over the other?
- The disparity between the fact that there would be an increase to 22 English-medium ALN units within the authority and no Welsh-medium units (referenced in the consultation comments - “the proposal makes no reference to addressing this rapidly growing need”, given that the proposal is not about Welsh-medium provision the omission is no different from a range of other Welsh-medium issues that were also not directly addressed).



The new WESP could address these issues and more, possibly with related targets and actions such as survey work and area-specific consultation and research, and then continually monitor the situation in terms of both English-medium and Welsh medium schools in parallel so that the inter-relationship can be more clearly demonstrated.

There is also the possibility for specific annual actions to be developed, which are linked to the Promotion Strategy as part of the wider community language planning, as required by Theme 3 of Cymraeg 2050. Parental choice and transition to Welsh-medium secondary education would be ideal for this kind of cross-policy research as it potentially involves both education and community/social issues, and would require partnership working with the organisations listed in Appendix C.

## **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.

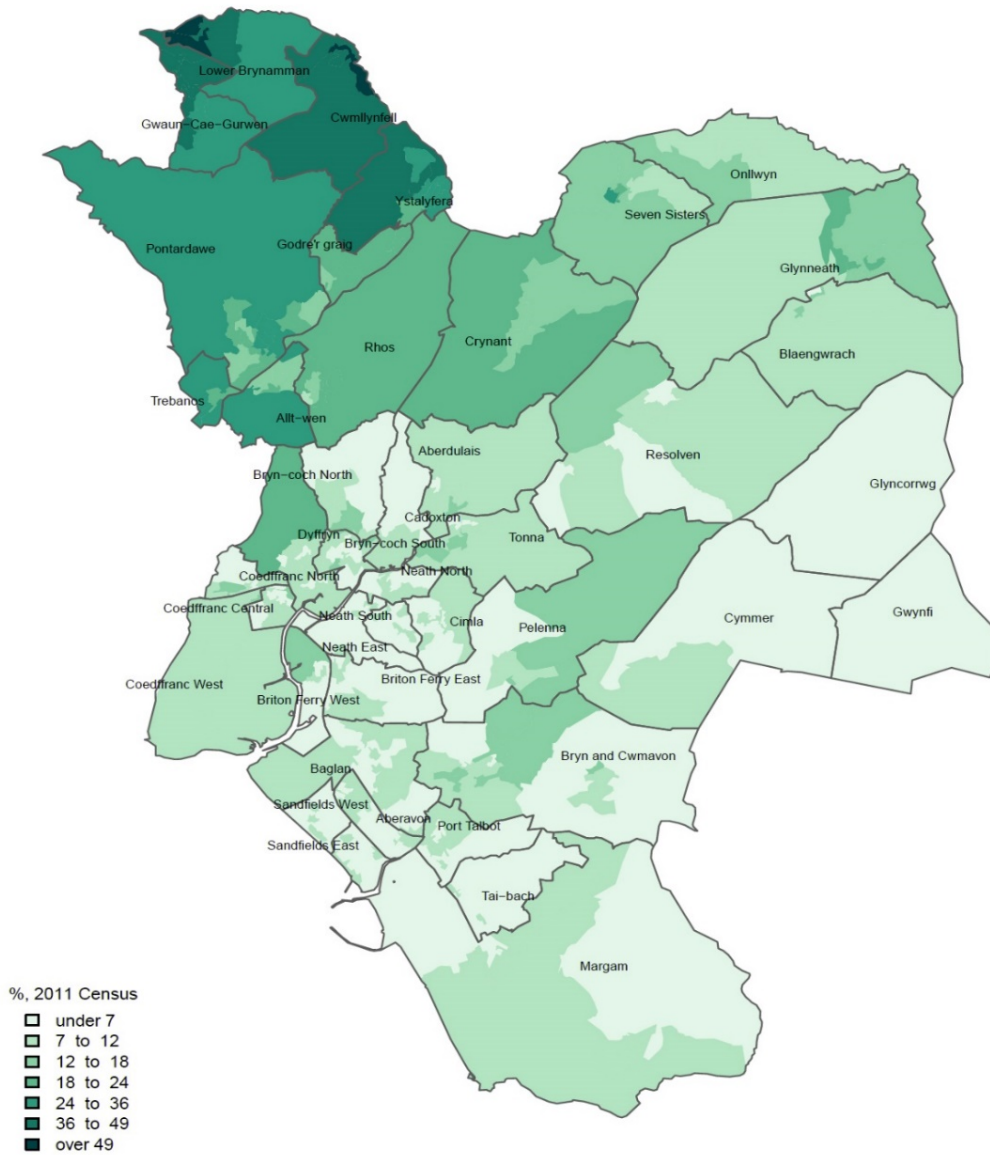
## **iii) Map of fluent Welsh speakers by Ward**

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.

Though the map is a decade old by now, it reflects visually the points made, in the Council's "Integrated Impact Assessment - first stage" document and the defined Linguistically Sensitive Area in the LDP's Supplementary Planning Guidance map shown on page 5, that the 3 English-medium schools are located in the north-west of the county borough, where the highest numbers of Welsh speakers are to be found.

# 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

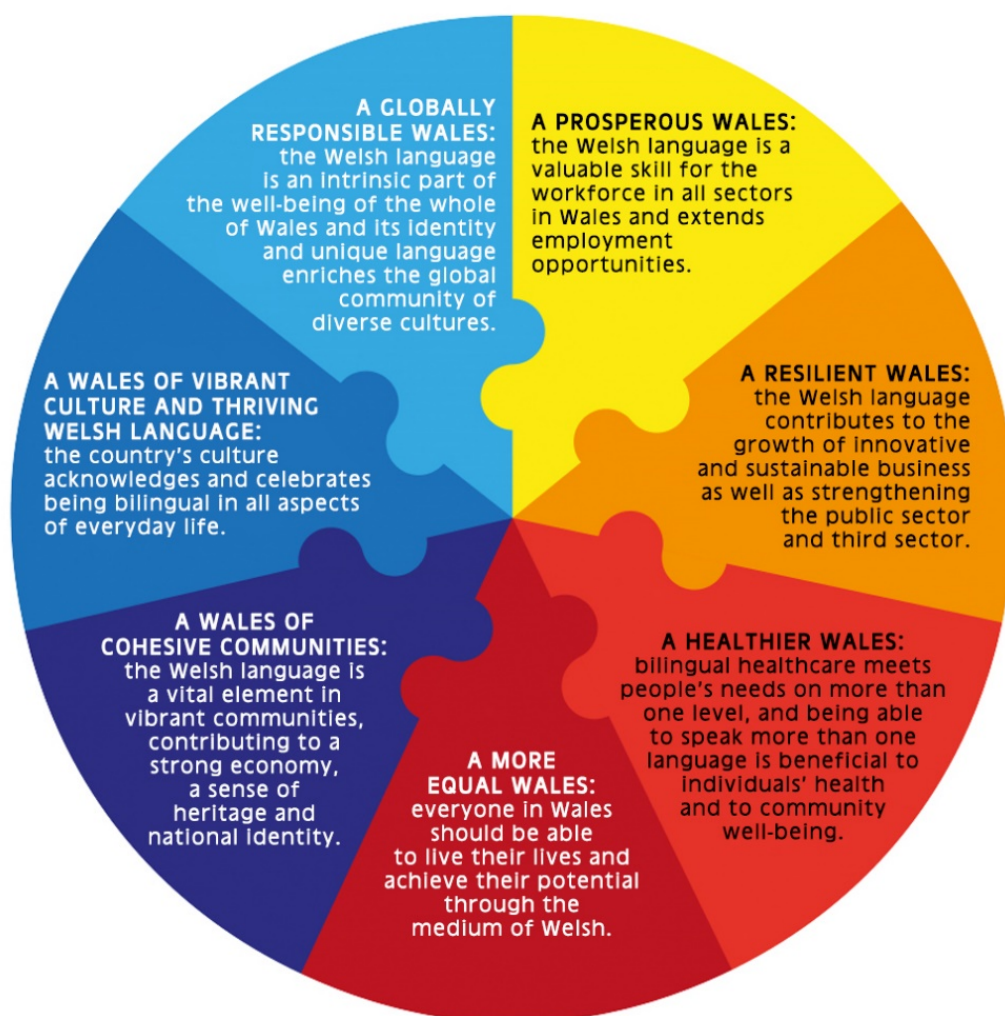
Map created by Hywel Jones. Variables KS208WA0022-27 corrected

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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.

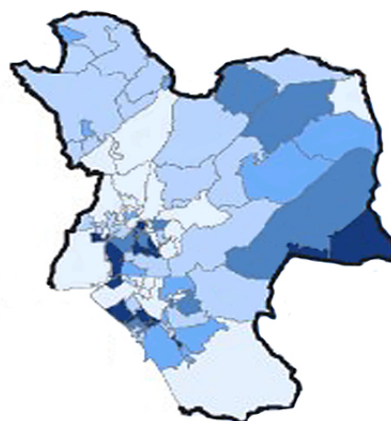
## 6. Social Deprivation Considerations

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 4, a number of Welsh-medium proposals across the county borough could mitigate any adverse effects, in particular the investment in, and expansion of, Ysgol Gynradd Gymraeg Pontardawe, 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	Dark Blue
192 - 382	10-20% most deprived	Medium-Dark Blue
383 - 573	20-30% most deprived	Medium Blue
574 - 955	30-50% most deprived	Light Blue
956 - 1909	50% least deprived	Very Light Blue

Least Deprived

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

## 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**

	<p><b>Title of the Initiative:</b> Proposal to establish an English-Medium 3-11 school to replace Alltwen, Godre’rgraig and Llangiwg Primary Schools</p>
<b>1a</b>	<p><b>Service Area:</b> Strategic School Improvement Programme</p>
<b>1b</b>	<p><b>Directorate:</b> ELLLS</p>
<b>1c</b>	<p><b>Summary of the initiative:</b> 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 Llangiwg Primary, all of which would close on 31st August 2024. 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>

<b>1d</b>	<p><b>Is this a ‘strategic decision’?</b></p> <p>Yes - forming part of the Council’s Strategic School Improvement Programme and included within Band B of Welsh Government’s 21<sup>st</sup> Century Schools Programme</p>
<b>1e</b>	<p><b>Who will be directly affected by this initiative?</b></p> <p>All staff, pupils, parents/carers/guardians of pupils and governors at Alltwn, Godre’rgraig and Llangiwg Primary schools, members of the community.</p>
<b>1f</b>	<p><b>When and how were people consulted?</b></p> <p>On 21<sup>st</sup> October 2020, the Council’s Cabinet determined to consult on the proposal to establish an English-medium 3-11 school to replace Alltwn, Godre’rgraig and Llangiwg primary schools, with an LSC for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). The consultation period ran from <b>3<sup>rd</sup> November 2020 to 19<sup>th</sup> January 2021</b>. A list of consultees is included at Appendix 1.</p> <p>Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments.</p> <p>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.</p> <p>Responses to the consultation were submitted by email, post and via the Councils 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> <p>During the consultation period Welsh Government imposed both local and national lockdown periods due to the Covid 19 pandemic. Restrictions meant that it was not possible to hold face to face meetings during consultation, however in every other respect the consultation proceeded as expected despite imposed restrictions. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments. Additionally, officers were available to answer queries by email and telephone should consultees require more information to enable them to respond to the consultation, and a ‘Frequently Asked Questions’ section was also added to the Council’s website to address more general queries on the proposal.</p>

	<p>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.</p>
<p><b>1g</b></p>	<p><b>What were the outcomes of the consultation?</b></p> <p>The consultation process followed Welsh Governments guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.</p> <p>The Authority received</p> <ul style="list-style-type: none"> <li>• Online responses                      161, of which 14 support the proposal</li> <li>• Emails                                      26, 1 in support</li> <li>• Paper forms/letter                      47, 6 in support</li> <li>• Online petition                          413 signatures, 50 of which included comments</li> </ul> <p>In total 234 responses were received.</p> <p>The Council is using the feedback and responses received to the engagement and consultation exercises carried out in relation to the proposal as part of its decision making process.</p>

## 2. Evidence

### What evidence was used in assessing the initiative?

Following consultation a 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.

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**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	√			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. According to Pupil Level Annual School Census (PLASC) carried out in January 2020, pupil numbers in the three schools combined are 454 full time

			<p>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, '<b>An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises</b>', it is reported that the attainment and achievement of pupils improves significantly 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.</p> <p>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> <p>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</p>
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			<p>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.</p> <p>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.</p> <p>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 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. Concerns have been raised that suggest this would close as a result of this proposal being implemented. 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.</p> <p>The proposal therefore should have a neutral impact on preschool children.</p>
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			<p>Comments have been received through the consultation which suggest that the wellbeing of pupils would suffer should the proposal progress due to the number of pupils to be accommodated in the proposed new school and the perceived negative impact on pupil well-being. There is no reason to assume that this would be the case. It is noted that the three current schools provide good levels of care and support, and there is nothing to suggest that the new school wouldn't at least offer the same. Monitoring of well-being would be part of Local Authority and Estyn visits and targets would be included in the new school's development plan for improvement. This would therefore result in at least a neutral impact.</p> <p>Concerns have also been raised regarding the size of the proposed new school, suggesting that younger children would be 'lost' in a larger school and that the 'family feel' of the current schools would disappear. Creating a larger school community does not necessarily mean that this would be the case, 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 could be 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. Such an approach would mitigate any perceived negative impact on pupils.</p> <p>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. This would have a positive impact on pupils should the proposal proceed.</p> <p>Some consultation responses have raised concerns that parents/carers would be negatively impacted upon due to this proposal, commenting that good relationships between staff and parents/carers would be impossible with such a larger pupil population. Despite the capacity of the proposed new school it is likely that classes within would remain at or below 30 pupils, and there is no reason to expect that teachers and support staff would not know the pupils in their class as well as they</p>
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			<p>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.</p> <p>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 could result in 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 existing schools, parents and the community should not be lost if the majority of current school staff transfer to the proposed new school as anticipated, as this would mean the wealth of experience and local knowledge which currently exists would be retained and developed for the future. This would result in a positive impact.</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, Llangiwig 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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			<p>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.</p> <p>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.</p> <p>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 21<sup>st</sup> Century school will have greatly enhanced facilities which should improve provision for all disabled users.</p> <p>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 accessibly 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.</p> <p>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>
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			<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>None of the respondents to the consultation identified as transgender however the parent of a transgender pupil commented their child did not struggle at primary level but did feel the impact of entering into a larger school environment at secondary level.</p> <p>None of the respondents indicated that this proposal would have an adverse impact on their status in this regard.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Marriage & civil partnership		√	<p>None of the respondents indicated that this proposal would have an adverse impact on their status in this regard.</p> <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>None of the respondents to the consultation indicated that this proposal would have an adverse impact on their status in this regard.</p> <p>The proposal therefore 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>Responses to the consultation identified the small percentage of non-white British pupils in Alltwen and the potential impact of moving to a larger school community, therefore making the percentage number smaller and potentially at risk of discrimination as a result. The local authority recognises the importance of proportionality of impact and not of percentages and numbers. A newly appointed leadership team for the proposed new school would be aware of the local and national policies relating to race equality and would seek to address any issues promptly should they arise. This has been the case in other school reorganisation proposals where minority groups have been identified, with successful outcomes achieved.</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>None of the respondents indicated and articulated that this proposal would have an adverse impact on their status in this regard.</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>None of the respondents to the consultation indicated that this proposal would have an adverse impact on their status in this regard.</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</p>

			<p>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>None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. 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**?

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 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 Llangiwig primary schools all</p>

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			have the same opportunities to benefit from the proposed 21 <sup>st</sup> century new build school and health and well-being campus.
To foster good relations between different groups	✓		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.

**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
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Positive/Advantage	<p>The proposal, if implemented, should have a positive impact on groups who experience socio economic disadvantage. A new 21<sup>st</sup> 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>
<p><b>What action will be taken to reduce inequality of outcome</b></p>	

- 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	√			<p>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> <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</p>

			<p>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>Concerns have been raised by consultees that the proposed new school would damage the communities of Alltwen, Godre'rgraig and Llangiwig through the closure of the local schools situated there. There is no evidence to suggest that by attending school outside of village boundaries, children and young people would no longer 'belong' to the community where they live. The CIA highlights the fact that many community based activities and events are not reliant on the schools and so these activities could continue. 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.</p> <p>Children and young people do not only mix socially through their schooling, as many will attend local after school groups or participate in wider community events. There is no reason why this wouldn't continue to be an important part of their lives should the proposal progress. Following reviews of school reorganisation in other areas of the county borough it has been the case that community interaction has not ended and that pupils continue to take part in community events.</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</p>
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			<p>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 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>

				The proposal should have a positive impact on reducing social exclusion														
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 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.</p> <p>Alltwen Primary, Godre'rgraig Primary and Llangiwig 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.</p> <table border="1"> <thead> <tr> <th>School</th> <th>FSM</th> </tr> </thead> <tbody> <tr> <td>Alltwen Primary</td> <td>17%</td> </tr> <tr> <td>Godre'rgraig Primary</td> <td>21%</td> </tr> <tr> <td>Llangiwig Primary</td> <td>22%</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td>NPT</td> <td>24%</td> </tr> <tr> <td>All Wales</td> <td>20%</td> </tr> </tbody> </table>	School	FSM	Alltwen Primary	17%	Godre'rgraig Primary	21%	Llangiwig Primary	22%			NPT	24%	All Wales	20%
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NPT	24%																	
All Wales	20%																	

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

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people's opportunities to use the Welsh language	√			<p>A detailed Welsh Language Impact Assessment has been undertaken by an external, independent consultant. The full report is contained in appendix 2 to this document.</p> <p>In summary the Swansea Valley area is a linguistically significant area as it contains the highest number and percentages of Welsh speakers in NPT, and is amongst the highest in Wales as a whole. There are concerns however that the number of Welsh speakers is declining and work has been ongoing to ensure the language is promoted and grows.</p> <p>The WESP objective ' To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained</p>

			<p>speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner' is of particular relevance to this proposal.</p> <p>Alltwn, Godre'rgraig and Llangiwig primaries teach Welsh as a second language and this would also be the case for the proposed new school. Estyn report that in each of the three existing schools pupils have positive attitudes to learning Welsh and show a willingness to use the language. In all three schools overall standards were found to be good. Currently 25% of staff across the three schools are fluent or fairly fluent Welsh speakers and as it is expected that staffing will generally remain unchanged this would also be the case for the proposed new school. 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. This is therefore likely to have a positive impact on opportunities to use the Welsh language.</p> <p>The new curriculum for Wales states '<i>The Languages, Literacy and Communication Area of Learning and Experience (Area) addresses fundamental aspects of human communication. It aims to support learning across the whole curriculum and to enable learners to gain knowledge and skills in Welsh, English and international languages as well as in literature.</i>' Support would be provided from local authority EDS staff to ensure that the aims of the new curriculum would be an important aspect of Welsh language development in the proposed new school.</p>
<p>– treating the Welsh and English languages equally</p>		<p>√</p>	<p>Concerns have been raised during consultation regarding the view that a new build English –medium school could attract pupils currently attending Welsh medium schools, which could hinder development of Welsh as a first language in the area, and as such could be seen to be treating the Welsh language less favourably than English.</p> <p>However, pupil numbers data indicates that new build English-medium schools in Neath Port Talbot, that have opened in the last 10 years, have had no significant impact on nearby Welsh-medium schools which suggests there is unlikely to be an impact on Welsh Medium schools in the locality due to the proposal.</p>

				<p>Significant work is being undertaken in a number of the Welsh-medium schools in the area which will improve provision for teaching and learning and provide extra pupil places, which should mitigate against the impact of a new school.</p> <p>Full details and further information can be found in Appendix A.</p>
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### 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 and at other Welsh-medium schools in the Swansea Valley and monitor impact on pupil numbers
- Monitor parental choice of school i.e. Welsh/English medium and take action if Welsh –medium admission rates drop significantly as a result of the new build

## 7. Biodiversity

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

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			✓	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

			<p>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>
<p>To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.</p>		✓	<p><b>Biodiversity Supplementary Planning Guidance (SPG)</b> – 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) 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><a href="https://www.npt.gov.uk/7315">https://www.npt.gov.uk/7315</a>  <a href="https://www.npt.gov.uk/media/9003/spg_biodiversity_geodiversity_may18.pdf">https://www.npt.gov.uk/media/9003/spg_biodiversity_geodiversity_may18.pdf</a></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"> <li>• Care for oneself - our health and well-being</li> <li>• Care for each other - across cultures, distances and generations</li> <li>• Care for the environment – local and far</li> </ul> <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"> <li>• Reduction in combined gas and electricity consumption to 190 kWh/m<sup>2</sup> by September 2025</li> <li>• Reduction in CO<sub>2</sub> emissions to 50.5 kg/m<sup>2</sup> by September 2025</li> </ul> <p>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%.</p>
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			<p>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.</p> <p>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.</p>
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### 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. <b>Long term</b> – 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. <b>Prevention</b> – preventing problems occurring or getting worse	If implemented the proposal would provide new 21 <sup>st</sup> 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.
iii. <b>Collaboration</b> – working with other services internal or external	Full consultation has been undertaken for this proposal where views from stakeholders, including services and organisations have been 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>iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population</p>	<p>Full consultation has been undertaken for this proposal where views from all stakeholders including other services and organisations have been gathered and reported. The consultation 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. Throughout the consultation period the consultation document and associated papers were available on the Council’s website located on the Council’s Strategic School Improvement Programme webpage ensuring a wide audience were able to access information about the proposal. A range of options were 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. <b>Integration</b> – making connections to maximise contribution to:</p>	
<p><b>Council’s well-being objectives</b></p>	<p>The Strategic School Improvement Programme and its related projects are included in the Directorate’s plans which link to the Council’s wellbeing objectives. The proposal directly supports wellbeing objective 1 – ‘to improve the wellbeing of children and young people’ 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.</p> <p>Through creating facilities that can be used by the community the proposal also supports wellbeing objective 2 –‘to improve the wellbeing of all adults who live in the county borough’.</p> <p>Wellbeing objective 3 ‘to develop the local economy and environment so that the well-being of people can be improved’ is also directly relevant to this proposal. To obtain WG approval of the business plan involves ensuring that community benefits are fully explored and implemented throughout the construction phase. Part of this work would ensure that local businesses are</p>

	used to supply labour and materials whenever feasible, local people will benefit from employment opportunities and the local economy would benefit due to an increased number of people working in the area.
<b>Other public bodies objectives</b>	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 21 <sup>st</sup> century new build with enhanced facilities.

## 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 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 which would be included in the updated WESP and monitored accordingly by the WESP forum.

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:

	<b>Conclusion</b>
<b>Equalities</b>	<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"> <li>• 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</li> <li>• Policies and procedures would be in place to support the school with inclusive practice; local authority policies would be adopted and adhered to</li> <li>• 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</li> <li>• Design processes would ensure accessibility is planned for and delivered</li> <li>• Engagement with school communities throughout process to encourage collaboration and involvement</li> <li>• Support provided for pupils and staff to ensure smooth transition prior to and during first term of opening</li> </ul> <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>

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<b>Socio Economic Disadvantage</b>	<p>A new build 21<sup>st</sup> 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>
<b>Community Cohesion/ Social Exclusion/Poverty</b>	<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>
<b>Welsh</b>	<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 build English-medium school is unlikely to discourage parental preferences for Welsh-medium education and mitigating actions will ensure consistency should this proposal proceed.</p>
<b>Biodiversity</b>	<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>
<p><b>Well-being of Future Generations</b></p>	<p>The proposal directly supports the Council's wellbeing objectives through the provision of a 21<sup>st</sup> Century school and health and well-being campus, for current and future generations of primary aged pupils and the community.</p>

### 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 proposal would create a new build, 21<sup>st</sup> 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 2024	Polices in place and adopted
Engagement with pupils, staff and wider school community to facilitate transition to proposed new school	SSIP Officers	January 2022 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 2022	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 2024	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 2024	Safe routes identified
<ul style="list-style-type: none"> <li>• 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</li> <li>• Monitor parental choice of school i.e. Welsh/English-medium and take action if Welsh –medium admission rates drop significantly as a result of the new build</li> </ul>	WESP Forum	Ongoing	Actions implemented and contributing to development of Welsh language
Support from local authority EDS staff for proposed new	EDS Officers	Ongoing	Expected standards in Welsh language met or exceeded

school staff to develop Welsh language provision in line with the new curriculum prior to opening			
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**12. Sign off**

	Name	Position	Signature	Date
<b>Completed by</b>	Rhiannon Crowhurst	SSIP Programme Co-ordinator		14.5.21
<b>Signed off by</b>	Andrew Thomas	Director of ELLs		14.5.21

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## Appendix 1

<b>List of Consultees</b>	
Alltwen, Godre'rgraig and Llangiwig 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 (for Neath) – Christina Rees
	Member of the Senedd for Neath – Jeremy Miles
Trade Unions	Regional Assembly Members
Estyn	SEN Partners
Regional Education Consortium (ERW)	Children and Young Person Partnership (inc. Early Years Development and Childcare)
NPTCBC Integrated Transport Unit	Police and Crime Commissioner
Communities First Partnership	NPTCBC Officers

In addition to the statutory consultees, notice of the consultation was also sent to the following:

All child care settings and registered childminders in the area  
Tegwch Community group  
Welsh Language Commissioner



# 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 Llangiwig Primary Schools

16th February 2021

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# Introduction

As part of its Strategic School Improvement Programme, Neath Port Talbot Council has proposed to establish a new-build English-medium school for the age range 3-11 to replace the existing Alltwen, Godre'rgraig and Llangiwg 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.

The Council's "Integrated Impact Assessment - first stage" document contained an initial overview of the possible impact on the Welsh language, in the communities affected by the proposed closure and the combining of the three schools into a single new site.

It identified and some possible considerations and mitigating factors, which the evidence presented in this assessment document supports and expands upon.

## i) The Cymraeg 2050 Strategy

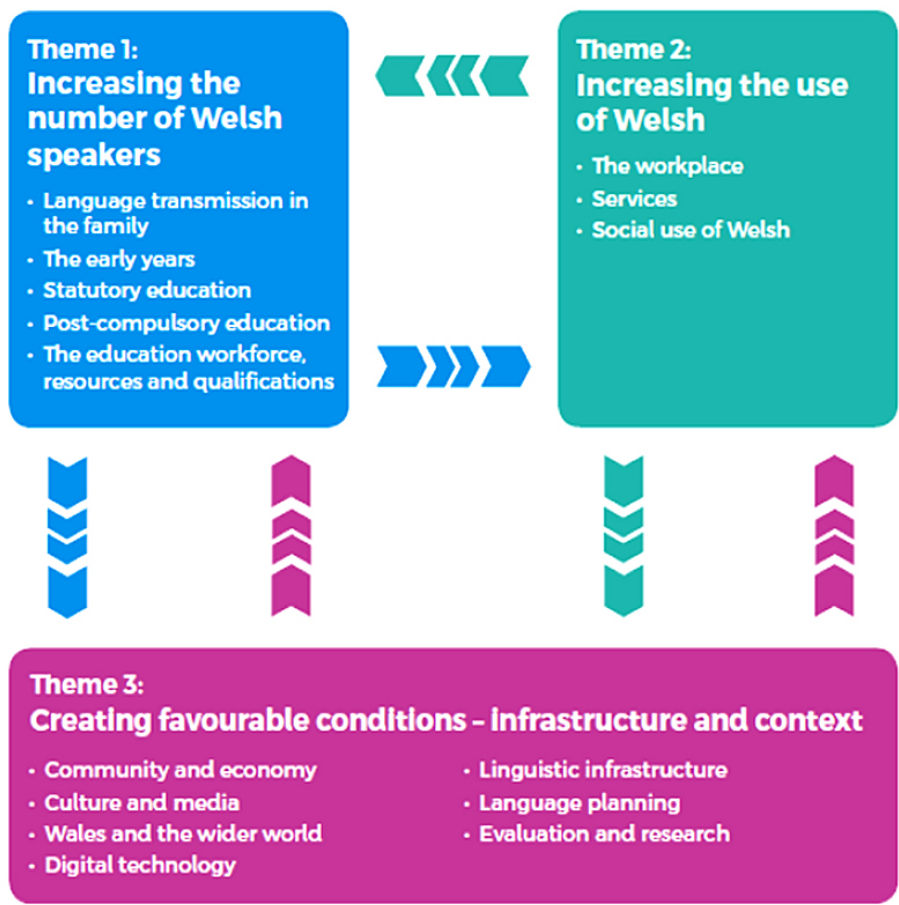
This is the Welsh Ministers' strategy for the promotion and facilitation of the use of the Welsh language. It sets out the Welsh Government's long-term approach to achieving the target of a million Welsh speakers by 2050.

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, and therefore although

they have been covered, the main focus has been on matters where there is more direct connection to the proposal.



As can be seen from the infographic above, all three Cymraeg 2050 themes would be directly relevant if the proposal concerned Welsh-medium education.

Much of the impact on the Welsh language in terms of English-medium education would be indirect in comparison, though still important to consider. Welsh as a second language will be taught in the proposed new school as it currently is in the three primary schools that are part of this proposal.

The focus of themes 1 and 2, whilst still important to recognise, lies far more within the direct remit of the Welsh in Education Strategic Plan (WESP), within the Council’s 5-year promotion strategy and within the Council’s current plans for Welsh-medium education.

Theme 3 is the most directly relevant to these proposals, as the evidence shown later in this assessment demonstrates how Neath Port Talbot Council’s wider work around the Welsh language, and its understanding of the area it serves, are geared towards, and already working towards, creating the required favourable conditions in terms of language planning. The supporting evidence is included in Section 5.

This assessment therefore pulls together a range of relevant Welsh language data sources, statistics and existing Council and Welsh Government policies and legislation, which must be considered in context, and more importantly as mitigating factors, by Neath Port Talbot

Council as it determines whether to proceed with the proposal, and should be included as a background paper as the proposal moves ahead.

# 1. The English-Medium 3-11 School Proposal

The following background information is taken from the Council's consultation document.

"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 2024.

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 2024.

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."

## ***Neath Port Talbot Consultation Document, November 2020***

The consultation ran from 3<sup>rd</sup> November 2020 to 19<sup>th</sup> January 2021. The consultation document does have a section noting the possible impact on the Welsh Language (noting the geographical area in questions as being linguistically sensitive - see definition/explanation of this overleaf) and makes reference to the teaching of Welsh as a second language in the current 3 schools and the proposed new, combined school.

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

This shows that overall, the consultation process to date has complied with the requirements of Welsh Language Standards 90 and 91. Including this assessment along with other background documents to the proposal will help inform the Council's decision-making process.

## 2. 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.

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:

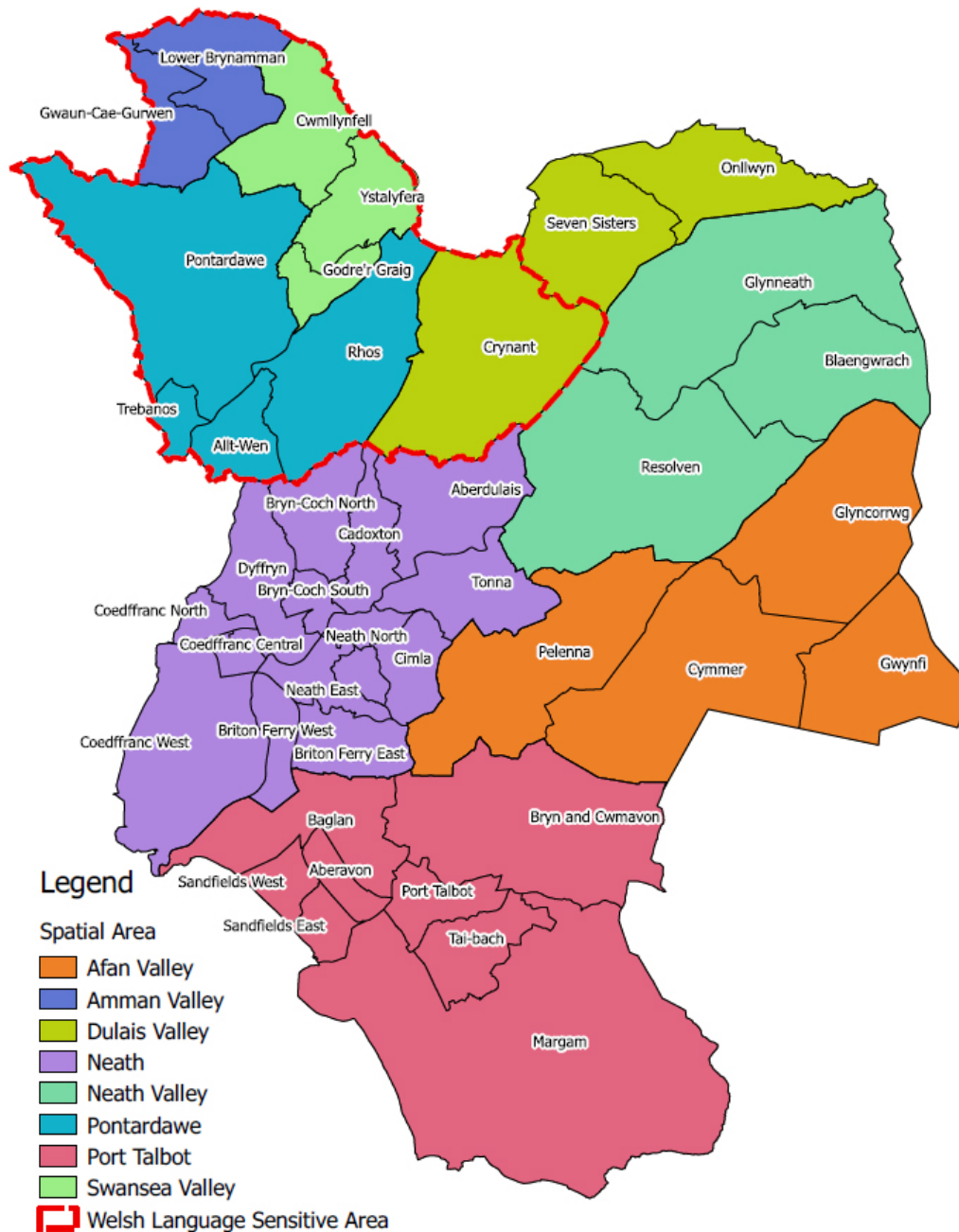
**2.1.2** Within the communities of Cwmllynfell, Gwaun Cae Gurwen and Lower Brynamman more than half of the population speak Welsh and these are widely regarded as traditional Welsh speaking areas. In addition, the Swansea Valley area is also considered to be a stronghold of the language locally with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

As a result, Neath Port Talbot Council's "Integrated Impact Assessment - first stage" document identifies the areas around the Alltwen, Godre'rgraig and Llangiwg schools as being of a linguistically sensitive nature (as is further supported by the ward data shown in map form on page 17), as they are within the Council's officially defined area.

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



Lastly, in the case of this proposal, just as the Welsh Language Standards (88, 89 and 90 - see Appendix A) require Neath Port Talbot Council 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.

### **3. Consultation Responses and Analysis**

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."

The requirements of the relevant Welsh Language Standards (88, 89 and 90 - see Appendix A) however are not specifically, or only, aimed at Education issues, but on the effects of policy decisions on the Welsh language in a broader sense, and the purpose of this assessment is to provide supporting information across many policy areas on that basis, not simply on Education matters.

The fact that this proposal is NOT a consultation on Welsh-medium education needs to be kept in mind when considering the consultation responses to the main proposal.

As part of the consultation process an online survey was undertaken to seek views on the proposal, and to gather information on how consultees felt the proposal may impact on the Welsh language and its further development in the area.

The medium of Education in the schools in question is English and so any impact on wider, community Welsh language issues may not be immediately identifiable and will require monitoring longer term.

The main questions asked were:

#### **Do you believe that the proposal will have a positive, negative or neutral impact on opportunities to use the Welsh language?**

- Negative (80) 49.7%
- Neutral (76) 47.2%
- Positive (5) 3.1%

#### **Do you believe that the proposal will treat the Welsh and English languages equally?**

- No (80) 49.7%
- Neutral (57) 35.4%
- Yes (24) 14.9%

Some respondents could not see any relevance in asking these questions when dealing with a proposal on English-medium schools, or felt that the question was unnecessary.

A common theme in the consultation comments was that a new English-medium school would negatively impact on the Welsh-medium schools in the locality.

However, data/evidence held by the Council indicates that new build English-medium schools in Neath Port Talbot, that have opened in the last 10 years, have had no significant impact on nearby Welsh-medium schools which suggests there is low if any impact on Welsh Medium schools in the locality with the proposal.

Some responses to the consultation also appeared to reflect a perception or misunderstanding that the question was being asked because teaching Welsh as a second language would be optional in some way in the new school, and had to be maintained or agreed upon, rather than that teaching of Welsh as a second language would continue unchanged as part of the curriculum, as such there is neither a negative or positive impact as there will be no change.

Current data on existing school staff reveal that 25% of staff across the three schools are fluent or fairly fluent Welsh speakers. Combining the three schools could improve Welsh language provision as there could be a greater impact as a result of having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh. This would indicate a positive impact.

Of the online consultation comments, only one referred to wider community usage of Welsh (unedited quote below):

"As a general principle efforts to encourage children to adopt the Welsh language outside the classroom setting are far more effective in a smaller, more homely, less intimidating setting. This is precisely what the smaller setting provided by our present model of Primary Education provides! The teaching of Welsh as a second language would therefore be far more effective under the present provision. In addition the local social focus by having a Primary School in the immediate community provides further opportunities for those Welsh speakers in the community who chose our school to use the language. Under the current proposals these opportunities would be dispersed/watered down."

There is no evidence to suggest that a larger English Medium school would prevent Welsh speakers to continue to use the language.

The Estyn's 'School size and educational effectiveness' report (Dec 2013) states that pupils' standards are good or better in a higher proportion of large primary schools than small and medium-sized primary schools. The report suggests that may be because large schools tend to have more expertise and capacity to address the needs of more vulnerable pupils and the more able and talented pupils.

The Report goes on to identify that Foundation Phase assessment outcomes improve with school size for language, literacy and communication skills. There is little difference

between schools of different sizes in terms of mathematical and personal and social development, wellbeing and cultural diversity. The differences between schools of different sizes at the higher-than-expected level are also minimal.

Similarly at key stage 2, there is little difference in the percentage of pupils achieving the expected level 4 in the core subjects of English, mathematics and science at the end of key stage 2 in all sizes of schools. The percentage of pupils achieving the expected level in Welsh is higher in large schools.

Generally, a slightly greater proportion of pupils achieve the higher than expected level (level 5+) in English, mathematics and science in large schools compared to medium-sized and small schools. A higher proportion of pupils in small and large schools attain level 5+ in Welsh than in medium-sized schools

A larger school community could create greater opportunities for using Welsh, bringing more Welsh speakers together from the wider Pontardawe area for school events. This would result in a positive impact on the Welsh Language.

In the context of the proposal around the English-medium schools, the range of mitigating factors provided in Section 4 from Neath Port Talbot Council's Welsh-medium education plans, and the supporting evidence in Section 5, provides a balance that addresses many of the concerns raised.

#### **i) Distance of Travel and Potential Discrimination**

A number of comments around the impact of the proposals were based on the distance of travel to the new school location as it would be further for many English-medium pupils from communities where the current school is closer to home.

As part of those concerns, it was also noted that parents may choose to send their children to the new English-medium school rather than to the catchment Welsh-medium school as it would also be closer. This raises a number of issues that need to be considered, but as will be noted later, the resulting actions are best suited to being placed in the updated WESP.

Any school reorganisation proposal that includes a physical change of school location will result in some pupils having further to travel and others with less. This is the case in general, regardless of the language of education in question. This will result in a positive impact for those with less travelling time and a negative impact for those who will need to travel further however all children and young people will have access to the Councils Home to School transport provision (providing they meet the criteria laid out in the policy).

The provision of home-to-school transport by the Council will not change as a result of these proposals (being covered by the requirements of **the Learner Travel (Wales) Measure 2008 in terms of eligible children**); what will change are the pupils who need to access that provision. Some may no longer need it as the new school is closer, others will inevitably require it for the first time.

It is also a related point to make that nowhere in Wales is there parity of catchment areas

between English-medium and Welsh-medium schools and so distances of travel have (for the most part) always been further for pupils travelling to Welsh-medium schools.

It is inevitable that some parents will wish to send their children to their local school, regardless of the language of education. Others will choose the language of education over and above the distance of travel. These could also be factors affecting the numbers of pupils who transition to Welsh-medium secondary education in the area.

The proposal does not seek to make any alterations to the current Welsh medium schools in the Swansea Valley, however it does involve the closure of 3 English-medium schools. It is a possibility that some parents will choose not to send their children to a large primary and will instead opt for a smaller school, in which case the Welsh-medium schools may be preferable. Should this happen then the impact on the Welsh –language could be said to be positive. Should the proposal go ahead this will need to be monitored to establish the longer term impact.

The proposed permanent closure of Godre’rgraig Primary School would mean that there would no longer be an English –medium school in the north of the Swansea Valley area in Neath Port Talbot. However, there is a new build primary phase in Ysgol Gymraeg Ystalyfera-Bro Dur on the Ystalyfera site. Parents wishing for a local school in the area may therefore opt for this school 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.

A number of respondents to the consultation referred to *discrimination* when referring to Welsh language matters. This is a very technical, legal point but important to note. Actual discrimination can only happen when referring to protected characteristics under the **Equality Act 2010** and the **Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**.

The Welsh language is protected in different ways under the **Welsh Language (Wales) Measure 2011**, and though that legislation refers to rights around unfair or unequal treatment, it does not contain a situation of discrimination in the same way.

Welsh speakers or school pupils cannot therefore be *discriminated* against as such, simply on the grounds of language. Members of the public may and do use term more broadly in describing what they perceive to be unfair or unequal treatment.

## ii) **Consultation Responses and Links to the WESP**

As has been referred to already, and as a general point around the consultation exercise, it could be argued that respondents have in effect provided Neath Port Talbot Council with a range of suggestions that could be addressed in more detail with relevant targets, actions and high-level commitments in the updated WESP.

This is because a great deal of the consultation comments received have focussed specifically on Welsh-medium education issues rather than the main English-medium proposals.

Whilst needing to be acknowledged as an issue in this Welsh Language impact assessment, it is advised that this and the other issues raised need full consideration and inclusion in any updated/revised WESP.

See Section 5.1 for further information on the WESP in context.

#### **4. Mitigating Factors/Actions**

**As a result of the consultation and consideration of existing data and evidence the following mitigating actions are recommended for consideration and implementation should the proposal be approved.**

- Longer term monitoring is required to ascertain any impact on wider community Welsh language issues; this could be planned for as part of the updated WESP actions (See Section 5.1)
- Monitor parental choice of school i.e. Welsh/English medium

The following information was provided by Neath Port Talbot Council as supporting evidence of its ongoing work on Welsh-medium education in its area. This information provides a level of detail that is intended to show, together with actions in the Council's WESP, that the Council does and continues to develop the Welsh-medium education sector and is aware of the linguistically sensitive nature of the geographical area in question.

These are relevant mitigating factors in terms of Welsh-medium education, to balance against the proposals regarding Alltwn, Godre'rgraig and Llangiwig Primary Schools.

Though the entire set of proposals has been included, of particular relevance are the proposals to do with Ysgol Gynradd Gymraeg Pontardawe (see page 11), which is in proximity to Llangiwig and Alltwn primary schools. Godre'rgraig Primary is in closer proximity to Ysgol Gymraeg Ystalyfera –Bro Dur's campus at Ystalyfera which has undergone significant investment.

#### **Welsh-Medium Education Projects - Background**

In 2018 Neath Port Talbot 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   | £1.34m |

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

### **Ysgol Gynradd Gymraeg Pontardawe**

YGG Pontardawe is a 3 - 11 Welsh-medium school with 289 F/T and 67 P/T pupils currently on roll (Jan 2018 PLASC).

The school roll has been steadily increasing every year since 2014 - 336 to 356 in January 2018, and is nearing its capacity of 335 and 59 nursery places. There is now very little available space for providing extra classrooms to meet anticipated future demand within the current accommodation footprint.

The £1.62m project funded through the Increasing Welsh-medium Provision grant will enable the school to increase capacity and improve current provision by providing 3 extra classroom spaces and refurbishing an existing gymnasium area (a former secondary school legacy) to create a hall.

In response to demand in the locality for Welsh-medium childcare, a classroom at the school was refurbished in 2015/16 to provide Welsh-medium pre-school provision, Cylch Pontardawe. This has 14 childcare places, including 10 Flying Start places. The pre-school provision is targeted to grow from the current 14 places to 28 places by 2021 and the current space available is not large enough to allow for further growth or to provide suitable outdoor play facilities.

Managers of the setting have already requested extra space to meet requests from parents in the area for additional childcare, and to accommodate places to facilitate the Childcare Offer for Wales.

Works undertaken at the school would be 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 would also assist with meeting the Childcare Offer for Wales as it would allow greater scope for providing wraparound childcare opportunities.

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

Work commenced in 2019 and following more detailed discussion with the school the scheme was amended. At the schools request the current childcare provision and nursery/reception classes were relocated within the school to allow for work to take place without interruption, which necessitated remodelling 2 classrooms, providing extra toilet facilities and outdoor play area, converting the staffroom and office to provide childcare facilities and converting a reception area for storage.

Phase 2 will see the completion of the remodelled and extended childcare and nursery facilities 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. The school has ample outdoor space and the MUGA has therefore been omitted from the scheme.

It is estimated that the additional works will bring the final cost of the scheme to circa. £2m and should be completed by summer 2021.

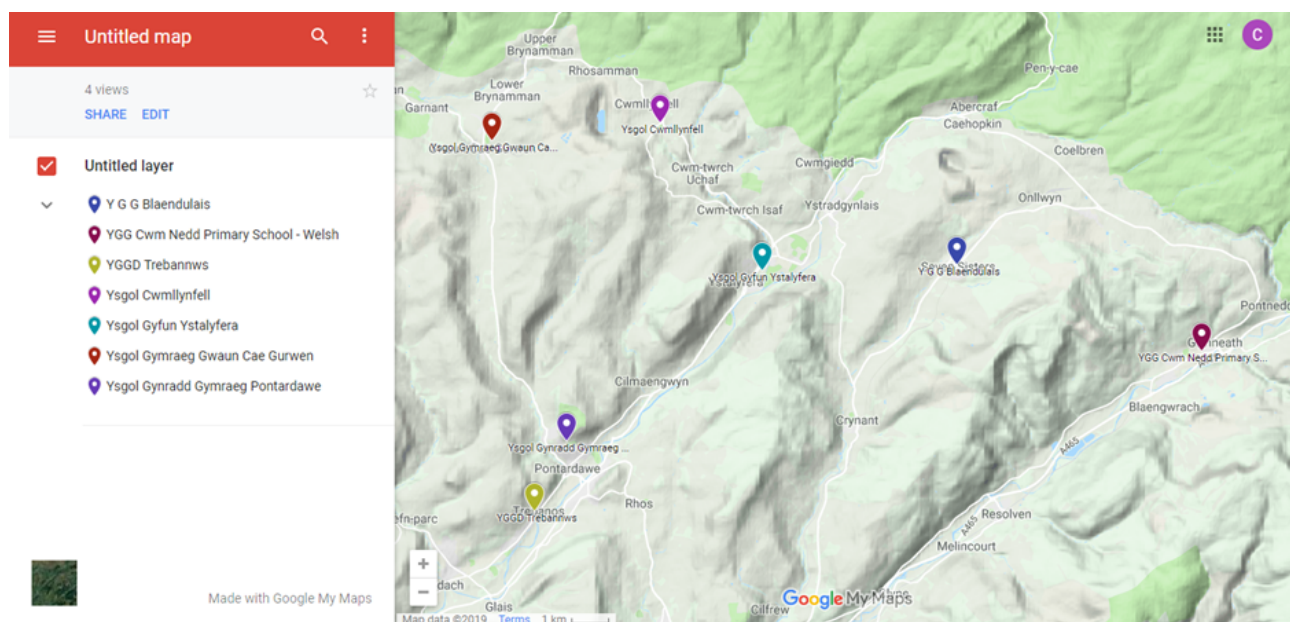
### **YG Ystalyfera- Bro Dur 21<sup>st</sup> Century School Funding**

**Band A funding (north and south) £37m** (new build 11-16 school in south; new teaching block and new primary phase building in north)

**Band B funding (north) £9m** (further remodelling of north campus with new teaching blocks, ATP and sports facilities)

The 21<sup>st</sup> century schools Band B scheme is currently ongoing at the Ystalyfera site to complete the 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.

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 21<sup>st</sup> 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 primary phase at Ystalyfera.

### **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 82 F/T and 10 P/T pupils on roll (Jan 2018 PLASC).

The £640k scheme is funded through the Increasing Welsh-medium Provision grant and will provide 1 extra classroom space and a Welsh-medium childcare offer at YGG Cwmllynfell. This would seek to increase the capacity of the school, improve Foundation Phase provision and provide space to develop pre-school Welsh-medium provision.

It would aim to prevent drift to other schools in neighbouring authorities, strengthening the development of Welsh language in the area and impacting 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 is expected to be completed by September 2021.

## **5. 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, in order to support Neath Port Talbot Council as it decides on the proposals regarding Alltwen, Godre'rgraig and Llangiwg Primary Schools.

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

This evidence also supports the mitigating factors in Section 4 in balancing out any potential negative implications, or negative perceptions that may exist.

### **i) Welsh in Education Strategic Plan (WESP)**

Welsh in Education Strategic Plans are a requirement under the **Welsh in Education Strategic Plans (Wales) Regulations 2019**. Neath Port Talbot's [current plan](#) under previous regulations (the **School Standards and Organisation (Wales) Act 2013**) ran from 2017-2020 but the new plans will need to be 10-year ones.

Compliance with these regulations (in the form of Neath Port Talbot Council's current and future plans for Welsh-medium education) provides a series of mitigating factors that should address any concerns raised regarding any possible negative impact on the Welsh language that these proposals may have.

Relevant mitigating factors in terms of Welsh medium-education (to balance out these English-medium proposals) were provided in more detail in Section 4 previously, however specifically in terms of the WESP, the 2017-2020 document notes the following:

"To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner."

And under **Outcome 5: More students with advanced skills in Welsh** there are a number of targets listed to increase the attainment levels in respect of Welsh Second Language pupils.

These are particularly relevant in terms of this proposal, given that Ysgol Gynradd Gymraeg Pontardawe and Ysgol Gynradd Gymraeg Trebannws are in the same area as the three schools being considered for closure and the site of the new proposed new English-medium replacement school, and their numbers could be affected, particularly if those schools are at, or near, capacity and so unable to meet demand for places.

A number of issues that have been raised as being of possible concern, in terms of the knock-on effect on the Welsh language, are ideally best addressed in a new WESP rather than detailed in a Welsh language impact assessment on English-medium proposals, but they are summarised below for reference and to acknowledge that Neath Port Talbot Council is aware of the potential impact:

- Childcare provision in the area in either language – Continuing to map provision and numbers, and monitoring the situation in order to be able to identify and address any issues that emerge;
- Parental choice from Welsh-speaking families in the area; given the linguistically sensitive nature of the area what are the intentions of such parents and are they being swayed by the condition of the school and available facilities are a more important factor than the language medium of education;
- The "North-South" divide in the county borough where the south is seeing a growth in demand, in the areas where there are less Welsh speakers (see the map in Section 5 iii) - Neath Port Talbot Council recognises that a different approach may be needed in the north, linking in with the previous bullet point around parental choice in the areas where there are far more Welsh speakers;
- Transition to secondary Welsh-medium education in the North of the county. This

has also been identified as an issue to be addressed and there are many factors involved, possibly linked to the above points and those made under the Section 3 i) Distance of Travel comments.

- Are these issues also linked to social deprivation issues in some way (see the map in Section 6) and the perceptions noted by some that new build means investment in one language over the other?
- The disparity between the fact that there would be an increase to 22 English-medium ALN units within the authority and no Welsh-medium units (referenced in the consultation comments - "the proposal makes no reference to addressing this rapidly growing need", given that the proposal is not about Welsh-medium provision the omission is no different from a range of other Welsh-medium issues that were also not directly addressed).

The new WESP could address these issues and more, possibly with related targets and actions such as survey work and area-specific consultation and research, and then continually monitor the situation in terms of both English-medium and Welsh medium schools in parallel so that the inter-relationship can be more clearly demonstrated.

There is also the possibility for specific annual actions to be developed, which are linked to the Promotion Strategy as part of the wider community language planning, as required by Theme 3 of Cymraeg 2050. Parental choice and transition to Welsh-medium secondary education would be ideal for this kind of cross-policy research as it potentially involves both education and community/social issues, and would require partnership working with the organisations listed in Appendix C.

## **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:

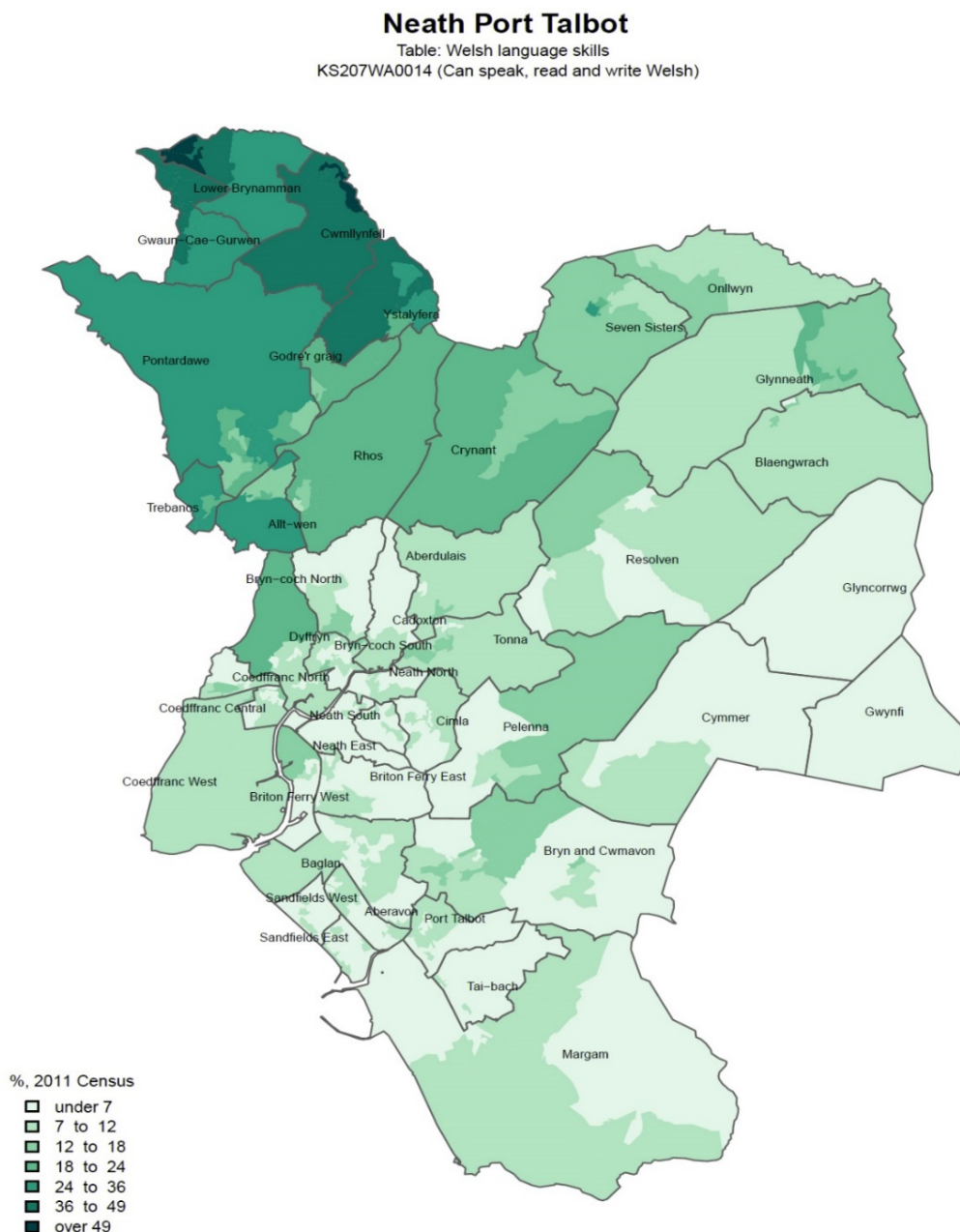
- a target (in terms of the percentage of speakers in the area) for increasing or maintaining the number of Welsh speakers in the area by the end of the 5-year period concerned;
- a statement setting out how they intend to reach that target; and conduct a review of the strategy and publish a revised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

## **iii) Map of fluent Welsh speakers by Ward**

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.

Though the map is a decade old by now, it reflects visually the points made, in the Council’s “Integrated Impact Assessment - first stage” document and the defined Linguistically Sensitive Area in the LDP’s Supplementary Planning Guidance map shown on page 5, that the 3 English-medium schools are located in the north-west of the county borough, where the highest numbers of Welsh speakers are to be found.



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.

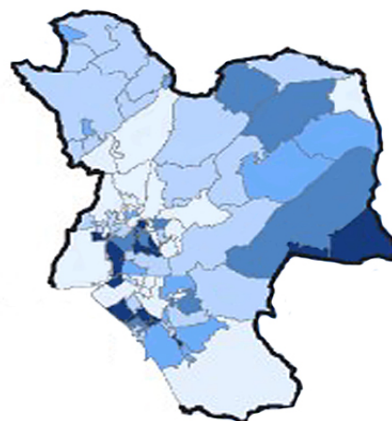
## 6. Social Deprivation Considerations

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 4, a number of Welsh-medium proposals across the county borough could mitigate any adverse effects, in particular the investment in, and expansion of, Ysgol Gynradd Gymraeg Pontardawe, 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

## Appendix A - Relevant Welsh Language Standards

Number	Policy-making Standard	Compliance Date
88	<p>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 -</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	30/09/2016
89	<p>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 -</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	30/09/2016
90	<p>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 -</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	30/09/2016
91	<p>When you publish a consultation document which relates to a policy decision, the document must consider, and seek views on, the effects (whether</p>	30/09/2016

	<p>positive or adverse) that the policy decision under consideration would have on -</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	
<b>92</b>	<p>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</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	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 \(the Welsh Language Society\)](#)

### Risk Assessment

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

##### **Context**

1. This risk assessment has been carried out in line with the Council's Risk Management Policy 2018.
2. Implementing the proposal will result in the establishment of a new build primary school to replace Alltwen, Llangiwg and Godre'rgraig primary schools, which will close. The new school will serve the combined catchment area of the three existing primary schools.

##### **The reasons for the proposal**

3. 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.
4. 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 Llangiwg primary, all of which will close on 31st August 2024.
5. 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.

6. 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.
7. 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.
8. 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 .
9. 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 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.
10. The new build will be funded jointly from Welsh Government 21st century School Programme capital grant monies and from the Council's prudential borrowing capacity.
11. 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.
12. 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.

13. 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.

### **Risks associated with the proposal**

14. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.
15. 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 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
  - discrimination against protected characteristics
  - loss of community facilities
  - increased governance and staff responsibilities
  - budget allocation insufficient to meet needs
16. 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

- providing additional purpose built facility for pupils aged 3-11 with Autistic Spectrum Disorder
- pupils accessing a wider range of staff expertise
- 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

### **Risk assessment**

17. The benefits of reorganisation, as set out above, 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.
18. The proposal will be subject to a full consultation and will enable the school communities to voice concerns and raise queries. This will support the process of change and aim to reduce anxiety.
19. To address staff anxiety about their employment situation, a temporary governing body will be established and a head teacher appointed before the opening of the primary school. The head teacher together with the temporary governing body will determine the staffing structure for the new primary school.

20. 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.
21. The appointment of the head teacher and the temporary governing body together with consultation with stakeholders will provide forums that will allow concerns to be considered particularly in relation to the areas of school identity resistance to change. The temporary governing body will have members with an interest in the areas served by the three existing schools and who will be well placed, therefore, to ensure concerns are addressed and the new school becomes the school of choice of pupils and parents.
22. With effective leadership and pastoral support structures, pupil well-being can be effectively supported in large schools.
23. An Integrated Impact Assessment will be required to fully progress this proposal and will be undertaken as part of the consultation process.
24. A Community Impact Assessment will also be required and will be undertaken as part of the consultation process.

Risk register

No	Risk description	L'hood score	Impact score	Overall Risk (Lxl)	Prox'ty *	Planned action to mitigate	Target Date	Owner	Update	Trend Up Down
1	Educational standards not maintained	1	5	Low Risk	4	Implementation of proposal together with appropriate support and challenge	Sept 2024	- SSIP team - EDS - GB - Headteacher - Inclusion support team	14.05.21	No change
2	Less effective support for pupil well-being in a larger school and in a different location	1	4	Low Risk	4	Implementation of proposal together with the appointment of suitable headteacher and appropriate support and challenge	Sept 2024	- ELLLS - Temp GB - Headteacher - School SLT - Inclusion support team	14.05.21	No change
3	Staff anxiety about job security and new management arrangements	4	3	High Risk	1	Implementation of proposal together with consultation with staff and teacher associations/trade unions. Ongoing support from HR and clear staff plans agreed with teacher associations/trade unions. Appointment of temp governing body and head teacher.	Autumn term 2020 ongoing	- SSIP team - HR	14.05.21	No change

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4	Loss of school identity from closure of existing establishments	4	2	Medium Risk	1	Implementation of proposal together with support for school community	Sept 2024	- Temp GB - Headteacher - EDS - SSIP	14.05.21	No change
5	Resistance to change leading to lack of pupil, parent and staff support	2	2	Low Risk	2	Information on the proposal to provide greater awareness. Effective communication with parents and staff	Autumn term 2020- Spring term 2021	- SSIP team	14.05.21	No change
6	Forecasted pupil numbers do not materialise	1	4	Low Risk	3	Implementation of proposal together with consultation meetings and appointment of suitable headteacher,	Ongoing: 2022 - 2024	- SSIP team - Temp GB - Headteacher	14.05.21	No change
7	21 <sup>st</sup> Century School capital funding opportunity not realised	1	5	Low Risk	2	Business case approval and implementation of proposal	Sept 2020- Jan2021	- ELLLS - Environment Services - SSIP team	14.05.21	No change
8	Discrimination against protected characteristics	2	4	Medium Risk	4	EIA mitigation. Inclusive ethos and practices. Appointment of suitable headteacher. Appropriate support and challenge	Ongoing 2021 -2024	- ELLLS - SSIP team - EDIS - Temp GB - Headteacher - Inclusion support team	14.05.21	No change

9	Increased home to school travel time for some pupil leading to poor attendance	2	4	Medium Risk	4	Inclusive ethos and practices. Appointment of suitable headteacher. Appropriate support and challenge Safe travel routes to school supported by school travel plans	Sept 2024 onwards	<ul style="list-style-type: none"> <li>- ELLLS</li> <li>- SSIP team</li> <li>- EDIS</li> <li>- Temp GB</li> <li>- Headteacher</li> <li>- School SLT</li> <li>- Road Safety Officer</li> </ul>	14.05.21	No change
10	Loss of community facilities	1	3	Low Risk	4	Community facilities enhanced through proposal	Sept 2024	<ul style="list-style-type: none"> <li>- ELLLS</li> <li>- Environment Services</li> <li>- SSIP team</li> <li>- Temp GB</li> <li>- Headteacher</li> </ul>	14.05.21	No change
11	Welsh language development not supported	1	3	Low Risk	4	Welsh will be taught in line with curriculum guidelines for an English-medium school. A larger school presents greater opportunity for language diversity and development with potentially more Welsh speakers available on the staff complement	Sept 2024	<ul style="list-style-type: none"> <li>- ELLLS</li> <li>- Temp GB</li> <li>- Headteacher</li> </ul>	14.05.21	No change

12	Increased governance and staff responsibilities	1	3	Low Risk	4	Although a larger school will mean additional responsibilities, economies of scale and a larger pool of professional skills and expertise will allow responsibilities to be shared more widely. Appointment of temp. GB and suitable head teacher.	Ongoing: 2021 - 2024	- ELLLS - Temp GB - Headteacher	14.05.21	No change
13	Budget allocation insufficient to meet needs			Low Risk		When the new school opens it will receive a budget appropriate for the size of the school and the number of pupils attending.	September 2024	- ELLLS - Temp GB - Headteacher	14.05.21	No change

Mae'r dudalen hon yn fwiadol wag

### **Neath Port Talbot County Borough Council Community Impact Assessment**

#### **Proposal to establish an English- Medium 3 -11 school to replace Alltwen, Godre'rgraig and Llangiwg schools.**

#### **1. Context**

In preparing statutory proposals involving a school a Local Authority is required to assess the impact that the proposals may have on local families and the local community through the preparation of a Community Impact Assessment.

The Community Impact Assessment has been conducted in line with the guidance set out in Welsh Government's Circular No: 011/2018: 'School Organisation Code'.

#### **2. The Assessment Process**

The Community Impact Assessment has been informed by:-

- A review of existing school/community interaction <sup>1</sup>. –Those schools directly affected by the proposal and all other schools in the area including Welsh and English – medium Primary and Secondary schools.
- Evidence from earlier school consultation events <sup>6</sup>
- A composite audit of community facilities <sup>2, 8,9</sup>
- Dialogue with key anchor partner Organisations to better understand current gaps in provision and their work in the community <sup>1, 3, 9</sup>
- Desktop study of secondary data <sup>3, 4</sup>
- Interviews with personnel that are most closely aligned to the schools , non-statutory provision and the wider community <sup>1,7</sup>
- A Scoping Study embracing the whole of the Swansea Valley <sup>8</sup>
- A Mapping exercise extending from Ystalyfera to Trebanos and Pontardawe including Alltwen and the hamlets of Cilmaengwyn and Ynysmeudwy<sup>10</sup>

Interviews have been held with the Head teachers, Deputy Heads, Bursars, Clerks, Primary School Support Officers, Governors, members of the PTA and relevant senior staff within each of the schools concerned. The findings from the interviews have been used to interpret the extent, type, frequency and duration of community activity on each of the school sites.

### 3. **The proposal**

As from September 2024, the Council proposes 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 the 31<sup>st</sup> August 2024.

It is proposed that the new school will be built at Parc Ynysderw, Pontardawe and will form part of a learning, health and well-being 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 to complement the current health and well-being offer for pupils and the wider community and to build upon the advantages of co-location.

### 4. **The Schools**

Alltwen Primary school is an English – medium community school serving boys and girls aged 3- 11years. The school occupies a prominent elevated position on Alltwen Hill and operates between two separate buildings a short distance apart. There is a thriving wraparound and after school childcare provision within a demountable on the school site.

58% of pupils are drawn from the catchment. 17% of children are in receipt of free school meals (lower than the NPT average of 23%) and 37% of children have been identified as having additional learning needs (higher than the NPT average of 24%).

An Estyn inspection in October 2018 reported the school had many good features including an inclusive and caring ethos, skilled teaching assistants and a well-motivated leader.

Alltwen Primary school is approx. 0.7 miles from the possible site of the new school.

Godre'rgraig Primary school is an English – medium community School serving boys and girls aged 3 -11 years. The school is circa 100 years old and occupies an elevated position on Graig Road.

In July 2019 Godre'rgraig Primary School was relocated temporarily from Godre'rgraig to Parc Ynysderw, adjacent to Cwmtawe Community School after geological experts found there was a potential risk to the school's playground from slag heap quarry waste. The demountable classrooms that now house the Godre'rgraig school pupils are of a good standard, however they are not intended for permanent use in the longer term.

82% of pupils are drawn from the catchment. 21% of children are in receipt of free school meals (lower than the NPT average) and 35% have been identified as having additional learning needs (higher than the NPT average).

An Estyn inspection in June 2017 awarded a good for current standards and good for prospects for improvement as the caring support and guidance offered by staff ensured that pupils worked collaboratively and interdependently.

The school and the village of Godre'rgraig is approx. 3.2 miles from the possible site of the new school.

Llangiwg Primary school is an English– medium community school serving boys and girls aged 3 – 11 years. The school holds a prominent kerbside position on New Road, Ynysmeudwy and operates from two distinct sites, the Nursery Block and the Main Block, approx.100 metres apart along the same road.

66% of pupils are drawn from the catchment. 22% of children are in receipt of free school meals (lower than the NPT average) and 22% have been identified as having additional learning needs (lower than the NPT average).

An Estyn inspection in January 2019 awarded good judgements in four inspection areas and one adequate needing improvement. The curriculum was considered to be broad and balanced and the quality of teaching was judged good overall.

Llangiwg School in Ynysmeudwy is situated approx. 1.3 miles from the possible site of the new school.

**5. The degree to which the school buildings are used now as a community resource**

Alltwen Primary school has hired its main hall and demountable to various groups ('Tiny Toes' ballet and Judo classes) but does not wish to compete and possibly reduce the use of the local Community Centre at Dyffryn Road. There are few other areas within the school that lend themselves to hire but over a period of years the school has steadily invested in an underutilised classroom to create the 'Cwtch.' The room has been adapted and equipped to provide weekly parent & toddler sessions, a reading café, a parent Nurture Group and relationship based play activities. The room doubles as a safe venue for pre-school children ('Babbling Babies'), for visits by the Health Visitor and for the Credit Union Bank. The provision is now an integral part of the school's 'Families Connects' ethos.

The school houses two demountable buildings in the school yard, one for Nursery and another for 'Hoots' childcare provision. The 'Hoots' childcare is run as a business venture and provides comprehensive wraparound care for up to 19 3 – 11 year olds, with up to 48 pupils attending at various times. There is also a daily play group/after school club which is operational until 5.15 p.m. The provision employs 8 part time staff who are fully qualified in all aspects of work leading to Foundation Phase including Nurture, 'Playworks' and Speech & Language. There are links with NPTCBC ALN team and Educational Psychologists due to its close proximity to the school.

Following 16 years of development, 'Hoots' regularly achieves the Gold standard with HSPSS (Healthy Sustainable Pre-school Services) and the 'Small Workplace & Health Award.' Parents see the on-site childcare as being essential to the health and well-being of the pupil, making transition natural and safe whilst instilling a sense of belonging.

Parents find 'Hoots' convenient as there are no transport issues with drop off and pick up, which would otherwise be the case with private Childcare providers in Herbert Street ('Lullaby's' and



‘Little Steps’) and the eight registered home – based child minders that operate within the Pontardawe area.

The Godre’rgraig Primary school pupils were relocated to Parc Ynysderw in July 2019 as a result of a perceived risk from slag heap waste shifting onto the school playground. Prior to being rehoused the Primary school was able to provide an After School club three days a week, a flourishing Mother & Toddler Group twice a week and a sports Club once a week. The Mother & Toddler Group was a useful transition and ‘outreach’ tool breaking the cycle of deprivation and creating a link between the school and its community. It was the intention, prior to being relocated, to further develop these school links to create numeracy & literacy classes for parents. The school would also stage its traditional summer and Christmas fetes.

Since relocation out of school hours activities have been trialled at the Parc Ynysderw site but have been unsuccessful as parents without cars have difficulty collecting the children that stay beyond the traditional school day. This can also apply to children that cannot get to school early enough for Breakfast Club. The relocated school is not currently functioning in terms of community benefit, as it was on the Graig Road site.

The Llangiwg Primary school has lost its playgroup, wraparound provision and Family Learning Group in recent times but still has an after school club for sport, art and the choir. The lack of wraparound care has affected transition to Early Years. The school continues to stage concerts and a Christmas market which have proven to be very popular and successful. The school donates and is a collection point for the ‘Pantry’ Food Bank. The school is involved with the ‘My Green Valley’ initiative (please see YGG Trebannws below). The school buildings are not used now as a community resource.

For the sake of completeness investigations have also been carried out with other Swansea valley schools that might offer community use of their school buildings and impact this proposal. The degree to which each school is used as a community resource has been reviewed with particular reference to Cwmtawe Community School, YGG Pontardawe, YGG Trebannws and Ysgol Gymraeg Ystalyfera.

Cwmtawe Community School has an extensive range of extra-curricular activity. The school offers all year groups a varied and inclusive programme of extended school day sport, dance, choir, music and drama. The school and its Primary feeder pupils benefit from the extensive on-site provision (e.g. the Main Hall, the science and technology laboratories, performance spaces, outdoor tennis and netball courts, etc.) and also the considerable leisure facilities (6 full size playing fields, Leisure Centre & Studio and 3G synthetic pitch) within easy walking distance.

YGG Pontardawe is currently benefiting from a £1.6 million investment which includes extended and enhanced childcare and Foundation Phase facilities. Once the Main Hall is completed (in 2021) the school will be able to more easily segregate activities with a view to continuing to provide a rich mix of school based ventures, its Urdd sports programme, PTFA events, house the Cwmtawe Youth Band, the school discos and the very popular Cylch Meithrin and Holiday play scheme. The school hosts training sessions for University of Wales students and intends to develop a community room on completion of their extension.

YGG Trebannws work closely with YGG Pontardawe and the Urdd sports club (weekly on a Monday out of school hours). The school has hosted a 10 week parental care workshop and enjoys use of a local woodland for Forest School (Ysgol Goedwig) activities. School based ventures include the traditional Christmas and summer fayres/jamboree, sports days and celebration of St. David's Day. Pupils are heavily involved in the 'My Green Valley' initiative which is a litter picking/recycling/environmental programme being developed by a local voluntary organisation in association with Eco – schools and 'Keep Wales Tidy'. The school has limited space to house community use and will use Cwmtawe Community School or the Graig Chapel for some of its well-attended school concerts.

Ysgol Gymraeg Ystalyfera is an 'all through' 3 -18, Welsh medium school boasting a range of on-site leisure and community facilities. Pupils enjoy a rich menu of Out of School Hours study in music, dance, drama, sport, Design & Technology and Duke of Edinburgh activities. Revision sessions are held after school hours for core curricular subjects and there is a vibrant school choir. All pupils enjoy use of the sports hall, the sports pitches and older age groups have use of the climbing wall (the swimming pool has been de-

commissioned). There are proposals for a new 100 x 60 m 2G pitch with changing facilities on the school fields that run parallel with the Afon Twrch tributary.

The school buildings and on-site facilities are currently not widely used by the community. There is limited public use of the sports hall and the playing fields. With the arrival of the synthetic 2G pitch the school will be looking to develop and increase the amenities for increased community use.

## **6. Extent of community facilities within easy reach of the existing schools**

The area under investigation within the Swansea Valley stretches from Ysgol Gymraeg Ystalyfera in the north east along the ribbon development of Godre'rgrraig, Cilmaengwyn and Ynysmeudwy to Pontardawe (please refer to the separate mapping exercise which identifies all community-based facilities within the tract of land under scrutiny). It straddles the Swansea canal to Trebanos in the south west and is bounded by Alltwen in the south east.

The locality has a proud industrial history linked to coal, iron and tinsplate manufacture, but as a result of the streamlining of these industries in the 20<sup>th</sup> century the valley communities are placed within the 30–50% most deprived LSOA's in Wales.

The number and type of community facilities are both many and varied often concentrated around densities of population in Ystalyfera, but particularly Pontardawe.

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'rgrraig Primary school (3.2 miles distant), Llangiwg 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.

The community facilities within easy reach of the three Primary schools in their present locations (i.e. Alltwen Primary at Alltwen Hill, Godre'rgrraig Primary at Graig Road and Llangiwg Primary at New Road, Ynysmeudwy) include :-

In Alltwen –

- Parks & Play areas at Lon Tanyrallt, Gwynfryn and Bryn Morgrug (also ‘Harry’s Park’)
- Community Centre at Dyffryn Road – which hosts amongst many other hires, the wood turners, yoga, kickboxing, modern sequence dancing, Parent & Toddler Group, ‘Let’s Dance’ and ‘Fit Steps’. Some space capacity on a mid-week morning to accommodate further hires. Access and parking at the Centre is very difficult and can deter would- be hirers. The Centre is managed by Cilybebyll Community Council which has very good relationships with the school jointly providing Remembrance services and Christmas concerts. The Centre is used for the Year 6 school leaver’s concert.
- Open Spaces – which include Alltwen rugby field, the community garden at the ‘Triangle’ (which Alltwen school children help to maintain) and the Glantawe Riverside Centre. The latter operates an Education Academy where children, including those from Alltwen, partake in field studies, workshops, mini-beast hunts and outdoor discovery sessions. Children benefit from full day sessions, which might be scheduled for a term or the whole of the academic year, and help those that might be ‘disadvantaged’ to problem solve, to build confidence and have a more positive focus on life. The Academy is accredited with Agored Cymru and receives over 100 young people each week (those of secondary school age have achieved the Level 2 Agored Cymru Essential Skills qualification). Self – employed practitioners walk to the school and walk participants to the Centre (via the Sustrans National Cycleway 43 or St. Illtyd’s Way) and this is seen as part of the programme by building resilience.
- Various Churches, Chapels and Places of Worship – the school and St. John’s Church derive mutual benefit from each other sharing premises for school choir rehearsals and ‘Messy Church’ activities. The school will use St. Peter’s for the Harvest Festival. Pontardawe Chapel hosts Merched Y Wawr.

## In and within reach of Godre'rgrraig-

- Parks & Play areas abound at Gnoll Road, Allt y Grug, Penywern Road, Hodgson's Road, Pen Yr Allt, Varteg Park, Maen Gwyn (Tai Tarian site), Parc y Darren (bowls and tennis) and at Ffordd Glandwr which also boasts a MUGA and skate park.
- The Band Room on the A4067 houses the Ystalyfera Public Band and kickboxing, whilst the Godre'rgrraig Workingmen's Club at Glan Yr Avon serves 'Tiddlywinks2' (see later). Ynysmeudwy Boys and Girls Club is within walking distance and this hosts a range of martial arts classes but no Youth Club.
- Ystalyfera Community Centre managed by the Community Council and providing for a range of community hires including Line dancing, Sewing Group, Cylch Meithrin playgroup, 'WeightWatchers' and Dance class. There is capacity within the Centre for yet more hires and there are proposals for 'Age Cymru' OAP exercise classes and 'Clwb Cwtch' sessions that are currently being held On line (Welsh language taster classes focussing on speaking Welsh with children).
- 'Tiddlywinks' – as providers of enhanced learning, childcare and play opportunities for children aged 6 weeks to 13 years old, Monday to Friday 7a.m to 7 p.m. The facilities at the Centre comprise Baby and Toddler rooms, playground and log cabin. Able to cater for 11 children under the age of 2 years and 32 children aged 2 years and over. 'Tiddlywinks2' is the overflow and school holiday facility for up to 32 children aged 7 and over and this has been registered and developed within Godre'rgrraig Workingmen's Club. Tiddlywinks serve the whole of the Swansea valley including parts of Powys.
- The Ystalyfera Development Trust (YDT) at the former HWB building in Commercial Street– the facilities now provide for computer classes (four times a week), yoga, and Tai Chi, pottery and Customer Services classes. The building is also home to the Art Club, the Sewing Club, 'Stitch R Us' and has a resident physiotherapist.

- Open spaces – which include Godre’rgraig Public Park (the Community Council intend to develop this area with the school to provide Nature trails). Sports pitches at Godre’rgraig FC, Ynysmeudwy FC (plus MUGA), Ystalyfera RFC and on the school site at Ysgol Gymraeg Ystalyfera. There is a growing junior section within Ynysmeudwy FC and Godre’rgraig Primary School uses the ground for its sports day.
- Various Churches, Chapels and Places of Worship – St. David’s Church Hall in Ystalyfera is used for school concerts but less so now given the capacity of the new hall in Ysgol Gymraeg Ystalyfera. The Gurnos Independent Chapel is home to C.A.T.C.H. and the Food Bank which is managed jointly by Ystalyfera Development Trust.

It can be seen from the above that the area under review is well served by community facilities and if the Godre’rgraig Primary school pupils are relocated to Parc Ynysderw responders fear there will be a disconnect with these local amenities.

In Ynysmeudwy (Llangiwig) –

- Ynysmeudwy Park is within easy walking distance of the school. A group of parents have set up ‘The Friends’ of the Park with Pontardawe Town Council. The schoolchildren are heavily involved in tree planting and ‘Working with Nature’ in the park as part of the ‘green classroom’ initiative.
- Ynysmeudwy Community Centre, managed by Pontardawe Town Council is again within easy walking distance of the school. The Centre offers a vibrant mix of mid-week community based activities which includes Art classes, Rainbows & Brownies, Dance, and Tai Chi and on a Friday evening, a Youth Club for 10 – 16 year olds which is proving so popular that an additional 6.00 – 8.00 p.m. slot is being sought.
- Dan y Bryn Residential Care Home and the school have close links with the children staging concerts (Dewi Sant, etc.), gifting Easter eggs and selection boxes to residents, with many children being ‘pen pals’ to the elderly.

- Mount Elim Evangelical Church and Llangiwg Primary school have close links as the children attend lessons on Christenings, weddings and are involved in the Christmas Box Appeal. Church representatives come to the school to hold assemblies. The Elim Church is planning to develop a new community Church hall at Coed Cae which is dependent upon realising sufficient grant aid.
- Open Spaces – The Pontardawe Recreation Ground (managed by the Pontardawe Sport and Recreation Association) is within walking distance of the school. The Rec. has two rugby, two football and two cricket pitches. The school uses the Rec. for its sports day and the sports fields are used regularly by Pontardawe RFC, Trebanos RFC, Pontardawe United F.C., Pontardawe and Llandarcy Cricket Clubs, Air Cadets and is the home of the ‘Heart of the Valleys’ Show.

Glantawe Riverside Centre is accessible via the Swansea canal towpath and Llangiwg Primary school have previously used the Centre for environmental studies (in the same vein as Alltwn Primary school above) by investing the PDG (Pupil Deprivation Grant).

- Pontardawe Swimming Pool and Pontardawe Arts Centre also serve Ynysmeudwy and Llangiwg because of their proximity to the School site.

This report acknowledges the community facilities that are within easy reach of the three existing schools affected by this proposal. The proposal is to relocate school pupils to the town centre of Pontardawe and Parc Ynysderw. For the sake of perspective there follows a complete review of the amenities that the children would have access to if relocated to the Parc Ynysderw site (please also refer to the separate mapping exercise that locates each of these facilities).

- Parks and Play areas – at Gellideg in Rhydyfro (complete with a ball court) and Trebanos Park (also home to Trebanos RFC). King George V Park, Pontardawe complete with tennis courts and a bowling green.

- Alltycham Rhydyfro Community Hall (ARCH) managed by Pontardawe Town Council is fully booked in the evenings with Dance, Tai Chi, after school club, Gardening Club, Twinning committee, etc. It sees daytime use from Toddlers Group, 'Age Concern' and Craft Club.
- Trebanos Hall (also managed by the Town Council) is the focal point for the village. It has a busy schedule involving the Cylch, Coffee mornings, crochet and sewing, Senior Citizens, Tae Kwon Do, Kung Fu and Brownies.
- The Cross, Pontardawe is privately run but does cater for Third sector organisations such as the History Society, Arts Group, OAPs and the Guild of Weavers, Spinners and Dyers. It is the central venue for 'Flying Start' courses, Child Protection meetings, Social Services and the Pontardawe Chamber of Trade & Commerce. In addition to the Gallery and the other rooms that are available for hire The Cross houses Business Units including a seamstress, two Care Companies, a Boiler/Economic Grants Enterprise, a vending company and a photographer.
- Pontardawe Arts Centre is the principle venue for drama, dance, music, craft and the performing arts in Pontardawe. There is a 'Friends of' organisation which works closely with local schools and they are currently running a volunteer scheme. The Centre, its rehearsal space and Gallery are to stage 'Little Boxes', a celebration of the Arts Centre's history from when it was a Miner's Institute.
- Pontardawe Library and Yr Hwb. The library has a good relationship with all schools, particularly Llangiwig. It provides for class visits, activity sessions, creative writing workshops and homework study. Yr Hwb houses the Welsh Language Centre ('Ty'r Gwrhyd') who work closely with Menter Iaith. There are Council Tax, Credit Union and Citizen Advice Bureau walk-in sessions. The 'Friends of' organisation assist with fund raising for author talks and historians.
- The Heritage Centre occupies a central location behind the Dillwyn Arms and acts as an exhibition centre and Visitor Information Point. It is voluntary run and, with the help of



young people from the local Primary and Comprehensive schools, celebrates the rich and diverse heritage, culture and history of the Swansea Valley.

- Open Spaces – in addition to the Swansea Canal (still very important to the area and maintained by the Canal Society) the main receiving centre for outdoor sporting/recreational activity is Parc Ynysderw (the proposed site for the new school).

Parc Ynysderw is currently laid out as 3 full size football pitches, one Academy (9 a side) pitch, various training grounds, 2 full size rugby pitches, a 3G floodlit synthetic pitch and an enclosed Welsh League pitch under the custodianship of Pontardawe Town FC. There are also changing rooms, two tennis courts and a small equipped children's play area.

The playing fields are maintained and hired out under a NPTCBC Lease with the Parc Ynysderw Sports Association and Pontardawe Town FC.

The pitches are used regularly by the West Glamorgan Junior League, Youth League and Ladies League, Pontardawe Town FC, Pontardawe RFC, Trebanos RFC, Rhos FC, Cwmtawe Community School, with occasional bookings being made by Glais, Clydach Sports and the Urdd.

There is a good working relationship between the Lessees, the school and the on-site Celtic Community Leisure Trust. The fields see use for mid-week training of Juniors (but there is no floodlighting), Youth and Senior fixtures on a Saturday and Minis/Junior rugby on a Sunday morning.

Trebanos RFC use Trebanos Park for the Senior XV but the Juniors (of which there are 600 registered with the Club) play at Parc Ynysderw. All five Pontardawe Town FC Senior Teams play at Parc Ynysderw (mixed Youth and Seniors totalling 60 – 80 players). The 220 Juniors, aged between 6 and 16 years, which are registered to Pontardawe Town FC also play at the venue. On a Saturday morning there will be approx. 300-350 players using Parc Ynysderw.

Clubs have indicated that they would like to see in the future the Changing rooms refurbished, some of the pitches equipped with floodlights, some of the pitches drained and improvements made to car parking.

The Pontardawe area also boasts extensive wooded valleys that follow the course of the Clydach River. Cwm Du Glen and Glanrhyd Plantation (part of the Arthur Gilbertson Estate, circa 1877) is steeped in history and has hosted many public and child centred activities sponsored by ‘Actif Woods Wales’ and Natural Resources Wales. The valley is rich in biodiversity and is considered locally to be an ideal venue for the advancement of education in conservation and environmental studies.

- Churches and Chapels – Apart from those that feature above, Graig Church in Trebanos is occasionally used for school concerts.
- Childcare provision – in addition to ‘Hoots’ at Alltwen Primary school, the Pontardawe area is very well served with childminders. There are two privately run Day Nurseries in Herbert Street (‘Lullaby’s’ and ‘Little Steps’) catering for up to 46 places aged between 0 months and 12 years. They offer Breakfast Club, Wraparound, after school Club and Holiday Care. ‘Little Steps Childcare Ltd’ is registered to deliver the Foundation Phase and can transport to and from local schools.

YGG Pontardawe provides Cylch Chwarae between 8 a.m. and 5.00 p.m. for 14 2 to 8 year olds.

Trebanos Hall runs a Cylch between 9.30 and 11.30 a.m. daily.

There are also eight home based childminders in the area offering between them 65 places.

- Leisure Facility providers. Celtic Community Leisure Trust (CCLT) operate the leisure facilities on behalf of the NPTCBC at Parc Ynysderw. In relocating to Parc Ynysderw the pupils of Alltwen, Godre’rgraig and Llangiwig would be

closer to these amenities during the school day. CCLT operate the Pontardawe Leisure Centre which comprises a four badminton court sports hall, a studio, a gym, spin bike room, an indoor bowls hall and fitness facilities. The NPTCBC PASS team run netball, badminton and tennis sessions at the Centre as part of the 'Active Young People' initiative. The Leisure Centre operates at full capacity and with innovative programming could respond to increased footfall from the affected Primary schools.

The Pontardawe Swimming Pool (set to relocate to Parc Ynysderw under this proposal) also operates at capacity with up to 850 children, including pupils from Alltwen, Godre'rgraig and Llangiwg, participating (80% of swimmers are drawn from a 5 mile radius). Junior Swimming Club is followed by Aqua Aerobics, then further school use from those out of County, then public use and Swimming Academy. The facility offers accreditation through the swimming pathway and has achieved excellent results with the STA, and is well regarded by 'Swim Wales' and Sport Wales.

Moving pupils from Alltwen Primary and Llangiwg Primary to the proposed campus will negate the need for the walking-bus that is currently employed to walk the pupils to the current swimming pool site.

The floodlit synthetic 3G pitch is fully booked during the winter evenings proving to be very popular for the training requirements of Pontardawe Town FC, Rhos FC, Trebanos RFC and Super Six Leisure Leagues. The Clubs would like to floodlight the natural turf pitches to generate more capacity to train on a mid-week when the daylight dictates otherwise.

## **7. Adverse impact of school closure upon the community**

Estyn reports (in 'Clever Classrooms' 2015, etc.) that attainment and academic achievement improves exponentially when pupils move to new or significantly refurbished buildings. With a new school comes more choices, improved opportunities, mobile technology, spacious classrooms and adaptable ICT facilities. At Parc Ynysderw these advantages will extend to social and sporting

activities that are within easy walking distance. Conversely, and in order to represent the local standpoint, the advantages of the proposal need to be considered against the following opinion (some being well- articulated and qualified, some circumstantial and others anecdotal).

Losses to the community would include:-

- ‘Hoots’ childcare and wraparound provision situated within the school grounds of Alltwen Primary (markedly impacts transition).
- The ‘Family Connect’ initiative and the services that have been developed in the Cwtsh in Alltwen Primary school.
- Possible downturn in the number of resident Godre’rgraig school children attending ‘Tiddlywinks’ as their new school is 3.2 miles from their former Primary school.
- Loss of equivalent of two football fields to the development at Parc Ynysderw (please see FIT {Fields in Trust} compensatory measure later in the Report).
- Godre’rgraig losing its one and only large meeting venue in the village.
- The Alltwen Primary schoolchildren not assisting the upkeep of the community garden within the Alltwen triangle.

Circumstantial evidence points to:-

- A likely reduction in passing trade affecting the livelihood and future of ‘Mark Wright’s Ynysmeudwy Stores’ and the ‘Welcome Shop’ in Alltwen.
- The intergenerational work currently being carried out by Llangiwig pupils for the residents of the Dan y Bryn Residential Care Home being lost or stifled. In Ynysmeudwy same would apply to the links between the school and the Mount Elim Evangelical Church.
- The continued involvement of the Llangiwig pupils with ‘The Friends of Ynysmeudwy Park’ will be hampered by them being more remote. (Same would apply for all community based initiatives when the schoolchildren are no longer resident in the village during school hours).
- Difficulty in building relationships between local children and Community Council civic events like fetes, Nature

Walks, Remembrance service, etc. when the children are absent from their locale in the school day.

- Certain Godre'rgraig children and those living remotely from Parc Ynysderw would possibly not be able to participate in Breakfast Club or any Out of School Hours Club in their new school as with 18.5% car less in Godre'rgraig and 26.7% car less in Ystalyfera, some parents would not be able to get their children to and from school outside of the traditional school day. There is an acknowledgement that school transport will be provided for those living remotely from the new school, at least to facilitate the school day but not beyond (also, if the LEA subsidy for displaced Godre'rgraig Nursery provision is removed upon the arrival of the new school in September 2024, this will impact Early Years and transition as transport costs would revert directly to the parents and this might not be affordable).
- The relocation of the Pontardawe Swimming Pool to Parc Ynysderw distances it from Ynysmeudwy with the Pool currently being within easy walking distance. Parc Ynysderw is considered not to be central to Pontardawe.

Respondents were quick to remind the interviewers that, in their opinion, this proposal does not promote the 'Active Travel Agenda' nor the NPTCBC rationale for building 'Safe, Strong and Resilient Communities.'

The passion and heartfelt emotion that has been rekindled by this proposal has generated many anecdotal comments that revolve around a loss of community identity and a sense of place. The proposal is seen as diluting village life, its spirit, and its confidence. There would be less interaction as commuting on buses and cars to the new school would negate the opportunity for parents to mix whilst walking children to school. Also the proposal is considered to be detrimental to the efforts made thus far, in an economic down turn, to make communities more resilient and close knit (opinion based upon losing the school leads to losing the Post Office, the Petrol Station, etc. eventually translating into making the village less attractive to new families who do not then move to the area and the village ultimately dies).

There is a fear of disconnect with the three communities affected by this proposal and Pontardawe – they are 'communities within

communities'. There is no affinity between Godre'rgraig and Pontardawe. The three schools affected by this proposal are different, located in three different distinct, separate villages where children have had different up bringing's and it is felt they cannot be treated the same and put together in one new school.

Pontardawe is seen as the 'city', the villages affected by this proposal will become no more than 'suburbs.'

From an educational perspective the proposal was not seen as being in accord with Curriculum 2022 which is pupil-led and celebrates the individuals sense of belonging, where they grew up, their place, their habitat (in Welsh 'Cynefin'). Opinion revolved around keeping English- medium education within each village and in Godre'rgraig the possible loss of pupils to Ysgol Bro Tawe and Ysgol Golwg Y Cwm in Powys (1.1 miles away as opposed to 3.2 to Parc Ynysderw). The Welsh – medium Primary schools were concerned of the 'draw' that a new English – medium school would have and its resultant effect upon the Welsh Language, in what is a strong Welsh speaking spatial area.

Businesses and Leisure providers in Pontardawe generally would welcome the increased footfall and potential secondary spend associated with more families visiting the Cwmtawe area.

Finally, interviewers were reminded that the people associated with the three schools were the facilitators and it is these people that have made things happen, not the buildings or the facilities.

#### **8. Plans to mitigate impact if community provision is lost from the schools**

Under this proposal the new build school also includes the creation of a learning, health and wellbeing community campus. Modern, fit for purpose educational, health and leisure facilities will be concentrated at Parc Ynysderw to form a focal point or community hub.

All existing school based activity amidst the three schools will be preserved and protected to naturally transfer to the new campus. Admittedly, some community provision will be lost from the schools, in some cases this can be mitigated against, in others, not so:

- ‘Hoots’ Childcare at Alltwen Primary School – unless provision in the way of dedicated classrooms, an enclosed play area, a kitchen, toilet provision, sensory rooms, etc. befitting the Care Inspectorate for Wales (CIS) standards, are provided within the new school build this business will be lost. There will be a loss of natural transition into a Primary School setting if the business was re- housed elsewhere. It could not relocate to the Dyffryn Road Community Centre in Alltwen as, even with costly conversion and adaptation works (to meet CIS standards), the venue is deemed unworkable because of restricted road access and limited car parking provision. Parents wishing childcare may be faced with seeking alternative provision at ‘Lullaby’s’ or ‘Little Steps Childcare Ltd.’
- Community buildings are in short supply in Godre’rgraig. There are not many alternatives to the school building as the Workingmen’s Club and the Band Hall, without expensive modernisation, are unsuitable being on a busy bypass, and not on a safe walking route.
- The relocation of the three Primary schools affected under this proposal to Parc Ynysderw would mean in some cases they move closer to both the Glantawe Riverside Education Academy and the Recreation Ground which is considered a positive.
- The plan to develop a new Community Church Hall for Elim Mount Evangelical Church in Coed Cae, Ynysmeudwy would grow community provision in the village should Llangiwig Primary School be lost to this proposal.
- Innovative programming of the already busy Leisure Centre, Swimming Pool and 3G pitch will assist in meeting what will be a growing demand for leisure time pursuits should the parents and grandparents of the relocated pupils avail themselves of the on- site amenities.
- The proposal for the new school includes for the redevelopment of the changing rooms at Parc Ynysderw and the installation, following site investigation, of positive drainage on one of the football fields – this has been

welcomed by the Cwmtawe Community School, CCLT, Parc Ynysderw Sports Association and Pontardawe Town FC.

- The footprint for the new school and new swimming pool will mean the sacrifice of an area currently laid out as two football fields. As the site was dedicated by King George V the Fields in Trust (FIT), as custodians, would wish compensatory commitments being made to offset the disposal of the playing fields. Negotiations with FIT indicate they are responsive to local change and alternative dedications are being explored (for either woodland in Glantawe or open space at the Recreation Ground). This arrangement would protect the new dedication and safeguard it from development in perpetuity.

Negotiations are also to be held with Parc Ynysderw Sports Association as with the loss of football pitches under this arrangement they would need to surrender 30% of their Lease on the site. They are conducive to this.

The management of the playing fields at Parc Ynysderw are comfortable with losing provision providing the fields are re-configured to make better use of available land, the second football field receives positive drainage so that it can receive more fixtures (as planned), the changing rooms are remodelled and the training displaced from the natural turf pitches (because of a loss of amenity) can be accommodated on the synthetic 3G pitch. There is a request also for an overflow car park.

There is a cautious welcome and general acceptance of the proposal within the sporting fraternity.

9. **Opportunities for enhancing existing community facilities to receive additional Out of School Hours activity.**

Under the proposal to establish a new 21<sup>st</sup> Century, 3-11 English - medium school on the Parc Ynysderw site, opportunities exist to create and enhance the new school based community activities and facilities, as a means of complementing existing provision in the Pontardawe area.



Existing community facilities at Alltwen, Godre'rgraig and Llangiwg will be retained and these can be added to and enhanced. The Third sector is very strong in the Pontardawe area and non – for – profit Organisations that promote sporting, recreational, cultural, health, educational and environmental activities would qualify for a raft of external grants and extra voluntary contributions. This is particularly true of 'The Friends of' entities. Similarly the Town and Community Councils, as the layer of Local Government closest to the people, uniquely qualify for grants that can improve existing community facilities. The Pontardawe area is within the geographic area of benefit that qualifies for support from:-

- Mynydd y Betws Wind Farm Community Benefit Fund
- Perthigwynion Wind Farm Fund
- The Coalfields Regeneration Trust
- Rural Development Plan (RDP)'Leader' revenue funding
- 'All Wales Play Opportunities ' Grant
- Welsh Rugby Union (WRU) Facilities Grant
- Football Association of Wales (FAW) Grant
- NPTCBC Minor Projects Grant (for Town/Community Councils)
- The National Lottery Community Fund

Best use can be made of existing facilities in order to receive additional Out of School Hours activity and this is particularly true of the Pontardawe Leisure Centre and the Swimming Pool where management have indicated that, with the advent of the new school, there will be a change to more innovative programming of classes, creative timetabling, inventive use of the staffing resource, etc. Those responsible for the management of outdoor sporting amenities at Parc Ynysderw have generally embraced the plans as opportunities exist for pitch drainage, new changing facilities, improved access, an overflow car park and reconfiguring the layout to gain extra playing space. They will then take it upon themselves to add to the site with floodlighting and to improve the infrastructure associated with consolidating Welsh League status. This can be achieved by utilising the grants that are peculiar and uniquely available in the Ward of Pontardawe.

## 10. Conclusion

The Community Impact Assessment recognises the importance of Alltwen, Godre'rgraig and Llangiwg Primary School in providing a venue for school based events, extra curricular activity and community use. Following evaluation, it has been demonstrated that under this proposal that 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.

There is general apprehension, even an anxiety and a concern amongst consultees that this proposal will greatly undermine village identity as they know it. There are many misgivings, in some cases trepidation, about the proposal to establish the new 21<sup>st</sup> Century 3-11, English- medium school at Parc Ynysderw. There is a view that the proposal may be detrimental or damaging to the three communities under review.

The process of completing the Community Impact Assessment has helped to engender a better understanding of how best to mitigate the impact of school reorganisation on a community, which is right and proper. The deciding factor in determining the school organisation proposal should be one of securing the best educational offer for pupils.

Impact assessments are important as they ensure that the Council has due regard to its responsibilities to its communities and in addition it has considered the opinions of its stakeholders. These assessments assist the decision making process as they provide information to inform officers and Members of any likely impact (negative or positive) any decisions will have on communities.

### Sources/References:-

(1)Interviews (conducted face to face or via 'Microsoft Teams'):-

- Head and Deputy Head, Bursar , School Clerk, Governors and members of the PTFA of YGG Trebannws (12.11.20)
- Head and Deputy Head, PA, Governors and members of the PTA of Cwmtawe Community School (18.11.20)
- Head and Deputy Head, Bursar, Primary School Support Officer, Governors, Urdd Sports Development Officer and

members of the Cylch Meithrin of YGG Pontardawe  
(19.11.20)

- Head and Governor of Alltwen Primary School (20.11.20)
- Head and Governor of Ysgol Gymraeg Ystalyfera (20.11.20)
- Head and Deputy Head and Chair of Governors of Godre'rgraig Primary School (25.11.20)
- Head of Llangiwig Primary School (2.12.20)
- County Councillors for the Wards of Trebanos and Alltwen (16.11.20)
- County Councillor for the Ward of Godre'rgraig and Trustee of Ystalyfera Development Trust (19.11.20)
- County Councillor for the Ward of Ystalyfera (19.11.20)
- County Councillors for the Ward of Pontardawe (24.11.20)
- Clerk and Town Mayor of the Pontardawe Town Council (10.11.20)
- Clerk and three Community Councillors of Cilybebyll Community Council (7.12.20)
- Clerk and three Community Councillors of Ystalyfera Community Council (11.12.20)
- Committee members of the Pontardawe Sport and Recreation Association (24.11.20)
- Committee member of the Trebanos RFC (3.12.20)
- Secretary and Trustee of the Parc Ynysderw Sports Association (8.12.20)
- Club Secretary and officials of the Pontardawe Town F.C (15.12.20)
- Facility Manager for the Pontardawe Leisure Centre and Pontardawe Swimming Pool ('Celtic Community Leisure Trust') 12.11.20
- Manager and practitioner of Glantawe Riverside Centre and Outdoor Education Academy (8.12.20)
- Proprietors of the 'Hoots' Childcare provision at Alltwen Primary School (9.12.20).
- Proprietor of 'The Cross' Community Centre, High Street, Pontardawe (16.12.20).

(2)NPTCBC Local Development Plan (2011-2026) identifying all community provision within the spatial areas.

(3)Audit of Town & Community Council provision in Pontardawe, Alltwen (Cilybebyll) and Ystalyfera.

(4)NPTCBC Neighbourhood Profile and data provided by the Office of National Statistics and Nomis (2011) for Pontardawe, Alltwen, Ystalyfera and Godre’rgraig.

(5)Welsh Government School Organisation Code: Circular No: 011/2018.

(6)Earlier school consultations -SSIP CIA 21<sup>ST</sup> Century schools – Godre’rgraig/Llangiwig: June 2010 and Ysgol Gymraeg Ystalyfera/Y Wern: July 2014.

(7) Dialogue with NPTCBC Lead Officers with expertise in the field of Youth Service provision, Play, Artistic Development, Early Years & ‘Flying Start’, Library provision, Sport Development and the ‘Active Young People’ initiative.

(8) Desktop Scoping Study (18.12.20) including a review of Childminding provision, Early Years and Wraparound provision at ‘Tiddlywinks’ in Ystalyfera, social housing in Craig Newydd, Godre’rgraig and Dan y Bryn Residential Care Home in Llangiwig.

(9) Primary research to establish an inventory of all Third Sector providers in the area under scrutiny. Inventory contains background information on non- for- profit organisations that promote sport, art & crafts, heritage & culture, recreation and environmental improvement throughout the Swansea Valley.

(10) Mapping Exercise (proximity of public buildings to Ysgol GymraegYstalyfera, Godre’rgraig Primary school, Llangiwig Primary school, YGG Pontardawe, Cwmtawe Community School, Alltwen Primary school and YGG Trebannws).

**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 **1<sup>st</sup> September 2024**.

Should the new school building not be available for occupation on 1<sup>st</sup> September 2024 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 Llangiwg 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 **14<sup>th</sup> July 2021**, 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](mailto:ssip@npt.gov.uk)

Signed:



Andrew Thomas, Director of Education, Leisure & Lifelong Learning

**Dated: 17<sup>th</sup> June 2021**

**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 31<sup>st</sup> August 2024 and as from 1<sup>st</sup> September 2024, full-time pupils attending Alltwen, Godre'rgraig and Llangiwg 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.

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- (ii) It is intended that the new school will open in a new building located at Ffordd Parc Ynysderw, Pontardawe, SA8 4EG on 1<sup>st</sup> September 2024. 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](http://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, 2<sup>nd</sup> Floor Port Talbot Civic Centre, Port Talbot.

Mae'r dudalen hon yn fwriadol 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”)<sup>1</sup>. 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

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<sup>1</sup> 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 will 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 Guidance<sup>2</sup>
  - Measuring the capacity of schools in Wales, Circular<sup>3</sup>.
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

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

<sup>3</sup> 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 1.14.

### **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