



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

Contents

Section	Title	Page
-	Introduction	1
	i) Cymraeg 2050	2
1	The English-Medium aged 3-11 School Proposal	3
2	Linguistically Sensitive Areas, the LDP and TAN 20	4
3	Consultation Responses and Analysis	6
	i) Distance of Travel and Potential Discrimination	9
	ii) Consultation Responses and Links to the WESP	10
4	Mitigating Factors	11
5	The Welsh Language in Neath Port Talbot	14
	i) Welsh in Education Strategic Plan (WESP)	14
	i) Welsh Language Promotion Strategy	16
	iii) Map of fluent Welsh speakers by Ward	17
	iv) The Welsh Language and Future Generations	19
6	Social Deprivation Considerations	20
Appendix A	Relevant Welsh Language Standards	22
Appendix B	Relevant Policies and Legislation	23
Appendix C	Welsh Language Partner Organisations	24

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.

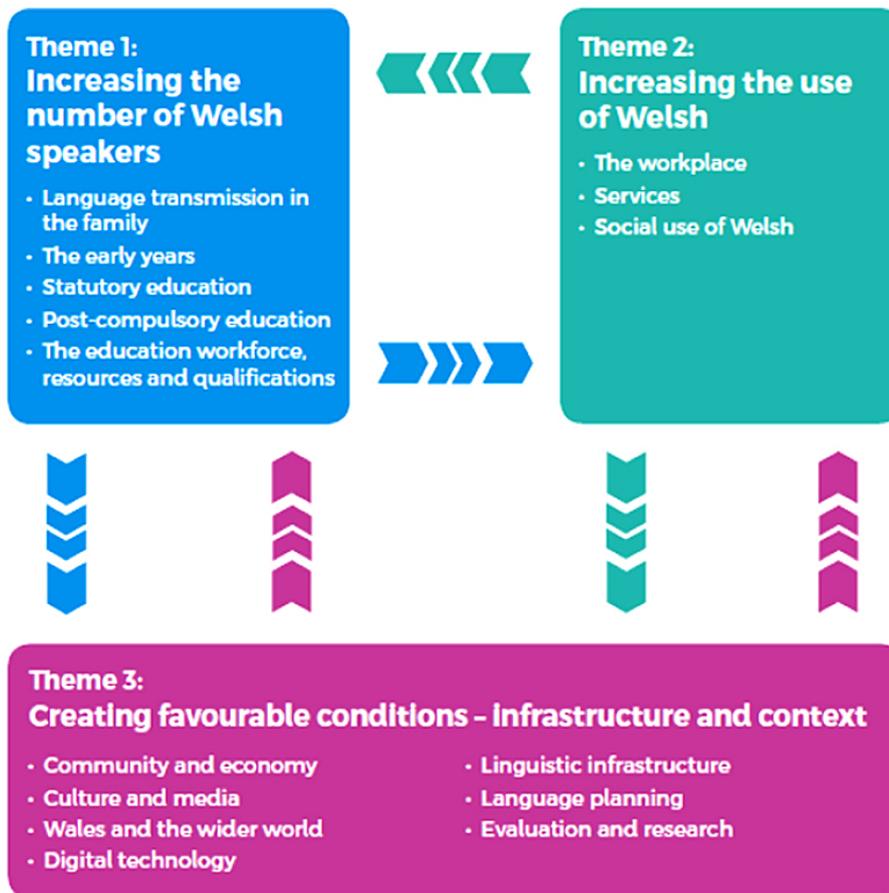
i) The Cymraeg 2050 Strategy

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 3rd November 2020 to 19th 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.

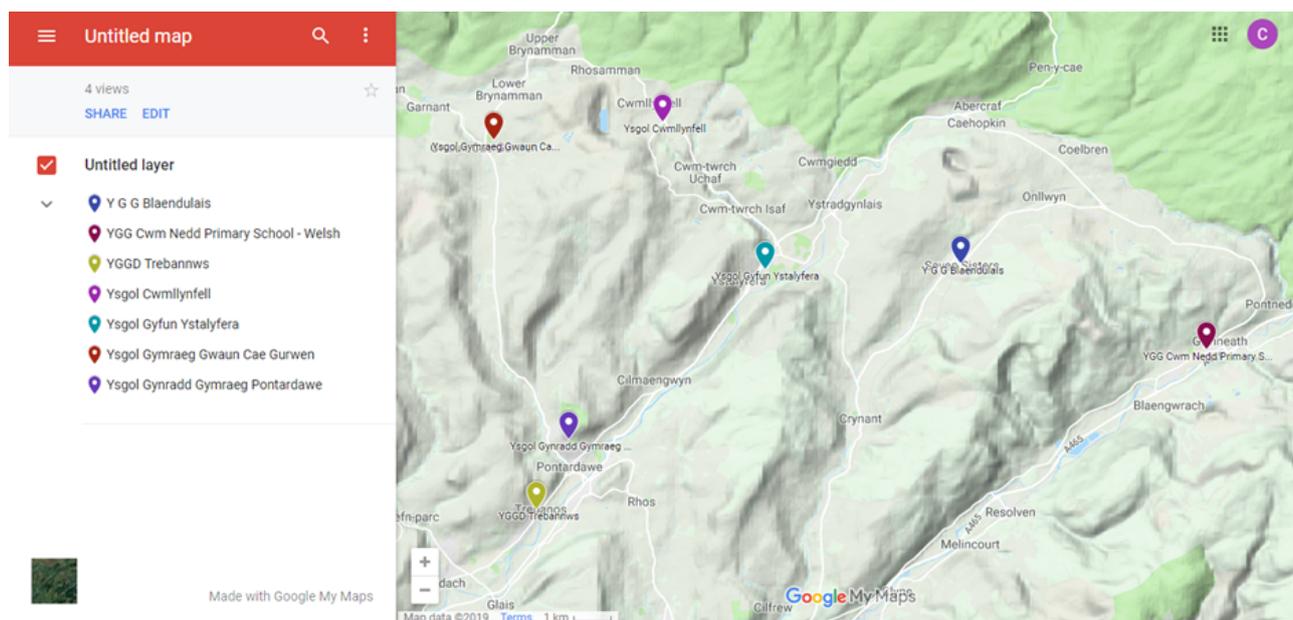
YG Ystalyfera- Bro Dur 21st Century School Funding

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 21st 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 21st century school environments in either Welsh or English medium, either by choosing the proposed new school at Pontardawe should the proposal progress, or by choosing the 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'graig 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.

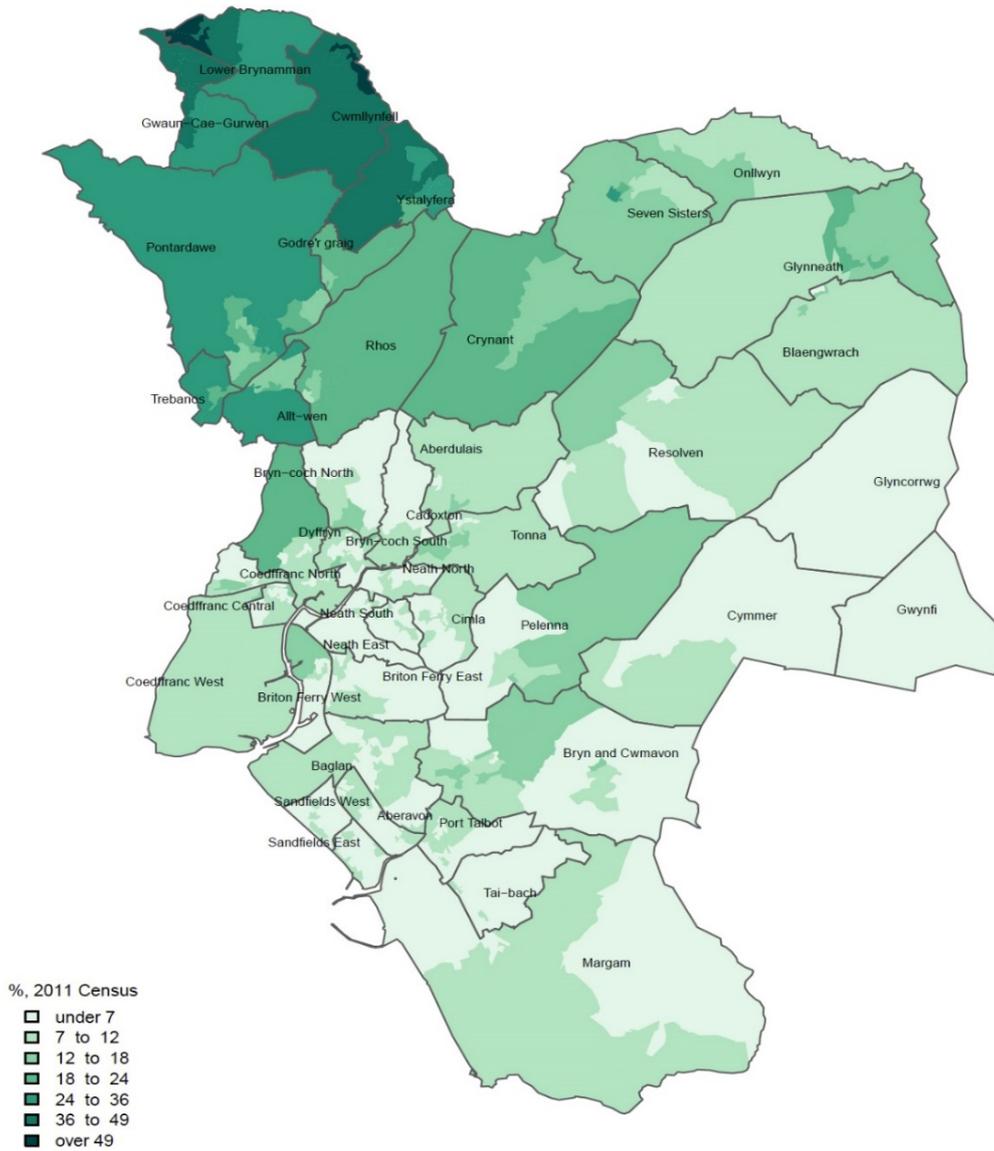
iii) Map of fluent Welsh speakers by Ward

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.

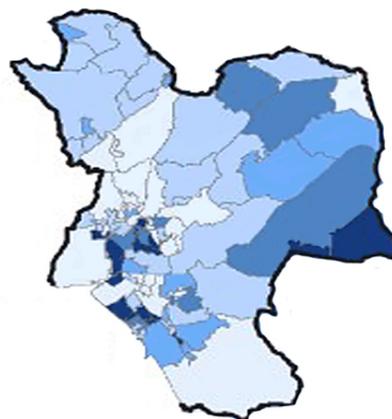
6. Social Deprivation Considerations

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
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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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 \(the Welsh Language Society\)](#)