



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Education, Leisure & Lifelong Learning
Service

Strategic School Improvement Programme

OBJECTION REPORT

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



Response to objections to the Council's proposal to establish an English-medium 3-11 school to replace Alltwen, Godre'rgraig and Llangiwg primary Schools

1. Introduction

This report addresses the principal issues raised in objection to the Council's 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 are proposed to be discontinued¹ on 31st August 2024.

It responds to the objections by means of clarification and commentary, with supporting reasons. The objection period commenced on 17th June 2021 and ended on 14th July 2021. During this period a statutory notice was made available on the Council's website under the Strategic School Improvement Programme's webpage and displayed at the main entrance to the schools. It was also made available to consultees listed in Appendix 1.

This report needs to be read alongside the associated consultation document and the Consultation Report

2. Context

The Council has consulted with interested parties 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 3rd November 2020 to 19th January 2021.

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

At the Cabinet meeting of 16th June 2021 the outcome of consultation was considered. Members carefully considered all consultation responses, and decided to proceed to the next stage of publishing a statutory proposal. Following Cabinet approval to proceed, a statutory notice was published on 17th June 2021 allowing the 28 day period for submitting objections, which ran until 14th July 2021.

If implemented, this proposal would take effect on 1st September 2024 with Alltwen, Godre’rgraig and Llangiwig primary schools closing on 31st August 2024.

3. Objections

In total 297 written objections were received during the objection period. These objections have been carefully considered by officers and responses are included in this report. The objections must be carefully considered by Members, alongside the arguments in favour of the proposal and in light of the factors set out in section 1 of the School Organisation Code

Not all objectors identified themselves other than giving their name, but of those that did the following categories were noted

<p>Alltwen, Godre’rgraig or Llangiwig primary schools 28 parents/carers, 2 members of staff 4 Governors /Governing Bodies</p>	<p>Other Swansea Valley schools 3 parents 2 Governors/Governing Bodies</p>
<p>Resident/community member of the Swansea Valley 16</p>	<p>Resident from outside Swansea Valley 8</p>

Objections were also received from:

- Cllr Andrew Nicholson
- MS Sioned Williams

- Tegwech
- Mentor Iaith
- RHag
- UCAC
- Ty'r Gwrhyd
- Cymdeithas yr Iaith
- Dyfodol I'r Iaith
- Lullaby's Nursery
- Pontardawe Town Council
- Ystalyfera Community Council
- Cilybebyll Community Council

Two further written objections were received on 16th July 2021, after the closing date, these have been included for consideration.

A number of the emails received were largely or wholly in standardised form.

Of particular note, 92 emails were received which stated

I object to the school proposal in the Swansea Valley. I do not believe that this is the best solution for education in our community and feel that it has been a rushed process and forced on us and our children from people from outside of our area.

I specifically feel that the proposal will be:-

Worst for education

Have a negative impact on traffic

a negative impact on local communities

35 of the objections received related specifically to the concerns that the proposal could negatively impact on the development of the Welsh language, 13 of these being standard emails, with some personalisation.

Copies of all written objections have been made available to Members to consider prior to the meeting of the Council's Cabinet on 20th October 2021 at which the proposal will be determined. Members will have also received and considered, prior to that meeting, this Objection Report.

4. Summary of objections received

Objections received relate to the following themes:

- Education
- Impact on the community
- Proposed site and traffic management , (including Parc Ynysderw playing fields)
- Transport and travel
- Alternative options
- Pupil numbers
- Godre'rgraig Primary school, Graig Road site
- Consultation process
- Impact on Welsh language development

The majority of the issues raised in the objection correspondence have been addressed in detail in the Consultation Report which should be read alongside this report. The objections are summarised below along with officer responses

5. Education

- *All the current schools show good Estyn reports which are also improving. Small children benefit from a small cohesive environment and the current schools already promoted a caring environment where children felt safe*
- *The proposed new school a 'super school' is very misleading by its name. Super just means big and there is ample evidence that children thrive in smaller numbers. There is a lot of need in the area, vulnerable children from vulnerable families who are currently nurtured in the individual schools. These children will be lost in a sea of 650 faces.*

- *I have looked into the benefits of superschools for children's educational outcomes but it's hard to find many benefits and the feedback from other parents who children attend the super school in Port Talbot is not favourable at all!*
- *This individual pupil focus is particularly vital in areas of deprivation. A large school cannot provide the same sense of membership, belonging to and feeling an important part of a school community. Additionally, where pupils have additional needs, are experiencing multiple ACEs, bullying, etc, the lack of connection between parents and the school will further serve to exacerbate problems for these children, meaning minor issues and upsets are likely to be missed. The report states that 'It is expected that parental links with the proposed new school would not be of lesser quality than they are now' (p23), but this doesn't take into account the missed opportunity for informal handover. The informal handover between parent and teacher at the beginning and end of the school day, that is so important for communication, simply can't happen when children are taken to and from school on a bus.*
- *I specifically feel that the proposal will not be beneficial for education of Primary aged pupils who are happy in their local schools.*
- *I have major concerns in regards to the size meaning less quality and 1:1 teaching opportunities*

Officer response:

Overall the number of objections received which expressed concern over quality and standards of education were relatively low and most focussed on concerns regarding the size of the proposed school.

While comments were made around evidence proving smaller schools were more beneficial, actual examples were not provided by the respondents and research undertaken by officers does not support this view. Evidence can be found however that larger

schools can be beneficial. The Estyn report 'School Size and Education effectiveness' December 2013, states 'Curriculum provision is better in large schools' – demonstrating that larger schools can provide greater opportunities for teaching and learning. Full details including analysis of data gathered by Estyn is contained in the report.

Objections received make claims that schools with large pupil populations do not offer an appropriate education. While the proposed school would be larger than any other primary in Neath Port Talbot, (the largest schools in this authority have between 400 -500 pupils on average) there are other schools which would be of a similar size across Wales. If it is felt to be necessary, the school leadership team, when appointed, could explore the leadership models used by these schools to better understand and learn how large schools operate successfully.

Larger schools make allowances for the fact that they have greater numbers of pupils – work is often completed in ability groups within the class, sometimes with teacher or teaching assistant support which can be funded due to efficient management and greater flexibility of a larger budget allocation; more easily achieved in a larger school. Larger schools will not necessarily mean larger classes – but it is almost certainly the case that in larger schools classes will not contain more than two different year groups, and the greater numbers of pupils often means that classes can be set to ensure that there is a more equal distribution of children with similar needs within them, thus enabling more opportunities for specific, structured teaching activities to address those particular needs.

Children with a variety of additional learning needs can be better supported in a larger school because a greater number of staff can mean that there is wider range of expertise available to work with pupils directly or to offer support and guidance to other teachers and support staff. It is also the case that more able children often make better progress in larger schools with a larger peer group,

offering greater challenge and opportunities to broaden their learning experiences.

Some objections note potential 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 it is expected that teachers and support staff will 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. 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.

School reorganisation work which has taken place across Neath Port Talbot has seen examples of small or medium sized schools merging to form larger school populations and again, despite comments received suggesting that these schools are 'failing', it is not the case.

Objections have been received which state that parents and children are very happy with their current schools and that they would not wish this provision to change. It is the case that this proposal will involve significant change with the aim of transforming educational provision not just for the current pupils but for future generations. It is recognised that the process of change is difficult, and will cause some anxiety amongst the school communities, however should the proposal be approved then work

will begin on ensuring that pupils, parents/carers and staff are supported through the process. In previous school reorganisation proposals where schools have merged, much work has been done following the appointment of the new Headteacher to ensure that the different school communities have been brought together, long before the new school has opened, through activities such as joint events for pupils (including sports days, school trips, year group visits etc.), shared INSET days for staff and parental meetings and events, in an effort to ease the transition for all.

The full response from Estyn is included in the Consultation Report, however it can be considered that Estyn's response to the proposal is favourable. Estyn were provided with a copy of the Statutory Notice, but no objection has been received or any further response following publication.

Estyn's response in respect of the proposed new school did not suggest any likely adverse impact against the following:

- standards and progress overall, of specific groups and in skills;
- wellbeing and attitudes to learning;
- teaching and learning experiences (quality of teaching, the breadth, balance and appropriateness of the curriculum, and the provision of skills);
- care support and guidance (tracking, monitoring and the provision of learning support, personal development and safeguarding); and
- leadership and management (quality and effectiveness of leaders and managers, self-evaluation processes and improvement planning, professional learning, and use of resources)

6. Impact on the community

- *The small local schools work hard to develop links within in their local village communities and this will just not be the same in one large primary school.*

- *I feel that the village primary schools are the heart of the community.*
- *The long-term effect of this would, I believe, drive away young families from the Swansea valley who have, traditionally, been attracted to the area due to the close relationship of these communities and their schools.*
- *The sense of community is so important in villages such as ours in the Swansea Valley and we cannot lose this. It's important for our villages, the people and the whole community to keep the schools individualized and give their communities their purpose.*
- *These schools were built close to the communities they serve for a purpose! They are there to enable parents and children to have easy access, they are not just there to provide education to children but also as a HUB for the community.*

Officer response:

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 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 central 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. 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 CIA highlights the fact that many community based activities and events are not reliant on the schools and so it is not apparent why 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, at 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.

Previous school reorganisation proposals which have created brand new schools have been noted to attract more families to the area and have seen an increase in 'movers-in'. It is unlikely that this proposal, which not only seeks to provide a new school but also improved leisure facilities, will not have the same effect.

7. Proposed Site, Playing Fields and Traffic Management

- *How is this traffic problem going to be managed if an additional school with the proposed number of 600 pupils is*

built? This will totally immobilise Pontardawe every school day afternoon

- There was no effective traffic management plan to determine how the addition of children not only during the morning and evening but also during the lunch period (part time placements) would be managed in an area where congestion was already a significant problem.*
- There is, already heavy, traffic congestion, at the Cwmtawe Comprehensive School site, with gridlock situations at home time. Further traffic in this area, would mean unacceptable delays for residents and parents alike, at dropping off and picking up, times.*
- The council have not provided thorough information about traffic when making this decision. There is no evidence provided to reassure locals that traffic won't be left congested. They have not provided traffic surveys or models on the issue. This goes against all the clean air initiatives, there will be far more idling traffic.*
- There isn't sufficient parking and traffic flow for Cwmtawe school, this is not managed at all and can cause awful traffic and become dangerous for pedestrians*
- Traffic in Pontardawe is chaotic at the best of times and will be even more so with the new school needing transport for children getting to school*
- The fields are used by hundreds of children weekly -primarily to play football and rugby.*
- In a time where public health focus is very much on reducing obesity to remove the playing fields would be detrimental to the physical and emotional health of many in the community*
- The site for the Super School will result in the loss of a large area of green space and sporting facilities. The potential loss of the Bowling Centre at the Leisure Centre*

Officer response:

Many objections have been received relating to the loss of the playing fields at Parc Ynysderw. The view that all the land will be

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

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

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

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

A significant number of objections raise concerns regarding increased traffic and congestion around the site of the proposed new school.

As reported in the consultation report this proposal relates to establishing a new school. Should the proposal be approved it will be a pre-requisite of gaining planning consent that traffic

management and safe routes for pupils and parents are thoroughly addressed.

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

An initial independent Traffic Impact Assessment has been carried out and has concluded that the site is located in a sustainable location with good walking and cycling connections from the surrounding area. There are good public transport connections within the immediate vicinity of the site allowing for good accessibility for staff and parents travelling to the site from further afield. There is no existing Highway Safety pattern problem which could be exacerbated by the proposed development. Both vehicular and pedestrian access to the site will be developed as part of the masterplan for the proposed development.

The impact assessment and review of the existing local highway network surrounding the site has highlighted some potential capacity constraints. As such, mitigation measures have been proposed to mitigate against the likely impact of the development on the surrounding local highway network. These will be further developed and explored as part of the planning approval process.

A Travel Plan for both the School and adjacent Swimming Pool will be developed as part of any forthcoming planning application. This will include the promotion of measures and initiatives to enhance the attractiveness of sustainable means of travel and educate and

inform pupils, parents, staff and visitors of the alternatives available to private single occupancy car use.

8. Transport and Travel

- *There is no safe walking or cycling routes to the new school, current crossing points were already dangerous for pedestrians.*
- *The mega-school will remove the opportunity for active travel for a very, very significant number of families*
- *The level of deprivation in the north of the valley makes it more likely that nursery pupils will not be able to attend the new school as they are not entitled to any free school transport arrangements. 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 access the new school and who probably need it the most. As a consequence, such children could miss out on 2 years of education under the proposed plan or relocate elsewhere. .*
- *The 2-mile cut off, will mean some children on a street will be entitled to free transport, but their neighbourhood friends will not. How are the children whose families do not have cars supposed to get to school?*
- *There were insufficient details of the practicalities of school transport. Would small children be expected to share a bus with teenagers?*
- *Free school transport available to those over 2 miles away, which will mean that the majority of pupils at Godre'rgraig will no longer be able to walk to school. The distance means that a large number of children will travel by bus (whether free or not), meaning their participation in breakfast clubs or after school activities will be governed by the timing of the bus. This will have a detrimental impact on their educational and social development in a school where many pupils will be more locally based.*

It is quite concerning that parents will have to put their 3 year old children on a bus on their own. What would be the plans for transport? If there continues to be a bus will this be at a cost?

- Children will not be living in the same area as their classmates so interaction out of school will be difficult.*
- The north of the Swansea valley is an area of significant deprivation. It is vital to have an accessible English medium primary serving Cilmaengwyn, Ystalyfera and Godre'rgraig. Most of the pupils attending Godre'rgraig Primary School come from further up the valley than the school building itself, which is a distance of around 4 – 5 miles and more from the proposed new school. This is an unreasonable distance for a primary school, and unnecessarily discriminates against pupils in this area. Parents may feel they have no choice but to send their child to the Welsh medium school because it is the only one that is accessible. The report has not understood my concern that this will impact on education.*

Officer response:

Issues raised around travel and transport have been addressed in the consultation report pgs. 27-29. The Council's current Home to School Travel Assistance Policy, as referenced in the consultation report, contains specific information on how to apply for assistance and the criteria used for assessing applications.

As noted in the consultation report, a significant number of pupils from Alltwen and Llangiwg Primary schools arrive at school by car on a daily basis, with pupils travelling across the Swansea Valley to attend schools outside their catchment area. A similar situation occurred in Godre'rgraig until the move to temporary accommodation, resulting in 85% of pupils travelling by bus. This would suggest that the three schools already contribute to traffic in the area.

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 Parc Ynysderw remains within 2 miles travel distance for homes in the catchment area.

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

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 these 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.

There is no statutory duty requiring a local authority to provide free transport to any nursery learner who is under compulsory school age. 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.

Objections 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.

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, a passenger assistant will be provided where deemed necessary according to Welsh Government Learner Travel guidance.

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.

9. Alternative Options

- *No consideration has been afforded to repair or refurbishment of the existing schools, it's appears this is not about local education, rather the lure of a 22million pound contract.*
- *Only the solution recommended by officers was open for consultation, with no opportunity for the community to look at alternative solutions to address issues.*
- *If you have money for such a huge school then you have money to improve the facilities at the 3 schools you plan to close*

- *Scrap the proposal as it is and renovate and rejuvenate the existing schools, allowing them to be the centrepiece of their communities and providing another 100 years of education where it is at its most accessible.*
- *I am also particularly concerned that the consultation report suggested that the funding available under the 21st Century Schools programme would be unlikely to be approved for “patch and mend” of the existing school sites, although this is what happened in the case of Ysgol Gyfun Ystalyfera’s secondary provision and is an available option under the programme.*

Officer response:

During the consultation a number of alternative options were brought forward by consultees for consideration and these, along with the options contained in the original consultation document, have been explored and reported upon in the consultation report (pgs. 44-52). It is therefore not the case that alternative options have not been considered or that only one option has been presented.

As stated in the Consultation report 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 do not allow for improving or upgrading which would provide schools with enhanced facilities for teaching and learning.

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

It is not the case that Ysgol Gymraeg Ystalyfera –Bro Dur has experienced a ‘patch and mend’ approach. During Band A of the 21st Schools Programme £18 m was invested at the schools’ north campus in Ystalyfera, with a further £9m investment in Band B, leading to an almost completely new build school with only two of the previous smaller teaching blocks remaining. A complete new build project, which would be a far cheaper and less disruptive approach, would have been preferable if enough land had been available to completely rebuild the school, however the constrained site at Ystalyfera and the lack of sufficient and available land elsewhere in the Swansea Valley has meant that the transformation of the school to a 21st century facility has had to take place over a number of phases.

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.

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.

10. Pupil numbers

- *The Super School has space for over 750 pupils while only 430 spaces are currently needed. This is not just an extra allowance for population growth. This is an allowance for at least one extra school, and it is disingenuous of you to say otherwise.*
- *The numbers of pupils who would attend the new super school don't add up, the current pupil numbers are too low for the proposed 640 pupils, unless there is more being hidden by the council, and there are plans of closing other schools in the area.*
- *NPT Councils pupil numbers for the proposed school also make no sense, there is no way that they will get close to that number of children by just closing the 3 schools, they must be planning to close more. Why is there so much secrecy?*
- *The majority of the houses to be built have been built in this area. The (clever but evil) suggestion that because there is an increase in pre-school childcare that there is going to be a boost in nursery kids is another blatant attempt to mislead.*

We all know that the Welsh Assembly have invested millions into pre-school childcare. It is free for huge number of parents which has increased pre-school numbers all across Wales.

Officer response:

Comments relating to pupil numbers, how they have been calculated and on whether an additional school is to 'secretly' be included in the proposal has been fully covered in the Consultation report (pgs. 39-40)

To summarise it is proposed that the 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 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. A number of these have not yet been built and it is not clear who will occupy them or whether additional pupils could be requiring a school place.

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 or prudent 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 should be repeated that there is no intention to include any other school in the proposed scheme, as stated in previous reports and again during the Cabinet meeting of June 2021. Despite these assurances, objections were received stating that other schools would 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.

For clarity, information gathered from childcare organisations has been used to assess the number of preschool children in the area who may be transitioning into one of the schools in the area. Information on the number of preschool children in a particular area is held by the health authority and is therefore not readily available to education officers. Knowing how many children are accessing child care in a particular area is an indicator of the number of children who will be requiring nursery places in the coming years and is therefore useful information to have when

planning for pupil places. The additional childcare provision available in the area has no relevance to this proposal; it is actual children who have been counted not available childcare places. However it should be noted that there are likely to be a number of pre-school children who do not access any child care provision in the area and who are not therefore included in any calculations for future numbers, meaning that in fact the preschool numbers could be higher than anticipated.

11. Godre'rgraig primary School, Graig Road Site

- *Godrergraig school was closed because of a supposed risk from the quarry above. Hogwash, I do not believe that contrived story for one minute. NPTCBC has looked for justification to close it and this was a convenient excuse. The residents have had no formal communication from NPTCBC and all are still resident in homes that must be at the same level of risk as Godrergraig School. Either NPTCBC is playing up the actual situation or is being negligent towards its statutory duty of care towards the residents.*
- *In my view, the consultation report did not fully capture nor address the concerns of the Godre'rgraig school community. This makes the whole process of a consultation invalid, and suggests a predetermined decision being made despite substantial community objection against the proposal.*
- *The council have attempted to close the school on two other occasions, when my children were pupils there, both times it was fiercely opposed, and I feel to close it in this way is a very underhanded attempt to "get their own way"*
- *In respect to the reasons for the school closure, I do not accept that the houses directly next to Godrergraig school are safe whilst the school isn't. The money spent on the "temporary" buildings for Godrergraig school would have been better spent in carrying out the recommendations in the report that Rob Jones used to force the closure of the school!*

- *The whole situation regarding the closure of the school should be investigated, particularly as the councillor who was responsible for its closure is already being investigated. Due to the situation of Godrergraig Primary I feel it should be looked at as an individual case*

Officer response:

Objectors have made reference to Godre'rgraig Primary School's temporary relocation from Graig Road, Godre'rgraig to land adjacent to Cwmtawe Community School. Objections have been received which 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 proposal is not about whether Godre'rgraig Primary should remain in its temporary location, or whether remedial works should be undertaken to allow for a return, but instead is about a proposal to establish a new 3-11 English – medium primary school in new build premises to replace three existing primary schools, of which Godre'rgraig Primary is one.

Whether the location of the school remained at Graig Road, Godre'rgraig or in its temporary location at Parc Ynysderw the current consultation would still be undertaken in the same way and the same principles for embarking on consultation would still apply.

The consultation document clearly outlines the reasons for the proposal; the expected benefits that a new school, along with the creation of a health and wellbeing community campus, can deliver are as relevant to pupils of Godre'rgraig as for pupils of Alltwen and Llangiwig. A feasibility study to investigate design options and produce budget estimates for works associated with the remediation at Godre'rgraig has been commissioned and is available to read on the Councils website following the link www.npt.gov.uk/godrergraig. The outcomes of this report will be the subject of a separate Council meeting. 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.

As regards the comment about investigation of a councillor, an independent investigation has taken place and the subsequent report has been considered by Council's Governance and Audit Committee. 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), discussed a number of matters surrounding school reorganisation and his comments include "If I had my way, all schools would be 3-16".

Objections have been received which suggest that this means that he prejudged the proposal for the 3-11 primary school at Pontardawe. The investigation findings were that there were governance processes in place for making decisions about school reorganisation and that they were followed by the Council. However, as a precautionary measure, Cllr Jones has taken no further part in decision making in relation to the proposal.

It has been stated that it is felt that the views of Godre'rgrraig School community have not been fully captured or addressed. Officers do not believe that this is the case – all comments received during consultation were addressed in the consultation report, and it is the case that there were many common themes across all of the schools involved in the proposal. Additionally Godre'rgrraig Primary's specific concerns were addressed in the report on pages 42 -43. Further opportunities to raise concerns have been made through the statutory objection period, and again it is the case that most of these are common to all of the schools.

It remains the case that the proposal which has been consulted upon 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.

12. Consultation Process

- *This would have been a very unfair and biased consultation process had it been undertaken during “normal times”, but conducting it at the height of a pandemic where the majority of the consultation period was during “lockdown” is nothing short of shocking and scandalous. Many people were confined to their homes, unable to meet and discuss the proposition in detail and unable to appropriately respond to the consultation, for the authority to push on with this proposition despite these circumstances really is bewildering.*
- *The consultation report is based on a consultation that provided inaccurate and misleading information. This concern was raised early in the consultation, but was not responded to, and accurate documents were not provided and consultees were not made aware of the inaccuracies. In my view, the consultation report does not adequately address these concerns.*
- *Every school’s circumstances in regard of its community, its needs and its physical estate is different. Offering the same set of options to the three different schools, rather than exploring different options for each, was both misleading and inappropriate.*
- *There are thousands of people in the valley, all with ideas and views. Your approach has been to try and limit their voice which is the complete wrong way around it.*
- *It was also difficult to come to a conclusion on a report that contained inaccuracies.*
- *These concerns were discussed in the report but then dismissed. Dismissing concerns just because you don’t agree with them, is not the same as addressing them.*

- *The consultation result seemed predetermined with only information to support the recommendation included. Much of the information from Estyn was included in small snippets which could be used out of context to support an argument or was out of date*
- *The 21st Century School programme is meant to improve education, not provide funding for leisure services. This proposal is not purely educational in focus, and the reference to the development of leisure facilities in the consultation was inappropriate.*
- *This reports that queries and comments have been responded to. I have not received any feedback to my comments and queries!*
- *If this decision is ratified without a proper public debate where questions can be asked and answered demanded, it will be irrational, unfair, discriminatory and illegal and the LA will leave itself open to the community seeking a Judicial Review, which of course will cost the public money.*

Officer response:

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.

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.

Objections have been received which state that undertaking a consultation during the pandemic has prevented public discussion and debate on the matter. 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.

It is also the case that this proposal has generated significant interest in the area and much wider afield, demonstrated from the objections received from across Wales and beyond. References to social media action groups would suggest that much debate has gone on through this platform and officers therefore do not support the view that the pandemic has prevented discussion.

Objections have been received which state individual feedback or responses to comments were not received. The consultation document outlined how the consultation would be conducted, stating *‘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.* (Consultation Document p.39) A comprehensive 63 page Consultation Report was published on 28th May 2021 which contained a summary of the comments received, along with officer responses. Individuals who contacted Strategic School Improvement Programme officers with queries to enable them to make an informed response to the consultation were provided with a direct response.

The Consultation Report has set out in some detail the views of the consultees who responded and the officer responses to their comments. Some comments received have highlighted concerns that will need to be addressed should the proposal be implemented, one example being the issue of ensuring that

transition work is undertaken in a timely manner to ensure that good relationships are created between the staff, pupils and parents of the three schools in advance of the new school opening. This does not mean the proposal should be abandoned but rather that care should be taken to ensure that these issues are noted and addressed if the proposal is progressed. This matter has been reported and has in turn been fully considered by Members when making their decision to publish the statutory notice. It is, therefore, not the case that these comments have been ignored or not taken into consideration. At no time has the Council sought to limit views or ideas. Alternative proposals received from consultees during the consultation period were reviewed and assessed and the Consultation Report provided information on the findings.

All information provided by officers has been as accurate as possible and while objectors have commented that incorrect answers and information have been given, it is the case that in most cases specific detail of these suggested inaccuracies has not been provided, making it impossible, therefore, to clarify or address any errors, if these have indeed been made. Where further clarification has been sought this has been provided, both in response to direct requests, through the consultation report and during Cabinet scrutiny meetings.

It is impractical to include the entire content of reports by Estyn or other bodies in a consultation report, however all references to reports were provided, allowing the reader to further investigate the source as required and to better understand the context. Equally this information makes it clear when a report was published, as some of the more thematic reports are not revisited and therefore provide the most up to date information available. For clarity at no point in the Consultation Report were the three current schools referred to as 'small schools' as defined by Estyn 'School Size and Education effectiveness' December 2013; however it is the case that they are clearly smaller than the proposed new school.

The proposal being considered relates to the establishment of a new 21st century school, and as such it is not clear why it has been suggested that three separate consultations should have been undertaken for each of the three affected schools. The proposal for a new build 21st century school was relevant to each school, and it was not necessary or appropriate to 'explore different options' for each by way of three different consultations.. However, where alternative options for different schools have been put forward during consultation then these have been explored and findings subsequently included in the Consultation Report.

Objections have been received which suggest the whole process has been rushed. This is incorrect. The proposal has involved extending the statutory periods as set out in the School Organisation Code in an effort to provide consultees with as much time as possible to respond to the consultation. There was no call to extend the process further. Previous evaluations of consultations involving proposals to close a school have suggested that the longer the process takes the more stressful it can be for those directly involved, especially staff and pupils who can find themselves in a prolonged period of uncertainty about the future.

Officers do not agree that the inclusion of information regarding the leisure facilities was inappropriate. It is the case that consultation on the proposed new pool is not a requirement of the School Organisation Code, though pupils at the new school and other schools in the area would have use of it. However it is also part of the overall proposal to create a health and well-being community campus and a number of comments were received about this aspect. In an effort therefore to address concerns and queries raised it was considered appropriate to include information about it in the consultation report. Additionally it is the case that the funding for the pool and the school has been secured as part of the 21st 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.

Objections have been received which state that this proposal has been predetermined. To date no decision has been taken on the proposal other than to approve consultation and to publish a statutory notice allowing for objections to the proposal to be put forward. Elected Members have yet to make a final decision and will be urged to ensure that all the relevant reports and information available to them is fully considered before a decision is reached. Nor is it considered that Members have had a closed mind in the process to date.

13. *Impact on the Welsh Language*

- The county has not considered the impact of this scheme on the Welsh language in the Pontardawe area. You make it clear in the original consultation that "... 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". But there is no evidence presented in the report to show that you considered this as part of the original consultation. No local engagement has taken place beyond the consultation to consider the potential impact on the Welsh language.*
- Measuring the impact on the Welsh language should have taken place at the first stage of this process, during the formative stages of the proposals and not as a last-minute consideration at the end of the process. The language impact study was published 4 months after the close of the original consultation and therefore insufficient time has been given to consider the full impact on the Welsh language.*
- The message Neath and Port Talbot is giving to the community is one of disrespect and the consultation process has been superficial and rushed without considering all the effects of the plan.*
- The language impact assessment does not take into account the contribution that an English medium school can make to delivering Welsh language skills to its pupils. Mention is*

made of learning Welsh as a 'second language', without considering the introduction of Welsh on one continuum, and without considering the possibility of creating a transition school, where a school can turn every year towards becoming a Welsh-medium school

- The community was not given an opportunity to comment on the language impact assessment. The council has not discussed the effects with the community*
- We are now very concerned that our efforts over the last five years will be unsuccessful in the face of the intention to establish a massive English - medium school on our doorstep, and undermines our future work*
- Over the past few years, we (Menter Iaith) have been working closely with the community to try and ensure the strong future of the language in the area, which is going to be impacted negatively if this application progresses. In addition, for several years we have been working with both Welsh medium Primary and Secondary schools in order to increase the number of people choosing Welsh medium education, and continuing with Welsh medium education into secondary school at Ystalyfera. This work is also going to be impacted if the new English medium school is opened in the area.*
- This new school will be within walking distance of Ysgol Gynradd Gymraeg Pontardawe and will include an on-site swimming pool amongst other facilities. This is a clear threat to Ysgol Gymraeg Pontardawe, as parents choose a brand new building and special facilities for their children.*
- We feel this proposal goes against the WG Welsh language targets. The school would remain within walking distance of Trebannws and its facilities would be a high incentive for parents to choose English language education over Welsh. There has been no assurance, should numbers drop in Welsh medium school as a consequence of the new super school that it would not result in further school closure. Following from that, this super school sets a precedent in the area for the merging of schools. There has been no official*

reassurance that our school has a safe future. This proposal puts our small community school at great risk of being enveloped by Pontardawe Welsh in the future.

Officer response:

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

It is not the case that the Council has not considered the possible impacts of the proposal on opportunities for persons to use the Welsh language, or on treating the Welsh language no less favourably than the English language. In preparation for the consultation a first stage screening assessment was undertaken which identified possible causes for concern. A Welsh language Impact Assessment was then developed by an independent consultant, including comments which were received during the consultation period, and this has formed part of the documents used to support the decision making process. The impact assessment identifies potential impacts, both positive and negative, and also possible mitigating actions.

Further opportunities to comment explicitly on the Welsh Language Impact Assessment have been possible during the objection period. The Welsh Language Impact Assessment has always been a document which is developed as part of the process of school reorganisation, taking into account new information gained through consultation with stakeholders as the proposal progresses, not just in this instance but for all proposals brought forward in Neath Port Talbot. As a result of comments received during this period it was recognised that in some respects the Welsh Language Impact

Assessment could benefit from additional information which was not received during the consultation period, and officers have therefore met with Welsh Government representatives to discuss the further development of the Welsh Language Impact Assessment in preparation for the final report.

A report was commissioned by Welsh Government in August 2021 to further explore the following in more detail

- Defining and providing context to the term 'linguistic sensitivity'
- Setting out the principles for safeguarding and promoting language in such an area.
- Consider how these principles could be applied to Pontardawe, within the context of the Swansea Valley proposal.
- Provide options around mitigating actions to reduce negative impacts on the stability and future growth of the Welsh language in the short, medium and long term.

The Welsh Government commissioned report notes the following '...it should be clearly underlined that, in terms of the language planning principles and processes noted above, no mitigating actions in the context of the future of the Welsh language in the Swansea Valley will compensate for continuing with this proposal as it stands'. It also notes that 'In bilingual communities, languages increasingly become a matter of choice. To support bilingualism within these communities, bilingualism must be an easy choice. This proposal takes away that easy choice.'

However, the report does identify a 11 possible mitigations, many of which have already been identified as actions in the draft WESP. These actions, along with officer comments are included in the revised WLIA document.

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 Code does not require a Welsh Language Impact Assessment to be completed when proposals relate to English-medium schools. Consultation has taken place in strict adherence to the Code, from 3rd November 2020 to 19th January 2021.

Objections have been received which state that the community was not given opportunity to comment on the Welsh Language Impact Assessment. The consultation related to the proposal to establish a new school and a Welsh Language Impact Assessment was developed through the consultation to help support Members in the decision making process. The community were invited to make comment on the proposal specifically in relation to its impact on the Welsh language and opportunities to use it.

The Code specifies who should be consulted and all statutory consultees were informed. The consultation was undertaken bilingually and consultees included the Welsh-medium schools of the Swansea Valley and preschool providers. The community councils of Cilybebyll, Cwmllynfell, Gwaun Cae Gurwen and Ystalyfera along with Pontardawe Town Council were consultees and the consultation document was also sent directly to the office of the Welsh Language Commissioner. Information regarding the consultation was widely shared across the Swansea Valley communities and the proposal was given a great deal of publicity both on social media and in the press.

It is recognised that a number of organisations in the area are concerned that the proposed new school will hinder their work on developing the Welsh language. If the proposal is approved and progresses, the Welsh Language Impact Assessment will continue to be an important document, not just to ensure that any mitigating actions are carried out but to continue to highlight any areas of concern and to further support the planning process. Significant actions will be included in Neath Port Talbot's Welsh in Education Strategic Plan which is expected to be submitted to Welsh

Government in January 2022, following an eight week consultation period, providing further opportunities for stakeholders to comment and shape the future development of the language.

It is not the case that the process has not considered the impact that the proposal could have on developing Welsh language skills in the proposed new English-medium school. Suggestions that the proposed new school should be a Welsh-medium school or should consider transitioning from an English-medium to a Welsh-medium provision have also been received. It should be noted that the proposal seeks to replace three current English-medium schools, transferring staff and pupils from existing schools to the new provision, and as a result it has to ensure that the pupils and staff who are displaced from the current schools are able to easily transition into the proposed new school. Changing the language designation of the proposed new school would create further change for the school communities, and is more likely to attract pupils who may otherwise have attended YGG Trebannws, YGG Pontardawe or YG Ystalyfera-Bro Dur (primary phase) for Welsh-medium education, meaning possible change and disruption for these schools also.

The new curriculum for Wales emphasises that language development (in Welsh or English) is based on a continuum or framework of progression. Welsh is a mandatory element meaning that in all schools there is the requirement to teach Welsh to all learners up to 16 years old, and while this is not new (Welsh was included in the national curriculum following the Education Reform Act 1988, and became a compulsory subject for all learners in Wales in Key Stages 1, 2 and 3 in 1990), the 2021 Curriculum and Assessment Act has brought about changes to delivery, removing the current distinction between two programmes of study – Welsh and Welsh second language, and allowing for one continuum of learning Welsh to be taught in all schools in Wales as part of the Languages, Literacy and Communication Area of Learning.

Alltwn, Godre'rgraig and Llangiwig primaries have traditionally taught Welsh as a second language with currently 25% of staff across the three schools being fluent or fairly fluent Welsh speakers. With the requirements of the new curriculum and the additional benefits of having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh, it would appear that if the proposal progresses and the school staff are combined, then progress in Welsh language development at the proposed new school could subsequently be improved.

Appendices

Appendix 1

List of Consultees	
Alltwn, 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 Cwmlllynfell 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:

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