

Appendix H

Integrated Impact Assessment (IIA)

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

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

1. Details of the initiative

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

1d	<p>Is this a ‘strategic decision’?</p> <p>Yes - forming part of the Council’s Strategic School Improvement Programme and included within Band B of Welsh Government’s 21st Century Schools Programme</p>
1e	<p>Who will be directly affected by this initiative?</p> <p>All staff, pupils, parents/carers/guardians of pupils and governors at Alltwen, Godre’rgraig and Llangiwg Primary schools, members of the community.</p>
1f	<p>When and how were people consulted?</p> <p>On 21st October 2020, the Council’s Cabinet determined to consult on the proposal to establish an English-medium 3-11 school to replace Alltwen, Godre’rgraig and Llangiwg primary schools, with an 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. A list of consultees is included at Appendix 1.</p> <p>Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments.</p> <p>The consultation document was made available by e-mail to consultees, with the schools managing distribution to their school communities. It was also available on the Council’s website. Hard copies were available on request. A pupil version of the consultation document was also made available to the schools to distribute as appropriate.</p> <p>Responses to the consultation were submitted by email, post and via the Councils online consultation portal. Details of how to respond were included in the consultation document and links to the online consultation portal were included on the website and on the Council’s social media channels.</p> <p>During the consultation period Welsh Government imposed both local and national lockdown periods due to the Covid 19 pandemic. Restrictions meant that it was not possible to hold face to face meetings during consultation, however in every other respect the consultation proceeded as expected despite imposed restrictions. The consultation period was extended from 6 weeks to 11 weeks to allow consultees additional time to consider the proposal and submit comments. Additionally, officers were available to answer queries by email and telephone should consultees require more information to enable them to respond to the consultation, and a ‘Frequently Asked Questions’ section was also added to the Council’s website to address more general queries on the proposal.</p> <p>The consultation document invited views and opinions to be submitted in respect of the proposal. The Welsh Government’s</p>

	<p>School Organisation Code requires the Council to consult on its proposal and to publish a consultation report summarising any issues raised by consultees, the Council's response to those issues and Estyn's view of the overall merit of the proposal.</p>
<p>1g</p>	<p>What were the outcomes of the consultation?</p> <p>The consultation process followed Welsh Governments guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.</p> <p>The Authority received</p> <ul style="list-style-type: none"> • Online responses 161, of which 14 support the proposal • Emails 26, 1 in support • Paper forms/letter 47, 6 in support • Online petition 413 signatures, 50 of which included comments <p>In total 234 responses were received.</p> <p>The Council is using the feedback and responses received to the engagement and consultation exercises carried out in relation to the proposal as part of its decision making process.</p>

2. Evidence

What evidence was used in assessing the initiative?

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

Respondents were asked to complete an Equalities Monitoring form included in the consultation document.

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

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

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

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

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

3. Equalities

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

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	√			The Equality Duty covers the protected characteristic of age, which refers to a person having a particular age or being within an age group. Due to the nature of this proposal it could impact on children who currently attend Alltwen, Godre'rgraig and Llangiwig Primary schools, and children who might attend the proposed new school. According to Pupil Level Annual School Census (PLASC) carried out in January 2020, pupil numbers in the three schools combined are 454 full time and 66 part time. The proposal, if implemented, is also likely to have an

impact on children under 3 who access childcare facilities.

The proposal would provide an English-medium school for 630 full time and 140 part time nursery pupils aged 3-11 with a specialist learning support centre, in new build premises. It would offer the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that would impact positively on the self-esteem and well-being of pupils and aim to further improve the learning outcomes for all children across the ability range. With a new school comes more choices and improved opportunities because there is more space and better facilities. In the Estyn report of 2007, '**An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises**', it is reported that the attainment and achievement of pupils improves significantly when they move into new or significantly refurbished buildings. In this respect the proposal can be expected to have a positive impact on pupils aged 3-11 who will attend the new school.

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

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

		<p>which is suitable for nursery aged pupils.</p> <p>These arrangements could be available to parents of nursery aged pupils attending the new school and are no less favourable than those applying to other parents of nursery age children across the County Borough and in this respect the proposal if implemented would have a neutral impact.</p> <p>No childcare provision has been included in the proposed new school and this could be seen as detrimental to preschool pupils as well as school aged pupils who access wrap around care. As a result of considering the current sufficiency of childcare within and around the catchment area of the proposed new build primary at Parc Ynysderw, the need for a childcare setting within the school was dismissed due to the fact that the area is already well served with childcare provision, with a number of settings offering full day and sessional care, and approximately 8 childminders with the capacity to take 65 children, all within reasonable distance of the proposed school site. It is expected that existing childcare provisions could easily adapt their transportation of children plans to enable children from the proposed new school's location to access/continue to access their provision. It was also felt that should the proposed new school include extra childcare provision then the required tender for any new childcare services within schools would potentially unsettle and disrupt the successful and established childcare in place in and around the area.</p> <p>Alltwen Primary School has a childcare facility on site. Concerns have been raised that suggest this would close as a result of this proposal being implemented. It is not clear why this would need to be the case. It may be possible to retain the provision on the Alltwen Primary site, or for the provision to relocate elsewhere if appropriate.</p> <p>The proposal therefore should have a neutral impact on preschool children.</p> <p>Comments have been received through the consultation which suggest that the wellbeing of pupils would suffer should the proposal progress due to the number of pupils to be accommodated in the proposed new school and the perceived negative impact on pupil well-being. There is no reason to assume that this would be the</p>
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case. It is noted that the three current schools provide good levels of care and support, and there is nothing to suggest that the new school wouldn't at least offer the same. Monitoring of well-being would be part of Local Authority and Estyn visits and targets would be included in the new school's development plan for improvement. This would therefore result in at least a neutral impact.

Concerns have also been raised regarding the size of the proposed new school, suggesting that younger children would be 'lost' in a larger school and that the 'family feel' of the current schools would disappear. Creating a larger school community does not necessarily mean that this would be the case, although it may need to be planned for more carefully. It is possible to create 'little schools' or communities within the larger school structure, either through year/phase groups, where activities and events could be planned for children and parents of those particular classes, or through systems such as House Groups, where children and classes are sub divided into separate sections within every class for events usually of a competitive nature such as sports day or eisteddfods. Such an approach would mitigate any perceived negative impact on pupils.

Delivery of education can be more effective in larger schools. The Estyn report 'School size and education effectiveness' December 2013, states 'Curriculum provision is better in large schools' – this means larger schools can provide greater opportunities for teaching and learning. This would have a positive impact on pupils should the proposal proceed.

Some consultation responses have raised concerns that parents/carers would be negatively impacted upon due to this proposal, commenting that good relationships between staff and parents/carers would be impossible with such a larger pupil population. Despite the capacity of the proposed new school it is likely that classes within would remain at or below 30 pupils, and there is no reason to expect that teachers and support staff would not know the pupils in their class as well as they do in any other school. Equally it is to be expected that parental relationships would be as important to the staff in the proposed new school as they are in the three current schools.

It is expected that parental links with the proposed new school would not be of

			<p>a lesser quality than they are now, and a larger number of parents could result in a more vibrant and varied school community available to support school activities and to form support groups. Good relationships that have been formed between the existing schools, parents and the community should not be lost if the majority of current school staff transfer to the proposed new school as anticipated, as this would mean the wealth of experience and local knowledge which currently exists would be retained and developed for the future. This would result in a positive impact.</p>
Disability	√		<p>The Council's arrangements for education across the county borough include those children and young people with a disability.</p> <p>Currently 27% of pupils who attend either Alltwen, Llangiwig or Godre'rgraig are recorded as having an additional learning need (ALN). Of these 17% have their needs met by the school they attend, 7% receive additional support from other agencies and 2% have a statement of Special Educational Need (SEN).</p> <p>Data indicates that there are currently 434 pupils with Autistic Spectrum Disorder (ASD) in Neath Port Talbot, an increase of almost 47% since 2012. (PLASC Jan 2019). This proposal seeks to address the needs of these pupils and future pupils identified as having ASD by providing a provision designed to meet their needs.</p> <p>There are no specialist units for children with statements of SEN at any of the three schools included in this proposal, i.e. provision recognised by the Council as reserved for pupils with SEN. Pupils with ALN, including children with statements of SEN, are supported in a mainstream setting with appropriate funding for this purpose. The new school would continue to offer this level of support and therefore have a neutral impact on these pupils should the proposal proceed.</p> <p>Data analysis suggests that a number of pupils within the Swansea Valley travel to gain additional learning support in specialist units elsewhere within Neath Port Talbot. Creating a new provision in the proposed new school would provide additional places in an area where need has been identified, potentially making transition easier and allowing the pupils to integrate with their friendship groups and peers within the mainstream classes whenever possible. The proposal would</p>

therefore have a positive impact on this group of pupils if implemented.

Pupils attending the proposed LSC provision within the new school would benefit from being taught by specialist staff, experienced in working with pupils with ASD needs. There is also the possibility that mainstream pupils with ASD could also benefit from the expertise available as the specialist knowledge and skills-set of the staff employed to work at the proposed LSC would be available to share with mainstream staff and, as such, would indirectly benefit SEN provision at the new school, resulting in a positive impact for mainstream ALN pupils should the proposal proceed.

It is also envisaged that the LSC provision would be able to provide support and training for other mainstream primary schools across Neath Port Talbot, building skills, competencies, expertise and capacity of all staff working with children with ASD.

The Council is required to have regard for the needs of disabled learners and learners with learning difficulties when assessing transport needs. The Home to School Travel Policy 2017 remains unaffected by the proposal and the Council would make suitable arrangements for learners with special needs to attend school including arrangements, as necessary, for home to school travel. An assessment of a learner's level of travel need would inform the type/level of transport that may need to be provided. The entitlement would be reviewed on an annual basis as outlined in the current policy. If implemented, the proposal would therefore have a neutral impact on these learners.

Larger schools often have more capability of addressing specific learning needs. Estyn in their 'School size and educational effectiveness' report, December 2013 found that that 'Large and medium sized primary schools are better able to identify pupils' additional learning needs at an early stage and make the necessary adjustments in the provision for those pupils. The report continued to suggest this is because they often have teachers with specific additional needs knowledge and understanding either working with these pupils directly or providing guidance and support to other teachers and support staff. Within the scope of this proposal, it is expected therefore that moving to a larger school should have at least a neutral

impact upon ALN pupils.

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

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

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

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

It is therefore expected that the proposal would have a positive impact on all users identified within this protected characteristic as they would have access to a fully accessible school premises managed and maintained by the senior leadership team at the school on appointment.

<p>Gender reassignment</p>			<p>Gender reassignment is not recorded for Primary age pupils however individual pupils requiring to live in a gender other than their birth gender are supported within all Neath Port Talbot primary schools. All children would continue to receive a high quality education at the proposed new school. The new building would have suitable facilities in place to accommodate pupils of any gender; no pupil would need to consider changing schools due to gender reassignment. Pupils and staff have the right to access the facilities that correspond to their gender identity. Any pupil or staff member who has a need for increased privacy would be provided access to a single cubicle toilet, but no pupil or staff member shall be required to use such a toilet. The new building would provide individual cubicles that could be used by all, albeit separate facilities would be available for adults and children.</p> <p>The use of changing rooms by transgender pupils and staff would be assessed on a case by case basis in discussion with the individual concerned. The proposed new school would maximise social integration and promote an equal opportunity to participate in physical education classes and sports, ensuring the safety and comfort, and removing any adverse impact for the individual. Transgender pupils or staff would be treated in accordance to their preferred gender identity.</p> <p>It is intended the new school site would therefore have a neutral impact on individuals protected under the gender reassignment characteristic.</p> <p>Staff would continue to receive protection under the Equalities Act 2010.</p> <p>Non-binary people, including staff, governors and members of the community accessing the facilities would benefit from the gender neutral provisions to the school that have been identified above.</p> <p>None of the respondents to the consultation identified as transgender however the parent of a transgender pupil commented their child did not struggle at primary level but did feel the impact of entering into a larger school environment at secondary level.</p> <p>None of the respondents indicated that this proposal would have an adverse impact on their status in this regard.</p>
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				The proposal therefore is likely to have a neutral impact on this aspect.
Marriage & civil partnership			√	<p>None of the respondents indicated that this proposal would have an adverse impact on their status in this regard.</p> <p>Pupils at the school are below the legal marriage age. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the new Governing Body and Council in order to support the staff at the school.</p> <p>The proposal is designed to have a neutral impact on those with protected characteristics accessing the new school.</p>
Pregnancy and maternity			√	<p>It is not considered that there would be a negative impact on pupils in this protected group as there is a minimal likelihood of pupils falling within this protected group due to the age range of the proposed new school. The provision of education for any pupil identified as being within this protected group would remain unaltered by the proposal.</p> <p>Existing staff from all three schools who are on maternity leave or are pregnant at the point of the proposed timescale would be protected under the Equalities Act 2010 in terms of employment and must be afforded the same opportunities for redeployment.</p> <p>None of the respondents to the consultation indicated that this proposal would have an adverse impact on their status in this regard..</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Race			√	<p>All Neath Port Talbot schools are inclusive for pupils of all ethnic groups and ethnicity is not a criterion under the Council's Admissions Policy.</p> <p>The majority of pupils in Alltwen, Godre'rgraig and Llangiwg primary schools are</p>

			<p>white British, however 6% of pupils identify with other ethnic groups.</p> <p>Data from schools indicates that the proportion of pupils from ethnic minority backgrounds (non-white British) is 4.6% compared to the Wales average of 8.2% (SEP evidence)</p> <p>Under the proposal the existing pupils would be moving to a new school building so it is unlikely that there would be any significant change to the ethnic profile of the school, although this could change should the wider community demographic change in the future.</p> <p>Responses to the consultation identified the small percentage of non-white British pupils in Alltwen and the potential impact of moving to a larger school community, therefore making the percentage number smaller and potentially at risk of discrimination as a result. The local authority recognises the importance of proportionality of impact and not of percentages and numbers. A newly appointed leadership team for the proposed new school would be aware of the local and national policies relating to race equality and would seek to address any issues promptly should they arise. This has been the case in other school reorganisation proposals where minority groups have been identified, with successful outcomes achieved.</p> <p>Race is not a criterion that is considered when employing staff currently or for the proposed new school.</p> <p>98% of staff employed at the present time at the three schools identify as white British, with the remainder preferring not to indicate ethnic origin.</p> <p>All staff, pupils and governors would continue to receive protection under the Equalities Act 2010, which would be referred to by the Governing Body and Council</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
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Religion or belief			<p>Alltwn, Godre'rgraig and Llangiwig primary schools are non-faith schools and admit pupils of all religions/beliefs who wish to attend. Religion or belief is not a criterion under the Council's Admissions Policy which is applicable to all three schools. Admission to the new school would be in line with this policy.</p> <p>Religion/belief is not a criterion that is considered when staff are employed currently and that position will remain unchanged for all staff employed at the proposed new school. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the newly established Governing Body and Council in order to support the staff at the new school.</p> <p>√ Respect for all religious and non-religious beliefs would not change as a result of implementing this proposal. Similarly, the aspect of the curriculum relating to religion and belief would not change because of this proposal. The proposal does not seek to reduce the number of faith school places and increase the number of community (not-faith based) school places.</p> <p>None of the respondents indicated and articulated that this proposal would have an adverse impact on their status in this regard.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Sex			<p>Children of both sexes would be treated and taught equally at the proposed new school. There would be no different methods of teaching or curricula for either sex. The school would aim to reduce, as far as possible, segregating pupils and students by gender.</p> <p>√ All three schools within the scope of this proposal admit boys and girls currently and the proposed new school would also admit both sexes. The three schools combined currently have 275 (52.88%) male pupils and 245 (47.12%) are female –this is a similar percentage as the authority wide primary aged pupil population (51.24% boys and 48.76% girls) therefore there is no perceived negative impact.</p> <p>Male and female staff are employed at all three existing schools and it is expected</p>

			<p>that the proposed new school would have a similar balance of male and female employees. Current data indicates that 88% of staff employed at the existing schools are female and are disproportionately represented compared to the general population but not in relation to numbers employed in the primary education sector nationally in Wales which is 84.6% female.</p> <p>Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.</p> <p>None of the respondents to the consultation indicated that this proposal would have an adverse impact on their status in this regard.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Sexual orientation		√	<p>Inclusivity and respect of others is an intrinsic element of the National Curriculum, and the proposed new school would seek to provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation. The Estyn School Inspection Handbook also details how inspection would evaluate how well individual pupils benefit from the school and states it may be relevant to pay particular attention to those with protected characteristics, therefore including transgender pupils. Under spiritual, moral, social and cultural development Estyn would look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation and disability.</p> <p>Under the revised 2017 Framework Inspectors would also consider types, rates and patterns of bullying and the effectiveness of the school's actions to prevent and tackle all forms of bullying and harassment – this includes cyber bullying and prejudice-based bullying related to special education need, sexual orientation, sex, race, religion and belief, gender reassignment or disability.</p> <p>Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the</p>

				<p>school.</p> <p>None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal, this proposal would have a neutral impact on people with this protected group.</p>
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What action will be taken to improve positive or mitigate negative impacts?
<p>This proposal, if implemented would be closely monitored with information gathered regarding characteristics and circumstances of the individuals involved. From the evidence currently available the proposal should have mainly positive or neutral impacts on the protected characteristics due to the following actions-</p> <ul style="list-style-type: none"> • The leadership team of the proposed new school would promote an inclusive ethos where everyone is valued, with support from local authority Education Development Service (EDS) and Inclusion teams • Policies and procedures would be in place to support the school with inclusive practice; local authority policies would be adopted and adhered to • Monitoring of pupil and staff well-being would take place by the leadership team of the school; a school review would be undertaken by the Strategic School Improvement Programme (SSIP) team in the first 2 years of opening • Design processes would ensure accessibility is planned for and delivered • Engagement with school communities throughout process to encourage collaboration and involvement • Support provided for pupils and staff to ensure smooth transition prior to and during first term of opening

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

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and	√			This proposal will have a positive impact upon the protected characteristics of Age and Disability. It is anticipated that the proposed new school would impact positively

victimisation			<p>on pupils aged 3-11 due to the improved facilities for teaching and learning, leading to better attainment and achievement.</p> <p>It is also expected that the proposal would impact positively on the protected characteristic of disability as users of the building would have access to a fully accessible school.</p>
To advance equality of opportunity between different groups	√		<p>This proposal would impact positively on pupils aged 3-11 as it provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that would impact positively on the self-esteem and well-being of pupils and aim to further improve the learning outcomes for all children across the ability range.</p> <p>The proposal would also impact positively on disability. Data indicates that there are currently 434 pupils with (ASD) in Neath Port Talbot (PLASC Jan 2019). This proposal seeks to address the needs of these pupils and future pupils identified as having ASD by providing a provision designed to meet their needs.</p> <p>The proposal will seek to bring together three different school communities, ensuring that pupils from Alltwen, Godre'rgraig and Llangiwig primary schools all have the same opportunities to benefit from the proposed 21st century new build school and health and well-being campus.</p>
To foster good relations between different groups	√		<p>The proposal is likely to provide the opportunities for relationships between pupils with ASD and mainstream pupils due to the proposed provision of the LSC as part of the new school build. By situating a specialist provision in a mainstream school opportunities exist for integration and the development of an inclusive learning community.</p>

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

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

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>The proposal, if implemented, should have a positive impact on groups who experience socio economic disadvantage. A new 21st Century school would provide greater opportunities for pupils from all socio economic groups, due to the better facilities available. In the Estyn report of 2007, 'An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises', it is reported that the attainment and achievement of pupils improves significantly when they move into new or significantly refurbished buildings, particularly when schools are in areas with high levels of social and economic deprivation. The proposal would therefore have a positive impact in this regard.</p> <p>A larger school would mean that there is a wider number of staff, with diverse interests, and as a result extracurricular provision can often be extended and improved for pupils moving from smaller schools with a smaller number of staff. This would therefore result in a positive impact, giving pupils opportunities for new experiences and broader learning.</p> <p>The enhanced leisure facilities in the close vicinity of the proposed new school should offer increased opportunities for improving health and well-being for pupils and the wider community.</p>

Negative/Disadvantage	Implementation of this proposal could mean that for some pupils the proposed new school is further away than their current school and for some this may be further than 2 miles. Support with home to school travel would be made available in line with the Council's Home to School Travel Policy, however separate transport for before or after school activities will not be provided. This could result in some pupils not being able to access extracurricular activities or breakfast club, particularly those from families who do not have access to a car.
Neutral	For many of the primary aged pupils the proposed location of the new school on the site at Parc Ynysderw remains within 2 miles travel distance for homes in the catchment area. Support with home to school travel would be made available in line with the Council's Home to School Travel Policy. This policy applies for all pupils across Neath Port Talbot and in this respect the proposal, if implemented, would have a neutral impact.
What action will be taken to reduce inequality of outcome	
<ul style="list-style-type: none"> • Breakfast Club has been successfully operated at all three of the current schools, promoting the Welsh Government aim of giving all children a flying start through encouraging healthy eating and social interaction. Should the proposal be implemented then it will be the Headteacher and Governing Body's decision to provide a breakfast club. Support will be provided to the school to enable them to address any difficulties arising from pupils arriving on school transport not being able to access the provision – for example they may wish to consider a later start to breakfast club so all transported pupils are able to participate. • Arrangements for extra-curricular activities can be managed to ensure that all pupils have equal opportunities to participate and the proposed new school leadership team will be strongly encouraged to consider all opportunities - potential solutions could include arrangements with transport companies for all pupils to finish later on 1 or more days of the week, arranging activities at lunchtime or other times during the school day or facilitating car shares with parents; prior to opening opportunities for facilitating extracurricular provision will be explored with the Headteacher and Governing Body of the proposed new school 	

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	√			<p>A Community Impact Assessment (CIA) has been undertaken for the purpose of providing information on the impact of the proposal on the local community's access to facilities and services currently available at the three schools. It has been prepared in line with the requirements of the Welsh Government's School Organisation Code. The CIA has been prepared using a range of sources and evidence, including discussion with various partner organisations in the Swansea Valley and the schools and provides further information all of which enables decision makers to have a fuller understanding of the possible consequences on communities as a result of the potential closure of the three schools linked to this proposal.</p> <p>The CIA states 'The proposal to establish a learning campus with modern day health and leisure facilities at Parc Ynysderw will further channel amenities into the town of Pontardawe. Pupils that might be displaced from Godre'rgraig Primary school (3.2 miles distant), Llangiwig Primary (1.3 miles distant) and Alltwen Primary school (0.7 miles distant) would benefit from the rich mix of sporting, artistic, cultural and social activities within walking distance of their new teaching and learning environment.'</p> <p>Concerns have been raised by consultees that the proposed new school would damage the communities of Alltwen, Godre'rgraig and Llangiwig through the closure of the local schools situated there. There is no evidence to suggest that by attending school outside of village boundaries, children and young people would no longer 'belong' to the community where they live. The CIA highlights the fact that many community based activities and events are not reliant on the schools and so these activities could continue. Schools are open to pupils for 190 days of the year. Outside of the school day; that is, before and after school, weekends and during school holidays, pupils will be in the areas where they live and available to make use of local facilities.</p> <p>Children and young people do not only mix socially through their schooling, as many will attend local after school groups or participate in wider community events. There</p>

			<p>is no reason why this wouldn't continue to be an important part of their lives should the proposal progress. Following reviews of school reorganisation in other areas of the county borough it has been the case that community interaction has not ended and that pupils continue to take part in community events.</p> <p>The proposed new school would provide an LSC for up to 16 pupils with statements for Autistic Spectrum Disorder (ASD). It would also provide the opportunity to become a community hub for the area, building on the work already being undertaken by other well established primary school LSCs.</p> <p>In addition community facilities are included within the scope of this project so that the proposed new school would be able to provide an important complementary role within the community and act as a catalyst for creating a wider local community focus. It is proposed that the new school would be built on Council owned land at Parc Ynysderw, in close proximity to Cwmtawe Community School and Pontardawe Leisure Centre. The proposal includes for a new 25 metre, 6 lane swimming pool with additional learner pool to replace the existing Pontardawe Swimming Pool. The proposed new pool would provide an additional facility co-located alongside Pontardawe Leisure Centre, revitalising and increasing the health and well-being facilities in the area thus increasing the connectedness of learners and non-learners from different communities in the Swansea valley. The combined proposal of a new build school, specialist ASD provision and leisure facilities would form part of a learning, health and wellbeing community campus. This would have a positive impact on community cohesion</p>
Social Exclusion	√		<p>The Welsh Index of Multiple Deprivation (WIMD) data states that six out of the eight LLSOA's that serve the Swansea Valley are in the 50% most deprived areas of Wales, including the employment, health, education and access to services domains. This proposal, with the creation of the learning campus would provide all members of the Swansea Valley community with modern, fit for purpose educational, health and leisure facilities that could potentially offer a catalytic community focal point for intergenerational health, wellbeing and cohesion in the wider Pontardawe area. It would assist in delivering the Council's aim of improving the health and wellbeing of all people living in Neath Port Talbot and reducing the gap between the least and most healthy.</p> <p>The proposed new school would provide an LSC for up to 16 pupils with statements</p>

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

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

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

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

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

The remaining pupils live on routes that have been assessed as safe, although these routes will be reassessed should the proposal progress and when details of the pupils who will be attending the new school are known. At that time the Neath Port Talbot Road Safety Officers will be available to assist and support schools, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance.

				<p>These arrangements are the same for every school in Neath Port Talbot including Alltwen, Godre'rgraig and Llangiwig primary schools. It is the case that some pupils will have further to travel to the proposed new school than to previous schools, while others will be closer. For those families living further away this may mean that travel costs are increased but others may have reduced costs or be eligible for travel assistance. In this respect the proposal has an overall neutral impact.</p>
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What action will be taken to improve positive or mitigate negative impacts?
<ul style="list-style-type: none"> • Support would be provided to ensure that opportunities are taken to create a new school community, involving pupils from the three schools, along with staff, governors, parents/carers and wider community groups including community and town councillors, childcare providers, local businesses etc. with the aim of improving community cohesion; this could involve open days, joint meetings across the three school communities etc. • Prior to opening the Headteacher and Governing Body will be supported by EDS officers to investigate the opportunities available to enrich the curriculum within walking distance of the new school • The proposed new school Leadership team will be encouraged to support and promote community engagement and events in the three villages of Alltwen, Godre'rgraig and Llangiwig where appropriate, to ensure links are maintained and developed • The development of enhanced health and well-being facilities alongside the proposed new school would promote healthy lifestyles; prior to opening discussions should take place with the operator to ensure that pupils and families are able to access amenities and that these are affordable • Prior to opening Neath Port Talbot Road Safety Officers will be available to assist and support schools, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance

6. Welsh

	+	-	+/-	Why will it have this effect?
<p>What effect does the initiative have on:</p> <ul style="list-style-type: none"> - people's opportunities to use the Welsh language 	√			<p>A detailed Welsh Language Impact Assessment has been undertaken by an external, independent consultant. The full report is contained in appendix 2 to this document.</p> <p>In summary the Swansea Valley area is a linguistically significant area as it contains the highest number and percentages of Welsh speakers in NPT, and is amongst the highest in Wales as a whole. There are concerns however that the number of Welsh speakers is declining and work has been ongoing to ensure the language is promoted and grows.</p> <p>The WESP objective 'To ensure that second language provision across all schools provides pupils with the skills and ability to become confident and sustained speakers of Welsh and that the provision develops a meaningful relationship between the language and the learner' is of particular relevance to this proposal.</p> <p>Alltwn, Godre'rgraig and Llangiwg primaries teach Welsh as a second language and this would also be the case for the proposed new school. Estyn report that in each of the three existing schools pupils have positive attitudes to learning Welsh and show a willingness to use the language. In all three schools overall standards were found to be good. Currently 25% of staff across the three schools are fluent or fairly fluent Welsh speakers and as it is expected that staffing will generally remain unchanged this would also be the case for the proposed new school. By combining the three schools Welsh language provision could be improved as there could be greater impact on having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh. This is therefore likely to have a positive impact on opportunities to use the Welsh language.</p> <p>The new curriculum for Wales states '<i>The Languages, Literacy and Communication Area of Learning and Experience (Area) addresses fundamental aspects of human communication. It aims to support learning across the whole curriculum and to enable learners to gain knowledge and skills in Welsh, English and international</i></p>

				<p><i>languages as well as in literature.</i> Support would be provided from local authority EDS staff to ensure that the aims of the new curriculum would be an important aspect of Welsh language development in the proposed new school.</p>
<p>– treating the Welsh and English languages equally</p>			√	<p>Concerns have been raised during consultation regarding the view that a new build English –medium school could attract pupils currently attending Welsh medium schools, which could hinder development of Welsh as a first language in the area, and as such could be seen to be treating the Welsh language less favourably than English.</p> <p>However, pupil numbers data indicates that new build English-medium schools in Neath Port Talbot, that have opened in the last 10 years, have had no significant impact on nearby Welsh-medium schools which suggests there is unlikely to be an impact on Welsh Medium schools in the locality due to the proposal.</p> <p>Significant work is being undertaken in a number of the Welsh-medium schools in the area which will improve provision for teaching and learning and provide extra pupil places, which should mitigate against the impact of a new school.</p> <p>Full details and further information can be found in Appendix A.</p>

<p>What action will be taken to improve positive or mitigate negative impacts?</p>	
<ul style="list-style-type: none"> • Support from local authority EDS staff for proposed new school staff to develop Welsh language provision in line with the new curriculum prior to opening • Raise parental awareness of the choice of schools available in the Pontardawe area including those offering Welsh-medium education so parents are able to make an informed decision when choosing a school • Continue to support preschool and childcare Welsh-medium provision in the area to enable non Welsh speaking parents to feel confident about choosing a Welsh-medium school • Raise awareness of improvements work undertaken at YGG Pontardawe and at other Welsh-medium schools in the Swansea Valley and monitor impact on pupil numbers 	

- Monitor parental choice of school i.e. Welsh/English medium and take action if Welsh–medium admission rates drop significantly as a result of the new build

7. Biodiversity

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

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

<p>To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.</p>		<p>✓</p>	<p>Biodiversity Supplementary Planning Guidance (SPG) – the Authority adopted the Biodiversity and Geodiversity SPG in 2018. The SPG sets out the basic framework for dealing with Biodiversity in the planning process in Neath Port Talbot. It provides guidance on how to conserve and enhance important habitats and species as part of development. This Supplementary Planning Guidance (SPG) provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest, focussing on the full range of biodiversity and geodiversity features and interests within Neath Port Talbot and sets out the measures that will be taken through the planning system to meet the relevant objectives set out in the Local Development Plan (LDP). https://www.npt.gov.uk/7315 https://www.npt.gov.uk/media/9003/spg_biodiversity_geodiversity_may18.pdf In line with the Council’s recently adopted Decarbonisation and Renewable Energy Strategy, this proposal, if progressed, would not only provide a safe and healthy building for effective educational delivery but it would also be designed and operated as close to zero energy/carbon as practically possible. In line with Welsh Government’s conditions of grant, the proposed new school and leisure complex (as a minimum) must attain a Building Research Establishment Environmental Assessment Method (BREEAM) Excellent rating. The proposed community focussed learning campus would be designed and built on the core principles of sustainable development that would encourage the following embedded principles for many generations of future pupils within NPT:</p> <ul style="list-style-type: none"> • Care for oneself - our health and well-being • Care for each other - across cultures, distances and generations • Care for the environment – local and far <p>The new school and leisure complex would demonstrate the aims of integrating the ethos of energy efficiency and low/zero carbon design principles. The design intent would provide an energy/carbon efficient and sustainable school that prepares young people for a lifetime of sustainable living, through their teaching, their learning environment and through the example of their day-to-day practices demonstrated by</p>

		<p>their school building.</p> <p>To deliver a sustainable energy efficient /low carbon - community focussed learning campus and attain the project's energy and carbon performance targets of:</p> <ul style="list-style-type: none"> • Reduction in combined gas and electricity consumption to 190 kWh/m² by September 2025 • Reduction in CO₂ emissions to 50.5 kg/m² by September 2025 <p>Extra traffic on the road will increase levels of emissions. Neath Port Talbot Council's Road Safety team collect modes of transport data from all Neath Port Talbot schools on an annual basis. Based on data collected in 2019, Alltwen and Llangiwg primaries have a high percentage of pupils who travel to school by car or taxi, 56% of Alltwen Primary pupils and 70% of Llangiwg Primary pupils. The majority of Godre'rgraig Primary pupils (85%) now travel by bus, as expected due to the increased distance to travel to the temporary site. However prior to moving to Parc Ynysderw the percentage of pupils travelling to school by car or taxi was 47%.</p> <p>Overall, the data indicates that the number of pupils who walk, cycle or scooter to school is relatively small compared to the number who use cars or taxis, and this appears to have been the case over the last four years. All three of the existing schools have pupils from outside their catchment area – 44% of pupils attending Alltwen Primary live outside the school catchment area, 37% of Llangiwg Primary pupils live outside the Llangiwg catchment area and 24% of Godre'rgraig Primary pupils live outside of the Godre'rgraig catchment area, suggesting that the current schools already contribute significantly to the traffic flow in the area.</p> <p>Should this proposal be approved, based on the numbers and addresses of the pupils currently in the three existing schools, approximately 176 pupils could potentially be eligible for assistance with transport, which would remove the need for parents to transport those pupils to school by car. Pupils travelling to school on relatively few school buses will have less environmental impact than pupils travelling in numerous cars. It is recommended that pupils who are entitled to free home to school travel should use the buses provided.</p>
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What action will be taken to improve positive or mitigate negative impacts?

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

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

- Incorporate water efficient services to ensure the school achieves highest levels of water efficiency performance
- Management Issues: Effective handover period: Training, commissioning (6 & 12 months after handover), provision of a log book and succinct instruction for building management and occupants how the building is supposed to operate and function

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

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

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

8. Well-being of Future Generations

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

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

<p>iii. Collaboration – working with other services internal or external</p>	<p>Full consultation has been undertaken for this proposal where views from stakeholders, including services and organisations have been gathered and reported. Should the proposal be approved then further work would be undertaken with relevant stakeholders, with professional colleagues across the Council including Education Development Service, Inclusion and Support for Learning Services, and Architectural and Construction colleagues. Additionally further work would be undertaken with external agencies including relevant ALN partners such as the National Autistic Society (NPT branch), NPT Special Needs Support Group, SNAP and Action for Children.</p>
<p>iv. Involvement – involving people, ensuring they reflect the diversity of the population</p>	<p>Full consultation has been undertaken for this proposal where views from all stakeholders including other services and organisations have been gathered and reported. The consultation has followed the procedures required under the Welsh Government’s School Organisation Code which specifies the type of school organisation activity on which the Council is required to consult and the process to be followed in conducting consultation. Throughout the consultation period the consultation document and associated papers were available on the Council’s website located on the Council’s Strategic School Improvement Programme webpage ensuring a wide audience were able to access information about the proposal. A range of options were presented in the consultation document, giving sufficient reasons to allow consultees to give intelligent consideration and response. It is recognised the consultation process should be undertaken when proposals are still at a formative stage. This is the case with this consultation as the Council would conscientiously take into account the responses before finalising its decision. As such the views of consultees are able to influence the decision making process.</p>
<p>v. Integration – making connections to maximise contribution to:</p>	<p></p>
<p>Council’s well-being objectives</p>	<p>The Strategic School Improvement Programme and its related projects are included in the Directorate’s plans which link to the Council’s wellbeing objectives. The proposal directly supports wellbeing objective 1 – ‘to improve the wellbeing of children and young people’ through providing 21st century teaching and learning experiences, supporting the implementation of new statutory duties to benefit pupils with ALN and to increase the opportunities for pupils to participate in activities that promote health and well-being.</p>

	<p>Through creating facilities that can be used by the community the proposal also supports wellbeing objective 2 –‘to improve the wellbeing of all adults who live in the county borough’.</p> <p>Wellbeing objective 3 ‘to develop the local economy and environment so that the well-being of people can be improved’ is also directly relevant to this proposal. To obtain WG approval of the business plan involves ensuring that community benefits are fully explored and implemented throughout the construction phase. Part of this work would ensure that local businesses are used to supply labour and materials whenever feasible, local people will benefit from employment opportunities and the local economy would benefit due to an increased number of people working in the area.</p>
Other public bodies objectives	<p>This proposal directly impacts upon the Public Services Board priority to support children in their early years and indirectly supports the priority to promote well-being through and in the workplace, by creating a 21st century new build with enhanced facilities.</p>

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

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

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

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

Neath Port Talbot County Borough Council works closely with Governing Bodies of schools to ensure that the highest standards are robustly maintained, that teaching and learning is of a high quality and that leadership and governance is strong. The Local Authority works with Estyn in order to monitor the performance of schools and to support school improvement. Monitoring would take place on a regular basis by Support for Learning and Inclusion officers, Education Development Service officers and outside bodies including Estyn.

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

be included in the updated WESP and monitored accordingly by the WESP forum.

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

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

10. Assessment Conclusions

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

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

	<p>There is no real risk of direct or indirect discrimination as the Council is pursuing a legitimate aim (namely improving the capacity and efficiency of education) and the decision to publish the proposals to make regulated alterations is a proportionate means of achieving that aim.</p>
Socio Economic Disadvantage	<p>A new build 21st Century school would impact positively on pupils from all socio economic groups, due to the significantly improved facilities available. In this respect the proposal would have a positive impact.</p> <p>Change of location may mean some pupils live further away from the proposed new school and may result in difficulties accessing extracurricular activities. This will have a negative impact, however mitigating actions could be implemented to address this.</p>
Community Cohesion/ Social Exclusion/Poverty	<p>The combined proposal of a new build school, specialist ASD provision and leisure facilities would form part of a learning, health and wellbeing community campus. This would have a positive impact on community cohesion. The proposed facilities would be accessible to pupils and the wider community regardless of any specific socio-economic disadvantage and could offer a focal point for local, stimulating, sustainable learning, health and wellbeing. The proposal therefore should have a positive impact on reducing social exclusion.</p> <p>The proposal should have a neutral impact on poverty. While some pupils will have further to travel to school support with home to school travel would be made available in line with the Council's Home to School Travel Policy. This policy is applicable to all pupils across Neath Port Talbot.</p>
Welsh	<p>Standards of Welsh in the three current schools are good; it is expected that the good practice that already exists would transfer to the proposed new school and that this would be improved upon due to having a more concentrated group of Welsh speakers able to support pupil and staff language development skills through the medium of Welsh. This is therefore likely to have a positive impact on opportunities to use the Welsh language.</p> <p>This proposal is expected to have a neutral impact on treating the Welsh and English languages equally. Evidence from previous new build school projects in Neath Port Talbot suggests that a new build English-medium school is unlikely to discourage parental preferences for Welsh-medium education and mitigating actions will ensure consistency should this proposal proceed.</p>
Biodiversity	<p>The proposal is likely to have at least a neutral impact on biodiversity. NPTCBC has a legal duty to maintain and enhance biodiversity, and in so doing, promote the resilience of ecosystems under the Environment (Wales) Act 2016. The Council's Biodiversity Duty Plan demonstrates how that duty is</p>

	<p>fulfilled and will act as a driver for conservation activities throughout the County Borough.</p> <p>The Biodiversity Duty Plan not only delivers our statutory duties with regards to biodiversity but also explains how, through meeting the Biodiversity Duty, the Council delivers well-being objectives and the ways of working under the Well-being of Future Generations (Wales) Act 2015.</p> <p>The Council has a variety of policies which support and inform biodiversity. Additionally should the proposal progress then Welsh Government conditions of grant have environmental stipulations that also seek to ensure important aspects of safeguarding the wider environment would be supported e.g. adherence to Building Research Establishment Environmental Assessment Method (BREEAM) and the Waste and Resources Action Programme (WRAP).</p>
<p>Well-being of Future Generations</p>	<p>The proposal directly supports the Council's wellbeing objectives through the provision of a 21st Century school and health and well-being campus, for current and future generations of primary aged pupils and the community.</p>

Overall Conclusion

Please indicate the conclusion reached:

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

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

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

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

significantly improved facilities provided and would also positively impact on community cohesion, and social exclusion.

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

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

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

11. Actions

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

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Ensure all appropriate policies and procedures are in place prior to the proposed new school opening	School Leadership team (including Governing Body) with support from Education Development Service	September 2024	Polices in place and adopted
Engagement with pupils, staff and wider school community to facilitate transition to proposed new school	SSIP Officers	January 2022 ongoing	Smoother transition creating a successful start to the new school
Develop links with the local communities to support the development of the proposed new school	SSIP Officers Project Manager , Community Benefits Officer (Environment) and Main Contractor when appointed)	January 2022	Creation of a strong and supportive school community Aims of community benefits plan met
Support provided to proposed new school to consider how extracurricular provision can be provided	SSIP Officers	September 2024	Extracurricular provision including Breakfast club (subject to Governing Body decision) is accessible to all pupils

Assistance provided to support the proposed new school, parents and pupils in planning safe routes in line with Welsh Government Learner Travel Guidance	NPT Road Safety Officers	September 2024	Safe routes identified
<ul style="list-style-type: none"> ▪ Raise parental awareness of the choice of schools available in the Pontardawe area including those offering Welsh-medium education so parents are able to make an informed decision when choosing a school • Monitor parental choice of school i.e. Welsh/English-medium and take action if Welsh –medium admission rates drop significantly as a result of the new build 	WESP Forum	Ongoing	Actions implemented and contributing to development of Welsh language
Support from local authority EDS staff for proposed new school staff to develop Welsh language provision in line with the new curriculum prior to opening	EDS Officers	Ongoing	Expected standards in Welsh language met or exceeded

12. Sign off

	Name	Position	Signature	Date
Completed by	Rhiannon Crowhurst	SSIP Programme Co-ordinator		14.5.21
Signed off by	Andrew Thomas	Director of ELLs		14.5.21

List of Consultees	
Alltwen, Godre'rgraig and Llangiwg Primary Schools: Pupils Parents / carers Staff Governing Body Wider School Community	NAASH (Secondary Schools Forum)
	LLAN (Primary Schools Forum)
	Bordering authorities – Swansea/ Bridgend/ Carmarthenshire/ Powys/ RCT
All other NPT schools	Pontardawe Town Council Cilybebyll Community Council 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:

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



Welsh Language Impact Assessment and Supporting Evidence

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

16th February 2021

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Introduction

As part of its Strategic School Improvement Programme, Neath Port Talbot Council has proposed to establish a new-build English-medium school for the age range 3-11 to replace the existing Alltwen, Godre'graig and Llangiwg Primary Schools.

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

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

The Council's "Integrated Impact Assessment - first stage" document contained an initial overview of the possible impact on the Welsh language, in the communities affected by the proposed closure and the combining of the three schools into a single new site.

It identified and some possible considerations and mitigating factors, which the evidence presented in this assessment document supports and expands upon.

i) The Cymraeg 2050 Strategy

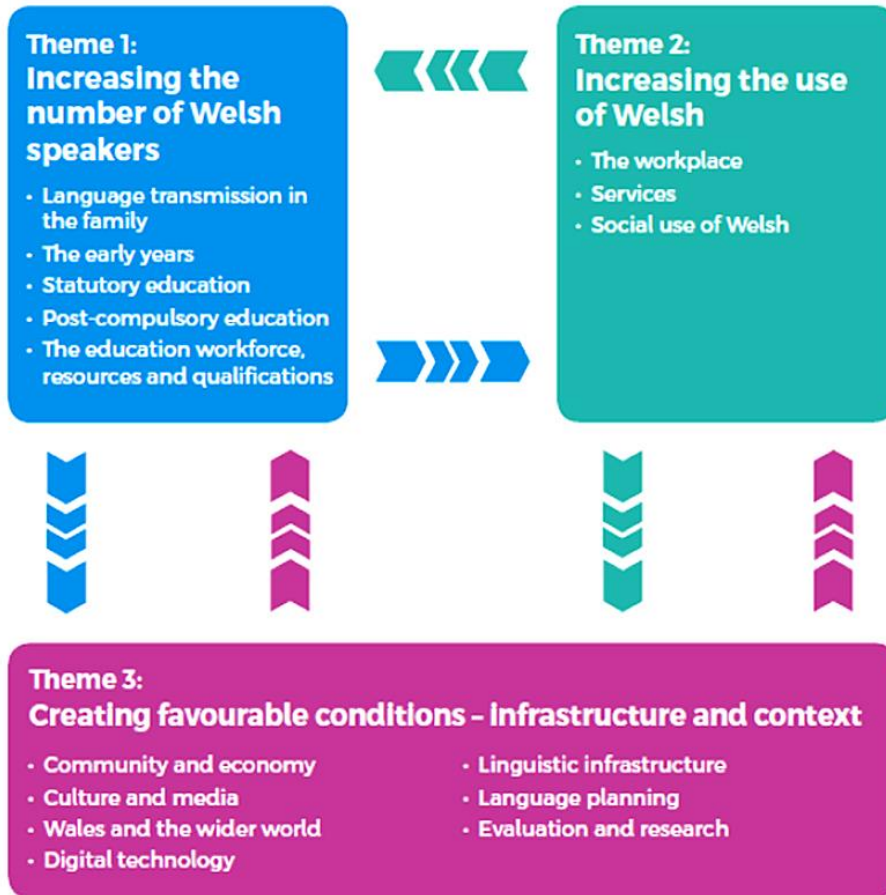
This is the Welsh Ministers' strategy for the promotion and facilitation of the use of the Welsh language. It sets out the Welsh Government's long-term approach to achieving the target of a million Welsh speakers by 2050.

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

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

Some of the standard questions within a more straightforward Welsh language impact assessment, and two of the three themes of Cymraeg 2050, are not as *directly* relevant to this proposal, due to the linguistic nature of the schools in

question, and therefore although they have been covered, the main focus has been on matters where there is more direct connection to the proposal.



As can be seen from the infographic above, all three Cymraeg 2050 themes would be directly relevant if the proposal concerned Welsh-medium education.

Much of the impact on the Welsh language in terms of English-medium education would be indirect in comparison, though still important to consider. Welsh as a second language will be taught in the proposed new school as it currently is in the three primary schools that are part of this proposal.

The focus of themes 1 and 2, whilst still important to recognise, lies far more within the direct remit of the Welsh in Education Strategic Plan (WESP), within the Council's 5-year promotion strategy and within the Council's current plans for Welsh-medium education.

Theme 3 is the most directly relevant to these proposals, as the evidence shown later in this assessment demonstrates how Neath Port Talbot Council's wider work around the Welsh language, and its understanding of the area it serves, are geared towards, and already working towards, creating the required favourable conditions in terms of language planning. The supporting evidence is included in Section 5.

This assessment therefore pulls together a range of relevant Welsh language data sources, statistics and existing Council and Welsh Government policies and

legislation, which must be considered in context, and more importantly as mitigating factors, by Neath Port Talbot Council as it determines whether to proceed with the proposal, and should be included as a background paper as the proposal moves ahead.

1. The English-Medium 3-11 School Proposal

The following background information is taken from the Council's consultation document.

"The Council ... is proposing to establish a new build, 21st century English-medium 3-11 school to replace Alltwen Primary, Godre'rgraig Primary and Llangiwig Primary, all of which will close on 31st August 2024.

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

It is proposed that the school will be built on Council owned land at Parc Ynysderw, in close proximity to Cwmtawe Community School and Pontardawe Leisure Centre. It is expected to open on 1st September 2024.

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

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

Neath Port Talbot Consultation Document, November 2020

The consultation ran from 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:

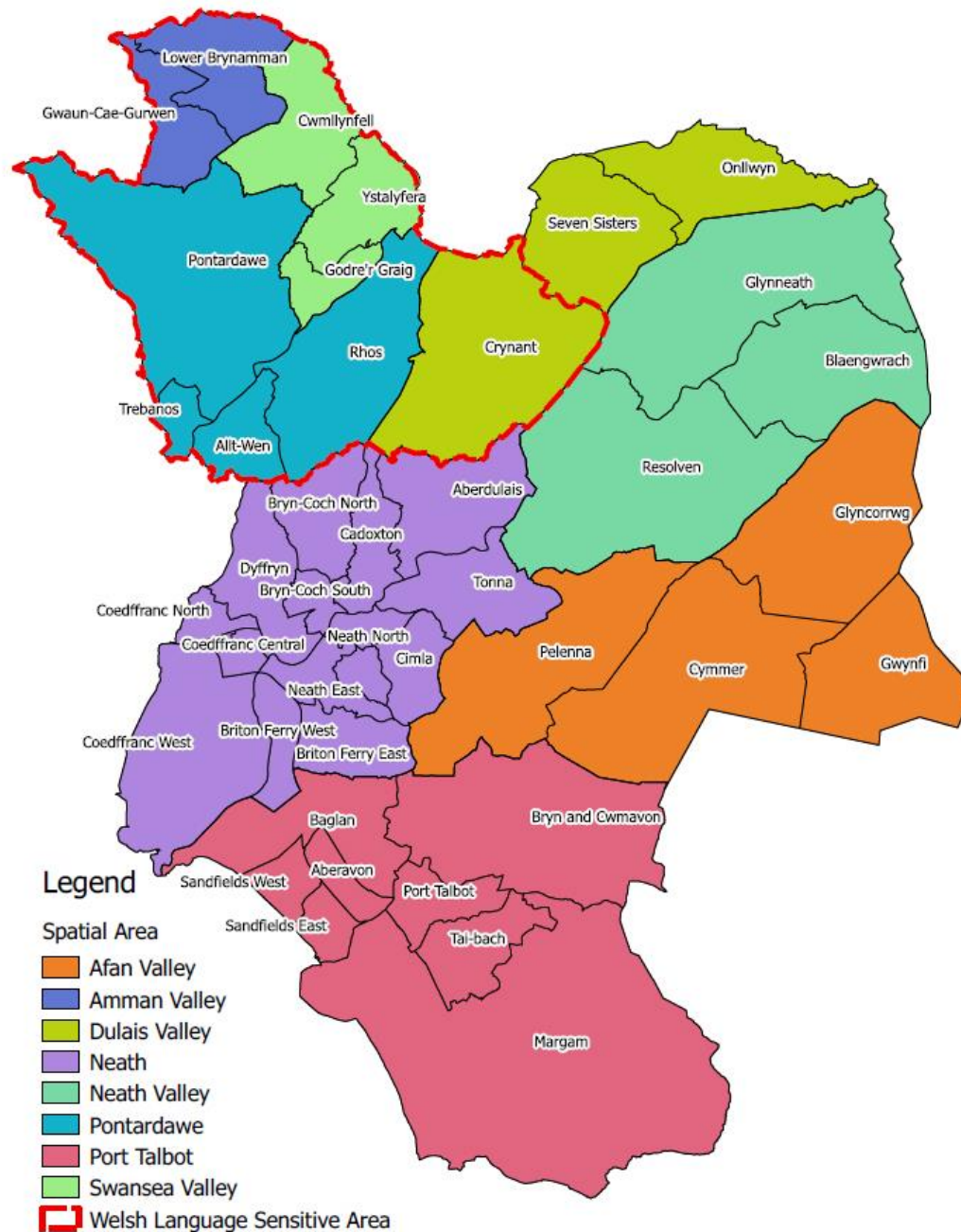
2.1.2 Within the communities of Cwmllynfell, Gwaun Cae Gurwen and Lower Brynamman more than half of the population speak Welsh and these are widely regarded as traditional Welsh speaking areas. In addition, the Swansea Valley area is also considered to be a stronghold of the language locally with the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

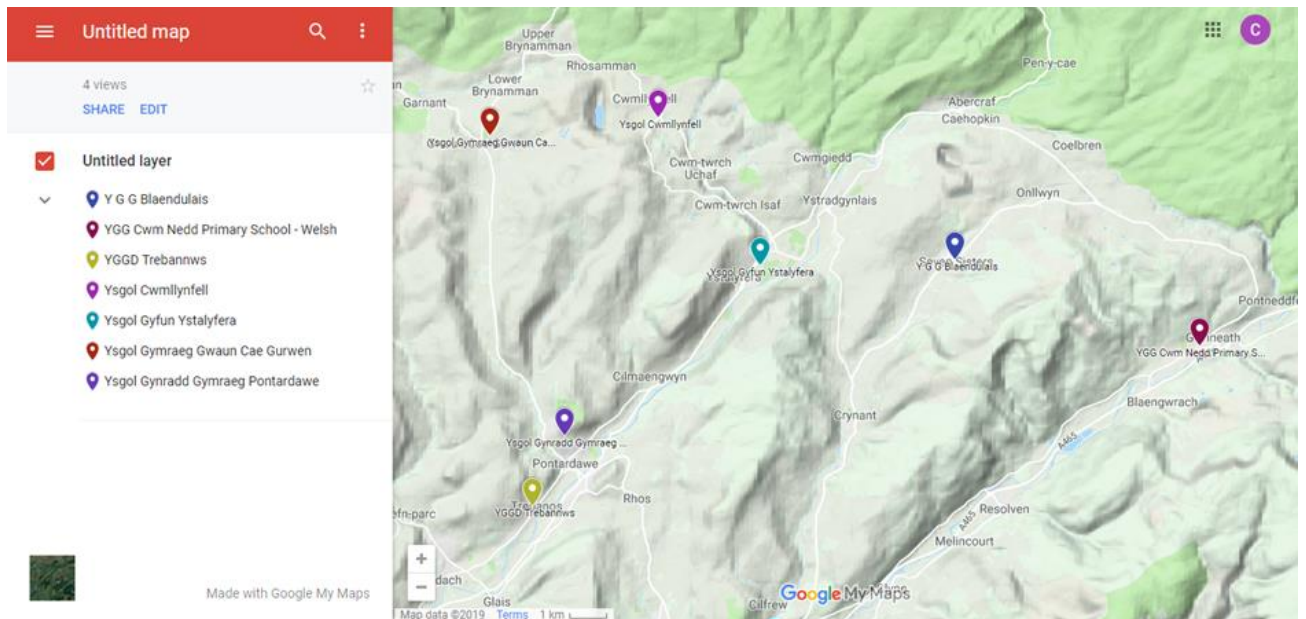
YG Ystalyfera- Bro Dur 21st Century School Funding

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'rgraig and Llangiwig 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.

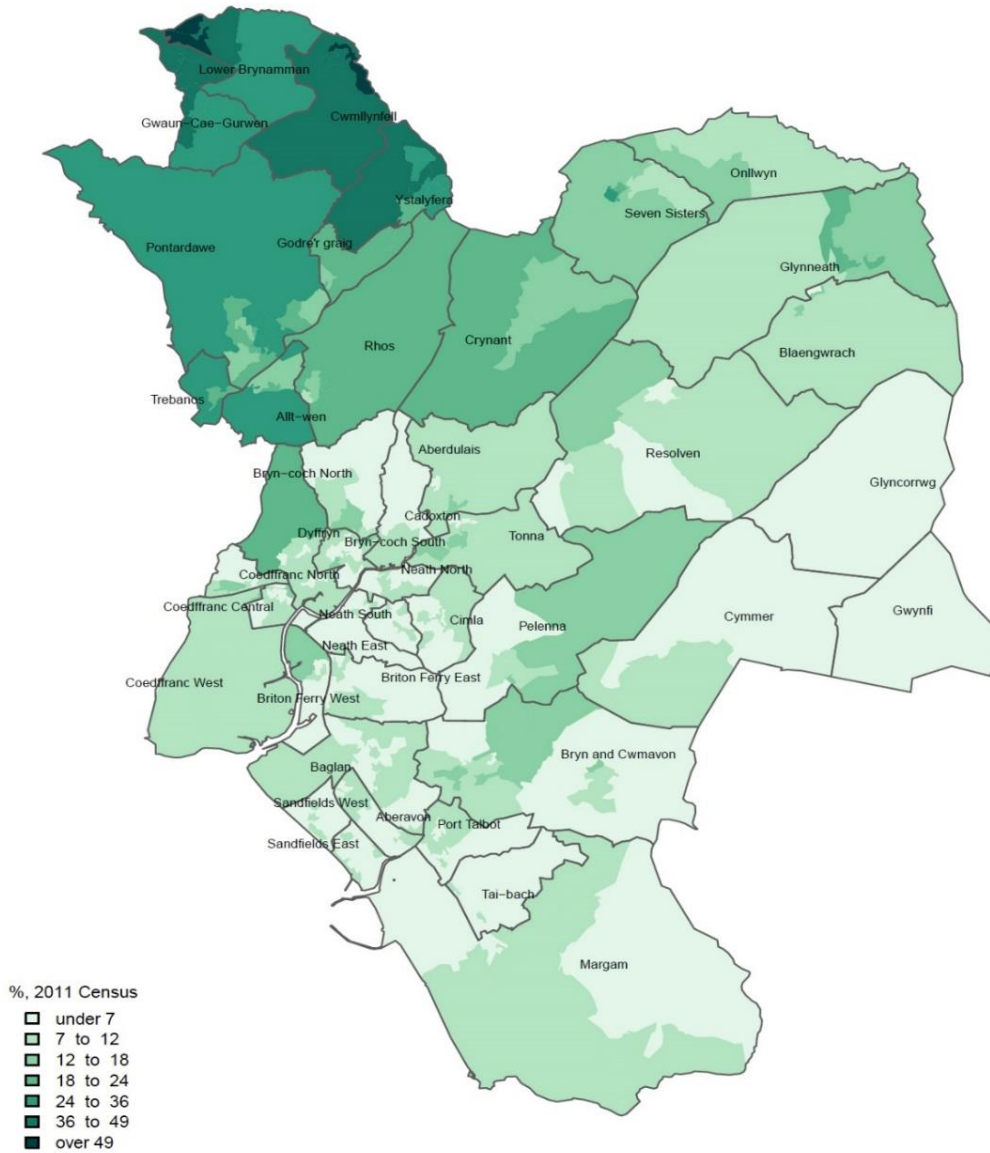
iii) Map of fluent Welsh speakers by Ward

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

Contains National Statistics data © Crown copyright and database right 2013; Contains Ordnance Survey data © Crown copyright and database right 2013

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.

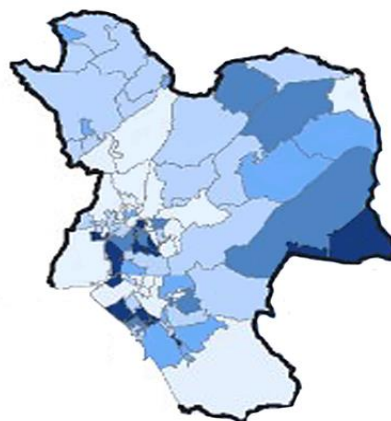
6. Social Deprivation Considerations

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

Appendix A - Relevant Welsh Language Standards

Number	Policy-making Standard	Compliance Date
88	<p>When you formulate a new policy, or review or revise an existing policy, you must consider what effects, if any (whether positive or adverse), the policy decision would have on -</p> <ul style="list-style-type: none"> (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	<p>When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would have positive effects, or increased positive effects, on -</p> <ul style="list-style-type: none"> (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	<p>When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would not have adverse effects, or so that it would have decreased adverse effects, on -</p> <ul style="list-style-type: none"> (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	<p>When you publish a consultation document which relates to a policy decision, the document must consider, and seek views on,</p>	30/09/2016

	<p>the effects (whether positive or adverse) that the policy decision under consideration would have on -</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	
92	<p>Policy Making When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would have positive effects, or increased positive effects, on</p> <p>(a) opportunities for persons to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language.</p>	30/09/2016

Appendix B - Relevant Policies and Legislation

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

Neath Port Talbot Council Welsh Language Policies and Strategies

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

Welsh Government Legislation and Regulations

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

Other Information

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

Appendix C - Welsh Language Partner Organisations

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

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

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