



# Welsh Language Impact Assessment and Supporting Evidence

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

19<sup>th</sup> April 2023

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# Introduction

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

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

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

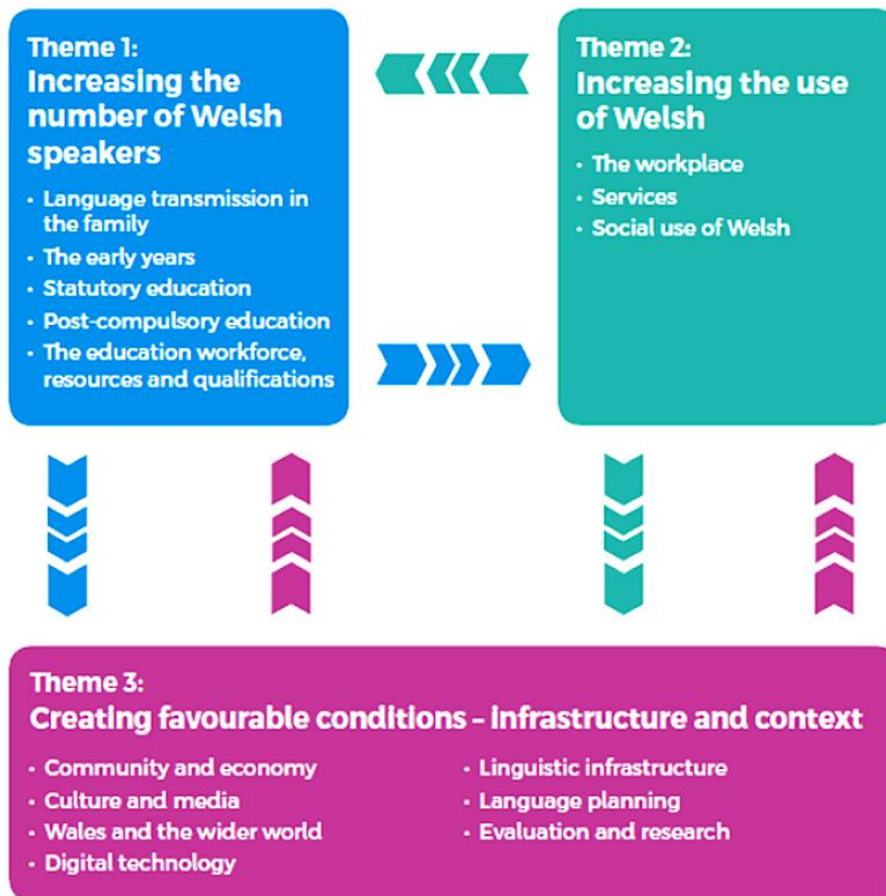
## i) **The Cymraeg 2050 Strategy**

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

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

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

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



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

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

## 1. The English-Medium 3-11 School Proposal

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

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

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

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

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

## 2. Consultation Process

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

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

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

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

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

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

Online responses	482
Emails	114

Paper forms/letter 23

In total 619

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

Including these the responses totalled 816,

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

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

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

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

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

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

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

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

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

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

### **3. Linguistically Sensitive Areas, the LDP and TAN 20**

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

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

#### **Defining and providing context to the term 'linguistic sensitivity'**

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

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

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

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

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

Factors that contribute to linguistic erosion include:

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

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

## **LDP and TAN 20**

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

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



national average.

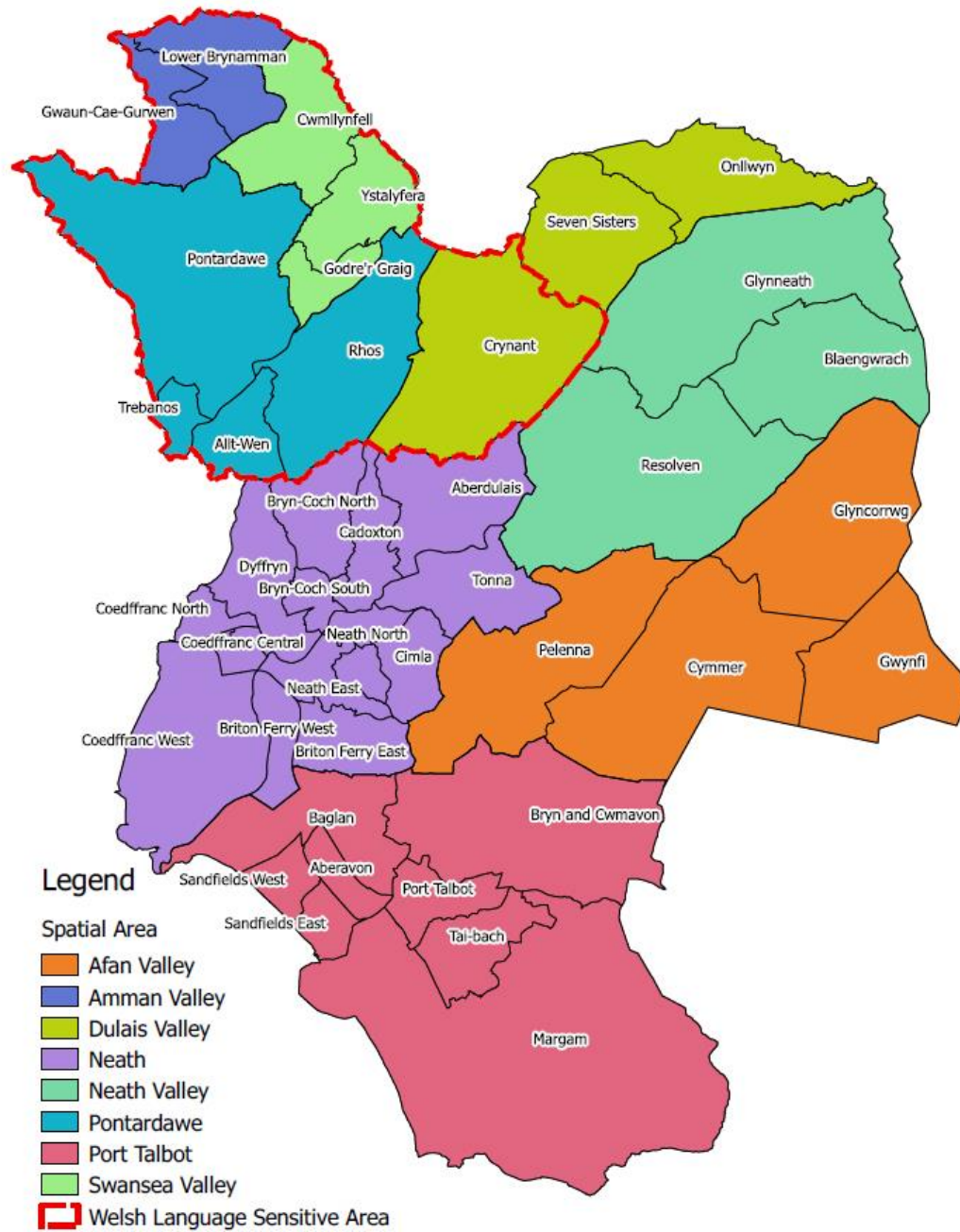
Each local planning authority's areas of linguistic sensitivity or significance will therefore be different.

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

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

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

## Neath Port Talbot Council's Defined Area of Linguistic Sensitivity



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

## 4. Welsh-Medium Education Provision within the area

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

## 5. Welsh-Medium Education Projects - Background

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

The breakdown is as follows –

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

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

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

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

### **Ysgol Gynradd Gymraeg Pontardawe**

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

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

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

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

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

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

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

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

### **YGG Trebannws**

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

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

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

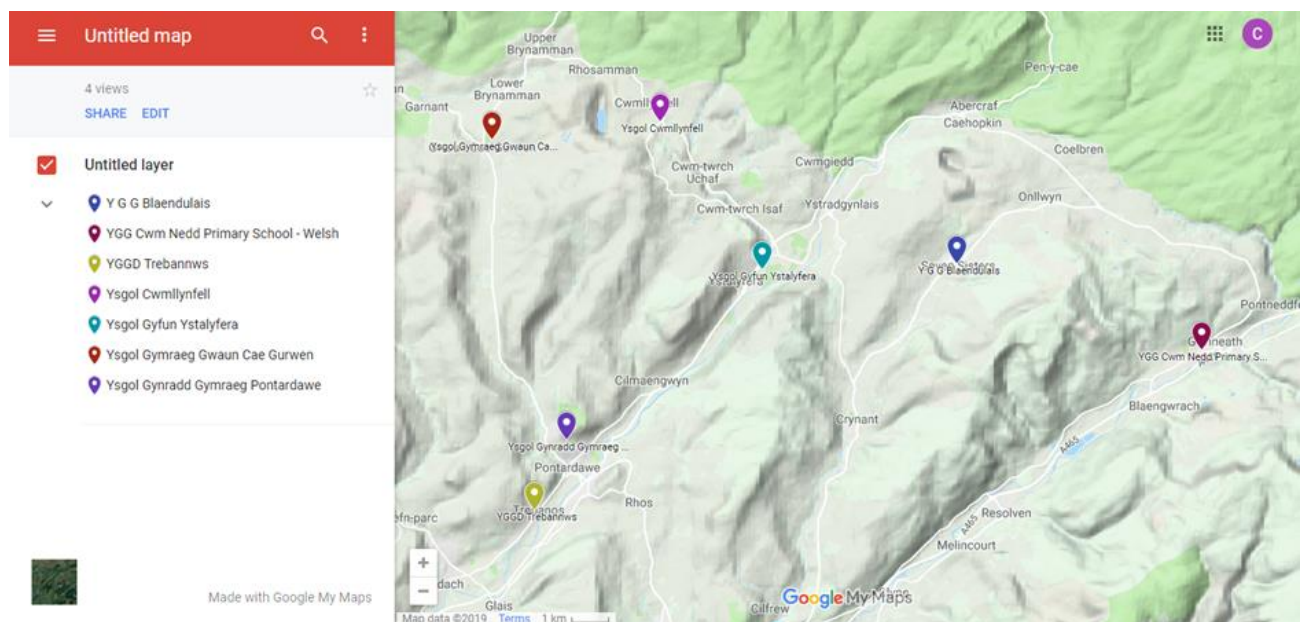
### **YG Ystalyfera- Bro Dur 21<sup>st</sup> Century School Funding**

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

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

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

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



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

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

### **Ysgol Gynradd Gymraeg Cwmllynfell**

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

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

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

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

Work was completed in September 2021.

## **6. The Welsh Language in Neath Port Talbot**

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

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

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

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

### **i) Welsh in Education Strategic Plan (WESP)**

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

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

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

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

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

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

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

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

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

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

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



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

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

## **ii) Welsh Language Promotion Strategy**

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

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

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

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

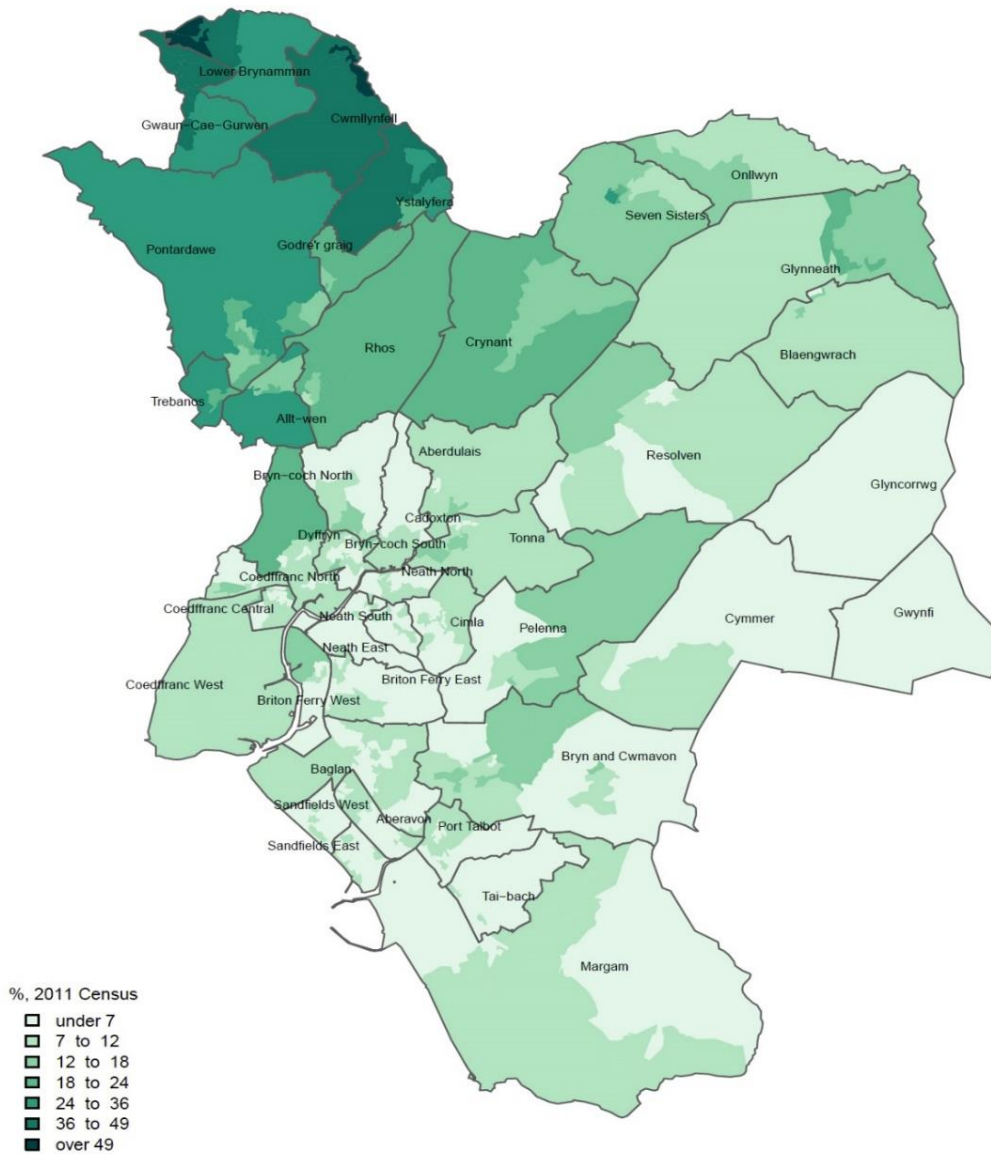
## **iii) Map of fluent Welsh speakers by Ward**



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

### Neath Port Talbot

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



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

Map created by Hywel Jones. Variables KS208WA0022-27 corrected

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#### iv) The Welsh Language and Future Generations

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

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



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

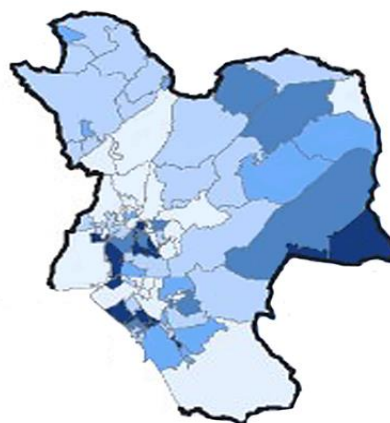
## 7. Social Deprivation Considerations

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

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

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

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



by Lower Level Super Output Areas

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

Least Deprived

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

## **8. Impacts and Possible Mitigating Actions**

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

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

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

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

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

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



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



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

		<ul style="list-style-type: none"><li>-increase and promote the a provision of adult Welsh language immersion courses for non-Welsh speakers and learners within the community and local area</li><li>-as in impact 12, develop a designated webpage to include information on opportunities for learning/using Welsh, links to other organisations and websites including Tŷ'r Gwrhyd and Menter Iaith</li><li>-as in impact 12, produce resources, promotional material and visual impacts that promote language use and fosters respect for the Welsh language and bilingualism</li><li>-as in impact 12, weekly social activities and 'sesiynau sgwrs' to increase confidence and fluency levels</li></ul>
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## Appendix A - Relevant Welsh Language Standards

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

## **Appendix B - Relevant Policies and Legislation**

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

### **Neath Port Talbot Council Welsh Language Policies and Strategies**

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

### **Welsh Government Legislation and Regulations**

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

### **Other Information**

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

## Appendix C - Welsh Language Partner Organisations

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

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

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