



CYNGOR  
monmouthshire  
COUNTY COUNCIL  
*sir fynywy*

# Welsh Language Impact Assessment and Supporting Evidence

Prepared in accordance with Welsh Language Standards 88-92, this assessment should be considered as part of Monmouthshire Council's proposal to establish an English-medium all-through school in Abergavenny, directly affecting Deri View Primary School and King Henry VIII Comprehensive School with effect from 1<sup>st</sup> September 2023.

Mae'r ddogfen hon hefyd ar gael yn Gymraeg  
This document is also available in Welsh

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# Introduction

As part of our 21st Century Schools Band B proposals for education in Monmouthshire, we have proposed to establish an all-through (4-19) school in Abergavenny. In order to facilitate the establishment of this new all-through school, we therefore propose to cease to maintain Deri View Primary School and King Henry VIII Comprehensive School with effect from 1<sup>st</sup> September 2023.

Whilst these proposals directly affect English-medium school provision, there is also a potential effect (that may be positive, negative or neutral) on Welsh-medium schools in the county, which we must also consider.

This is due not only to Welsh Government regulations on bilingual Education provision, but also considerations under a range of other statutory duties identified in this assessment, and in particular due to the requirements of the Welsh Language (Wales) Measure 2011.

The Welsh Language Standards that stem from the Measure require policy decisions of any kind to be assessed as to their affect on the Welsh language in the policy and/or geographic area in question. Those same policy-making standards apply to both Welsh Government and Monmouthshire County Council.

A council's policy framework is an interlinked set of documents, and in the same way, an impact assessment's contents are interlinked and cannot be regarded section by section in isolation, but as a cumulative whole. 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 impact assessment therefore includes in Section 1 a summary of the options being considered, Section 2 contains all the legislation, regulations and other issues to which Monmouthshire County Council must have due regard in terms of the Welsh language and this all-through school proposal; Section 3 notes the current mitigating factors in place that help to balance out any potential negative impacts identified, with the positive steps being undertaken by this council.

It should also be noted that the evidence and mitigating factors refer for the most part to the north of the county and the catchment area of Ysgol Gymraeg y Fenni, due to the main proposals being around Deri View Primary School and King Henry VIII Comprehensive School, which are located in the same area.

An impact assessment is an evolving document, especially during the consultation period and may be updated and amended as new issues are brought to light, or further evidence may be added to support the assessment. This current version should be regarded as a draft document and may be subject to change.

The final version will be included along with other background papers to the proposal, in order to inform and support Monmouthshire County Council's decision-making process in this matter.

# 1. Summary of Options

The full consultation document on the all-through school proposal is available as a document in its own right, however the options being consulted upon are copied/summarised here for ease of reference, in order for Sections 2 and 3 to be read in the context of a Welsh language perspective.

Each option was scored against the following Critical Success Factors (CSF):

- Deliver a high quality and inclusive curriculum for all learners;
- To deliver a sustainable and cost-effective model;
- Educate our children and young people and their families in their local communities whenever possible;
- Meet the needs of children and young people now and be suitable adaptable to meet changing needs in the future.

The CSF were each weighted High 5, Medium 3, Low 1. Each option was then scored against the CSF and was scored on the following basis:

**5** exceeds criteria

**4** meets criteria

**3** neither meets/ does not meet the criteria

**2** partially meets the criteria

**1** does not meet the criteria

## **Option 1**

Do nothing and maintain the status quo. This would mean that there would be no change to the current provision.

## **Option 2**

To establish an all-through School with suitable ALN provision and close King Henry VIII and Deri View Schools.

## **Options 3 & 4**

To extend the age range of King Henry VIII Comprehensive School to incorporate Deri View Primary School and relocate all to a new building on the King Henry VIII site and close Deri View Primary School.

**OR**

Extend the age range of Deri View Primary School to incorporate King Henry VIII Comprehensive and relocate to new purpose-built building on the King Henry VIII site.

## **Option 4**

To establish an all-through School with suitable ALN provision and Welsh Medium stream at KS 3,4 and 5 and cease to maintain King Henry VIII and Deri View Schools.

The results from the options analysis are shown below

	<b>Option</b>	<b>Score</b>
1.	Do nothing and maintain the status quo. This would mean that there would be no change to the current provision.	30
2.	To establish an all-through School with suitable ALN provision and close King Henry VIII and Deri View Schools.	100
3.	To extend the age range of King Henry VIII Comprehensive School to incorporate Deri View Primary School and relocate all to a new building on the King Henry VIII site and close Deri View Primary School.	80
4	Extend the age range of Deri View Primary School to incorporate King Henry VIII Comprehensive and relocate to new purpose-built building on the King Henry VIII site.	80
5.	To establish an all-through School with suitable ALN provision and Welsh Medium stream at KS 3, 4 and 5 and cease to maintain King Henry VIII and Deri View Schools.	20

### **The Preferred Option**

The Council's preferred option is Option 2, to establish an all-through School on the King Henry VIII School site and close Deri View Primary School and King Henry VIII Comprehensive School.

We understand that there are some disadvantages associated with the proposal but we feel that the advantages far outweigh the disadvantages (full details of all the advantages and disadvantages can be found in the Consultation Document).

Regarding Option 5 specifically, and the option of a Welsh-medium secondary stream in the proposed Abergavenny 4-19 School, this option did not proceed following discussions with the Welsh Education Forum as it was accepted that pupils require a completely immersive Welsh-medium secondary education after receiving an immersive Welsh-medium primary education.

## 2. Relevant Welsh Language Considerations

The School Organisation Code November 2018 (2<sup>nd</sup> edition), paragraph 1.4 states:

“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.

In all cases local authorities should consider:

- The extent to which the proposal would support the targets in the approved Welsh in Education Strategic Plan (WESP).
- How the proposal would expand or reduce Welsh language provision and in the case of the latter, set out why provision will be reduced.”

Further to the above however, the requirements of the relevant Welsh Language Standards (88, 89 and 90 - see Appendix A) are not specifically, or only, aimed at Education issues, but on the effects of policy decisions on the Welsh language in a broader sense.

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

### 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. Our WESP, under the previous regulations (the School Standards and Organisation (Wales) Act 2013) ran from 2017-2020. The development of the new WESPs have been delayed due to the current pandemic situation, but it is intended that the new plans will be 10-year ones.

Section 1.8 of our current WESP, under sub-section 4, notes that one of the steps to be taken during the lifetime of the plan is to “Ensure that our 21<sup>st</sup> Century Schools Band B programme aligns with our WESP to facilitate the anticipated growth in demand by 2020 and supports future demand identified during the life of this plan”.

Further, sub-section 6 notes another step to “Increase the rate of transition between key stage 2 and 3 to 95% by 2020”.

These are relevant points from the WESP in terms of this assessment, when considering actual transition rates from Welsh-medium primary to secondary schools in our county, and must be considered in conjunction with the consequential effect of the new Abergavenny proposals and with the Catchment Areas and Distance of Travel section later in this report.

See Section 3 for related mitigating factors.

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

Under Welsh Language Standard 145 (see our [compliance notice](#)), local authorities must 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.

Our current 5-year strategy notes as part of its vision, that by 2022 Monmouthshire will be a county where:

- More children are educated through the medium of Welsh.

And its targets include:

- Introduce more effective ways to promote the advantages of Welsh-medium education to pupils and parents to stimulate greater demand in our primary schools through the provision of better information and easier access to schools and services using the medium of Welsh
- Implement robust and reliable systems to measure and plan future provision and a suitably skilled workforce to meet the increasing demand for Welsh-medium education
- Ensure that our 21<sup>st</sup> Century Schools Band B programme aligns with our WESP to facilitate the anticipated growth in demand by 2020 and supports the future demand identified during the life of this plan.
- Increasing the percentage of children and young people educated through the medium of Welsh in Monmouthshire from 577 students to 663 students, an increase of 15% by 2022.
- Increasing the rate of transition from Key Stage 2 to 3 to 95% by 2022. (2016 - 2017 Ysgol Gymraeg Y Ffin 93.3% or 14 out of 15 / Ysgol Gymraeg Y Fenni 78.6% or 22 out of 28 / Total 83.7% or 36 out of 43).
- Increasing the percentage of young people in Monmouthshire leaving school with bilingual skills (Welsh and English) that can be used in the workplace from 577 (5.2%) to 1,106 (10%) by 2022.

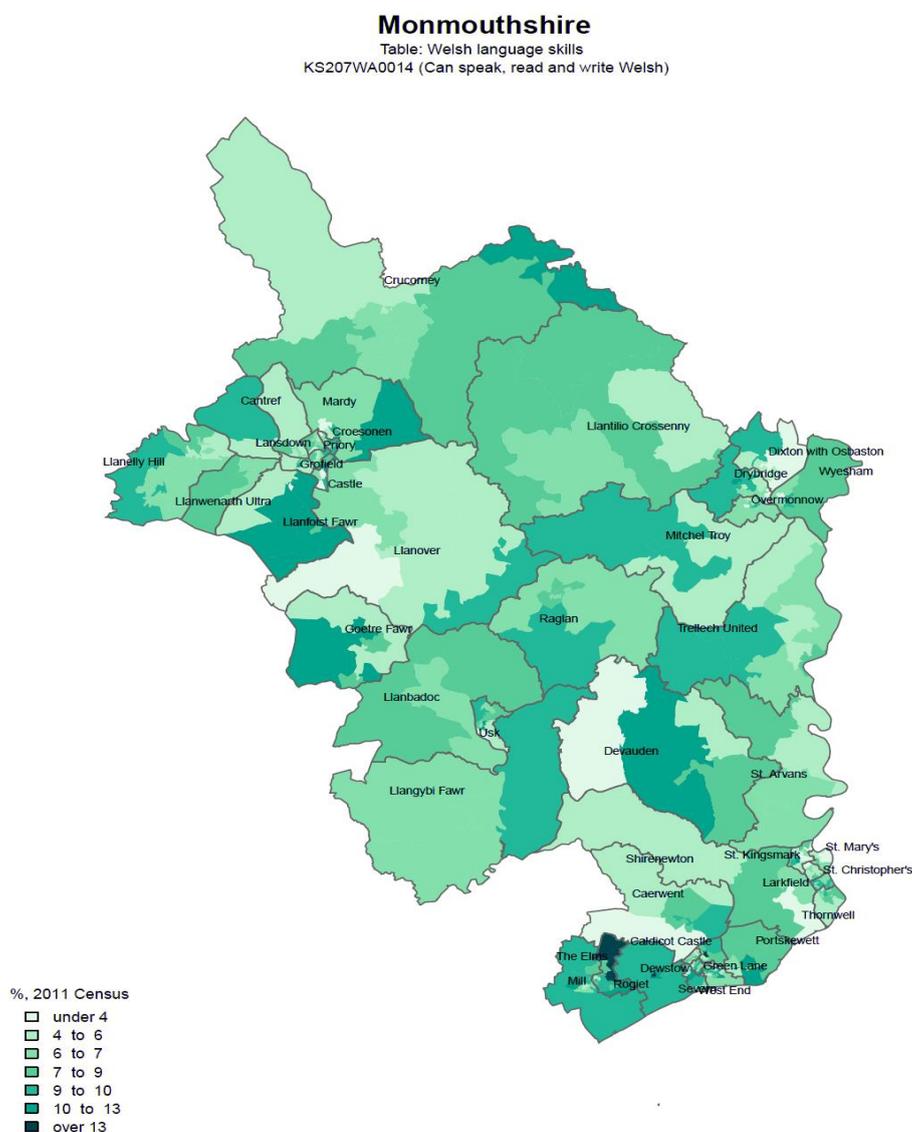
These targets will be affected to a greater or lesser degree by any significant investment and development in English-medium education, especially where there is no balancing evidence provided of any investment in Welsh-medium education, which should be promoted as mitigating factors in order to lessen any potentially negative consequential impact. Section 3 of this assessment provides those factors in terms of this proposal.

### iii) Welsh speakers by Ward 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.

The [map](#) below provides 2011 Census data demonstrating the Welsh language skills of people in Monmouthshire and is therefore relevant to the considerations being addressed in this assessment, when considered alongside other factors.



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

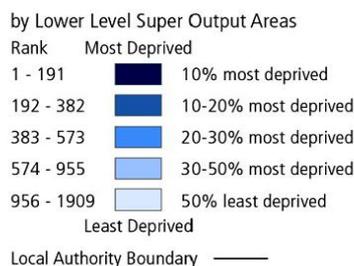
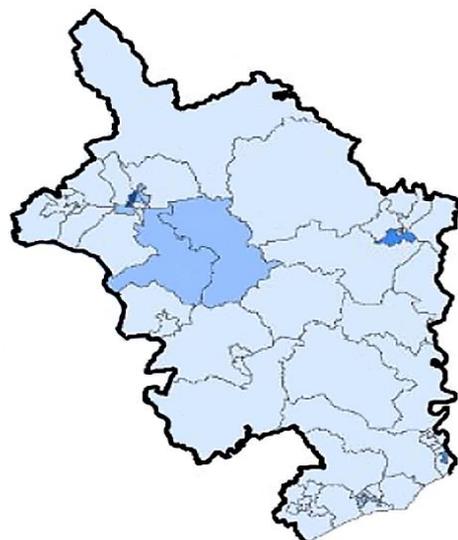
There are no designated areas of linguistic sensitivity identified in our LDP, however the Census data map shows that the north-west of Monmouthshire contains some of the highest numbers of Welsh speakers in the county. This is a material consideration when investing in English-medium education, as the consequential effects on Welsh-medium education in the same area must be acknowledged and addressed as part of the mitigating factors (See Section 3).

#### iv) Socio-economic Considerations

Monmouthshire is generally a prosperous county and according to the Welsh Index of Multiple Deprivation 2019 report, there are no areas in the most deprived 10% of Lower-Level Super Output Areas. The county does however, have higher than average levels of deprivation with regard to access to services (predominantly within rural areas) and environment (predominantly in urban areas). Poor access to community facilities and declining local service provision is an issue for rural communities.

Comparison of the map below (sourced from the 2019 report) with the map of Welsh speakers in the previous section, shows that the area where these proposals are located, show a higher level of relative deprivation compared with the majority of the county.

The Abergavenny proposal could have a negative impact on the desirability of Welsh-medium education and on parental choice, in terms of the perceived positive opportunities that a new all-through school might offer their children, especially when considered in conjunction with distance to travel issues and the actual transition numbers from Key Stage 2 to 3.



## **v) Catchment Areas and Distance of Travel Issues**

A general point to bear in mind is that there is no part of Wales where a parity of catchment areas exists 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.

Parental choice plays a factor of course, and it is inevitable that some parents will wish to send their children to their local school, regardless of the language of education, whilst traditionally, many parents choose the language of education regardless of the distance of travel required.

This is a particularly relevant point for Monmouthshire, as there are currently 28 English-medium primary schools compared with 2 Welsh-medium primary schools serving the same geographical area.

When considering secondary education, there are 4 English-medium comprehensive schools in the county, and no direct provision in terms of Welsh-medium comprehensive education, with pupils having to travel either to Ysgol Gyfun Gwynllyw in Pontypool (in Torfaen) or to Ysgol Gyfun Gwent Is Coed (in Newport).

The general provision of home-to-school transport by the Council to any school 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 may change are the pupils who need to access that provision.

The proposals for the all-through school may possibly impact on numbers attending Welsh-medium education to some degree, even when taking into account the further proposals around Ysgol y Fenni and the former Deri View site. Parents could be faced with a choice of sending their children to a significantly improved local site or sending them on a much longer journey out-of-county to Ysgol Gyfun Gwynllyw in Pontypool.

See Section 3 for related mitigating factors, as due to the nature of secondary Welsh-medium education in Monmouthshire, these factors are regional in nature not simply confined to being within this council's boundaries.

## vi) Cymraeg 2050

This is the Welsh Ministers' strategy for the promotion and facilitation of the use of the Welsh language, setting out a long-term approach to achieving the target of a million Welsh speakers by 2050. Education is central to this vision and our WESP and Welsh Language Promotion Strategy show our support and commitment to this.



As can be seen from the infographic above, Theme 3 of the strategy is the most directly relevant to these proposals, as the mitigating factors and our plans for expanding Welsh-medium education demonstrates how our wider work around the Welsh language (as evidenced by the various sub-sections here) are contributing in a positive way towards creating the required favourable conditions in terms of language planning.

## vii) The Welsh Language and Future Generations

This section is included for general reference.

The 7 aims of the Well-being "wheel" include A Prosperous Wales, aiming to create a skilled and well-educated population and A Wales of Vibrant Culture and Thriving Welsh Language. Each of the 7 aims is important in its own right but they are not separate aims, each form a vital part of how Wales should look and so each aim is linked to the other 6.

In order to achieve the desired growth in terms of the numbers of Welsh language speakers as noted in the Welsh Government's Cymraeg 2050 national strategy and our own Welsh Language Promotion Strategy and WESP, looking at each of the aims from a Welsh language perspective 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.

The Welsh Language Commissioner's 2018 guidance document on Promotion Strategies covers this in more detail, with an adapted wheel infographic showing how the Welsh language is a part of each of the 7 aims. The document is not available online at present following the cyber-attack on the Welsh Language Commissioner's website in December 2020 so cannot be linked here.

### **viii) Consultation**

The consultation period on this proposal runs from 26<sup>th</sup> April 2021 to 25<sup>th</sup> June 2021.

Our consultation document notes that should this proposal move ahead, the former Deri View Primary School site will be refurbished and Ysgol Gymraeg Y Fenni will relocate there from its current site, facilitating the continued growth of Welsh medium education in the north of the County, through increasing the capacity of that school. Further, it notes that due to the proposed increase in size, should relocation of Ysgol Gymraeg Y Fenni take place a separate statutory consultation process will be undertaken.

Ysgol Gymraeg y Fenni is clearly noted in relevant sections of the consultation document as a school that will be affected by the Abergavenny proposals, demonstrating that the Council has recognised the potential for consequential impact on the Welsh-medium education provision in the county.

The consultation has been undertaken fully bilingually. The list of consultees includes some Welsh language partner organisations, and in consulting with all Monmouthshire County Council schools, this would have included the two Welsh-medium primary schools.

This shows that when taken in conjunction with this assessment, our consultation process for the proposal in question has complied with the requirements of Welsh Language Standards 90 and 91 (see Appendix A).

### **ix) School Standards**

We work with the EAS (Education Achievement Service) to ensure that standards at all our schools are monitored and that any issues are acted upon and supported.

We also work with the EAS and the neighbouring councils of Blaenau Gwent and Newport, as our pupils travel to secondary level education in their areas due to the locations of Ysgol Gyfun Gwynllyw (in Pontypool) and Ysgol Gyfun Gwent Is Coed (in Newport), in order to ensure that Welsh medium secondary education for Monmouthshire pupils remains an attractive option for those who wish to receive a wholly immersive Welsh education experience.

### **3. Mitigating Factors (including regional)**

#### **i) Primary Sector**

Currently, Ysgol Gymraeg y Fenni has a capacity for 257 pupils plus a 60 place Meithrin. The Council has recently invested Capital funding worth £123k to site a double demountable classroom on the site (creating an additional 60 places) as an interim measure to support the growth of Welsh-medium education in the area. The school's capacity is now suitable for 317 children plus a 60 place Meithrin.

The consultation document for the all-through school notes that if those proposals move ahead, the Council also has plans to relocate Ysgol Gymraeg y Fenni to what would be a fully refurbished 420-place site (currently occupied by Deri View Primary, which would be absorbed into the new all-through school) as the permanent offer, meaning a further increase in Welsh-medium places available.

The investment in the refurbishment of Deri View, as the proposed new location for Ysgol Gymraeg y Fenni, is noted in the consultation document as being worth £1,055,424.00.

Though in the south of the county and so not as directly affected as Ysgol y Fenni will be by the all-through school proposal for Abergavenny, we also have plans to increase capacity at Ysgol y Ffin in Caldicot, whose pupils now transition to Ysgol Gyfun Gwent Is Coed in Newport.

This will ensure that the Council have sufficient places available to meet the increasing trend for demand in the primary sector in this area for the next five years and is in line with our proposal in our WESP. It also addresses issues raised in the various sub-sections of Section 2 previously.

Further, we are also looking at primary provision in the north-east of the county and are looking for potential and suitable sites in the Monmouth area. It must be noted that these possible plans are in the very earliest stages of discussion and no details are available, however it is worth noting here that those initial discussions are being had.

## **ii) Secondary Sector**

Ysgol Gyfun Gwynllyw is the Welsh-medium secondary school situated in Torfaen and is the secondary school to which pupils at Ysgol Gymraeg y Fenni transition. Recently, Torfaen Council have consulted on a plan to invest £6m to develop the site at Ysgol Gyfun Gwynllyw into a 3 to 19 school and increase capacity in the secondary sector.

This proposal may possibly have a positive impact on the demand for Welsh-medium primary places in the Abergavenny area as it becomes established. The additional primary capacity being created by our Abergavenny proposals for Ysgol Gymraeg y Fenni is currently projected to be sufficient to manage increased demand for longer than the original five-year plan.

In the north of the county, we are continuing with our initial discussions with both Blaenau Gwent County Borough Council and Powys Council in terms of Welsh medium secondary provision in the north of Gwent / south Powys area, which longer term may possibly also mitigate any potential negative impacts of the Abergavenny proposal.

In the south of the borough, pupils from Ysgol y Ffin in Caldicot transition to Ysgol Gyfun Gwent Is Coed in Newport, which opened in 2016 in a temporary location and in its permanent location in 2018.

The £16m funding for Ysgol Gyfun Gwent Is Coed came from the 21<sup>st</sup> century schools programme as a joint enterprise between Welsh Government, Newport City Council and Monmouthshire County Council, providing secondary school places for both local authorities following an increasing demand for Welsh-medium education across Newport and South Monmouthshire.

We are further proposing to develop a Welsh language only provision to secure an effective and sustainable learning pathway for all of our learners wishing to continue their education through the medium of Welsh. We will be looking to develop this through Band C and within the life of the new WESP 2021-2031.

## 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.

### **Monmouthshire County Council Welsh Language Policies and Strategies**

- [Welsh in Education Strategic Plan](#)
- [Welsh Language 5-year Promotion Strategy](#)
- [Welsh Language Standards Compliance Notice](#)

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

- [Welsh-medium and bilingual education](#)
- [Welsh Language \(Wales\) Measure 2011](#)
- [Welsh in Education Strategic Plans \(Wales\) Regulations 2019](#)
- [Welsh Government School Organisation Code - second edition](#)
- [Well-being of Future Generations Act 2015](#)
- [Cymraeg 2050](#)
- [Planning Policy Wales: TAN 20](#)
- [Learner Travel \(Wales\) Measure 2008](#)

### **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 in Monmouthshire or the region, either directly through education, through their corporate governance and/or strategic role in ensuring compliance with legislative requirements, or in the voluntary sector through delivering projects and achieving the related targets.

Many are already partners on Monmouthshire's Welsh Language Forum.

- [Ysgol y Fenni](#)
- [Ysgol Gymraeg y Ffin](#)
- [Ysgol Gyfun Gwynllyw](#)
- [Ysgol Gyfun Gwent Is Coed](#)
- [Menter Iaith Blaenau Gwent Torfaen Mynwy](#)
- [Menter Casnewydd](#)
- [Mudiad Ysgol Meithrin](#)
- [Rhieni dros Addysg Gymraeg](#)
- [Urdd Gobaith Cymru - Gwent](#)
- [Welsh Language Commissioner](#)
- [Monmouthshire Public Services Board](#)
- [Gwent Education Achievement Service](#)
- [Estyn](#)
- [Cymdeithas yr Iaith Gymraeg \(the Welsh Language Society\)](#)