

## **Planning and the Welsh language: a review of Welsh planning authorities' procedures**

### **Introduction**

In January 2019 the Welsh Language Commissioner sent a questionnaire to every planning authority in Wales, asking a number of questions about the Welsh language in the context of their planning policies. The Commissioner had conducted a planning review in 2013 and there had been a number of developments since then. Through the Planning (Wales) Act 2015 the Welsh language became, for the first time, a consideration in planning legislation created in Wales. Subsequently, in October 2017 the Welsh Government published a revised version of Technical Advice Note (TAN) 20, *Planning and the Welsh Language*. In light of these developments, the intention was to gather further evidence on how planning authorities in Wales consider the Welsh language in their work.

A response was received from 21 of the 24 authorities by the end of March 2019. It should be noted that Gwynedd Council and the Isle of Anglesey County Council act as one joint planning authority. The authorities that did not respond were Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Ceredigion County Council. After analysing the responses to the questionnaires, meetings were arranged with two of the authorities that took part in the review. The purpose of the meetings was to discuss some of the issues raised in the responses and to receive further information about them. Both meetings were held during October 2019.

It should be noted that 11 of the Local Development Plans (LDPs) which are discussed below were adopted prior to the enactment of the Planning (Wales) Act 2015. Four were adopted before the publication of TAN 20 (October 2013) and three others shortly after. Seven others were adopted before the publication of TAN 20 (October 2017). Only three were adopted after the enactment of the 2015 Act and the latest TAN was published. Two authorities have a Unitary Development Plan (UDP) rather than a Local Development Plan and are currently preparing an LDP. See further details in the two tables below.

<b>Planning authority</b>	<b>Date of LDP adoption</b>
Brecon Beacons National Park Authority	17 December 2013
Snowdonia National Park Authority	6 February 2019
Vale of Glamorgan Council	28 June 2017
Blaenau Gwent County Borough Council	22 November 2012
Caerphilly County Borough Council	23 November 2010
Neath Port Talbot County Borough Council	27 January 2016
Conwy County Borough Council	24 October 2013

Merthyr Tydfil County Borough Council	25 May 2011
Bridgend County Borough Council	18 September 2013
Rhondda Cynon Taf County Borough Council	2 March 2011
Torfaen County Borough Council	3 December 2013
Cardiff Council	28 January 2016
Swansea Council	28 February 2019
Newport City Council	27 January 2015
Gwynedd Council and the Isle of Anglesey County Council	31 July 2017
Denbighshire County Council	4 June 2013
Monmouthshire County Council	27 February 2014
Carmarthenshire County Council	10 December 2014
Powys County Council	17 April 2018

<b>Planning authority</b>	<b>Date of UDP adoption</b>
Wrexham County Borough Council	14 February 2005
Flintshire County Council	28 September 2011

### **The review's main findings**

In summary, the following conclusions were reached following the review:

- There is a lack of consistency in authorities' planning policies in the context of the Welsh language. There is no certainty that the potential impact of developments on the Welsh language is assessed reliably, or that appropriate action is taken to mitigate any adverse effects.
- There is a call from the authorities for clear, national guidance on language impact assessment and defining areas of linguistic sensitivity. Linked to this is the call for an independent, specialist arbiter with the authority to validate decisions on language and planning issues.
- A question has arisen regarding linguistic expertise within the Planning Inspectorate. The development to create a specific Planning Inspectorate for Wales will provide an opportunity to consider this further.

These conclusions are discussed below. The questionnaire questions and a summary of the answers received are presented first. (Both Gwynedd Council and the Isle of Anglesey County Council are counted as one authority.) Following this, the issues which arose in the meetings with the two authorities mentioned above are dealt with.

### **Response to the questionnaire**

1. The Authority is required to conduct an assessment of the **Local Development Plan's** impact on the Welsh language. Please outline how the Authority undertakes this. You are welcome to include a copy of any relevant guidelines or template with your response.

In summary, 15 of the 21 authorities who responded indicated that they had considered the impact of their LDP on the Welsh language.

Ten authorities stated that the Welsh language was considered in the sustainability appraisal of their LDP and, in the case of five authorities, that the appraisal included an aim relating to the Welsh language. One conducted an iterative Welsh language impact assessment of the LDP.

Two authorities undertook a Welsh language impact assessment when preparing their LDP. One of them had also undertaken a new homes occupancy survey. Three other authorities considered the Welsh language through an equality impact assessment.

Two authorities commissioned a joint study of the impact of new developments on Welsh language heartlands, or areas of linguistic sensitivity. Another authority noted that the LDP monitoring framework assesses the number of planning applications with a Language Action Plan which are allowed in the area of linguistic sensitivity. Another authority referred to such areas, noting that evidence indicates that it is not a suitable designation within the county.

In the case of one authority, no specific Welsh language impact assessment was undertaken but the impact of the LDP was assessed through the sustainability appraisal. It was one of four authorities, which adopted an LDP prior to the enactment of the 2015 Act, which referred to new legislation or revised guidelines (such as TAN 20 and Planning Policy Wales) in the context of their next LDP and the Welsh language. Two stated that the Welsh language would need to be considered in a more comprehensive way in the next LDP.

Another of these authorities intends to commission an integrated sustainability appraisal, including a Welsh language impact assessment, in conjunction with two other authorities. The LDP period for these three authorities will expire in the same year. One authority had decided, in drawing up its current plan, that the Welsh language did not require a specific policy as the county had a low percentage of Welsh-speaking residents. However, the LDP states that the Welsh language will be taken into account when determining planning applications where appropriate.

Another authority also noted that the Welsh language did not need to be addressed in the LDP as the county had a low percentage of Welsh speakers. On the basis of the Census data quoted in the LDP Sustainability Appraisal Scoping Report, the

authority decided that the LDP land use planning policies would not adversely affect the linguistic balance of the area as the use of the Welsh language there was limited.

One authority referred to a specific Welsh language policy in the LDP. Another explained that it had commissioned a language consultant to consider the evidence relating to the Welsh language within the county in order to decide whether a more detailed policy is needed in the LDP that it is currently formulating, and to help develop a suitable policy if necessary.

Two authorities did not refer to an impact assessment of the LDP. One of them referred to the use of Welsh in the consultation process, but not in the context of the impact of the LDP itself on the language. The other authority reported that it was monitoring planning applications in the area of linguistic sensitivity through the LDP. Equally, however, it did not refer to assessing the impact of the LDP itself. Of the six authorities that did not make it clear whether they had assessed the impact of their LDP on the Welsh language, this authority was the only one that had adopted its current scheme following the enactment of the 2015 Act.

## **Conclusion**

The majority of authorities had considered the impact of their LDP on the Welsh language. Eight of them had adopted their existing plans before the enactment of the 2015 Act and the other seven thereafter. This Act introduced the requirement for authorities to assess the likely impact of the LDP on the Welsh language. It is not clear why six other authorities did not note that they had carried out an impact assessment, particularly in the case of the authority which adopted its scheme following the 2015 Act. This is an indication of the lack of consistency in this area.

2. Does the Authority assess the impact of **individual planning applications** on the Welsh language?

If so:

- (a) how does it undertake this?

Eight authorities stated that they assessed the impact of individual planning applications. (It should be noted that one of them has not yet adopted an LDP. The intention of that authority is to assess impact in exceptional circumstances only and, otherwise, to conduct an impact assessment in the preparation of the LDP. Of the remainder, three LDPs were adopted following the publication of TAN 20 (October 2017). Four of these authorities assess impact in specific circumstances and one reported that all sites in the Welsh language heartlands had been assessed in the formulation of the LDP. Another stated that it assesses applications in line with two policies in the LDP. One explained that it undertakes an indirect assessment in the context of the LDP and that, if necessary, further work is undertaken in the context of

any developer assessment that the authority is not satisfied with its quality. One authority said that it assesses impact through consultation with Welsh-medium schools and its Welsh language officer where relevant. Another stated that it assesses all major planning applications. One authority explained that it does not carry out a formal impact assessment but that every planning application is considered in terms of its potential impact on the Welsh language, in accordance with Section 31 of the Planning Act 2015.

Ten authorities stated that they do not assess the impact of individual planning applications. (It should be noted that each of these authorities adopted an LDP/UDP prior to the publication of TAN 20 (October 2017)). Two authorities emphasised that they did not do so themselves, as developers were expected to carry out an impact assessment or submit a statement or plan in certain circumstances. Another explained that it did not usually assess the impact of individual planning applications, as decisions are made in accordance with the LDP, but two exceptions were identified where a language/planning consultant was commissioned to work on two planning appeal cases. In both these cases, the Planning Inspectorate permitted the application. One was in relation to the development of permanent living units as well as holiday units and the other related to a holiday site. The authority had rejected the applications as it was concerned about the impact of the developments on the Welsh language. In one case, a language consultant was commissioned to evaluate the authority's reasoning for rejecting the application. In the other case, a planning consultant was commissioned to consider the impact of the development on the linguistic and cultural character of the community.

Another authority explained that decisions are made in line with the LDP and another stated that it was not necessary to assess the impact of individual planning applications as it would duplicate the evidence base of the LDP.

There were three ambiguous answers to the question. One authority noted that it has not, as yet, assessed the impact of individual planning applications. Another authority stated that it would consider the need in accordance with Planning Policy Wales and TAN 20. Another explained that it is not essential and that it relies on enquiries during the consultation process.

## **Conclusion**

The authorities who responded positively to the question above demonstrate a range of approaches. For those who responded negatively, it is interesting to note that three of them justify this by referring to the LDP.

(b) what are the criteria for conducting a language impact assessment?

Eight authorities referred to criteria. One of them referred to the Welsh language heartlands, where the authority carries out an impact assessment on developments of a certain size. Three others referred to areas of linguistic sensitivity. These three

operate in different ways in this context. One asks developers to submit a Language Action Plan for some types of developments. (Note that this authority provided a negative answer to the previous question.) Another authority, which has not yet adopted an LDP, noted that its intention was that a case officer would carry out an assessment following receipt of a planning application. The third authority undertakes an impact assessment on developments of a particular size or type on windfall sites, in accordance with TAN 20. Another authority referred to TAN 20 and to the need to carry out impact assessments of large windfall sites where the use of the Welsh language may be affected. In this case, this means areas in which over 30% of the population speaks Welsh. Three other authorities require applicants to submit a statement or language impact assessment in the case of developments of a specific size or type. (Two of these authorities provided a negative answer to the previous question.)

Four authorities stated that they do not have any criteria. (Two of them had answered the previous question positively and the other two had given a vague answer.) Two of them deal with applications on a case-by-case basis and in another authority, a planning officer or committee decides on each application.

## **Conclusion**

Again, differences are seen in the way in which authorities operate, from following various criteria for carrying out a language impact assessment, to deciding on a case-by-case basis. This means that there is a risk of inconsistency, not only between authorities but also within those authorities that do not have established criteria.

(c) how many language impact assessments has the Authority conducted since the Planning (Wales) Act 2015 came into effect?

None of the authorities stated that they had carried out a language impact assessment. Of the eight authorities that reported that they do assess the impact of individual planning applications, one explained that the authority did not do this itself. The same explanation was received from two of the ten authorities who said that they do not carry out impact assessments. One of them stated that three applicants had submitted a Language Action Plan to the authority.

There was one ambiguous response, from an authority that does not monitor data on windfall sites.

In answering this question, one authority raised concerns regarding the definition of areas of linguistic sensitivity:

“We understand that there is no definition of linguistically sensitive areas currently in place, although authorities are free to define these areas as they wish. But this can lead to inconsistencies and a failure to identify some areas as being linguistically sensitive, where they should be identified as such, or vice versa.

Furthermore, setting definitive parameters would be difficult as there are so many variables affecting the language e.g. its use, politics, choice etc. One hopes that these issues may be addressed on a statutory footing in our local policy making procedures (under the Welsh Language Standards (No 1.0) Regulations 2015 and via key policies and strategies from the Welsh Government.”

### **Further development**

There was a significant development following the survey, where one authority approved a change to its planning policy. The aim of the change is to make the Welsh language a material planning consideration in the case of developments of five or more houses in rural areas, and ten or more houses in urban areas, whatever the number of Welsh speakers in those areas. One county councillor commented that there is inconsistency across Wales and that although the Welsh Government provides guidance, there are no clear guidelines on defining an area as one of linguistic sensitivity. Since 2014 it had been necessary to assess the impact of developments on the Welsh language in communities in the county where 60% or more of the population were Welsh speakers. The policy change will be subject to public consultation. The authority is currently developing its next LDP.

### **Conclusion**

The authorities themselves have not assessed the impact of individual planning applications on the Welsh language since at least 2015. There are concerns regarding defining areas of linguistic sensitivity and a lack of consistency amongst the authorities.

3. Does the Authority require **developers** to conduct Welsh language impact assessments in the context of individual developments?

Six authorities require developers to carry out Welsh language impact assessments. One requires a Community and Linguistic Impact Statement or Assessment, depending on the nature or extent of the development. Another authority requires an assessment in certain circumstances, and another does so in accordance with TAN 20 and criteria in the LDP. Another authority requires developers to provide a Language Action Plan for specific proposals in areas of linguistic sensitivity. Another authority explained that a developer may be asked to carry out an assessment, depending on the nature and location of the proposed development. If there are doubts about the quality of the assessment, the authority can carry out further checks of its own.

Eleven authorities indicated that they do not require developers to carry out Welsh language impact assessments. One referred to paragraph 3.3.1 of TAN 20, which states that the authority is responsible for conducting any assessment and for determining its form. Another explained that it conducts a Welsh language impact

assessment on any development of ten or more units. If that assessment indicates that the development may have a detrimental effect on the Welsh language, the developer is asked to produce a Language Action Plan. This means that, in the case of two authorities, the authority itself as well as the developer could assess the impact of a development in certain circumstances.

There were four ambiguous responses. Two authorities stated that they had not, as yet, asked a developer to carry out an impact assessment but one stated that it would do so if it considered that an application could have a negative impact on the Welsh language. Another authority stated that there was no formal requirement for developers to carry out impact assessments, but also noted that it had requested one impact assessment. Another authority noted that it could request an assessment and would follow the guidelines of TAN 20 and any other available national guidance. The same authority also said that it would consider carrying out a language impact assessment itself, in answer to question 2 above.

## **Conclusion**

The majority of authorities do not ask developers to carry out language impact assessments.

If so:

- (a) what guidelines, guidance or criteria does it provide for the developers to undertake this?

Details were received from six authorities. One stated that it provides guidance in a Supplementary Planning Guidance. A further four stated that there are criteria in the LDP and further guidance in a Supplementary Planning Guidance. In the case of one authority, it explained that its proposed Supplementary Planning Guidance would include a methodology for undertaking a development assessment. That guidance was evaluated by a linguistic consultant and an independent planning consultant. Another authority said that the criteria were in line with Section 3 of TAN 20, namely for large windfall sites in areas where over 30% of the population speaks Welsh.

There was an ambiguous response from one authority, which noted that an assessment of the likely effects of the deposit local development plan had been undertaken and that this was part of a subject paper on the Welsh language.

## **Conclusion**

All authorities requiring developers to undertake language impact assessments were able to refer to criteria for that work.

- (b) how many language impact assessments have been requested since the Planning (Wales) Act 2015 came into effect?



Three authorities reported that they had received impact assessments from developers since the introduction of the act. In one county three Language Action Plans were submitted with planning applications and requirements were imposed on two applications under Section 106 of the Town and Country Planning Act 1990. In the case of another authority, it did not ask for assessments but received some voluntarily from applicants, following the planning policy and the requirements of TAN 20. In another county 95 assessments were received, in the form of a statement or an impact assessment.

Another authority noted that it had requested and received an impact assessment, but this related to the period before the introduction of the 2015 Act.

Six authorities had not requested an impact assessment since the Act was introduced.

There was one ambiguous response, as the authority does not have the relevant information.

## **Conclusion**

One authority received a very high number of language impact statements/assessments (95). This raises a further question about the lack of consistency in the way in which planning authorities operate.

4. Does the Authority **consult with stakeholders** when considering the impact of developments on the Welsh language?

Eleven authorities reported that they do consult but not all stated that they hold consultations specifically on the Welsh language. One of them (in its response to question 2a) stated that it consults with Welsh-medium schools and the authority's Welsh language officer where relevant.

Five of the above authorities provided a general response. One stated that it conducts an open consultation exercise for all stakeholders on each planning application, while another stated that it carries out all the necessary statutory consultation depending on the nature of the application. Another authority explained that, in accordance with TAN 20, it consults with stakeholders, including the Welsh Language Commissioner, about the nature of any assessment it is considering conducting. Another authority arranges publicity and public consultation for each individual planning application. Another authority stated that it consults on the Welsh language in the few instances where an impact assessment has been discussed or introduced.

More specific responses were received from four other authorities. In preparing the LDP, one authority reported that it consults with key stakeholders (in line with the

LDP Regulations) and interested parties listed in the LDP database. The process of applying for planning permission is a public one and anyone can submit representations. The local Menter Iaith is a planning application consultee and receives the weekly planning list. If a financial contribution is received, the Menter Iaith can help to identify how the money should be spent. Another authority stated that it undertakes public consultation in accordance with the legislation and has identified specific consultees with an interest in Welsh culture in the LDP Delivery Agreement. Another authority had also identified stakeholders with an interest in Welsh culture in the preparation of the LDP. They were included in the authority's Delivery Agreement and were consulted at each stage of the LDP preparation process. Another authority consults internally, for all major planning applications, with a team responsible for promoting bilingualism. It also consults the Welsh Language Commissioner in the preparation of planning policy documents, such as Supplementary Planning Guidance.

Another authority stated that it had established a Planning and Welsh language technical group, which assesses impact assessments where appropriate.

Eight authorities do not consult specifically on the Welsh language. One stated that LDP officers review assessments.

One authority did not answer the question as it had not yet adopted its LDP.

Two authorities raised a question about impact assessment and the stakeholders that should be included in the consultation:

“Technical Advice Note 20 (Wales) states that a Welsh language impact assessment should be part of the Sustainability Appraisal processes. The authority believes that the Technical Advice Note should provide more direction on this and what emphasis should be placed on the outcomes in the context of other outcomes e.g. when the impact on the language is critical and whether it should be part of more general impacts on society. Without further guidance the necessary emphasis on the language and how this compares with other impacts could be lost. What will the outcome of a weak or deficient Appraisal be in the context of the Welsh language? It is felt that it is necessary to identify a stakeholder to verify an assessment that has a strong linguistic element. In addition no guidance is given to inspectors with regard to the amount of consideration that should be given in a Public Inquiry. It would also be helpful if a stakeholder such as the Welsh Language Commissioner were to provide comments on Welsh language impact assessments in the context of specific individual planning applications.”

“The statutory requirements in relation to consultation/publicity do not identify bodies specialising in linguistic/community issues (in terms of land use planning and language planning), and therefore the professional judgement of officials with responsibility for the development of the Welsh language and

planning policy officers (who have led on the preparation of the Local Development Plan and Supplementary Planning Guidance) will be sought in relation to information submitted by applicants for planning permission in the form of a Welsh language statement and a Welsh language impact assessment.”

## Conclusion

The authorities consult on their LDPs in a variety of ways but they do not all consult specifically on the Welsh language. It is interesting to note that one authority is proactive in updating the local Menter Iaith on planning matters and that the Menter Iaith has a role in identifying how to spend financial contributions arising from developments. No other authority referred to conferring such a role on an external organisation.

There are concerns about the official guidance given to planning authorities and it is suggested that the Commissioner should provide an opinion on Welsh language impact assessments. This raises further questions about the degree to which it is appropriate for the Commissioner’s office to undertake such work, since it is specialist work which requires local knowledge to be accomplished successfully.

5. Have past language impact assessments led to the **refusal** of planning applications or the introduction of **changes or planning conditions** to mitigate the possible impact of developments? Please provide relevant examples.

Two authorities rejected planning applications for reasons relating to the Welsh language, in the case of four applications altogether. In one case, the applicant submitted an appeal and the appeal was unsuccessful. In two other cases, although the authority rejected the applications, they were permitted by the Planning Inspectorate following an appeal.

Four authorities approved planning applications subject to conditions and/or Section 106 agreements. The conditions include affordable housing on the site, an acceptable range of housing, an acceptable number of houses, work for which skills are available locally, bilingual signage in public places and financial contributions to mitigate the impact of the development on the Welsh language.

One authority stated that it intended to recommend the installation of Welsh signage in the case of commercial development planning applications.

Twelve authorities stated that no applications had been rejected or conditions relevant to the Welsh language imposed. There was an ambiguous response from three other authorities, who were unsure as to whether there were examples of this.

Of the eight authorities that assess the impact of individual planning applications on the Welsh language, not one had rejected an application or introduced changes.

## **Conclusion**

This last question went to the crux of the purpose of impact assessment: what is the eventual outcome of the work? A small number of planning applications were rejected and two of those decisions were overturned by the Planning Inspectorate. A small number of authorities imposed special conditions when granting planning permission. This raises further questions. Considering the diversity of ways in which planning authorities operate in the context of the Welsh language, how can it be ensured that the potential impact of developments on the Welsh language is assessed reliably? How can it be ensured that appropriate action is taken to mitigate any adverse effects? On the basis of this review, it is not possible to be confident that planning authorities are acting in the most positive way in the context of the Welsh language.

## **Issues raised in the follow-up meetings**

Outlined below are the issues raised during the meetings with the two authorities referred to, including concerns that were common to both organisations.

### **Long term planning**

Officers from one authority referred to the fact that the long term nature of LDPs means that they become outdated when changes to planning policy occur at a national level. Although LDPs are reviewed, this does not necessarily allow for full consideration of all changes.

### **Impact assessment and the definition of areas of linguistic sensitivity**

Both authorities shared concerns about language impact assessment and defining areas of linguistic sensitivity. One of them had carried out research that showed the complexity of judging the link between development or non-development, and linguistic decline or improvement. The other authority's officers said that it was difficult to assess the impact on language beforehand, particularly in the case of smaller developments. It was explained that the authority received few language impact statements or assessments, and that the organisation followed Welsh Government guidelines by requiring impact assessments in the case of windfall sites only. It could be argued that these guidelines lead to a situation where the fact that planning authorities are reluctant to request language impact assessments and that they accept a small number of them, means that producing and judging such assessments is not given sufficient expert attention.

The officers asked for advice on defining areas of linguistic sensitivity. It was noted that a lack of data creates difficulties, referring to the fact that the Census takes place once every decade and that other surveys are carried out on a smaller scale. The other authority's officers hoped to designate the whole county as an area of linguistic sensitivity when publishing their next LDP. This would be in line with a proposed change of policy, which would make the Welsh language a material planning consideration in certain circumstances, whatever the number of Welsh speakers in those areas. The current requirement to assess the impact of developments on the Welsh language only in communities where a certain percentage of the population speaks the language was discussed. Officers explained that this threshold was set following the instructions of the Planning Inspector who examined the previous LDP, and that the authority itself wished to set a lower threshold. It was explained that the basis of the inspector's instructions was national policy and the view was expressed that there was tension between national policies and local aspirations. A revised TAN 20 was published during the preparation of the LDP which placed an emphasis on undertaking impact assessments in the production of LDPs rather than in the consideration of individual planning applications.

The authority's officers were critical of the lack of robust, national guidelines in terms of language impact assessment, compared to other areas such as flood defence. They felt that each planning authority had to devote time and resources individually to developing a method of conducting language impact assessments. Frustration was expressed with the situation and a call was made for planning and language issues to be raised to a national level in order to have a national impact. Reference was also made to the fact that it is possible to turn to an independent authority, such as Dŵr Cymru and Natural Resources Wales, to validate decisions on other planning matters, but that there is no specialist, independent organisation that can be asked to authorise decisions on language issues. Furthermore, a question was raised about the expertise of Planning Inspectors in language issues. This should be considered in the context of the comments noted above regarding the instructions given to inspectors and the planning applications granted by inspectors on appeal, against the wishes of planning authorities.

## **Consultation**

The authorities were asked about the role of external consultees in assessing the impact of developments on the Welsh language. Officers from one of the councils said that they consulted with the local Menter Iaith when preparing the LDP and the Supplementary Planning Guidance on the Welsh language. Officers explained that in the case of an individual planning application they would also consult with the Menter Iaith if there was doubt about the potential impact of the scheme. The other authority referred to a stakeholder forum that consulted on the LDP, including Dyfodol yr Iaith and Cymdeithas yr Iaith Gymraeg. The same authority emphasised that it was

almost too late to undertake a consultation when a planning application is received due to the influence of the LDP on its decisions.

## **Education**

Officers from one authority explained that they were trying to ensure that their development plans were aligned with the county's education plans. Work was underway to move the county's schools along the linguistic continuum in order to increase their Welsh-medium provision. The other authority's planning officers said that they worked closely with education officers. An opportunity to promote the Welsh language in the county was discussed in the wake of a proposed major development and related issues included reference to the provision of Welsh-medium education.

The development in question was the subject of a Section 106 agreement between the authority and the developer. The development is intended to include a large number of new houses and a new school. It is a condition of the agreement that the developer pays for Welsh language initiatives in the county and for employing a Welsh language officer to implement them. As part of its planning application, the developer submitted a language impact assessment which refers, among other aspects, to the provision of land on the site for a new Welsh-medium school. The authority's officers stated that the language medium of the proposed school had not yet been determined. There is an opportunity in such a case to create a link between development, the authority's Welsh in Education Strategic Plan and the Welsh Government's policy, *Cymraeg 2050: A million Welsh speakers*. In this situation, the Council could operate in accordance with Objective 4, Chapter 9 of *Cymraeg 2050: A million Welsh speakers – Work Programme 2017-21*:

“When considering the content of Welsh in Education Strategic Plans, we will look for evidence that Welsh-medium education is fully considered as part of local authorities' policy and planning developments including opportunities for Welsh-medium provision through section 106 agreements.”

## **Affordable housing**

Affordable housing was discussed and one authority's officers noted that local ties are a criterion that potential purchasers of housing of this kind must meet. This could mean increasing the possibility of Welsh speakers benefiting from the provision. It was explained that a number of developments included affordable housing only.

## **Outward migration of young people**

Both authorities referred to a problem in relation to young people leaving the county and, in the case of one authority, young people leaving rural areas in order to move to urban areas within the county. The officers of that authority considered this to be linked to a tendency by national organisations to impose an urban planning model on

rural areas and greater consideration of the needs of those areas was called for. In that county, the percentage of Welsh speakers is highest in rural areas.

### **Cross-institutional collaboration**

The authorities were asked about collaboration with other county councils. One of them works closely with a neighbouring authority which follows a similar timetable in the context of its LDP. The two plans are drawn up separately but officers from both authorities work together on some aspects of the work involved. One of the councils undertook a study on behalf of the other on the occupancy of new homes. It was also explained that collaboration takes place among planning officers more widely across the region. This includes the sharing of good practice, research work and the costs of the work where possible. There were no formal regional planning aims, however, in relation to the formulation of Strategic Development Plans.

Officers from the other authority explained that they had held discussions with other county councils in the past but that there had been no further developments, partly because each authority was following a different timetable in terms of its LDP. No formal decision has yet been made in terms of drawing up a Strategic Development Plan with neighbouring authorities. However, it was noted that there were other opportunities for driving collaboration, such as the Arfor scheme.

### **Conclusion**

The issues discussed in more detail in the meetings highlight the challenges and some of the opportunities that authorities face in the context of planning and the Welsh language. Authorities are not confident in their efforts to promote the Welsh language within the planning system because of their perception of shortcomings in the guidance available to them within national policies and guidelines. On the other hand, they have identified opportunities through collaboration with other authorities and in the context of providing Welsh-medium education and affordable housing. The main conclusions of the survey, listed above, highlight a number of issues that need to be addressed in order to safeguard the Welsh language within the planning system and to ensure consistency in the way that planning authorities operate across Wales. There is an opportunity to achieve this through collaboration between the authorities themselves, the Welsh Government and the Planning Inspectorate.