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welsh centre for language planning

Carmarthenshire Draft Deposit LDP Welsh Language Impact Assessment

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KEY DEFINITIONS

Consequence - the effect of a hazard on the presence of future persons or households who can speak Welsh if it happened usually measured on a scale of severity of outcome (similar to impact).

Decision Making - The process of identifying the likely consequences of decisions, establishing the importance of individual factors, and selecting the best course of action to address risk to the vitality of the Welsh language.

Exposure - the consequences, as a combination of impact and likelihood, which may be experienced by the Welsh language if a specific risk is realised.

Hazard - A situation or action that could lead to harm to the Welsh language or cause negative effects.

Inherent Risk - the exposure arising from a specific risk before any action has been taken to manage it.

Impact - The effect that a risk would have if it happens.

Likelihood of occurrence - the likelihood of risk of a hazard occurring. Rather than being precise (which is often spurious accuracy) the suggested option in this report is for this to be done in bands.

Qualitative risk assessment - Describes the probability of an outcome in terms that are by their very nature subjective as the assessment typically assigns relative values to assets, risks, controls and effects.

Quantitative risk assessment - A methodology used to organise and analyse scientific information to estimate the likelihood and severity of an outcome. In this approach, objective numeric values are calculated for each component gathered during a risk assessment.

Residual risk - The exposure arising from a specific risk after action has been taken to manage it and making the assumption that the action is effective.

Resilience - the power or ability to recover quickly to a previously better condition despite the presence of risk factors.

Risk - A combination of possible consequence(s) of hazards <u>and</u> their likelihood.

Risk Advantage - Adopting a strategy that increases the likelihood that it will be possible to take advantage of unanticipated positive effects.

Risk Assessment - The formal process of evaluating the consequences of hazards <u>and</u> their likelihood.

Risk Management - The process of identifying, assessing and judging risk and weighing up the available options for responding to risk and deciding upon the preferred strategy.

Risk Tolerance - the threshold to go beyond which is unacceptable.

Scenario building - provides a structured way to think about and plan for future uncertainties and explores plausible pathways of how more than one possible future might develop.

Uncertainty - Limitations of our knowledge about the effects of people choosing which language to use and the factors that influence that decision.

Weighted Threshold - the different values given to the range of percentages of Welsh speakers present in a unit of area, e.g. in this study it is 70% and over = 3; 50 – 69.9% = 2; 20 – 49.9% = 1; less than 20% = exact percentage.

Welsh Impact Assessment - the likely effect of a proposed development plan or land use development on the use/resilience of the Welsh language in an area.

Part 1 – Welsh Language Impact Assessment Methodology

1.1   Introduction

1. Carmarthenshire County Council (the Council) wishes to undertake further assessment on the Carmarthenshire LDP Preferred Strategy's likely impact on the Welsh language within the Plan area.

2. The first stage involves agreeing upon the impact assessment methodology to be used. The criteria to be used for agreeing upon a methodology are that the approach needs to be <u>comprehensive</u>, <u>realistic</u> and <u>suitable</u>.

3. The approach adopted here is to review existing guidelines to understand what are required of Local Planning Authorities (LPA's) and then review existing Welsh Language Impact Assessment (WLIA) methodologies to see whether such methodologies are still fit for purpose. In the light of this review, we then explore what other methodologies are possible, examined against the criterion of comprehensiveness, deliverability and suitability and make recommendations on the preferred methodology to be used.

1.2   The Policy Context - Planning Policy Wales and TAN 20: Planning and the Welsh Language

4. Planning Policy Wales (PPW) Edition 10, published in December 2018, makes it clear that the Welsh language is "part of the social and cultural fabric" (of Wales) and "the land use planning system should take account of the conditions which are essential to the Welsh language and contribute to its use and thriving Welsh language goal".[1]

5. Prior to PPW 10, LPA's were asked to consider that if protecting/promoting the Welsh language was identified as a priority in their Single Integrated Plan, then the needs of protecting/promoting the Welsh language should be, so far as relevant to the development and use of land, taken into consideration in developing their local development plans using the mechanism of the Sustainability Appraisal (SA).

6. TAN 20 was published prior to PPW 10 in October 2017 and explains the legislation and policy framework to consideration of land use planning and the Welsh language (Part A) and provides advice on how to consider the Welsh language in the local development plan process (Part B). The emphasis is on using the SA framework to develop a sustainable objective for the Welsh language and to assess the soundness of the Local Development Plan (LDP) against the objective set. It is noted that this advice

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[1] Welsh Government (December 2018) Planning policy Wales Edition 10, section 3.25.

is non-prescriptive. It also continues to adopt the advice for undertaking SA/SEA (Strategic Environment Assessment) assessments developed in 2005.

1.3   Review of Existing Methodologies

1.3.1   Sustainability Appraisal/Strategic Environment Assessment

7. [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to carry out a sustainability appraisal of each of the options, preferred strategy and proposals in a plan during its preparation. More generally, [section 39 of the Act](#) requires that the authority preparing a plan must do so "with the objective of contributing to the achievement of sustainable development".

Guidance on SA/SEA methodology

8. The stages of a Sustainability Appraisal of Local Development Plans are as follows:
   - **Scoping** - setting the context and objectives, establishing the baseline and deciding on the scope;
   - **Assess Local Development Plan strategic options** against the Sustainability Objectives and produce Sustainability Appraisal Report;
   - **Assess Local Development Plan policies** against the Sustainability Objectives and produce Sustainability Appraisal Report;
   - **Produce a Sustainability Statement** stating how the findings of the Sustainability Appraisal has been considered in the final Plan.

9. In terms of assessment against SA objectives, LDP's are asked to identify the likely significant effects of the option taken. Prediction of effects involves identifying likely changes to the baseline. Prediction of effects should include magnitude of the plan's effects, the sensitivity of the receptor and the effect characteristics.

10. Most assessments are based on adopting a predominantly qualitative approach. This is due to the difficulty in separating out the effects of the proposed plan from other effects and the broad scope of the plan itself.

11. In general, SA/SEA assessments focus on the direction of travel (i.e. broad-brush and descriptive) rather than on a specific outcome. Scores for predicting likely effects typically follow the guidance published for undertaking SEA's published in 2005[2]. Using this guidance, predicted likely effects are scored as follows:

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[2] Office of the Deputy PM, UK Government (2005) A Practical Guide to the Strategic Environmental Assessment Directive, Appendix 7.

++	major
+	positive
0	neutral
-	negative
--	negative

12. The scoring framework also allows for 'uncertain(?)' where there the effects cannot be predicted.

13. The Scoring Matrix suggested by Welsh Government in its Development Plans Manual consultation draft adopts this approach and is reproduced in Figure 1.1. This matrix assesses the sustainability of the proposed options in relation to the current situation at the time of conducting the assessment. Given that LDP timescales are typically for a period of 15 – 20 years, it is our view that the assessment will have more saliency if conducted in relation to the LA's predicted trajectory for population growth over the lifetime of the plan.

Figure 1.1: Welsh Government Suggested SA/SEA Scoring Matrix[3]

Symbol	Predicted effect	Suggested action
++	Very positive effects compared to the current situation	Consider any further enhancement measures
+	Positive effect compared to the current situation	Consider any further enhancement measures
0	Neutral effect compared to the current situation	Consider whether intervention could bring positive effects
-	Negative effect compared to the current situation	Consider mitigation measures: first avoidance of the impact, then reduction of impact, and finally compensation for the impact. Reconsider policy/proposed use.
--	Very negative effect compared to the current situation	Consider mitigation measures to reduce the severity of the effect, but these are likely to be difficult and/or expensive. Reconsider the policy or proposed use.
I	Effect depends on how the policy and allocation are implemented	Suggestions for implementation
?	Uncertain	More information is required. Consider where the information could be sourced? How and when it could be collected.

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[3] Welsh Government (June 2019) Development Plans Manual, Edition 3, Consultation Draft.

1.3.2 Current approaches to WLIA among Local Planning Authorities

14. **Appendix 1.1** provides a snapshot of adopted LDP's and SPG's and their consideration of the Welsh language as reviewed by IAITH/BURUM in 2019. Of the 24 Development Plans[4] examined, eleven LPA's had a specific policy 'hook' in relation to the Welsh language. Nine LPA's had identified geographic/spatial areas within their boundaries with the Gwynedd and Ynys Môn and Eryri LDP's having Plan-wide policies. In these plans, additional weighting is given to Welsh language considerations. Typically, these considerations are applied as a part of general development plan policies and proposals against which specific proposals are assessed. The IAITH/BURUM review indicated that, where relevant, almost all LPA's advocated using the WLIA methodology described in *Planning and the Welsh Language: The Way Ahead* (2005).

1.3.3 Planning and the Welsh Language: The Way Ahead (2005)

15. The key stages involved in the Welsh Language Impact Assessment methodology presented in *Planning and the Welsh Language: The Way Ahead (2005)* WLIA involve:
    - Formulating a Checklist (including a baseline)
    - Scoring the checklist for likely effects
    - Calculating the Overall Impact Index
    - Assessing against the linguistic sensitivity of the site / area.

16. This methodology has several limitations. It should be noted that while it is widely used, *The Way Ahead* has no official status and has never been endorsed by Welsh Government as its recommended WLIA methodology. Other limitations to this WLIA methodology are listed below:
    - It was principally designed and used for the purpose of assessing individual applications and not for assessing the impact of development plans.

    - The role and responsibilities of other stakeholders (in addition to the LPA) in undertaking a Language Impact Assessment is unclear.

    - The relationship between the impact of a proposed development on the vitality of the Welsh language and some of the 18 questions that form the assessment seem weak or difficult to measure because, at times, the quality of the data is not current or useful. In addition, no future scenario modelling methods are used.

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[4] Gwynedd and Ynys Môn have adopted a Joint Local Development Plan

- The Overall Impact Index does not give guidance regarding the weighting that should be considered for the results of the 18 questions. Although the methodology acknowledges the option to weigh up the five components of "community life" and the 18 associated questions, in practice this weighting is not often used in WLIAs.

- This methodology only measures impact against the baseline and not against anticipated trajectories for change in the future. It does not acknowledge that the vitality/ resilience of the Welsh language will change over time and respond to economic and social drivers along with other drivers such as people's aspirations and attitudes and to national and local policies.

- It is often not clear what the subjective basis is for deciding whether an impact is significant or not.

- The response is only considered in the context of mitigating measures and the (mitigating) measures proposed have not necessarily taken into account what linguistic factors are appropriate and relevant to the context.

1.4 Alternative Approaches to Risk Assessment and Management

17. The Anglesey and Gwynedd LDP SPG (adopted July 2019)[5] has pioneered an innovative approach in its guidance to developers for the assessment of likely effects on the Welsh language of housing or employment development proposals on large unforeseen or 'windfall' sites.

18. The guidance suggests a methodology based on a more detailed consideration of predicted effects and broadly follows the methodology underpinning the UK Government's Guidelines for Environmental Risk Assessment and Management, *Green Leaves III*[6]. In turn, *Green Leaves III* follows developments in the field of risk assessment and management widely used in a range of public policy contexts.

19. The International Organization for Standardization (ISO) has adopted an *International Standard (31000:2009) on Risk Management*.[7] This provides principles and guidelines

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[5] Gwynedd and Ynys Môn Councils (2019) Gwynedd and Ynys Môn Local Development Plan Supplementary Planning Guidance *Creating and Sustaining Distinctive Communities*.

[6] UK DEFRA/Cranfield University (2011) *Green Leaves III Guidelines for Environmental Risk Assessment and Management*

[7] International Organization for Standardization (2009) *Risk Management Principles and Guidelines*.

for use across all organisations and situations. The introduction to ISO 31000 explains the reasoning behind the introduction of a worldwide standard:

"Although the practice of risk management has been developed over time and within many sectors in order to meet diverse needs, the adoption of consistent processes within a comprehensive framework can help to ensure that risk is managed effectively, efficiently and coherently across an organization. The generic approach described in this International Standard provides the principles and guidelines for managing any form of risk in a systematic, transparent and credible manner and within any scope and context.

In general terms, 'risk management' refers to the architecture (principles, framework and process) for managing risks effectively, while 'managing risk' refers to applying that architecture to particular risks."

20. **Figure 1.2** overleaf has been reproduced from the ISO 31000 document. It presents a model of risk management that identifies the relationship between the principles that underpin the management of risk, a framework to follow in undertaking risk management, and the detailed process of conducting a risk assessment.

21. ISO guidelines identify the following characteristics of effective risk management:
    - describing and establishing the context;
    - identifying, analysing, assessing, and addressing risk; and
    - communicating and consulting with stakeholders throughout the process.

22. The characteristics listed above are not too dissimilar to the steps of undertaking a SA/SEA assessment. While the focus is still broad-brush, the predicted likely effects are:
    - differentiated more clearly in terms of both the magnitude of consequences and likelihood of happening;
    - not given a neutral score thus avoiding a tendency amongst users of those frameworks that use odd scales (three, five, seven etc.) towards clustering around the central point.

Figure 1.2: The Architecture of Effective Risk Management – the relationship between principles, framework and process[8]
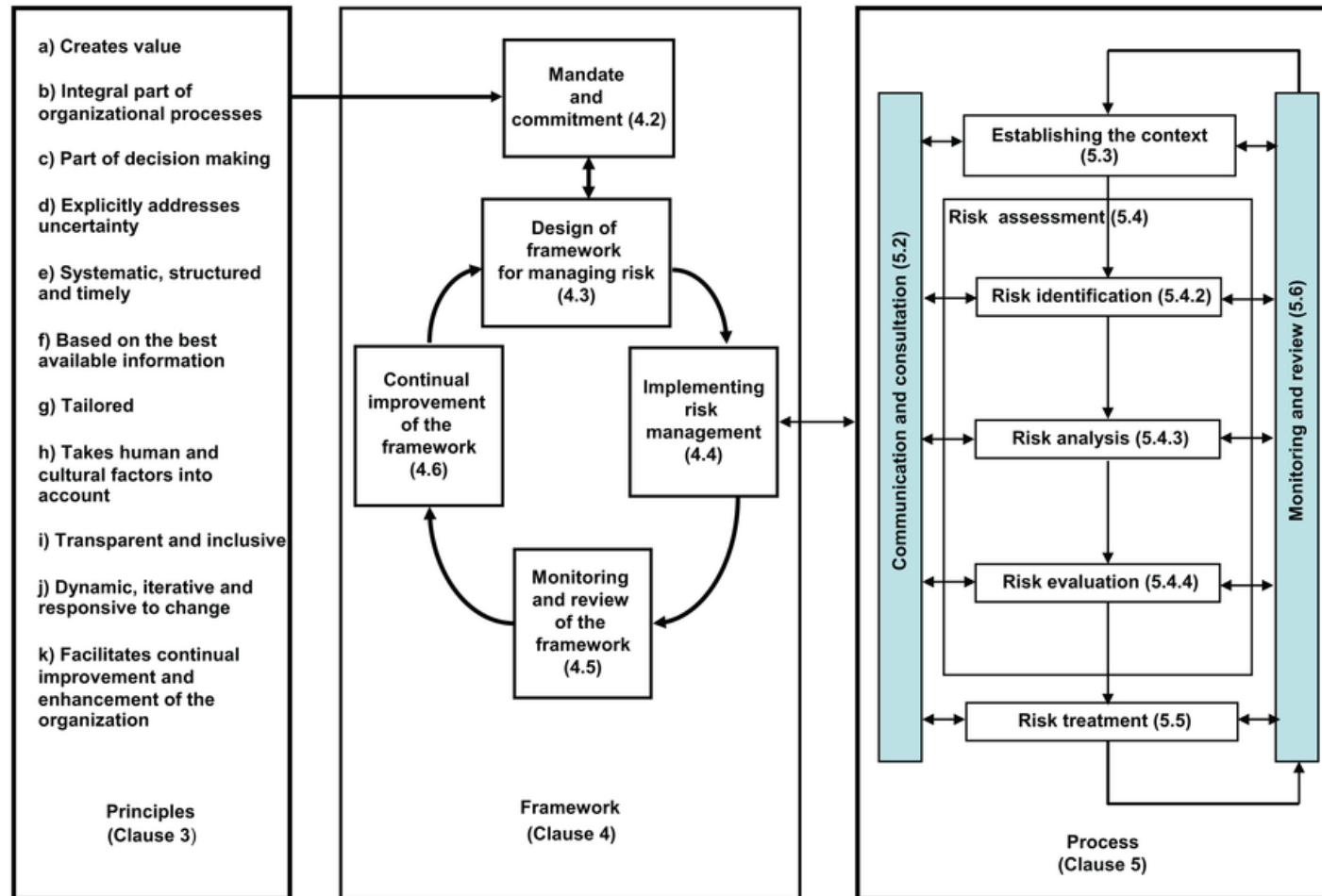
[8] Source: International Organization for Standardization (2009) *Risk Management Principles and Guidelines*.

23. *Green Leaves III* recommends a cyclical framework for environmental risk management based on four main components:

- formulating the issue or problem recognising the key pathways between source of hazard and receptor(s);
- planning for and carrying out an assessment of the risk;
- identifying and appraising the risk management options available;
- addressing the risk with the chosen risk management strategy ensuring that the implemented strategy is appropriately monitored.

24. **Figure 1.3** presents a possible approach to Welsh Language Resilience Risk Management within the LDP plan-making process and is an adaption of this general risk management framework.

Figure 1.3: Welsh Language Resilience Assessment and Management Framework – the relationship between the Framework, the Process and the Context (Sustainability/Well-being Objectives).[9]

FRAMEWORK	PROCESS	POLICY CONTEXT
	Screening "Development plans should include a statement on how planning authorities have taken the needs and interests of the Welsh language into account in plan preparation and how any policies relating to the Welsh language interact with other plan policies." (PPW 3.27)	Sustainability/Well-being Objectives
STAGE 1 PREPARE FOR THE ASSESSMENT	Set the Context Identify and Engage with Key Stakeholders Develop Model Screen Out Insignificant Hazards Design the Assessment	Procure Baseline Data

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[9] Adapted from DEFRA/Cranfield University (2011) – *"Green Leaves III – Guidelines for Environmental Risk Assessment and Management*

STAGE 2 CONDUCT THE ASSESSMENT	Build Scenario ↓ Identify Main Hazards ↓ Assess Consequences ↓ Assess Likelihood ↓ Describe Risk and Uncertainty	⟷	Measure potential impact against Sustainability/ Well-Being Objectives
STAGE 3 APPRAISE THE OPTIONS	Evaluate impact on language reproduction factors ↓ Evaluate impact on language production factors ↓ Evaluate resource capacity to implement ↓ Evaluate organisational capacity to implement ↓ Choose preferred option	⟷	Measure potential impact against Sustainability/ Well-Being Objectives
STAGE 4 ADDRESS THE RISKS	Type of Response (e.g. mitigation/ benefit enhancement measures) ↓ Monitoring/ Reporting Strategy ↓ Produce Report		

25. This model presents a process comprising of four stages:

Stage 1 – preparing for the risk assessment, defining the problem or issue with

accuracy and designing the assessment;

Stage 2 – undertaking the risk assessment;

Stage 3 – identifying and considering the viable options and choosing a 'preferred strategy' to address or manage the risk;

Stage 4 – preparing an action plan to address the risk within the preferred strategy.

26. In **Figure 1.3**, the middle column outlines the steps to be followed and the matters to consider in each stage. The right-hand column addresses the criteria against which the risk is assessed and managed. The model assumes that the Local Development Plan reflects the Local Authority's aspirations at the end of the period of the plan (typically 15 years). The sustainability of this plan (including the sustainability of the Welsh language) will be assessed through the Sustainability Appraisal process.

1.4.1 Predicting Resilience Scores

27. HM Treasury's Orange Book identifies three important principles for identifying risks:
    - *"Ensure that there is a clearly identified process in which both likelihood and impact are considered for each risk;*
    - *Record the assessment in a way which facilitates monitoring and the identification of risk priorities;*
    - *Be clear about the difference between inherent and residual risk."* [10]

1.4.2 Consequences and Likelihood

28. The combination of consequence and likelihood chosen should be based on the risk of something happening within a defined time period. It is also vital to ensure that the selected likelihood score relates to the likelihood of a <u>level of consequence/impact occurring</u>, NOT just the likelihood of the activity/event/hazard occurring.

29. It should be noted that is not necessary to have full certainty about facts and issues to rate risk. Nor does uncertainty automatically generate a high risk. The level of uncertainty is only a component of the risk calculation process. Risk assessment is therefore making the MOST informed decision possible that includes uncertainty.

30. **Figure 1.4** proposes a matrix for identifying risks to the resilience of the Welsh language from appraising the Preferred Strategy of the Carmarthenshire LDP. Although it is possible to develop more sophisticated matrices, we believe that the proposal better meets the criteria required for the methodology, particularly in terms of deliverability. It proposes the use of a 4*4 matrix based on the following impact and likelihood scales:

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[10] HM Treasury (2004): *The Orange Book: Management of Risk- Principles and Concepts*

Impact	
Major Positive	+2
Minor Positive	+1
Minor Negative	-1
Major Negative	-2

Likelihood	
Highly Likely	4
Likely	3
Possible	2
Unlikely	1

31. This proposed model acknowledges that the risk assessment will need to be revisited as time goes on and/or as new or better information and evidence becomes available.
32. **Appendix 1.2** describes the proposed *Welsh Language Resilience Assessment and Management Framework* methodology in greater detail.

Figure 1.4: Proposed Welsh Language Resilience Risk Matrix

WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted	MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
				Major Positive	Minor Positive	Minor Negative	Major Negative
				Increase of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory
				High	Low	Low	High
	Probability	**Frequency**	**Score**	**2**	**1**	**-1**	**-2**
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely — 4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely — 3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible — 2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	HIghly Unlikely — 1	2	1	-1	-2

1.5 Limitations of Risk Assessment and Management Models

33. As with other models, Risk Assessment and Management Models attempt to represent a system using a collection of concepts and assumptions to help people understand that system. In the context of the resilience of the Welsh language the attempt is to design a model of the 'real world' in terms of language use. There are, necessarily, constraints on the extent to which such a model can represent the complexity of the linguistic practices that characterise the linguistic 'vitality' or 'resilience' within specific neighbourhoods.

34. The current understanding of the relationship between changes in land use and its implications for influencing peoples' language practices, either negatively or positively over time, especially in the future, is relatively limited. In order to be robust, language impact assessments need to be based upon data that is *reliable* and of *high quality*. As such, it is necessary to continue to rely largely on a proxy measure of language ability – a record of the population's ability to speak Welsh, as expressed in response to a question in the decennial Population Census. While it is essential to be 'objective' and ensure accuracy and replicability, it is also necessary to acknowledge the limitations of indicators such as 'language ability' census data. Consequently, it is also necessary to depend upon the contribution of stakeholders to evaluate the data used in a Risk Assessment and Management Model and relate it to their experience and understanding of local language practices.

35. Finally, due to its roots in identifying hazards and assessing and managing risk, the model is currently probably more adept at identifying negative rather than positive impacts and opportunities for enhancing benefits. Within the context of assessing the impact of physical developments on the vitality and resilience of the Welsh language - and the need to refine risk assessment and management approaches - this will probably be an ongoing 'work in progress' for the immediate future.

1.6 Summary and Conclusions

36. This section has reviewed existing WLIA methodologies. The method that is currently widely used by LPAs, *Planning and the Welsh Language: The Way Ahead* (2005), is dated and has its limitations. Based largely on a model that we have been developing for assessing the impact of large, unanticipated developments on the Welsh language, it is proposed that the Council undertakes further assessment on the Carmarthenshire LDP Preferred Strategy's likely impact on the Welsh language within the plan area using an alternative *Welsh Language Resilience Management Framework*. The approach to WLIA methodology contained within this framework is aligned to current risk management approaches and, in our view, provides a suitable, comprehensive and deliverable method for conducting the assessment. While it is recognised that this

risk assessment and management framework is relatively untested, it is nevertheless underpinned by a robust ISO methodology for risk assessment and management.

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Part 2 - Welsh Language Impact Assessment of the Deposit LDP's Preferred Strategy

2.1 Introduction

1. Part 2 requires a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Growth and Spatial Options** upon the Welsh language in Carmarthenshire building upon the assessment already completed for the Sustainability Appraisal.

2. The PCPA 2004 as amended by the PWA 2015 (section 11) confirms the requirement for the SA to include "*an assessment of the likely impacts of the plan on the use of the Welsh Language in the plan area. The purpose of this is to ensure that the scale[11] and location of change set out in the plan supports the Welsh language and ensure appropriate mitigation measures are in place, if required.*"[12]

3. A key outcome for the LDP system is "*to support sustainable development and quality places based around the National Sustainable Placemaking Outcomes, aligned with national policy (set out in PPW) integrated with a SA/SEA/HRA, including Welsh Language and the requirements of the WBFGA 2015.*"[13]

4. This assessment is composed of the following elements:

   - A review of the background and context for the assessment;

   - A more detailed analysis of the assessment already done as part of the Sustainability Appraisal;

   - Identifying and populating any existing gaps to achieve a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Growth Option** using the methodology adopted in Part One;

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[11] Our emphasis
[12] Planning and Compulsory Purchase Act 2004, section 60B (1) (b) and 60B (2) as amended by the Planning (Wales) Act 2015 (section 11)
[13] Op.cit.

- Identifying and populating any existing gaps to achieve a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Spatial Option** using the methodology adopted in Part One

- Making recommendations of what changes, if any, are needed in order to overcome any negative impacts of the Preferred Growth and Spatial Options.

2.2 The Context

5. The Council's Preferred Strategy was published in December 2018 with a request for any comments to be received by early February 2019.

6. A total of five objections and concerns were raised about the assumed choice of population projection growth (PG Long Term) and consequent scale of housing and employment growth adopted for the Preferred Strategy.

7. In terms of the impact on the Welsh language the Welsh Government's Planning Directorate raised concerns around the soundness of the proposed Preferred Growth strategy, specifically in relation to:

   "The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable. You should also demonstrate the growth strategy is compatible with the aspirations of neighbouring authorities and provides the most sustainable locations for growth for the wider area.

   "the proposed distribution of housing growth as ... it raised sustainability issues based on the role and function of places, particularly the level of growth attributed to Tiers 3 and 4 including its impact on the Welsh language."[14]

8. The WG response goes on to state that the following key requirement of TAN 20 has not been addressed:

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[14] Mark Newey, Planning Directorate, Welsh Government (February 2019) *Carmarthenshire County Council – Replacement Local Development Plan – Preferred Strategy Consultation: Welsh Government Response*

"The consequence of the level/distribution of housing growth proposed on the Welsh language needs to be clearly articulated especially as past high levels of in migration and international migration are being used to justify the housing requirement………

There is no indication the authority has considered the potential strategic approaches to the Welsh language, as outlined in paragraph 2.5.2 of TAN 20. The authority should consider a suitable approach, taking account of how it fits with neighbouring authorities, and consider whether there are any anticipated impacts on the language which should be avoided or where they cannot be avoided, require mitigation."[15]

9. In specific relation to the proposed Spatial Strategy the WG made the following comments:

"The SA of the Hybrid Option alludes to positive effects (SA, Figure 6) however the implications of the settlement hierarchy and proposed distribution of growth (SP16) is not conclusive in this respect (SA, Figure 8). There is no indication the authority has considered the potential strategic approaches to the Welsh language, as outlined in paragraph 2.5.2 of TAN 20.

10. The Council, in its meeting on May 15th 2019 adopted the recommendations of the Executive Board to note the representations received, ratify the officer's recommendations and to delegate authority to amend the Preferred Strategy in light of the recommendations emerging from the SA/SEA, HRA process and emerging evidence as part of the preparation of the Deposit LDP**.**

11. In terms of the specific response to the representations on the Preferred Growth and Spatial Strategy, the report: "*Noted, the scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP. Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal.*"[16]

12. In addition, the Council adopted the following motion at its full Council meeting on 10th July 2019:

"This council believes that the whole of Carmarthenshire is an 'area of linguistic sensitivity and significance' and that the planning system has a crucial role to play in

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[15] Op. Cit.
[16] Carmarthenshire County Council (2019) , *Appendix 2 Preferred Strategy: Summary of Represesentation/Responses and Recommendations*

supporting the Welsh language across the county. To this end, we believe that the language should be a Material Planning Consideration in all applications for the development of five or more houses in rural areas and ten or more in urban areas in every community, irrespective of the percentage of Welsh speakers.

We maintain that this policy is necessary and justifiable due to:

- *the need to address the severe and unexpected reduction in the number of Welsh-speakers in Carmarthenshire in the 2011 Census*
- *being a contribution towards the Welsh Government's target of creating a million Welsh-speakers by 2050*
- *complying with the Wellbeing of Future Generations Act, in particular "a Wales of Vibrant Culture and Welsh Language: a society that promotes and protects culture, heritage and the Welsh language…"*

13. Of equal relevance as context to this study is also the officers' decision to commission Edge Analytics to provide further consideration of possible population, housing and employment projections in the light of new evidence relating to mid-year population estimates and migration trends. This work was completed in September 2019 and led to the adoption of a revised Population projection (PG10 year – 2019) as the basis of calculating housing and employment land needs.

2.2.1 Welsh Government Guidance

14. The Welsh Government's national planning policy for Wales is contained in Planning Policy Wales (Edition 10). **Figure 2.1** below is a reminder of the National Sustainable Placemaking Outcomes set by Welsh Government. Within the outcome of Creating and Sustaining Communities is a requirement that the LDP system "enables the Welsh language to thrive".

Figure 2.1 National Sustainable Placemaking Outcomes

15. Technical Advice Note (TAN) 20, published in October 2017 provides more detailed guidance on how LPA's should consider LDP options in terms of their impact on the Welsh language.

"*LDP options*

3.3 The preferred strategy of the LDP will derive from a series of strategic options. These options will set out potential levels of growth and key locations for growth. LPAs should identify how each option is expected to impact on the use of the Welsh language. Details on how to assess options through the SA can be found in section 6.3 of the LDP Manual".

16. Section 6.3 of the LDP Manual in turn describes a process of identifying realistic options and assessing those options for predicted effects, both positive and negative.

17. A new draft Development Plans Manual was published for consultation in Summer 2019 and whilst it has yet to be published in its final form, the current Manual does provide important clues as to current WG thinking.

"The Draft Development Plans Manual (Sections 4.13 and 4.14)

In summary, LPAs must consider the likely effects of their development plan as part of the SA process and include a statement within the deposit plan on how this has been considered and or addressed within the development plan.

The SA process is the mechanism for considering how:

➢ **the scale and location of growth,**

➢ **the vision, objectives, policies and proposals**

individually and in combination, impact on the Welsh Language. [Our emphasis]

Where evidence indicates a detrimental impact on the use of the Welsh Language the LPA can assess whether the strategy should be amended, or mitigation measures should be identified.[17]"

18. In relation to assessing the likely impacts of a development plan on the Welsh Language section 4.14 summarises the legislative requirements and guidance as follows[18]:

In summary, LPAs must consider the likely effects of their development plan as part of the SA process and include a statement within the deposit plan on how this has been considered and or addressed within the development plan. The SA process is the mechanism for considering how the scale and location of growth, the vision, objectives, policies and proposals individually and in combination, impact on the Welsh Language. Where evidence indicates a detrimental impact on the use of the Welsh Language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

2.3 Findings of the Sustainability Appraisal (SA)

19. Our approach is based on a review of how the impact on the Welsh Language has been considered in the SA process. This is from the Scoping Report (July 2018) to the

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[17] Welsh Government (June 2019) *Consultation on Draft Development Plans Manual Edition 3*
[18] Welsh Government (June 2019) *Consultation on Development Plans Manual edition 3.*

Initial Sustainability Appraisal (SA) of the initial Preferred Strategy published for consultation in December 2018 and, finally, the Sustainability Appraisal Report of the Deposit LDP produced in November 2019.

20.   The main aim of this report is to provide a more detailed assessment of the anticipated impacts of the Deposit LDP upon the Welsh language. However, this Report also informs the production and content of the Plan itself as well as the SA. As such, this report presents new evidence to inform the SA and the LDP itself as part of an iterative approach which reflects the most up-to-date information available.

21.   A background summary of the principles and requirements for conducting a Sustainability Appraisal can be found at **Appendix 2.1**.

Carmarthenshire LDP SA/SEA General Methodology

22.   Section 2.4 states the adopted approach to assessing magnitude and significance of effects:

"Given the broad nature of plan proposals and the difficulty of separating other causes of the effects, a qualitative approach is considered to be the most meaningful approach. However, qualitative does not mean 'guessed' and predictions need to be supported by evidence. Once the evidence has been considered, a judgement must be formed on whether or not the predicted effect is considered significant. (Figure 1) provides a framework by which judgements of significance can be made consistently and ensuring prediction, evaluation and mitigation are all incorporated into the appraisal."[19]

Scoping Study - Stage A

23.   The Scoping Report describes how the Welsh language has been considered as part of the SA:

"It is now a legislative requirement that the SA must include an assessment of the likely effects of the plan on the use of Welsh Language (section 62(6A) PCPA 2004 as inserted by section 11, PWA 2015)."

-*"it is considered prudent and necessary to include (the Welsh Language) as a separate heading and issue for the purposes of this SA. There should not be an over*

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[19] Carmarthenshire County Council (November 2019) *Carmarthenshire Revised Local Development Plan: Sustainability Appraisal Report of the Deposit LDP.*

emphasis on these issues as separate individual matters and many of the themes are interwoven and interrelated – this is particularly the case with the Welsh language."[20]

24. The Scoping Report thus identifies Welsh Language and Culture as one of 15 sustainability issues each with an objective:

- SA1 Sustainable Development
- SA2 Biodiversity
- SA3 Air Quality
- SA4 Climatic Factors
- SA5 Water
- SA6 Material Assets
- SA7 Soil
- SA8 Cultural Heritage and Historic Environments
- SA9 Landscape
- SA10 Population
- **SA11 The Welsh Language**
- SA12 Health and Well-being
- SA13 Education and Skills
- SA14 Economy
- SA15 Social Fabric

25. The Scoping Report describes the importance of the County as one of the heartlands of the Welsh language and notes the steep decline in the number and percentage of Welsh speakers over the period from 1991 to 2011, particularly 2001 to 2011 where it had the second largest decline in percentage terms amongst Welsh counties. The Scoping Report also develops a baseline against which to assess the likely impact of the revised LDP. **Figure 2.2** reproduces an extract from Appendix B of the Sustainability Appraisal Report of the Deposit LDP (November 2019) (we assume that the reference to the UDP in line 10 is a typographical error).

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[20] Op.Cit., Section 5.2

Figure 2.2 The Business as Usual Baseline

Predicted Effect Without Implementation of the LDP
The adopted LDP defines Language Sensitive Areas which are communities with a significant proportion of Welsh speakers where proposals for the provision of housing and employment will have the most impact upon the future vitality and viability of the Welsh language. The Language Sensitive Areas in the LDP are based on the 2001 Census and do not reflect the most recent Census Data which shows a general decline in areas where there is a high concentration of Welsh speakers, particularly in the traditional Welsh speaking heartlands . There is however an increase in the overall number of Welsh speakers, particularly in school age children. National legislation and Planning Policy Wales ensures the impact of development on the Welsh language is taken into account when assessing planning applications, but without the UDP there would be no local Policy which specifically requires developers to consider the impact of certain proposals in the areas of the County where the Welsh language is an important part of the social fabric.

26. A SA Framework is then developed for each of these issues.   It is stated that *"each objective is supported by a number of sub-objectives and accompanying 'decision making criteria' to aid in the assessment process"*. **Table 2.1** reproduces the objective and key issue identified for the Welsh Language.

Table 2.1 The Welsh Language Sustainability Objective and Key Issue

11 The Welsh language	
11-1 Encourage growth of the Welsh language and culture	Will the LDP encourage the growth of the Welsh language and culture?

2.3.1 Comment

27.   In discussing the 15 SA Objectives the Report notes that:

"There should not be an over emphasis on these issues as separate individual matters and many of the themes are interwoven and interrelated – this is particularly the case with the Welsh language."[21]

28. Following publication of the SA Scoping Study in July 2018 for consultation, no specific representations were made on the aspiration and wording of the objective. Two responses were received – neither of which raised issues relating to the scope and to the Welsh language.

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[21] Carmarthenshire County Council (2018) Sustainability Appraisal of the LDP – Scoping Study.

2.4 Findings of The Initial Sustainability Appraisal of the Draft Preferred **Growth** Strategy

29. The LDP's draft Preferred Strategy was published for an eight-week consultation period in December 2018 alongside the Sustainability Appraisal/Strategic Environmental Assessment (SA – SEA) of the Preferred Strategy. The following summarises the Preferred Strategy and reproduces the Easy Read version produced and published as part of the consultation.

    "The Preferred Strategy is an early stage in the development of the LDP that begins to set out the long-term vision for Carmarthenshire by indicating how much development is needed within the County and broadly where this is likely to be. It sets out the strategic objectives and the strategic land use polices to deliver that vision. It is based on an analysis of the context, requirements, main issues and aspirations that relate to land use and development."[22]

30. The main issues are highlighted as:

    - *"Lack of new homes being built.*

    - *Lack of employment opportunities, broadband and public services in rural areas.*

    - *Young people leaving the County;*

    - *Meeting the needs of an ageing population.*

    - *Distributing growth sustainably."*[23]

31. A summary of the LDP's Preferred Growth Strategy is found at **Appendix 2.2**.

    SA Initial Report Stage B

32. The Initial Report was published in December 2018.

33. The SA considered that the most prudent baseline was to consider "*how the area would change under the current (2006 – 2021) Local Development Plan in the absence of new policies being introduced*" (para. 2.5.1). The narrative goes on to explain in the ensuing

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[22] Carmarthenshire County Council (2018) Consultation on the preferred revised LDP Preferred Strategy.
[23] Op. Cit.

paragraph that regard has been given to existing plans, programmes and policies in place (para. 2.5.2). We have assumed similar parameters for our additional assessment later in this evaluation.

2.4.1 Comment

34. In assessing the likely impact of each Option on the Welsh language against the Business as Usual (BAU) scenario, in our view, a baseline of the implications of the scale of changes anticipated under the BAU Scenario on the Welsh language is required.

2.4.2 The SA's Assessment of the Reasonable Alternatives for the Preferred Scale of Growth

35. The assessment of Strategic Growth Options is contained in section 4.1 of the SA. This section describes the eight demographic scenarios (two of which are employment–led scenarios) that were generated and how these were converted to identify the resulting number of dwellings required to deliver the LDP objective. Their SA score is then assessed against the existing LDP dwelling requirement of 1,013 dwellings per year. **Figure 2.3** reproduces Figure 4 from the Initial SA which summarises the score for each Option with the score for the Welsh Language Objective highlighted in yellow.

Figure 2.3 Testing of Strategic Growth Option against the Sustainability Objective Framework

Figure 4 Testing of Strategic Growth Options against the Sustainability Objectives framework

Growth Option	SA1 Sustainable Development	SA2 Biodiversity	SA3 Air Quality	SA4 Climatic Factors	SA5 Water	SA6 Material Assets	SA7 Soil	SA8 Cultural Heritage and Historic Environment	SA9 Landscape	SA10 Population	SA11 Welsh Language	SA12 Health and Well-being	SA13 Education and Skills	SA14 Economy	SA15 Social Fabric
Option 1 224 dwellings a year	-	+/-	+/-	+/-	+		+	I	I	--	-	--	?	--	--
Option 2 436 dwellings a year	-	+/-	+/-	+/-	+		+/-	I	I	-	-	-	?	-	-
Option 3 470 dwellings a year	-	+/-	+/-	+/-	+		+/-	I	I	-	-	-	?	-	-
Option 4 482 dwellings a year	-	+/-	+/-	+/-	+		+/-	I	I	-	-	-	?	-	-
Option 5 659 dwellings a year	+	+/-	+/--	+/-	+		+/-	I	I	+	+	?	?	+	+
Option 6 939 dwellings a year	+	+/-	+/-	+/-	-		+/-	I	I	+	+	?	?	+	+
Option 7 1,160 dwellings a year	-	-	-	-	-		-	I	I	+	+/-	+	?	++	+
Option 8 1,313 dwellings a year	-	-	-	-	--		-	I	I	+	+/-	+	?	++	+

SA – SEA Initial Report
December 2018

21

Source: Carmarthenshire County Council (December 2018) Sustainability Appraisal Initial Report

36. The SA does not specifically identify which was the Preferred Growth Option although the draft Preferred Strategy itself refers to a level of growth equivalent to Option 5 (9,885 - 659 dwellings a year) based on the PG Long Term population scenario that anticipates catering for a population increase of 17, 567 by 2033.

37. Compared to the BAU scenario the SA assesses the impact on the Welsh language as *minor positive*. **Figure 2.4** reproduces the commentary made from Table 6 of the Initial SA Report.

Figure 2.4   Commentary on SA of Strategic Growth Option 5

SA11 – Welsh Language	+	Increasing numbers of young people is likely to have a positive effect on the Welsh language as more young people are education through the medium of Welsh in the County.

2.4.3 Comment

38. There appears to be one or more missing words in the commentary but essentially the commentary assesses that the scale of growth (compared to the BAU Scenario) will result in a greater number of young people being retained in the Plan Area.

39. However, given that BAU would result in 1,013 dwellings per year compared to 659 dwellings per year under Option 5, it is not clear how Option 5 would lead to more young people being educated in Welsh. In our view, it is more likely that the present County Welsh Language Education Strategy would seek to grow more 3 – 16 Welsh speakers under the BAU Option. However, it is likely that there would be more in-migration of non-Welsh speakers under BAU, particularly the later age cohorts of the 16 – 64 age group and the 65+ age group, and that, at least in percentage terms the proportion of Welsh speakers would decline. It should also be borne in mind that in the long-term, those who move into the County may have families of their own who would likely be educated through the County's education system.

40. As a result of this Initial SA and stakeholder engagement a Hybrid Spatial Option ("Balanced Community and Sustainable Growth Option") was eventually chosen as the draft Preferred Strategy for consultation.

41. As described in paragraphs 10 -12 further analysis of response and population projections led to a revised assumption about housing requirements and led to a revised Preferred Strategy being endorsed by Council (as part of the Draft Deposit Revised LDP) in November 2019.

2.4.4 The Draft Revised Deposit Local Development Plan Preferred **Growth** Strategy

42. The revised Preferred Strategy (PS) seeks to deliver an overall population increase of 15,115 (8.1%), with the requirement for 8,835 new homes (equivalent to 589 new homes per year) and the delivery of a minimum of 5,295 jobs over the revised LDP period 2018-2033.

43. The SA Report of the Draft Deposit revised LDP was produced and endorsed by Council at the same time. In addition to the assessments made as part of Stage B and C, the introduction includes a more detailed explanation of the "Business as

Usual" assumptions made about the Baseline and future trends. **Figure 2.5** below reproduces Section 4.2 and Table 5:

Figure 2.5 Business as Usual Assumptions

4.2 Future Trends

The SA Scoping Report brought together a detailed analysis of the current state of the social, economic and environmental situation across Carmarthenshire, characteristic likely to be affected by the LDP as well as existing problems relevant to the LDP.

Table 5 presents the likely evolution of the baseline aspects of the social, economic and environmental situations, without the implementation of the LDP. These likely future trends are considered to be either static, improving or declining. Future trends were calculated based on the analysis of the baseline data identified and compiled within the SA Scoping Report and how these trends have changed over time. Further commentary on these trends are discussed in Appendix 2.

Table 5 Likely evolution of the baseline aspects of the social, economic and environmental situations in the absence of a revised Local Development Plan

SA Objective	Future Baseline
SA1 – Sustainable Development	Declining
SA2 – Biodiversity	Declining
SA3 – Air Quality	Declining
SA4 – Climatic Factors	Declining
SA5 – Water	Declining
SA6 – Material Assets	Static
SA7 - Soil	Declining
SA8 – Cultural Heritage and Historic Environment	Declining
SA9 – Landscape	Declining
SA10 – Population	Static
SA11 – Welsh Language	Declining
SA12 – Health and Well-being	Declining
SA13 – Education and Skills	Improving
SA14 – Economy	Improving
SA15 – Social Fabric	Improving

Source; Carmarthenshire County Council (November 2019) Sustainability Appraisal Draft Deposit Plan

44. As can be observed above in relation to the resilience of the Welsh language the assumption for the Business as Usual scenario is "*declining*".

45. The revised growth options were assessed and its summary conclusions reported in Table 14 and Section 6.2 and are reproduced in **Figure 2.6** below:

Figure 2.6 SA Scores for the three Additional 2019 Growth Options

Table 14 Summary of the SA of the rLDP revised Growth Options

Growth Options	PG Long Term (2019) 671 dwellings per year	PG 10 Year (2019) 589 dwellings per year	PG Short Term (2019) 585 dwellings per year
SA1 Sustainable Development	+	+	+
SA2 Biodiversity	+/-	+/-	+/-
SA3 Air Quality	+/-	+/-	+/-
SA4 Climatic Factors	+/-	+/-	+/-
SA5 Water	+	+	+
SA6 Material Assets	0	0	0
SA7 Soil	+/-	+/-	+/-
SA8 Cultural Heritage	I	I	I
SA9 Landscape	I	I	I
SA10 Population	+	+	+
SA11 Welsh Language	+	+	+
SA12 Health and Well-being	?	?	?
SA13 Education and Skills	+/-	+/-	+/-
SA14 Economy	+	+	+
SA15 Social Fabric	+	+	+

In summary, these growth options all contribute positively to supporting a sustainable economy and a healthy, balanced society, whilst also reducing the risks of negative effects on environmental SA Objectives.

It was concluded that the preferred growth option would be PG 10 Year (2019 Addendum) as this option provided a balance of socio-economic benefits in the delivery of the Swansea Bay City Region Deal, the Council's Corporate Strategy, regeneration and job creation objectives and progressing the Council's ambitions in delivering affordable homes across the County, whilst also looking to reduce tensions between development and the potential for impacts on SA Objectives such as Biodiversity, Air Quality, Water, Soil, Cultural Heritage, Landscape and Welsh Language.

Source: Carmarthenshire County Council (November 2019) extracts from SA of the Draft Deposit revised LDP

46. In relation to the impact on the Welsh language the Preferred Growth Option (PG10 Year (2019 Addendum) scored "*minor positive*". The commentary in Appendix 6 of that document gives the following reason for the score:

"*The predicted increase in the numbers of young persons is likely to have positive effects on Welsh Language*"

2.4.5 Our High-level Welsh Language Impact Assessment of the Preferred **Growth** Strategy

47.   This section provides a high-level impact assessment of the likely impacts on Welsh language resilience of the Preferred Growth Strategy.

48.   Our starting point for conducting the Assessment was to review the assumptions made about the baseline position. We were unclear as to whether correlating an increase in the number of persons (especially young persons) with various levels of growth was correct or sufficient. We also consider that the narrative would benefit from robust reference to the context in which Welsh Government policy seeks to realise a million Welsh Speakers in Wales by 2050 and the consequences of this direction in policy travel for the position by 2033 and for Carmarthenshire in particular.

49.   **Appendix 2.3** presents our analysis of the Welsh Government's projected and trajected number of Welsh speakers age 3 and over from its 2011 Census baseline or the period up to 2050 and their possible consequences for the number of Welsh speakers age 3 and over for Carmarthenshire by 2033. In summary, we posit the following position:

"Applying the same change (22.5%) in the percentage of the population aged 3 and over who speak Welsh to the projected change in the overall percentage figure of Welsh speakers in Carmarthenshire would possibly lead to a growth in the number of Welsh speakers aged 3 and over to 78,048 *22.5% = 95,608.

*This would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 52.0%. This compares to 43.9% recorded in the 2011 Census. **Figure A2.3-1** shows the trajectory of the growth in numbers of Welsh speakers in Carmarthenshire based on the overall trajectory for Wales."*

50.   All population scenarios developed suggest that the main component of growth would be net migration from other parts of the UK. Internal migration figures are produced annually and are based on records of persons registering and de-registering with GP's in various parts of the UK and are produced on a county basis. As the scale, source and destinations of movements in and out of a county can have major implications for

the Welsh language we sought to understand what those implications might have for the Plan Area.

51. **Appendix 2.4** presents our analysis of the situation. In summary, our key findings are:

"Analysis of the gross migration figures show that a significant proportion of net migration in terms of Carmarthenshire (in and out migrants) are internal to Wales.

The analysis of the 2011 Census of Population returns for those persons who moved from an address outside the County during the previous twelve months also suggests that a significant proportion (around a third) of in migrants to Carmarthenshire were from households where at least one adult spoke Welsh.

Similarly, around one in six households from outside Wales had at least one adult who speaks Welsh.

Whilst past results are, in themselves, no predictor of future outcomes, the evidence presented does suggest that gross in migration is likely to include a significant proportion of households where at least one adult may be able to speak Welsh and thus provide better foundations to plan for enhancing the resilience and vitality of the Welsh language."

52. Our third piece of analysis then sought to understand the key implications of adopting the Preferred PG 10 Year (2019 Addendum) Growth Scenario for the Welsh language baseline trajectory. This is presented in **Appendix 2.5.**

53. Our key finding is:

"Based on assumptions about the characteristics of in-migrants from the 2011 Census, the net change in population scenario figures for 2019 PG10 over WG14 and the future success rate of Carmarthenshire's Welsh Language Education Strategy, the numbers of Welsh speakers could possibly be higher over the WG Trajectory by 4,206.

Total number of Welsh speakers = 95,608 + 4,206 = 99,814

Percentage of Welsh speakers age 3+ = 99,814 divided by 195,527 = 50.5%

This suggests a likely reduction of 1.5% percentage point reduction from the WG14 Trajectory scenario (52.0%)."

<u>Likelihood</u>

54.   In addition to assessing magnitude of impact, the other key aspect of Risk Assessment is determining the likelihood of an event occurring. In this case, the likelihood of the net percentage change in the number of Welsh speakers increasing by, for example, 0.5% is dependant on a number of assumptions. The key assumptions include past experience of the characteristics and changes found on the basis of the previous Plan being realised, particularly in terms of household formations, employment growth and housing land allocation take-up.

55.   In terms of realising population and household projections and economic growth, the consistency of realising projections is not particularly good. The evidence of realising land allocations is a little better.

56.   The relationship between development land take-up and the proportion of Welsh speakers is poorly understood. The analysis of housing completions between 2001 and 2011[24] and changes in the number of Welsh speakers over the same period does suggest an extremely weak correlation. In fact, the anlaysis of ward areas undertaken by Carmarthenshire County Counil suggests a negative correlation between the steepest decline in Welsh speakers and a low number of housing completions.

57.   The 2014 University of Wales Trinity St. David study[25] of the experience of the development of three estates found that around 52% of the 158 families who responded to the survey had members that were able to speak Welsh. It should, however, be noted that only 27% of these reported that Welsh was the main language of the home.

58.   In conclusion, therefore, due to the evidence being undeveloped, the likelihood of the above scenario being realised is at present relatively weak.

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[24] Carmarthenshire LDP (2019) Welsh Language Change and Housing Completions 2001- 2011.

[25] Lewis and Fisher (2014) A study of the possible impact of new developments on Welsh speaking communities in Carmarthenshire, namely three housing estates in Carmarthen, Cross Hands and Llandeilo.

2.4.6 Scoring the Initial Risk

59. In terms of the scale of likelihood of the magnitude of change (-1.0% over and above the trajectory) being realised, this is initially scored at -2 using the risk assessment matrix reproduced in **Figure 2.7** overleaf. This score comprises an assessment of the magnitude of the consequence and the likelihood of that consequence.

Figure 2.7 Welsh Language Impact Assessment of LDP Preferred <u>Growth</u> Strategy

					MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
					Major Positive	Minor Positive	Minor Negative	Major Negative
WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN PREFERRED GROWTH STRATEGY				Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted	Increase of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory
					High	Low	Low	High
		Probability	Frequency	Score	2	1	-1	-2
LIKELIHOOD		Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely 4	8	4	-4	-8
		Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely 3	6	3	-3	-6
		Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible 2	4	2	-2	-4
		Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	Highly Unlikely 1	2	1	-1	-2

2.5 Findings of The Initial Sustainability Appraisal (SA)of the draft Preferred **Spatial** Strategy

60. The process of preparing the Carmarthenshire replacement Local Development Plan (rLDP) involved working alongside the SA assessor to generate six spatial options. One of the initial steps requires an understanding of the role and function of places and how the proposed distribution of growth will impact on those places (**Figure 2.8**).

Figure 2.8 The Role and Function of Places

The Role and Function of Places
The spatial strategy underpins all elements of the plan and must demonstrate compliance with the gateway test, search sequence and National Sustainable Placemaking Outcomes in PPW.

The spatial strategy must clearly communicate where future development will be located, why and how it will deliver the vision, key issues and objectives.

*In order to develop and create sustainable places, each LPA must have a thorough understanding of its area, including strengths, opportunities and constraints, demonstrated by an up-to-date evidence base. A robust understanding of **the role and function of places**, supply and demand factors, both within and beyond its administrative boundary is fundamental to achieving an effective strategy and quality planning outcomes. This must be clearly articulated in the plan and evidence base*

Source: Welsh Government (2019) Draft Development Plans Manual, edition 3

61. CCC published a revised Role and Function Paper in Summer 2019. The Paper sought to provide the evidence for adopting a new approach to its Preferred Spatial Strategy:

"*In considering a settlement hierarchy for the revised LDP, this paper considers the rationale of adopting a character area / cluster approach rather than what has traditionally been considered a 'top down' approach based on key services and facilities" (para 1.5) A character area / cluster approach seeks to acknowledge contrasting spatial features and the respective contributions of individual settlements within these areas.*"[26]

62. The paper then goes on to examine the evidence from the review of the current LDP (2006 – 2021) in terms of the delivery of housing and employment
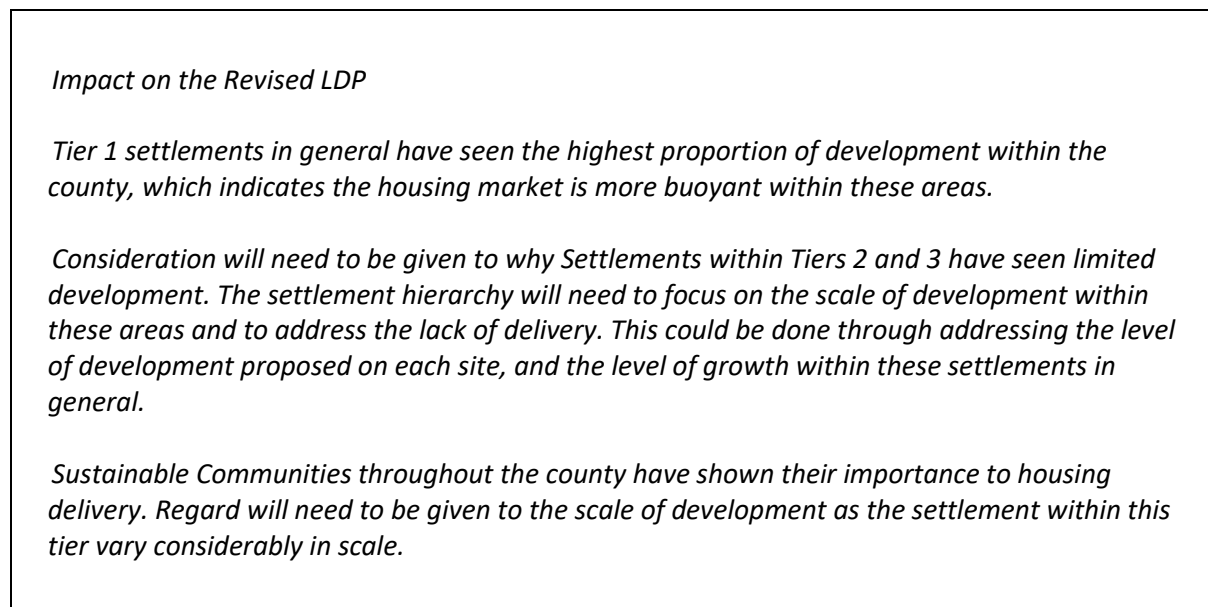
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[26] Carmarthenshire County Council (July 2019) Revised Role and Function Paper

In summary, the key findings are:

- *The hierarchy of settlements identified within the LDP is across four tiers consisting of three Growth Areas (Llanelli, Carmarthen and Ammanford / Cross Hands), six Service Centres, eleven Local Service Centres and 42 Sustainable Communities which consists of some 135 villages*

- *Development was distributed across each of these settlements, however in summary, many settlements have developed at a greater pace than others. The reasons for this may be due to the housing and employment market being more buoyant in certain settlements, or that the wrong site is allocated within that settlement."*[27]

63. The impact of the current LDP is summarised in the following **Figure 2.9**:

Figure 2.9 Summary of Impact of Current LDP

Impact on the Revised LDP

Tier 1 settlements in general have seen the highest proportion of development within the county, which indicates the housing market is more buoyant within these areas.

Consideration will need to be given to why Settlements within Tiers 2 and 3 have seen limited development. The settlement hierarchy will need to focus on the scale of development within these areas and to address the lack of delivery. This could be done through addressing the level of development proposed on each site, and the level of growth within these settlements in general.

Sustainable Communities throughout the county have shown their importance to housing delivery. Regard will need to be given to the scale of development as the settlement within this tier vary considerably in scale.

Source: Carmarthenshire County Council: Background Paper Revised Role and Function of places in Carmarthenshire

64. In considering the spatial options and settlement framework for the revised LDP, the Deposit Plan proposes a series of geographical clusters which support a hierarchy of settlements. The LDP Plan Area is broken down into 6 geographical clusters, each with a principal or service centre supporting other settlements.

- Carmarthen and its Rural Areas;

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[27] Carmarthenshire County Council (July 2019) Revised Role and Function Paper

- Llanelli and the Southern Gwendraeth Area

- Amman and Upper Gwendraeth

- Teifi;

- Upper Tywi Valley

- Western Carmarthenshire

65. Chapter 6 then goes on to describe the characteristics of each cluster and how each cluster will contribute to the delivery of the Plan.

2.5.1 SA Assessment of Predicted Welsh Language Impact of the Initial Preferred **Spatial** Strategy

66. As part of Stage B of the SA an assessment was made of six initial spatial options which varied as to where and what level housing, employment and services were to be encouraged to locate. Following this initial SA of, and stakeholder engagement, in addition to these six options, a further "hybrid option" was developed.

67. This is summarised in sections 4.5.1 and 4.5.2 of the Initial SA and is reproduced in **Figure 2.10** overleaf:

Figure 2.10 Summary of the Hybrid Option

4.5 Hybrid Option – Balanced Community and Sustainable Growth

4.5.1 As a result of this Sustainability Appraisal, and subsequent stakeholder engagement, it is recommended that a hybrid option is considered as the preferred option which reflects a number of characteristics from the options above. This hybrid option seeks to build on the approach highlighted through Strategic Option 4 - Community Led, seeking to provide opportunities for rural areas and ensuring the diversity of the County and communities is recognised, but removing the prescriptive approach of assigning character areas within the County. This option aims to retain an approach which reflects the role and function of settlements and will seek to be responsive in how it assigns growth, to urban and rural areas of the County.

4.5.2 The hybrid option will incorporate elements of Option 5, recognising and reflecting investment and economic benefits to the County and its communities through the Swansea Bay City Deal, and other economic opportunities. As is the primary focus in Option 2, it also acknowledges that sustainable growth needs to be supported by the availability of a range of appropriate infrastructure. In line with Option 6, it will recognise that growth should also be deliverable and orientated to a community's needs and market demand.

68. The SA of all Spatial Options, including the Hybrid Option, is summarised in Figure 6 of the SA and reproduced below in **Figure 2.11** (with the assessment against the Welsh Language Objective (SA11) highlighted in yellow).

Figure 2.11 Summary of SA of Spatial Options

Figure 6 Summary of the Sustainability Appraisal of Spatial Options, including Hybrid Option

SA Objective	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Hybrid
SA1 Sustainable Development	+	-	-	+	?	?	+
SA2 Biodiversity	I	+	I	I	+	I	I
SA3 Air Quality	-	-	-	-	-	-	+
SA4 Climatic Factors	+/-	+/-	+/-	+/-	-	-	+/-
SA5 Water	-	+	-	+	-	-	+
SA6 Material Assets	+	-	-	+	-	-	+
SA7 Soil	I	+	-	I	+	+	I
SA8 Cultural Heritage	I	I	I	I	I	I	I
SA9 Landscape	I	I	-	I	I	I	I
SA10 Population	++	-	-	++	+/-	+/-	++
SA11 Welsh Language	+	-	-	+	+/-	-	+
SA12 Health and Wellbeing	+	-	-	++	+/-	+/-	++
SA13 Education and Skills	+	-	-	+	++	?	++
SA14 Economy	+	-	-	+	++	?	++
SA15 Social Fabric	+	-	-	++	-	-	++

Source: Carmarthenshire County Council (December 2018) Initial SA of Preferred Strategy.

69. The Hybrid Option is not directly assessed and scored in terms of anticipated impacts on the Welsh language (SO 11). However, the SA appears to suggest that the option, in terms of Dwellings per Year, will lie somewhere between Option 4 and Option 5 and has led to the score being assessed as a **minor positive effect** on the Welsh language. The scores and justification for the assessment are given as follows in **Table 2.2:**

Table 2.2 The Predicted Impact on Welsh Language of Options 4 and 5 and the Hybrid Option

Spatial Option 4 Community Led Option	*"This option has largely positive effects on Welsh language, as growth directed to more rural areas will help to ensure that Welsh speakers, in particular young people, can afford housing and access jobs in rural areas and are retained in these areas."* **Predicted Impacts: Short Term + Medium Term + Long Term +**
Spatial Option 5 City Deal Ripple Effect	*"Focused growth around the Swansea Bay city region developments in both Carmarthen and Llanelli has the potential to create a vibrant environment in which Welsh speakers may be encouraged to remain in the county. However, this option would see development directed to areas that have historically seen high levels of development. These areas may not have the potential to absorb changes in character and so Welsh language could be adversely effected."* **Predicted Impacts: Short Term +/- Medium Term +/- Long Term +/-**
Hybrid Option	*"This option has the potential to support existing settlements with regards to services and facilities which in turn is likely to have a positive effect on the retention of young welsh speakers in the county. It will also align residential development with significant, skilled employment opportunities as a result of the Swansea Bay City Deal, which is likely to encourage the retention of young Welsh speakers in the county."* **Predicted Impacts: Short Term + Medium Term + Long Term +**

2.5.2 Comment

70. We agree with WG that the Draft Preferred Spatial Strategy does not fullly consider how the scale and location of growth, individually and in combination, will impact on the Welsh language.

71. We recognise, however that this is often difficult to assess because the relationship between development land take-up and the proportion of Welsh speakers is poorly understood.

72. However, some evidence is available about the spatial impact of the growth of housing over the last period since the 2001 Census.

73. Firstly, as a result commissioning of this study, an initial study undertaken in late 2019 by the Forward Planning Unit examined data on the spatial distribution of housing completions and rates of decline in the percentage of residents speaking Welsh between 2001 and 2011[28] and changes in the number of Welsh speakers over the same period.   The analysis of housing completions does suggest a negative correlation between the steepest decline in Welsh speakers and a low number of housing completions.

74. Secondly, limited research[29] undertaken by researchers from the University of Wales St. David's in 2014 on the impact of new development on the distribution of Welsh speakers on three settlements suggests that a significant proportion of new developments are occupied by existing Welsh speaking households moving from the existing stock. A study undertaken as part of the Ynys Môn and Gwynedd Joint Local Development Plan also found similar evidence.[30]

75. We recognise that obtaining a full understanding of the relationship between past distribution of housing development and its impact on the Welsh language is not be easy due to the lack of comprehensive data available but an examination and understanding of proxy data (such as PLASC data over time) may provide additional information of the spatial impact of such past growth.

76. Given the prominence given for the Preferred Growth and Spatial Strategies to retain a higher proportion of young people (including Welsh speakers) it would also be extremely valuable if it were possible to gain a better understanding of the barriers to retaining Welsh speakers. It is acknowledged, however, that such a study goes beyond

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[28] Carmarthenshire LDP (2019) Welsh Language Change and Housing Completions 2001- 2011.
[29] Lewis and Fisher (2014) A study of the possible impact of new developments on Welsh speaking communities in Carmarthenshire, namely three housing estates in Carmarthen, Cross Hands and Llandeilo.

[30] Gwynedd Council Research and Analytics Service (2014) Gwynedd and Anglesey Housing and the Welsh Language Survey

the LDP's remit and function and as such there is no expectation that this work is undertaken as part of the Plan's production.

2.5.3 Our High-Level Welsh Language Impact Assessment of the Preferred **Spatial** Strategy

77. As with SA methodology in general, our assessment starts by trying to identify a 'business as usual' position.

78. Part 2.1 of the High-Level Assessment looked at the Preferred Growth Strategy and assessed the likely impact of adopting the 2019 population growth (PG10 year Addendum) assumption rather than the WG2014 based assumption.

79. Whilst there are County level projections produced there is no sub county data available and it is therefore more difficult to identify and test the 'Hybrid Option' against what might have been 'business as usual'.

80. The existing LDP expires in 2021 and uses a different Spatial Strategy and whilst it would have been useful to test the position in 2021 against the results of the Census this is of course not possible.

81. Our preferred approach is to assume what might be the position by 2033 in the absence of the Hybrid Option. We have sought to project what might be the position if the current LDP spatial strategy were continued but on the basis of the Business as Usual position adopted for the Preferred Growth Strategy, namely a population projection based on WG 2014 – based Projection. This corresponds to Option 1 in the SA which is described as "*the distribution of employment and housing in a manner reflective of their existing scale....*"[31] Based on our calculations of a projected population of 199,631 this would lead to a projected population age 3 and over of 195,638.

82. This would apportion growth to 2033 to the six clusters based on their current proportions of the population. In our prediction of the WLIA in Part 2.1 for Carmarthenshire as a whole, we assumed that by applying the same change (22.5%)

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[31] Carmarthenshire County Council (December 2018) Sustainability Appraisal of Draft Deposit LDP, section 5.6

over the period 2011 – 2033 in the percentage of the overall population of Wales aged three and over who speak Welsh, Carmarthenshire would have a proportionate share of the WG Trajectory for a growth in the number of Welsh speakers from 78,048 in 2011 to 95,608 by 2033.

83. In our analysis of the preferred Growth Strategy, based on our assumptions on adopting a target of 75% on the proportion of 3-15 age group Welsh speakers and assumptions on the impact of migration flows on Welsh language household members, we have predicted that this growth option is likely to lead to an increase in the number of Welsh speakers to 99,814. We have calculated the effect of the Preferred Spatial Strategy on the distribution of population among the six clusters by apportioning the distribution of allocations onto our estimate of the 2018 populations for each cluster.

84. **Table 2.3** shows the results the likely impact on the spatial distribution of Welsh language speakers when comparing the Preferred Spatial Option against the Option 1 ("Business as Usual") Spatial Strategy.

Table 2.3 Comparison of Welsh Language Predicted Impacts of Business as Usual and Preferred Spatial Strategy Options

		LDP 1 (Option 1) Projection			Preferred growth strategy	Preferred Spatial Strategy		Difference	
	Cluster	Residents Age 3+	Welsh Speakers		Residents Age 3+	Welsh Speakers		Count	Percentage
Cluster 1	Carmarthen and its Rural Areas	35936	18742	51.7%	36283	19567	53.9%	825	2.2
Cluster 2	Llanelli a Gwendraeth Isaf	78335	28051	35.5%	79092	29285	37.0%	1234	1.5
Cluster 3	Aman a Gwendraeth Uchaf	45420	29696	64.8%	45859	31002	67.6%	1306	2.8
Cluster 4	Dyffryn Teifi	13817	8322	59.7%	13950	8688	62.3%	366	2.6
Cluster 5	Tywi Uchaf	11154	5851	52.0%	11262	6109	54.2%	257	2.2
Cluster 6	West Carmarthenshire	10976	4945	44.6%	11082	5163	46.6%	218	2.0
Total		195638	95608	48.9%	197527	99814	50.5%	4206	1.6

- In terms of the impact on Cluster 1, this suggests that the number of Welsh speakers would be 825 (2.2%) higher under the Preferred Spatial strategy.

- In terms of the impact on Cluster 2, this suggests that the number of Welsh speakers would be 1234 (1.5%) higher under the Preferred Spatial strategy.

- In terms of the impact on Cluster 3, this suggests that the number of Welsh speakers would be 1306 (2.8%) higher under the Preferred Spatial strategy.

- In terms of the impact on Cluster 4, this suggests that the number of Welsh speakers would be 366 (2.6%) higher under the Preferred Spatial strategy.

- In terms of the impact on Cluster 5, this suggests that the number of Welsh speakers would be 257 (2.2%) higher under the Preferred Spatial strategy.

- In terms of the impact on Cluster 6, this suggests that the number of Welsh speakers would be 825 (2.0%) higher under the Preferred Spatial strategy.

- The difference in percentage terms varies between 1.5% for Cluster 2 (Llanelli and Gwendraeth Isaf) to 2.8% for Cluster 3 (Aman and Gwendraeth Uchaf).

Overall, this suggests that the proportion of Welsh speakers would be 1.6% higher (50.5% compared to 48.9%).

Likelihood

85. A discussion of the characteristics of 'likelihood' of a particular level of magnitude happening, and caveats surrounding any assumptions made is discussed in paragraphs 55 to 59 above.

86. In conclusion, therefore, due to the evidence being undeveloped, the likelihood of the above scenario being realised is at present relatively weak and scored as 2.

2.5.4 Scoring the Initial Risk

87. In terms of the scale of likelihood of the magnitude of change for the Preferred Spatial Strategy against the LDP Option 1 (Business as Ususal Strategy) (overall +1.6%) being realised, this is initially scored at +2 using the risk assessment matrix reproduced in **Figure 2.12** overleaf and suggests a minor positive result. This score comprises an assessment of the magnitude of the consequence and the likelihood of that consequence.

88. In terms of the SA Framework in our view this would be scored as MINOR POSITIVE.

Figure 2.12 Predicted Risk Score for the Preferred <u>Spatial</u> Strategy

					MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
					Major Positive	Minor Positive	Minor Negative	Major Negative
WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN PREFERRED SPATIAL STRATEGY			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted		Increase of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory
					High	Low	Low	High
	Probability	Frequency		Score	2	1	-1	-2
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely	4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely	3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible	2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	HIghly Unlikely	1	2	1	-1	-2

2.6 Secondary, Cumulative and Synergistic Effects of the draft Preferred Strategy

89. As referred to in paragraph 17 of Part 2 above, the new edition of the Development Plans Manual is likley to require LPAs, as part of the SA process to consider how the scale and location of growth individually and <u>in combination</u>, impact on the Welsh language.

90. Within our brief, we have confined our examination to a consideration of how the SA has assessed the secondary, cumulative and synergistic effects of the revised Preferred Strategy on SA Topic 11 (*Will the LDP encourage the growth of the Welsh Language and Culture?*) . This analysis is contained in Appendix 6 of the SA[32].

91. As there appears to be no specific assessment of the secondary, cumulative and synergisitc effects of the preferred strategy, Section 7 provides a summary of the sustainbility impacts of the Deposit LDP and provides the following commentary on sumulative, secondary , synergisitc and indirect efffects:

"Cumulative, secondary, synergistic and indirect effects

The plan as a whole has also been appraised for cumulative, synergistic and indirect effects"[33]

92. From our examination and assessment of the likely cumulative, secondary, synergistic and indirect impacts of the Preferred Growth Strategy, we conclude that it is extremely difficult at this stage to separate out any such effects from the influence of other factors such as economic, social and environmental uncertainities; the application of Welsh Government policies towards encouraging the growth of the use of the Welsh language; spatial policies at national and strategic levels and those of neighbouring local planning authorities.

93. We score the direct effects of the Preferred Growth Strategy and Preferred Spatial Strategy against the Business as Ususal scenarios as **minor negative** and **minor positive** respectively. However, we would score the indirect and other effects as uncertain due

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[32] Carmarthenshire County Council (November 2019) *Sustainability Appraisal of the Revised LDP Report on the Deposit LDP*

[33] Op. Cit. Page 48

to the lack of robust evidence which might help weigh the influence of the Draft LDP against other factors.

2.7   Recommendations for Managing the Risk

94. In order to manage the risk identified by this high-level Welsh language impact assessment of Carmarthenshire's Preferred Strategy (both Scale and Distribution of Growth), a Welsh Language Action Plan that sets out the Local Authority and other stakeholders' responses to the risk identified will need to be put in place.

95. In line with Carmarthenshire's Strategic Policy, SP7: Welsh Language and Culture "*All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture*" (SP7, p.1). WL1: Welsh Language and New Developments identifies that such measures could include:

- *"Providing support and funding towards organisations and bodies that provide activities, facilities and education for Welsh speakers and learners, and*

- *Support and funding towards Welsh language classes."* (WL1, p.2)

96. The appropriate mitigation measures will need to be identified for i) Carmarthenshire as a whole, ii) each of the six cluster areas, and iii) each development. It is expected that, at each level, the mitigating measures will include, as appropriate:

- Promoting and facilitating children's early acquisition and use of Welsh in the home and among close family members and family friendship networks;

- Maximising childcare and non-statutory early education provision through the medium of Welsh;

- Maximising the capacity of statutory education providers to develop the Welsh language awareness, abilities and use of pupils who speak Welsh at home, speak English at home, speak other home languages;

- Maximising the capacity of tertiary and further education providers to develop the Welsh language awareness, abilities and use of young and older adult learners;

- Maximising the opportunities for adults to develop their Welsh language awareness, learn Welsh and to use Welsh in the workplace;

- Promote and support organisations, networks and spaces that provide opportunities for people to interact, socialise and collaborate through the medium of Welsh.

97. As part of the planning permission process WL1 allows for *"conditions or legal agreements to secure the implementation and enhancement measures proposed within the Action Plan"* (WL1: p.2) to be placed upon developers.

98. The proposed Welsh Language Action Plan will be agreed by all relevant stakeholders and partners including the Local Authority and the developer and costed in full once the proposed development has been agreed.

99. An appropriate framework and plan for updating and monitoring the Welsh Language Action Plan will also need to be agreed by stakeholders and partners.

*   *   *   *   *   *   *

Part 3 – Welsh Language Impact Assessment of the Deposit Revised LDP Policies

3.1 Introduction

1. Part 3 of the agreed Brief[34] requires a Welsh Language Impact Assessment of the likely anticipated impacts which the Deposit LDP's Policies are likely to have upon the Welsh language in Carmarthenshire.

2. The stated SA objective is to "*Encourage growth of the Welsh language and culture*" Planning Policy Wales also expects the land use planning system to "*take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well-being goal*".

3.2 Methodology

3. It was agreed at the Briefing meeting that, given the constraints on time and resources, IAITH/BURUM would work iteratively with the Forward Planning Section and focus its efforts on assessing the impacts of the two most relevant policies relating to the Welsh language (SP7 and WL1).

4. A copy of early drafts of these two policies were provided in early October. These are reproduced in **Figure 3.1** without their reasoned justifications.

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[34] The original brief also requested the following components but could not be delivered due constraints on time and resources:

- An assessment of the likely anticipated impacts which the Deposit LDP's site allocations are likely to have upon the Welsh language in Carmarthenshire
- Recommendations for the provisions and guidance to be set out in Supplementary Planning Guidance to assist with the deliberations of future planning applications, including a methodology for any further assessment or appraisal which may be required at application stage as well as guidance as to what information will be required in support of future planning applications.

Figure 3.1 Draft Welsh Language Strategic and Detailed Policies

Strategic Policy – SP 7: Welsh Language and Culture

The Plan supports development proposals which safeguard and promote the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated.

WL1: Welsh Language and New Developments

All development proposals throughout Carmarthenshire will be required to safeguard and promote the Welsh language.

Allocated Sites

The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard and promote the Welsh language:

Residential development for 10 or more homes in the Principal Centres and Service Centres;

Residential development for 5 or more homes in the Sustainable Villages; and,

Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more.

Windfall Sites

The following proposals on windfall sites will be required to present a Welsh Language Impact Assessment in support of any planning application:

Developments of 10 or more homes in the Principal Centres and Service Centres;

Developments of 5 or more homes in the Sustainable Villages; and,

Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more

> **Proposals which do not accord with the Plan's housing trajectory (Appendix 9) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.**
>
> **Residential developments for 10 or more homes on both allocated and windfall sites will be required to positively contribute towards the vitality and viability of Welsh language community groups and Welsh language learning opportunities.**

5. We agreed with the general thrust of these draft policies as they provide appropriate policies that safeguard and support the Welsh language. However, our assessment concludes that the main area that could be strengthened relates to including a form of wording that supports conditions that allow the Welsh language to be more resilient, or indeed, thrive, in addition to being avoiding decline and/or maintaining the existing conditions. This supports the general direction of travel in creating conditions for the Welsh language to thrive as required by the Well Being goal.

6. Our suggestions have been the inclusion of word(s) and actions that "enhance" the interests for the Welsh language and culture in the county. **Figure 3.2** reproduces the suggested changes as a result of our assessment.

Figure 3.2 Revised Welsh Language and Culture Policies

> **Strategic Policy – SP 7: Welsh Language and Culture**
>
> **The Plan supports development proposals which safeguard, promote <u>and enhance</u> the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. <u>All development proposals subject to WL1, will be expected to identify measures for that enhance the interests of the Welsh language and culture.</u>**

WL1: Welsh Language and New Developments

All development proposals throughout Carmarthenshire will be required to safeguard and promote the Welsh language.

Allocated Sites

The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard, promote <u>and enhance</u> the Welsh language:

Residential development for 10 or more homes in the Principal Centres and Service Centres;

Residential development for 5 or more homes in the Sustainable Villages; and,

Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more.

Windfall Sites

The following proposals on windfall sites will be required to present a Welsh Language Impact Assessment in support of any planning application:

Developments of 10 or more homes in the Principal Centres and Service Centres;

Developments of 5 or more homes in the Sustainable Villages; and,

Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more.

Proposals which do not accord with the Plan's housing trajectory (Appendix 9) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.

<u>Windfall development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard, promote and enhance the Welsh language.</u>

> **Residential developments for 10 or more homes on both allocated and windfall sites will be required to positively contribute towards the vitality and viability of Welsh language community groups and Welsh language learning opportunities.**

7. Other modifications to the Reasoned Justification for the policies have also been made and accepted. A copy of the draft Deposit Plan version of these policies is contained in Appendix 3.

3.3 Secondary, Cumulative and Synergistic Effects of the draft Preferred Strategy

8. As referred to in paragraph 17 of Part 2 above, the new edition of the Development Plans Manual is likley to require LPAs, as part of the SA process, to consider how the (scale and location of growth) individually and in combination impact on the Welsh language.

9. Within our brief we have confined our examination to a consideration of how the SA has assessed the secondary, cumulative and synergistic effects of the revised Preferred Strategy on SA Topic 11 (*Will the LDP encourage the growth of the Welsh Language and Culture?*). This analysis is contained in Appendix 6 of the SA[35].

10. As there appears to be no specific assessment of the secondary, cumulative and synergisitc effects of the preferred strategy, Section 7 provides a summary of the sustainability impacts of the Deposit LDP and provides the following commentary on sumulative, secondary , synergisitc and indirect efffects:

    "Cumulative, secondary, synergistic and indirect effects

    The plan as a whole has also been appraised for cumulative, synergistic and indirect effects"[36]

11. From our examination and assessment of the likely cumulative, secondary, synergistic and indirect impacts of the Preferred Growth Strategy, we conclude that it is extremely difficult at this stage to separate out any such effects from the influence of other factors such as economic, social and environmental uncertainities, the application of Welsh Government policies towards encouraging the growth of the use of the Welsh language,

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[35] Carmarthenshire County Council (November 2019) *Sustainability Appraisal of the Revised LDP Report on the Deposit LDP*

[36] Op. Cit. Page 48

spatial policies at national, and strategic levels and those of neighbouring local planning authorities.

12. We score the direct effects of the Preferred Growth Strategy and Preferred Spatial Strategy against the Business as Ususal scenarios as **minor negative** and **minor positive** respectively. However, we would score the indirect and other effects as **uncertain** due to the lack of robust evidence which might help weight the influence of the Draft LDP against other factors.

<p style="text-align:center">*   *   *   *   *   *   *</p>

Appendix 1.1: The Status of the Welsh Language in Local Development Plans in Welsh Local Authorities

Table A1-1: The Status of the Welsh Language in Local Development Plans (as reviewed by IAITH/BURUM 2019)

Authority	Development Plan (post 2004)	Period	Year of Adoption	Sepcific Policy on the Welsh Language	Spatial Guidance	Constraints Map with Linguistically Sensitive Areas	Requirements on Developers on Unanticipated Winfdfall Sites		Supplementary Planning Guidance
							Requires WLS	Requires WLIA	
Blaenau Gwent	LDP	2006 - 2021	2012	No	No	No	No	No	No
Brecon Beacons	LDP	2007 - 2022	2013	No	Yes (30%+)	No	No	No	No
Bridgend	LDP	2006 - 2021	2013	No	No	No	No	No	No
Caerphilly	LDP	2006 - 2021	2010	No	No	No	No	No	No
Cardiff	LDP	2006 - 2026	2016	No	No	No	No	No	No
Carmarthenshire	LDP	2006 - 2021	2014	Yes	Yes (60%+)	Yes	No	No	Yes
Ceredigion	LDP	2007 - 2022	2014	No	No	No	No	No	No
Conwy	LDP	2007 - 2022	2013	Yes	Yes (part)	No	Yes (5+)	Yes (20+)	Yes
Denbighshire	LDP	2006 - 2021	2013	No	No	No	Yes (5+)	Yes (20+)	Yes
Eryri	LDP	2016-2031	2019	Yes	No	No	Yes (5+)	Yes (substantially above 5)	Yes
Fflintshire	UDP	2000 - 2015	2011	Yes	Yes (20%+)	No	Yes (25+)	No	No
Gwynedd	LDP (Joint with Ynys Môn)	2011-2026	2017	Yes	No	No	Yes(5+)	Yes (5+)	Yes
Merthyr	LDP	2006 - 2021	2011	No	No	No	No	No	No
Monmouthshhire	LDP	2011 - 2021	2014	No	No	No	No	No	No
Neath Port Talbot	LDP	2011 - 2026	2016	Yes	Yes (25%+)	No	No	Yes	Yes
Newport	LDP	2011 - 2026	2014	No	No	No	No	No	No
Pembrokeshire Coast	LDP	2006 - 2021	2010	Yes	Yes (30%+)	No	No	No	No
Pembrokeshire	LDP	2006 - 2021	2013	Yes	Yes	No	No	No	No
Powys	LDP	2011 - 2026	2018	Yes	Yes (25%+)	No	No	Yes (10+)	No
Rhondda Cynon Tâf	LDP	2006 - 2021	2011	No	No	No	No	No	No
Swansea	LDP	2010 - 2025	2019	Yes	Yes (19%+)	Yes	No	Maybe (10+)	No
Torfaen	LDP	2006 - 2021	2013	No	No	No	No	No	No
Vale of Glamorgan	LDP	2011 - 2026	2017	No	No	No	No	No	No
Wrexham	UDP	1996 - 2011	2005	Yes	Yes (20%+)	No	Yes (25+)	No	No
Ynys Môn	LDP(Joint with Gwynedd)	2011-2026	2017	Yes	No	No	Yes(5+)	Yes (5+)	Yes

Local Development Plans in Wales and Consideration of the Welsh Language (as at April 2019)

Appendix 1.2: Welsh Language Resilience Management Framework - The Four Components in Detail

Stage 1: Preparing the Assessment

Who Defines the Impact and its Significance?

1. Setting the boundaries of the assessment is key to ensuring a clear focus on the scope of the assessment and how to reach conclusions based on the results of the assessment.

2. **Stakeholders** should be included in preparing the assessment. Obtaining several perspectives when designing the assessment will promote shared understanding about how the proposal plays a part in affecting the resilience of the Welsh language. It will be a means to build the logic model that makes explicit to everyone what the assumptions, processes, impacts and outputs are. These, in turn, can help identify the data that needs to be gathered to support the process.

3. Involving stakeholders will also be a way of estimating the significance of the risk as well as creating dialogue on the scope of the risk. Conducting and recording the discussion with stakeholders can be a means to withstand any challenges to the robustness of the assessment. For this early dialogue about preparing the assessment, it would be beneficial to prompt the stakeholders to think of the following three components:
   * developing and presenting the model of the relationship in question – the risk of what, to whom, where and when;
   * planning what data is to be collected and the method of data collection
   * initial screening to identify and prioritise significant hazards

4. In any system of measurement, there are acknowledged compromises in data collection between the need for richness, robustness and saliency/usability (relevance and convenience) for specific users. In order to define a measure for Welsh Language Resilience, the most robust and reliable data is the decennial Census of Population data.

5. The Census provides us with information on the number and proportion of the population aged 3 and over who are able to understand, speak, read, and/or write Welsh by competence level and age.

6. In considering the main factors about what data should be collected when conducting a risk assessment, it is recommended, in the context of Welsh language resilience, that a combination be used of **the number and percentage of the population that speaks Welsh** as recorded in the decennial Population Census.

7. This is proposed because speaking Welsh is a key factor when considering the extent to which the use of Welsh is an integral and recognised part of social and community life. The higher the percentage of Welsh speakers, the stronger the language's position in that community because it is usually heard and used more prominently as the language of communication in all aspects of daily life.

8. Research evidence suggests that there are important proportional thresholds for language resilience that a linear weighting approach does not recognise. There is some evidence to suggest that a proportion of around 70% is a significant threshold for the resilience of any minority language.[37] In statistical terms, it can be argued that if a Welsh speaker meets another person, there is at least (0.7% x 0.7%) = 49% chance that this other person will be a Welsh speaker. In such areas, there is a good chance that Welsh would remain the dominant language within the local population.

9. However, the absolute number of speakers can also be an important element, particularly in instances where a minimum number of users is required to justify the provision of a service or when the number of speakers in an area is relatively high but represents a relatively low percentage, due to the size of the population.

10. Consideration needs to be given, therefore, as to which spatial level of data is most useful as a building block in this context - Lower Super Output Areas (LSOA's) or electoral wards. LSOA's are built on contiguous output areas and are designed to be as consistent as possible in terms of population with a minimum of 1,000 people (400 households), a maximum of 3,000 people (1,200 households) and an average (in Wales) of 1,600 people. LSOA's are often the building blocks used for analysing socio-economic data and for developing policy (e.g. Welsh Index of Multiple Deprivation).

11. Census Area Statistics (CAS) Wards are based on Electoral Wards but are subject to similar minimum thresholds as LSOA's. However, they can vary significantly more in size than LSOA's. For example, across Wales, the ward with the minimum population aged 3 and over was Rudbaxton in Pembrokeshire (749) whilst the largest ward was Cathays in Cardiff with a population aged 3 and over of 19,870.

12. As LSOA's are, by their very nature, designed to be standardised it can be more difficult to recognise where clusters of Welsh speakers exist.

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[37] For example, arresting the decline in "the number of communities where Welsh is spoken by over 70% of the population" was a key target for the Welsh Government's (2003) National Action Plan for a Bilingual Wales (Welsh Assembly Government 2003). . This is supported by research in several countries, including work undertaken in Ireland (cited in Lewis and Fisher (2014) *A study of the possible impact of new developments on Welsh speaking communities in Carmarthenshire, namely three housing estates in Carmarthen, Cross Hands and Llandeilo*.

13. CAS wards are considered a reasonably "fine grained" basis on which to provide a general picture of linguistic resilience across Wales and individual local authority area. For the purposes of this WLIA of the Carmarthenshire Draft Deposit LDP, we use wards rather than LSOA's for our analysis.

14. **Figure A2-1** identifies important thresholds in the weighting of the percentage of Welsh speakers (PWS) when assigning levels of Welsh language resilience.

Figure A2-1: Definition of language resilience thresholds[38]

PWS threshold weightings	Description and rationale	Resilience score
If PWS>70%, PWS=3	Welsh is the socially dominant language and where the odds on meeting another Welsh speaker in a range of social activities are high. Here also the vitality of the language is strong and linguistic creativity is at its strongest.	Very High
If 50≤PWS<70%, PWS=2	The Welsh language plays a major, if not necessarily dominant, role both within social interaction, and within the educational domain. These communities are more bilingual in nature. Use of Welsh is heard frequently on the street and Welsh is used extensively in the formal and social life of the area. However, it is not necessarily the dominant language.	High
If 20%≤PWS<50%, PWS=1	Such areas contain substantial numbers of Welsh speakers. However, the language is not the predominant language of social interaction in the public sphere and its use is restricted, often to the home and to private interaction among select groups.	Low
If <20% PWS PWS=PWS	Such areas are not Welsh speaking, and Welsh is rarely spoken in public, though there may still be vibrant interest in Welsh language medium education. Consequently, many of the Welsh speakers in such areas are likely to be under 18 and to live in households with no other Welsh speakers.	Very Low

15. For the Carmarthenshire LDP the use of the following equation is recommended for calculating the baseline for assessing the resilience of the Welsh language:

$$f(WLR) = NWS + PWS_{threshold\ weighted}$$

where: 0<WLR≤4

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[38] Professor D. Demeritt, unpublished working paper for IAITH, 2016.

16. If those weightings are applied to PWS, then the possible range of values for WLR runs from 0 to 4. Figure A2-2 illustrates the effect of applying these weightings to the calculation of WLR for Wales at Local Authority level.

Figure A2-2: Welsh Language Resilience (WLR) at Local Authority level (WLR score calculated using *f(WLR) = NWS + PWS* **threshold weighted)**
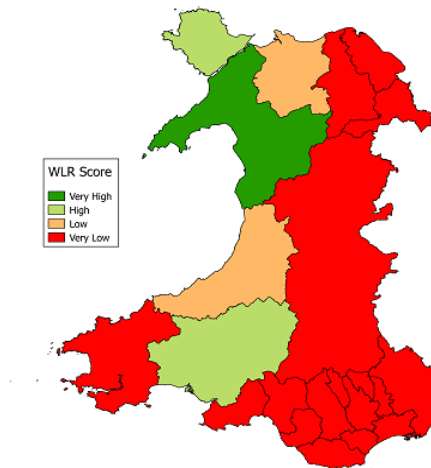
Data Source: Census of Population, Welsh speakers aged 3 and over, 2011

17. Figure A2-3 illustrates these weightings as applied at ward level in Carmarthenshire.

Figure A2-3: Welsh Language Resilience in Carmarthenshire according to Ward calculated using *f(WLR) = NWS + PWS* **threshold weighted**
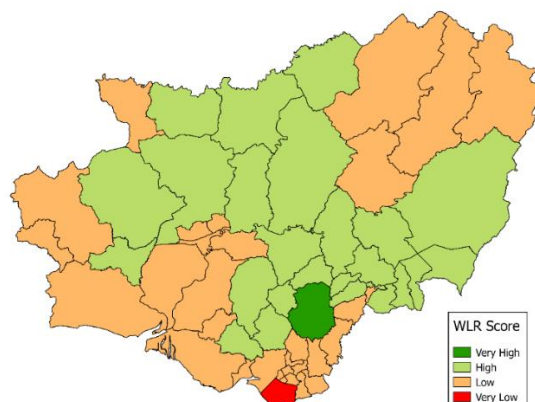
Data Source: Census of Population, Welsh speakers aged 3 and over, 2011

18. Due to the length of time between the results of each census, other data is required to come to an acceptable agreement among stakeholders on the direction and magnitude of change. There is a paucity of reliable quantitative data regarding the Welsh speaker dimension within, for example, the projections for population growth, actual and projected inward and outward migration figures, etc. The Pupil Level Annual School Census data on Welsh language ability is collected annually every January by each local authority. This data can be used to track change in the Welsh language abilities of pupils in maintained and statutory education provision in the 3-4; 5-11; 11-16; and 16-18 age groups. In the absence of other reliable quantitative data, more reliance needs to be placed upon a subjective opinion (whether an expert opinion or not).

Screening and Prioritising the Risks to be Assessed

19. In preparing for the assessment, screening the Development Plan is necessary in order to identify and define what hazards should be more closely scrutinised and which ones do not need further analysis. This step also provides an opportunity to identify the scale of uncertainty that will be present in the assessment, considering the quality of data available.

Stage 2: Conducting the Risk Assessment

20. Risk assessment is the formal process of evaluating the consequence(s) of a hazard and their likelihood.[39] This involves asking:
    - What could go wrong?
    - What would the consequences be?
    - How likely will those consequences be?
21. Undertaking or conducting the Welsh Language Impact Assessment therefore includes the following five steps.
    - What would happen without the local development plan ('intervention')?
    - Identifying the main hazard(s)
    - Assessing the possible impacts/consequences
    - Assessing the likelihood of the impacts/consequences

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[39] Op. Cit. Defra (2011) Green Leaves III section 1.3

- Describing the features of the risk and the uncertainty that comes with the assessment

Step 2.1 Building a Scenario

22. The first step in the process is to build a scenario of what the vitality / resilience of the Welsh language will be at a given point in the future. It will build on the work carried out to develop the conceptual model and establish the baseline Welsh language resilience indicator.

23. Scenarios are "plausible descriptions of how the future may develop"[40]. They are based on a logical and consistent collection of assumptions about the main elements and forces that drive the development under consideration.

24. In considering the impact of any land use on an area's linguistic resilience, it is useful to build a scenario that can consider how a series of factors can influence change in the linguistic position. Planning a scenario will pull together a connected series of possible developments. At this point, consideration should be given to possible total and cumulative effects and their chronology and synchronicity. Building scenarios can help with the process of risk assessment by creating a long-term view of how the linguistic position could evolve. By doing this effectively, it is possible to note critical matters and points that will assist in the process of forming a clear context for future strategies and policies.

25. Creating economic and social projections is a complex and difficult at best. Foreseeing personal attributes such as the ability to speak a minoritised language is even more difficult. This should be recognised and made explicit within the assessment.

Step 2.2 Identifying the Key Hazards

26. In the context of a plan designed to grow and manage sustainable development, the key hazards will need to be identified and the spatial impact of these hazards considered. The following factors, among others are likely to be present:
- significant short-term inward migration to the area associated with major construction that impacts the current linguistic balance in communities within the new development's scope of influence;
- inward migration to the area by permanent workers and residents that would decrease the percentage of Welsh speakers in an area;
- local Welsh speakers lacking the skills to apply for the new jobs available, resulting in more outward migration;
- fewer opportunities to speak Welsh in the workplace and other social domains due to the influence of the inward migration on non-Welsh speakers;

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[40] DEFRA (2011) Green Leaves III Section 2.3.3

- more discontent with the area's educational policy in terms of the Welsh-medium education provision; and
- a decline in the current level of the Welsh-speaking community's resilience.

Step 2.3 *What Would the Consequences Be? (Assessing the Consequences)*

27. The whole range of possible consequences should be considered in the process of identifying and reaching an opinion about the possible consequences or impacts. Some of the key considerations are listed below.
    - Is the impact more relevant to specific age groups?
    - Is the data detailed enough, or is there a need for further research?
    - Is more information needed about the resilience of Welsh-speaking communities?
    - Are the social and community networks that support the use of Welsh easily identified?
    - Were local societies, groups and other stakeholders given enough voice in the process to identify possible consequences and impacts?
    - Are the Local Authority's policies clear enough to enable a response to the risk assessment?
    - Do the impacts/consequences (in terms of scope and scale) seem sensible to the stakeholders?

28. To date, establishing the scale of the hazard to the resilience of the Welsh language is not an objective process based on 'scientific' evidence alone. Instead, it is dependent on making a subjective appraisal of the **scale** or **magnitude** of the hazard, over a given **period**.

29. It will also be important to define the possible consequences in terms of **what** the consequence is, **where** the consequence will occur, **who** will be affected by the consequence and **how** they will be affected and **when** (and/or over **what period of time**) the consequence will occur. The hazards of not acquiring or transferring the language, or of losing it can happen at different stages in an individual's life.[41] This is also a factor that should be noted when attempting to define the possible consequences.

30. In terms of determining the thresholds of scale of impact we recognise that, at present, there is insufficient evidence to directly link a given development with changes to Welsh language resilience. On the one hand, the average decline in the percentage of the population aged 3 and over in Wales between 2001 and 2011 was 1.8 percentage points whilst the average at local authority level varied from 6.4 percentage points in Carmarthenshire to a gain of 0.6 percentage points in Monmouthshire. On the other hand, the estimated number of Welsh speakers aged 3 and over in the Annual Population survey for Wales has suggested an increase from

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[41] For example, see work on linguistic 'mudes' in Pujolar, J. a Gonzalez, I. (2012) 'Linguistic 'mudes' and the de-ethnicization of language choice in Catalonia', *International Journal of Bilingual Education and Bilingualism*, http://dx.doi.org/10.1080/13670050.2012.720664.

760,000 in June 2011 to 898,700 in June 2018 – which, when compared to an estimated number of Welsh speakers in 2001, suggest a percentage point increase of around 2.0 percentage points. Our judgment for now, therefore, is that, given the current political, economic, socio-cultural and technological (PEST) environment over a period of 15 years a magnitude of around 2.5 percentage points seems to be a reasonable threshold. **Table A2-1** presents the thresholds for scoring the magnitude of impact / consequence.

Table A2-1: Scales of magnitude of impact

Major Positive	Minor Positive	Minor Negative	Major Negative
Increase of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory
High	Low	Low	High
2	1	-1	-2

Step 2.4 *How Likely Are the Consequences? (Assessing the Likelihood or Probability)*

31. It is possible to define the likelihood of an event as a fraction (or percentage) from 0 to 1. It is not practical to consider every probability and so the common practice is to determine degrees of probability and define their scope.

32. In order to avoid unnecessary confusion, these scales typically vary between 2 and 9 degrees. Where there is not a high level of confidence in defining probability, it is usual to use a scale that is a combination of a percentage band (e.g. once in 10 occurrences, 2–4 times in 10 occurrences, 5–8 times in 10 occurrences, 9 times or more in 10 occurrences) and a qualitative description (e.g. highly unlikely/possible/likely/highly likely). Many probability models favour scales with between 3 and 5 degrees in this situation.

33. At present, the best way forward in the context of the Welsh language is the evidence provided in monitoring previous development plans. For example, this could be based on an analysis of homes or employment sites developed against the resilience of the Welsh language for that area over a similar period. Linguistic resilience will vary

according to the percentage of Welsh speakers and their age and this will be a matter for consideration at the time of preparing the assessment.

34. **Table A2-2** provides an example of expressing likelihood.

Table A2-2: Scales of Likelihood (probability and frequency)

Likelihood of Occurrence	Probability	Frequency	Likelihood	Score
Highly likely	Experience shows that growth/ decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	>90%	4
Likely	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases of similar developments	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	>50<89.9	3
Possible	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	>20<49.9%	2
Highly unlikely	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	<10%	1

Formulating the Impact Description (Combining Consequences and Likelihood)

35. The analysis is then used to describe the risk (being a combination of the consequence and the likelihood of the consequence) and to record the uncertainty associated with the assessment.

36. Based on the scores in the risk matrix, a table can be constructed to give an assessment of the general impact.

37. Within the range of possible impacts, it should be possible to describe the likelihood of the impact occurring in terms of frequency or probability. Assessing **probability** with a degree of certainty or consensus is important. Certainty and objectivity can be strengthened through dialogue with stakeholders and partners to ensure a consensus that is as robust as possible. Different interpretations should be addressed by holding further discussions and possibly seeking further data or more dependable evidence.

38. When considering the likelihood, it will also be important to scrutinise the original plan and the options offered, to form an opinion about the options most likely to be realised. The difference between the probability of the <u>level</u> of the impact and the general likelihood of the impact occurring should also be kept in mind. This is important in measuring risk using the risk assessment matrix. In coming to a decision, consideration will also need to be given to the resilience or the fragility of the area facing the hazard.

Step 2.5 Describing Risk and Uncertainty

39. Although there are many ways to describe risk, the model we recommend using is well-known in many other fields and is a variation of what is known as the 'Risk Matrix' or 'Heat Map'. The risk matrix combines the two dimensions of impact and likelihood described in steps 2.3 and 2.4. The recommended Risk Matrix is shown overleaf in **Figure A2-4.**
40. The score is the likelihood of a specific level of impact occurring as a result of the development (direct impact, gradual impacts over time or indirect impacts). The score recorded must be a **combination** of i) the level of impact **and** ii) likelihood of the impact occurring.
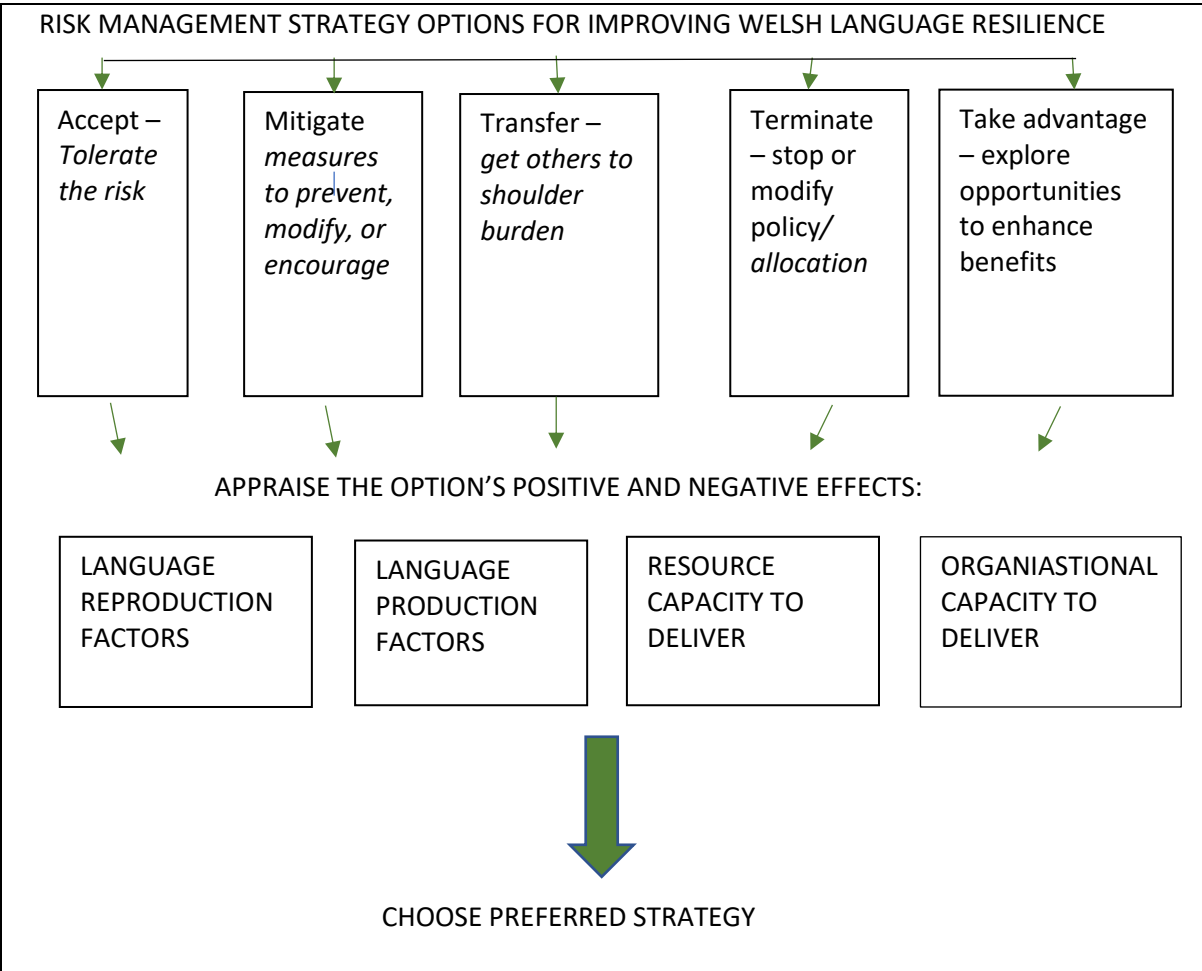
Figure A2-4: Recommended Welsh Language Risk Assessment Matrix

					MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
					Major Positive	Minor Positive	Minor Negative	Major Negative
WELSH LANGUAGE RESILIENCE RISK MATRIX **CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN**			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted		Increase of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers in the Plan Area aged three and over above the trajectory
					High	Low	Low	High
	Probability	**Frequency**		**Score**	**2**	**1**	**-1**	**-2**
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely	4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely	3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible	2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	HIghly Unlikely	1	2	1	-1	-2

Stage 3: Appraising the Risk Management Options

41. Risk management frameworks typically identify five strategic options, as follows:

- **Accept/ Tolerate** the risk by not intervening (e.g. if it is not possible to control it or the cost of addressing it is too high).
- **Mitigate the impacts** (e.g. by strengthening or investing in infrastructure to support the resilience of the Welsh language).
- **Take advantage of opportunities** that arise from the risk to create new opportunities and enhance benefits
- **Transfer the risk** (e.g. another organisation takes the burden of addressing the risk).
- **Terminate** the source of the risk where possible.

Figure A2-5: Identifying the preferred strategy for managing risks and benefits[42]

RISK MANAGEMENT STRATEGY OPTIONS FOR IMPROVING WELSH LANGUAGE RESILIENCE

| Accept – *Tolerate the risk* | Mitigate *measures to prevent, modify, or encourage* | Transfer – *get others to shoulder burden* | Terminate – stop or modify policy/ *allocation* | Take advantage – explore opportunities to enhance benefits |

APPRAISE THE OPTION'S POSITIVE AND NEGATIVE EFFECTS:

| LANGUAGE REPRODUCTION FACTORS | LANGUAGE PRODUCTION FACTORS | RESOURCE CAPACITY TO DELIVER | ORGANIASTIONAL CAPACITY TO DELIVER |

CHOOSE PREFERRED STRATEGY

Step 3.1 Evaluating the Impact on Welsh Language Reproduction Factors

42. The home is the principle domain where Welsh speakers are 'reproduced'. In 2011, in households where both parents speak Welsh the level of language reproduction was 80%[43]. In households with one Welsh-speaking parent, Welsh language reproduction was around 40%.[44] Research shows that children who are socialised in Welsh in the home generally continue to speak Welsh and transfer the language to their own children. Consequently, safeguarding those settings where Welsh language socialisation in the home is thriving is key to the vitality and resilience of the Welsh language. The impact of a development on language reproduction factors will need to be evaluated by considering the likely impacts on the following aspects:

- Levels of language 'reproduction' in the home

  o the number of children born into families where both parents can speak Welsh and use the language with their children;
  o the number of children born into families where only one parent speaks Welsh;
  o to what extent, if any, is the language of the home becoming increasingly bilingual/English/ other language-medium;
  o the availability of Welsh-medium childcare provision in the area; and
  o the availability of Welsh-medium and bilingual education provision in the area.

- Community Welsh language resilience

  o to what extent, if any, is the status of Welsh decreasing due to a decline in the number of speakers as a percentage of the local population;
  o to what extent, if any, are fewer Welsh community groups and societies flourishing locally;
  o to what extent, if any, will people's daily use of Welsh decrease;
  o to what extent, if any, will the resilience of Welsh as a language of daily interaction decrease;
  o to what extent, if any, will the use of Welsh retreat to more limited domains and lack creative freshness.

Step 3.2 Evaluating Impact on Welsh Language Production Factors

43. Education is the principle domain where new speakers of Welsh are 'produced'. Around two thirds of children in Wales learn Welsh at school through Welsh-medium and bilingual education. The education system and education policies as these are

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[43] Census data 2011.
[44] Census data 2011.

formulated and implemented at both national and local authority levels are consequently key to the vitality and resilience of the Welsh language. Consideration must, therefore, be given to the local availability of:

- Welsh-medium pre-school provision (maintained and non-maintained);
- full statutory education through the medium of Welsh;
- follow-on levels in Welsh education/skills and training.

44. Outside the education system, other factors ensure the vitality and resilience of Welsh by giving people the opportunity to use the language in their personal lives and at work. The impact of a development on language production factors will need to be evaluated by considering the likely impact on:
- the use of Welsh in the workplace (across all local economy sectors);
- the use of Welsh among various socio-economic groups;
- social and community activity through the medium of Welsh.

45. Other factors that need to be taken into consideration regarding the vitality and resilience of the Welsh language are the levels of mobility within communities and the patterns of inward and outward migration that happen during some key life stages. Specific attention should be given to:
- outward migration rates (especially among the 16 – 30 age group); and
- inward migration rates (especially among the 31 – 45 age group).

46. Furthermore, many other aspects relating to maintaining the local resilience of the Welsh language should be identified. These include:
- to what extent, if any, is there questioning of the local authority's language policy in terms of the provision of education that makes significant use of Welsh as a teaching medium?
- to what extent, if any, is there an increase in the number of children attending school who cannot speak Welsh?
- to what extent, if any, is there a decrease in fluency levels among speakers of Welsh as a first language?
- to what extent, if any, is there insufficient take-up of Welsh-medium courses to make courses for the 14+ age group viable, resulting in a lack of follow-on to the workplace?
- to what extent, if any, are the opportunities of continuing 'follow on' Welsh-medium education in schools and colleges decreasing?
- to what extent, if any, are the numbers of adults learning Welsh low?
- to what extent, if any, are there negative attitudes towards Welsh with Welsh being seen either as a language for the 'elite' or as an 'old fashioned' language?
- to what extent are employers seeking Welsh language skills for their workforce and promoting the use of Welsh in the workplace?

Step 3.3 Evaluating the Resource Capacity for Implementing the Risk Assessment

47. In evaluating the capacity to implement the risk assessment, the following should be given consideration:

- what will the LA and other stakeholders' role be?
- will additional resources be offered in order to deal with one of the steps that could arise from the risk assessment?
- how will the risk be divided among the parties?
- will enough capacity to implement the risk assessment be available?

Step 3.4 Evaluating Organisational Capacity for Implementation

48. This step involves identifying what sort of assistance could be made available from:

- the local authority;
- the Welsh Government;
- the UK Government; and
- Third Sector bodies.

Step 3.5 Choosing the Preferred Option

49. When formulating the preferred strategy, a decision should be reached based on:
- a consensus between the LA and all relevant stakeholders; and
- a process of analysis based on several criteria that will lead to a decision.

50. It is common practice to make use of Multi Criteria Analysis (MCA)[45] when making decisions about what path to choose. MCA offers a practical way of comparing and prioritising decision-making options where there are multiple criteria and different levels of risk and uncertainty. MCA is a process of evaluating decisions by using a performance matrix that includes criteria to weigh up the options in question with the aim of identifying the order of the options from the most favoured to the least favoured. It is expected that MCA will be required in the process of choosing the preferred option.

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[45] Department of Communities and Local Government (DCLG) (2009*): Multi Criteria Analysis – a manual.*

Stage 4: Formulating a Welsh Language Resilience Mitigation and Enhancement Action Plan

Step 4.1: Identifying the Appropriate Combination of Responses

51. In responding to the risk assessment, careful consideration must be given to which strategies for managing the risk and benefits to the resilience of the Welsh language should be considered. Whichever strategy is adopted, there will remain an element of risk ('residual' risk). As well as taking steps to implement the preferred strategy, a plan for monitoring and managing the residual risk will need to be included.

Step 4.2 Formulating a Reporting/Monitoring Strategy

52. The Local Authority will be responsible for formulating a reporting and monitoring strategy in order to track the impact of the LDP on the resilience of the Welsh language over the course of the plan. This strategy will identify what role the local authority and other key stakeholders / partners will have in the implementation, monitoring and the periodic reassessment of risk.

Mitigation and Enhancement Measures

53. In formulating an action plan following the risk assessment, it will become clear where necessary mitigation and enhancement measures are needed. Any mitigation and enhancement measures will be introduced in order to promote the positive impacts of the LDP. This will mean that the mitigation and enhancement measures and targets are clear and understood at the beginning of the plan. There will be an expectation that the mitigation and enhancement measures are fully costed once the final LDP has been agreed. This will ensure a general awareness of the risks, the benefits and the opportunities that may arise from the plan.

Step 4.3 Producing the Proposed Mitigation and Enhancement Action Plan

54. The proposed mitigation and enhancement action plan will be agreed upon based on consensus. The Local Authority, in consultation with its key stakeholders and partners will agree the structure and content of the action plan and it will be updated in line with the timetable that the Local Authority and its stakeholders/partners agree upon.

Monitoring the Mitigation and Enhancement Action Plan

55. The Local Authority will need to monitor and update the mitigation and enhancement action plan. The Local Authority should ensure that the data that is used to monitor the impact of the LDP is current so that it is possible to update the mitigation and enhancement action plan as needed. After conducting the initial risk assessment of the LDP on the resilience of the Welsh language within the authority, it will be necessary to review and reassess the linguistic situation regularly over the course of the plan to see if the situation has changed in any way.

*   *   *   *   *   *   *

Appendix 2.1: The Sustainability Appraisal Requirements

<u>Background</u>

1. Sustainability Appraisal (SA) is a statutory requirement for Local Development Plans under Section 62(6) of the Planning and Compulsory Purchase Act 2004. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 transposes the requirements of EU Directive 2001/42/EC (also known as the SEA Directive) into Welsh Law. SEA requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment - this includes LDPs.

2. The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the WBFGA 2015.

    "Sustainable development" means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals."

3. The consultation draft on the LDP Manual (Edition 3)[46] describes the relationship between the Well-being requirements, SA and SEA

    "The LDP must demonstrate how it contributes to achieving the well-being goals. The approach taken to appraise the plan through the SA can enable LPAs to understand where the plan can maximise its contribution. The well-being goals should be integral to the preparation of the SA Scoping Report and used to inform the review of evidence, identify issues and structure the SA framework which will assess the plan's growth options, objectives, policies and proposals". (section 4.10)

    "The scope of SEA is limited to environmental effects of plans, whereas the remit of an SA is broader and covers the effects of social, economic and cultural wellbeing, as well as environmental effects. The requirements of the SEA Regulations are best incorporated into a SA to avoid unnecessary repetition.

    To be effective a SA should be fully integrated into the plan making process from the outset and provide input at each stage. It should be clear from the process why growth options, objectives, policies and proposals in the plan have been chosen. The SA will play an important part in demonstrating the LDP is sound, by ensuring that it reflects the legislative requirements and achieves sustainable development." (sections 4.3 and 4.4)

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[46] WG (June 2019) Consultation period ended August 31 2019. Edition 2 in force until Edition 3 published

4. The Royal Town Planning Institute's (RTPI) Practice Advice on SEA – SA[47] neatly summarises the key characteristics of good practice:

- SEA/SA aims to make a plan more sustainable and more responsive to its environmental effects, by identifying the plan's significant impacts and ways of minimising its negative effects;

- It also documents the 'story' of the plan – why the plan is the way it is and not something else. The SEA/SA report should discuss:

  o How the reasonable alternatives were identified and assessed, why the preferred alternatives have been chosen, and why others were rejected; What changes have been made as a result of the SEA/SA;

  o What comments the statutory consultees and the public have made on the scoping (and any assessment reports), and what changes have been made in response to these comments.

  o It may be useful to consider "Where were we, where are we now, where will we be, and how did we get from one to the other?"

- SEA/SA can best influence the plan at the alternatives and mitigation stages, so these require particular focus;
- SEA/SA should focus on key issues and effects, scope out insignificant effects, and not include unnecessary information.

5. TAN 20 (Part B) notes that "3.1…The SA will normally consist of an assessment against specific sustainability objectives, which should include the Welsh language".

6. The Draft Manual also encourages LA's and others to consider the value and opportunities for undertaking an integrated assessment approach as an effective and holistic approach to plan making.

"The integration of statutory and key elements such as WBFGA 2015 requirements, Equalities Act, Welsh language, and Health Impact Assessment (HIA) (when relevant) into a single Integrated Sustainability Appraisal (ISA) will enable a more transparent, holistic and rounded assessment of the sustainability implications of growth options, objectives, policies and proposals." (Section 4.5)

7. RTPI's Good Practice advice also notes that *"The SEA/SA report can act as an 'umbrella' report, which summarises and integrates the findings of other assessments and studies".*

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[47] Royal Town Planning Institute (2018) Strategic Environmental Assessment - Improving the effectiveness and efficiency of SEA/SA for land use plans.

8. The five main stages in conducting a SA that need to be integrated into LDP preparation are:

    Stage A – Scoping. Setting the context and objectives, establishing the baseline evidence and deciding on the scope.

    Stage B – Appraisal. Developing and refining options and assessing effects.

    Stage C – Reporting. Preparing the SA Report.

    Stage D – Consulting. Consulting on the preferred option of the development plan and the findings of the SA Report.

    Stage E – Monitoring. Monitoring significant effects of implementing the development plan.

    *   *   *   *   *   *   *

Appendix 2.2: Summary of The LDP's Revised Preferred Strategy

<u>The vision</u>

Carmarthenshire 2033 will be a place to start, live and age well within a healthy, safe and prosperous environment, where its rich cultural and environmental qualities (including the Welsh language) are valued and respected for residents and visitors alike.

It will have prosperous, cohesive and sustainable communities providing increased opportunities, interventions and connections for people, places and organisations in both rural and urban parts of our County.

It will have a strong economy that reflects its position as a confident and ambitious driver for the Swansea Bay City Region.

<u>Scale of Growth</u>

1. In preparing the Preferred Strategy, CCC looked at eight different population scenarios based on varying past timescales (six population based, two employment based), which it then narrowed down to its preferred option.
2. In choosing its preferred option, CCC looked at how social and economic factors can influence Carmarthenshire's population. Some of those factors included *creating opportunities for young people to live and work in the County, providing more affordable housing, and supporting the County's regeneration ambitions.*
3. The Balanced Community and Sustainable Growth strategy is predicated on PG 10yr scenario from the 2019 Edge Analytics Report and utilise the alternative vacancy rate of 3.4% to underpin the future growth requirements for this revised LDP.
4. This projects an overall population increase of 15,115 (8.1%), with the requirement for 8,835 new homes (equivalent to <u>589 new homes per year</u>) and the delivery of <u>a minimum of 5,295 jobs</u> over the revised LDP period 2018-2033.

<u>Location of Growth</u>

5. The second part of the Preferred Strategy looked at how the homes and employment sites that CCC need to provide are to be distributed across the County.
6. As part of this process CCC looked at <u>six</u> different spatial options for distribution - all very different to each other. It considered factors such as:
   - Reducing the number and distance of journeys by car;
   - The location of services and facilities;

- Which areas have supporting infrastructure in place, such as access to water and sewerage systems;

- Impacts on the environment;

- Access to main roads and public transport routes;

- Where employment land is located;

- Where new homes are located;

- Which areas are more popular to build in.

7. CCC concluded that the best way to distribute growth was through a mix of the different options to create a new option called "The Balanced Community and Sustainable Growth Strategy".

8. The Balanced Community and Sustainable Growth strategy aims to distribute the 8,835 new homes and 5,295 jobs by:
   - Developing homes on both large and small sites to cater for different housing needs across the County, including ensuring opportunities are provided for rural areas;

   - Providing homes where the housing market is buoyant;

   - Providing homes where they are needed, including affordable homes;

   - Delivering growth where there is sufficiency and range of appropriate infrastructure;

   - Recognising and reflecting the investment and economic benefits to the County through the City Deal, and other economic opportunities.

   - Recognising that growth should be deliverable and orientated to a community's needs and market demand.

9. The Plan area is subdivided into six geographical clusters with each containing component settlements as defined within the settlement framework set out within Strategic Policy SP16, each with a principal or service centre supporting or supported by a network of other settlements. The defined clusters are as follows:
   1. Carmarthen and its Rural Areas
   2. Llanelli and the Southern Gwendraeth Area
   3. Amman and Upper Gwendraeth
   4. Teifi
   5. Upper Tywi Valley
   6. Western Carmarthenshire

10. The draft Preferred Strategy also sets out 19 strategic policies with which the Council seeks to deliver its vision and objectives by 2033.

Appendix 2.3: Establishing the baseline for the number and percentage of Welsh speakers in Carmarthenshire by 2033

Acknowledgements

Introduction

1. As part of the assessment of the likely impact of the LPD Preferred Strategy on the Welsh language, the methodology requires the development of a baseline (or 'business as usual') model of what the position might be in 2033 (the end of the Plan period) without the policy intervention of the Plan's Preferred Strategy.

2. This is not easy to establish because, notwithstanding the problematic field of population projections and trajectories, forecasting future language transmission, acquisition, use and loss is an extremely difficult and complex field, made even harder by trying to model the impact of policy interventions.

Approach

3. As a first stage in the development of the baseline, IAITH/BURUM have sought to understand Welsh Government's (WG) latest trajectory for how it might achieve its aspiration of achieving a million Welsh speakers in Wales by 2050 and its implications for what might be Carmarthenshire County's position in 2033[48].

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[48] Welsh Government Statistics for Wales (June 2017) *Technical report: Projection and trajectory for the number of Welsh speakers aged three and over, 2011 to 2050.*

4. As a precursor to the analysis and discussion, it is important to re-emphasize the important differences between a <u>projection</u> and a <u>trajectory</u>.

5. A **projection** in this context is defined as "the number of Welsh speakers that is predicted if the current patterns and trends regarding the Welsh language and the population continue until 2050."[49] A **trajectory** in this context is defined as "the number of Welsh speakers estimated based on the projection as well as a number of assumptions in relation to the aims of the WG strategy to reach the target of a million Welsh speakers by 2050."[50]

Welsh Language Speaker Projections

6. The data used for the projection contained in the report was based on the following three sources:
   - ONS mid-year population estimates by age for the period 2011 to 2013;
   - ONS national population projections by age for period 2014 to 2050;
   - data about Welsh language ability by age from the 2011 Census.

7. The projection is based on the conceptual model devised by Sankoff (2008)[51] and broadly assumes that the percentage of Welsh speakers in one age group in one year will be equal to the percentage in the age group in the previous year with adaptations on assumptions made about language acquisition by children.

8. **Figure A3.1** and **Table A3.1** present WG projections for the growth in the number of Welsh speakers aged three and over during the period 2011 to 2050. As stated previously, care needs to be taken as they are based on a set of assumptions about trends, trends that will possibly/probably change over time.

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[49] Ibid.. p2.
[50] Ibid.. p7.
[51] Sankoff, D. 2008. 'How to predict the evolution of a bilingual community' in Meyerhoff, M. a Nagy, N. (eds.) Social Lives in Language – Sociolinguistics and Multilingual Speech Communities Celebrating the Work of Gillian Sankoff. Edinburgh University/ Toronto University.

Figure A2.3-1 WG projected numbers of Welsh speakers aged three and over, 2011 to 2050
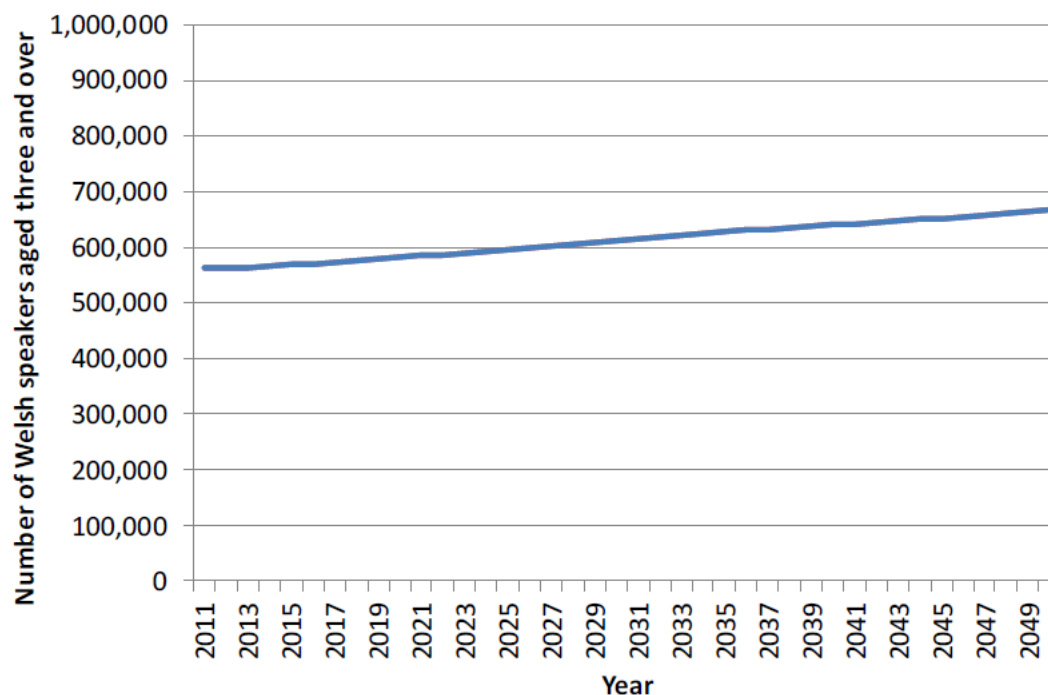
Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit. Chart 2, p. 5.

Table A2.3-1 WG projected numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050

Year	Number	Percentage
2011	562,000	19
2017	570,000	19
2021	580,000	19
2026	600,000	19
2031	610,000	20
2036	630,000	20
2041	640,000	20
2046	650,000	20
2050	670,000	21

Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit., Table 1, p.5.

9. The more detailed background tables[52] show a projected number of Welsh speakers aged three and over as reaching 621,000 by 2033 which suggests an increase of a little under 50,000 by 2033 (+10.5%).

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[52] This data is available at https://statswales.gov.wales/Catalogue/Welsh-Language.

10. Although not directly shown in the statistics, the WG 2014 based projections estimated a population aged three and over for Wales of 3,153,560 giving a percentage figure of 19.7% (rounded up to 20% in Table A1 above) for Welsh speakers.

11. The projected figure for Carmarthenshire's total population for 2033 using the WG 2014 projection is 189,317. The County's population aged three and over is projected to be 183,937. The number of persons aged 3 and over in 2011 able to speak Welsh was 78,048.

12. Applying the same change (10.5%) over the period 2011 – 2033 in the percentage of the overall population of Wales aged three and over who speak Welsh to the projected change in the overall percentage figure for Welsh speakers aged three and over in Carmarthenshire would lead to a growth in number of 78,048 *10.5% = 86,243.

13. This would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 47.0% by 2033. This compares to 43.9% recorded in the 2011 Census.

14. The WG 2016 based projection revises the total population aged three and over to 3,142,564. The percentages of Welsh speakers produced in the Welsh Government data presented in **Figure A3.1** and **Table A3.1** above will not be updated until after the results of the 2021 Census are known but is expected to remain the same or close to this figure.

A possible Welsh language speaker Trajectory

15. The WG's trajectory has been calculated building upon the WG 2014 projection produced above as a baseline and using four main assumptions based on the policy aims of the strategy:
   - Welsh language transmission at home;
   - learning Welsh in school;
   - learning Welsh through Welsh for Adults; and
   - improved continuation of Welsh-speaking ability post-16.
16. **Figure A3.2** below and **Table A3.2** overleaf are reproduced from the WG report.

Figure A2.3-2 WG projection and trajectory for the number of Welsh speakers aged three and over in Wales, 2011 to 2050
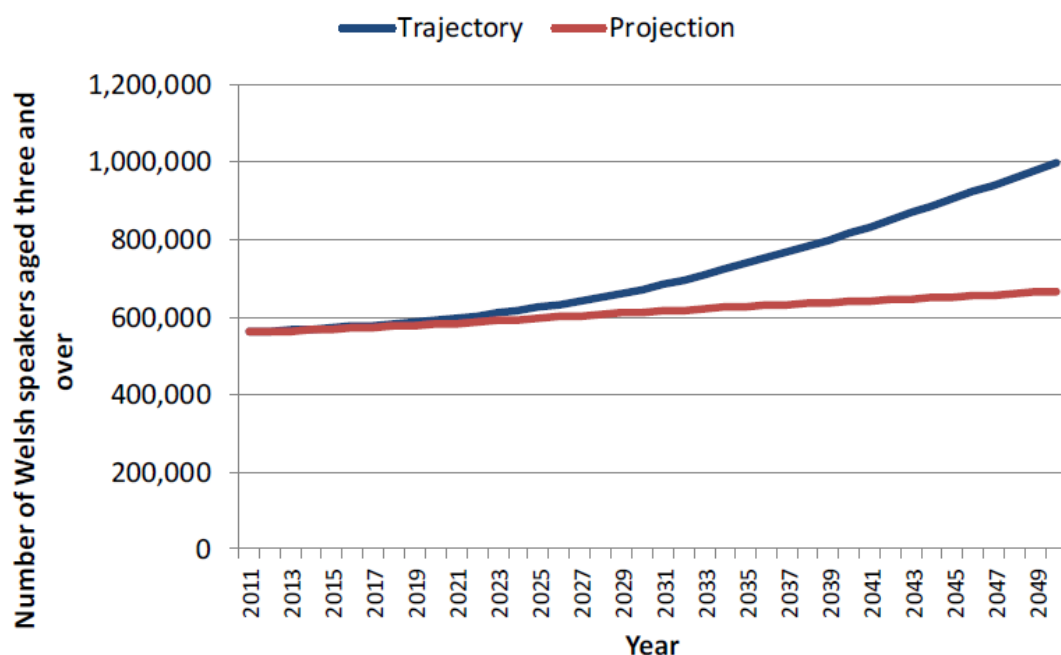
Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit. Chart 6, p. 10.

17. The more detailed background tables[53] show that the trajectory estimated number of Welsh speakers aged three and over as 710,000 by 2033. The WG 2014 based projection aged 3 and over for Wales of 3,153,560 gives a percentage figure of 22.5%.

Table A2.3-2 Numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050 according to WG trajectory

Year	Number	Percentage
2011	562,000	19
2017	580,000	19
2021	600,000	20
2026	630,000	20
2031	680,000	22
2036	750,000	24
2041	830,000	26
2046	920,000	29
2050	1,000,000	31

Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit., Table 2, p 11.

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[53] This data is available at https://statswales.gov.wales/Catalogue/Welsh-Language.

18. Applying the same change (22.5%) in the percentage of the population aged 3 and over who speak Welsh to the projected change in the overall percentage figure of Welsh speakers in Carmarthenshire would possibly lead to a growth in the number of Welsh speakers aged 3 and over to 78,048 *22.5% = 95,608.

19. This would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 52.0%. This compares to 43.9% recorded in the 2011 Census. **Figure A3.3** shows the trajectory of the growth in numbers of Welsh speakers in Carmarthenshire based on the overall trajectory for Wales.

Figure A2.3-3 Estimated trajectory for growth in Welsh speakers in Carmarthenshire by 2033

Carmarthenshire - Number of Welsh speakers aged 3 and over 2011 - 2033
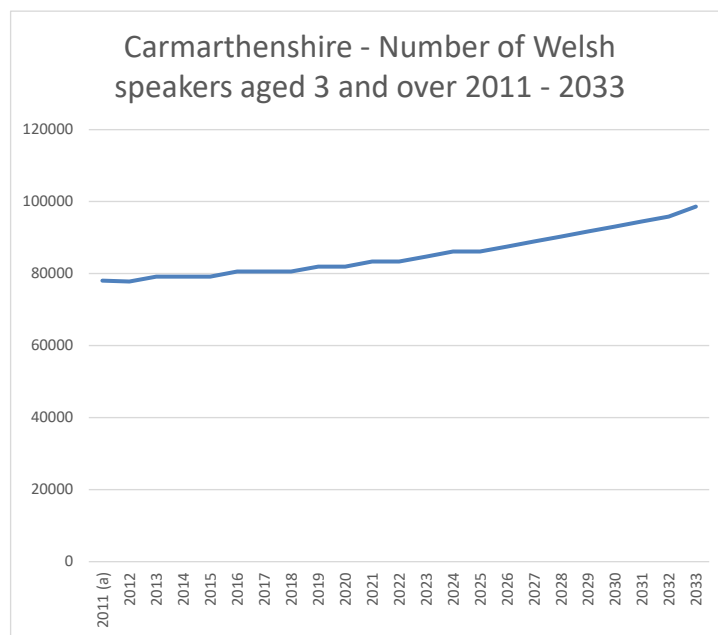
(a)   2011 data is based on the numbers from the 2011 Census.

Limitations

20. A note of caution needs to be reemphasised. The above assumes that the *Cymraeg 2050: a million Welsh* speakers strategy outcomes are apportioned equally across Wales. It is understood that, at present Welsh Government, does not intend to produce spatial trajectories or targets for regions and each individual local authority. In the absence of such trajectories, the assumption of equal impact across Wales is the best working 'guesstimate'.

*   *   *   *   *   *   *

Appendix 2.4: Gross Migration 2017-18 and Implications for WLIA of the LDP Preferred Strategy

Introduction

1. The LDP's published draft Preferred Strategy (PS) originally based its approach on a housing requirement figure of 9,887 dwellings (average of +659 dpa.), consistent with Edge Analytics **PG Long Term** scenario.

2. The response received in respect of the draft Preferred Strategy published in December 2018 raised several issues. These concerns included the lack of robust evidence to demonstrate the following:

   - the compatibility of the PS with neighbouring authorities;
   - that the growth levels are directed to the most sustainable places; related to the scale and location of housing need;
   - the PS does not impact negatively on the Welsh language; and
   - that the PS is realistic and deliverable.

3. In response, the Authority agreed to undertake a further process of providing justification for the scale and distribution of growth.

4. New evidence suggested that the approach might need to be reviewed. This included the publication of the mid 2018 population estimate as well as the guidance and regional housing growth aspirations detailed in the draft National Development Framework published July 2019[54] (NDF).

5. The mid 2018 population estimate suggested that the County had recently experienced strong growth in population as a result of an increase in rates of net migration and housing demand.

6. The draft NDF identifies Llanelli in Carmarthenshire as part of the primary growth area for the Mid and West Wales region. Carmarthen is also identified as a regional centre. The Welsh Government has estimated that 23,400 additional homes are required in the Mid and West Wales region by 2038. Apportioning this regional housing requirement based upon population distribution, would allocate approximately 5,000 of these 23,400 additional homes to Carmarthenshire.

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[54] https://gov.wales/draft-national-development-framework

7. This is substantially below that of the implications of adopting the PG Long Term scenario.

8. As a starting point, Edge Analytics were asked to review the population scenarios in the light of the new evidence.

Summary of Edge Analytics (EA) Findings

9. Edge Analytics presented a range of scenarios using POPGROUP technology to consider alternative growth outcomes. Edge Analytics' analysis of the re-configured scenarios is preceded by an updated demographic profile of Carmarthenshire. This incorporates the latest components of population change (births, deaths and migration), historical patterns of international and internal migration, in addition to housing completion statistics and an updated analysis of the county's age profile. The revised scenarios continue to predict negative natural change and a consistent level of international migration.

10. The report[55] emphasises the point that "*There is no single definitive view on the likely level of growth expected in Carmarthenshire. Ultimately, a mix of demographic, economic and local policy issues will determine the speed and scale of change*".

11. In addition to the WG 2014-based scenario, three alternative demographic scenarios have been configured. The full suite of scenarios is as follows:

- **WG 2014-based:** this replicates the WG 2014-based population projections.

- **PG Short Term:** Internal migration rates and international migration flow assumptions are based on the four-year historical period (2014/15-2017/18) which corresponds with the four-year period of recovery in housing growth.

- **PG Long Term:** Internal migration rates and international migration flow assumptions are based on the full seventeen-year historical period (2001/02 - 2017/18).

- **PG 10-yr:** Internal migration rates and international migration flow assumptions are based on a ten-year historical period, ignoring the anomalous years around the immediate aftermath of the financial crash.

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[55] Carmarthenshire Population and Household Forecasts – Edge Analytics Ltd (October 2018).

12. **Figure A2.4-1** below summarises the total projected dwelling growth during the plan period under each scenario, for both the Census and alternative vacancy rates, together with the percentage population growth (circles).

Figure A2.4.1. A4.1 Average Annual Dwellings Growth and Population Growth for each Demographic Scenario
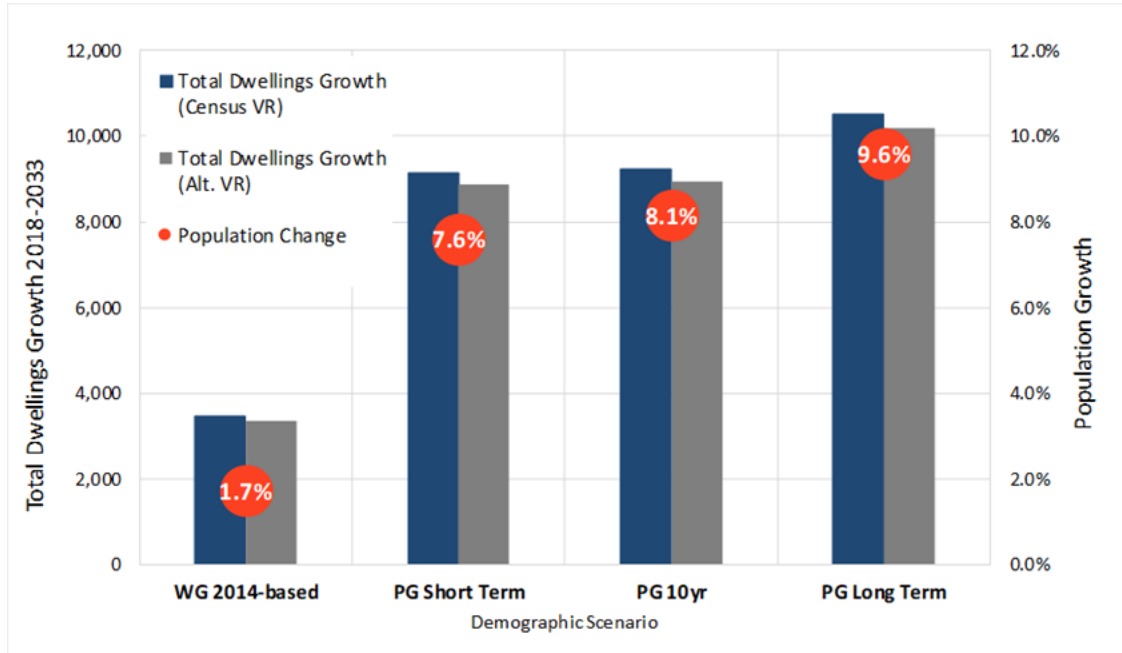
Source reproduced from Edge Analytics Figure 1: Average Annual Dwellings Growth and Population Growth for each Demographic Scenario.

13. **Figure A2.4-2** below illustrates the anticipated change over time to 2033.

Figure A2.4-2 Anticipated Carmarthenshire population growth 2001 - 2033
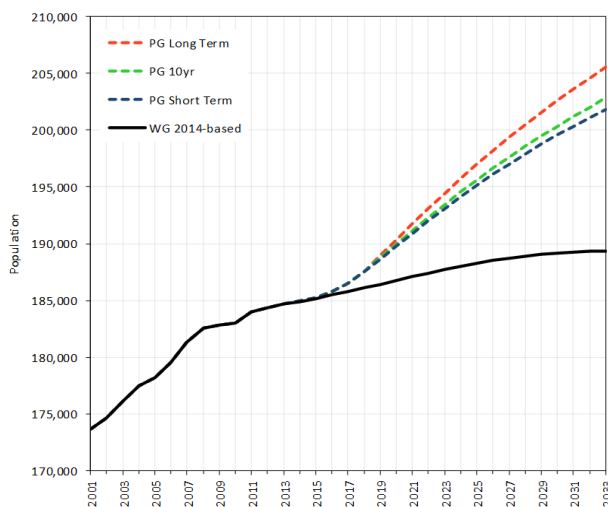
Source reproduced from Edge Analytics Figure 12: Carmarthenshire population growth 2001-2033

14. **Table A2.4-1** below shows average change per year (excluding the Brecon Beacons National Park Area)

Table A2.4-1 Demographic Scenario Outcomes 2018 - 2033

Scenario	Change 2018 - 2033				Average per year			Total Dwellings Growth (Census VR)	Total Dwellings Growth (Alt. VR)
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings (Census VR)	Dwellings (Alt. VR)		
PG Long Term	17,811	9.6%	9,726	12.0%	1,516	692	671	10,375	10,065
PG 10yr	15,115	8.1%	8,538	10.6%	1,337	607	589	9,108	8,835
PG Short Term	14,133	7.6%	8,474	10.5%	1,317	603	585	9,040	8,769
WG 2014-based	2,581	1.4%	2,878	3.6%	481	205	199	3,070	2,978

Source reproduced from Edge Analytics Addendum (September 2019): Table 3: Carmarthenshire Demographic Scenario Outcomes 2018-2033 (In order of population change) Alt VR = Alternative Dwelling Vacancy ratio of 3.4%

15. Following further analysis and discussion of these scenarios, CCC has decided to amend the preferred strategy to be based on the (2019) **PG 10-year** scenario.

16. The PG 10-year scenario has been reconfigured to ignore the years in the immediate aftermath of the financial crash.

17. **Table A2.4-2** shows the net differences in outcomes between the 2019 PG 10-yr scenario and the WG 2014 based scenario.

Table A2.4-2 Net differences in outcomes between 2019 PG 10-yr and WG 2014-based scenarios

Scenario	Change 2018 - 2033				Average per year		Total Dwellings Growth (Alt. VR)
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings (Alt. VR)	
PG 10yr	15,115	8.1%	8,538	10.6%	1,337	589	8,835
WG 2014-based	2,581	1.4%	2,878	3.6%	481	199	2,978
Net Difference	12,534	6.7%	5,660	7.0%	857	390	5,857

Source: adapted from Table 1 above.

18. Of the three EA scenarios the 2019, **PG 10-yr** scenario projects the middle population change over the plan period and is thus consistent with the scenario's position in the previous report[56] but is higher than the scenario based on the WG 2014 projections.

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[56] Carmarthenshire Population and Household Forecasts – Edge Analytics Ltd (October 2018)

Under this scenario, estimated population growth is 8.1% over the plan period, compared to 5.7% previously.

19. The analysis shows that this is largely due to the sharp rise in <u>net internal migration in 2017/18 that is now captured in this scenario, and the focus on the four years of housing growth recovery</u>.

20. The estimated population growth would support a total dwelling growth of 8,835 using the alternative 3.4% dwelling vacancy rate. This would require an average annual dwelling growth of +589 dwellings per annum (dpa).

Summary of Report Findings

<u>Population Change</u>

- Carmarthenshire's population rose by 1,116 to an estimated 187,568 between mid-year 2017 and mid-year 2018.
- The rate of annual growth is at the highest annual rate (+0.6%) since 2007/8, a continuation of accelerated annual population growth since 2015.
- Net internal migration continues to be the dominant driver of population change, with a sharp increase in the level of net inflow, reaching approximately +1600 in 2017/18 and showing a significant increase of over 700 compared to the previous year.
- As in all previous years since 2001, natural change has continued to have a negative impact on population growth. The 2017/18 period recorded the highest number of deaths (2,453) since 2001.
- In terms of international migration statistics, the number of National Insurance Number (NINo) registrations in 2018 was the 3rd lowest since 2008 at 473, remaining consistent with the previous year. Romania was the highest contributor in 2018 (157 registrations).
- The 65+ and 80+ age groups continue to experience the highest annual population growth, having growth rates of 30% and 28% respectively since 2001. In 2017/18, the population aged 16-64 age increased marginally, for the first time since 2006/07.

Implications of Adopting the 2019 PG 10-yr Growth Scenario for the Welsh language baseline trajectory

21. The Preferred Strategy's adoption of an increase in population of 15,115 and total dwelling growth of 8,835 is thus predicated in the main on the assumptions made about current rates of net internal migration as the main driver of population change.

22. We were interested, therefore, to try and get a better understanding of whether and how net internal migration assumptions, as the main driver of population, household and dwelling growth would have any implications for the resilience of the Welsh language.

23. As part of the further analysis of net migration EA provided IAITH/BURUM with the raw data on gross internal migration figures for Carmarthenshire.

24. For the purposes of this exercise the data was analysed as follows:

- gross inward and outward migration by age and gender from/to other parts of Wales by county and strategic planning region;
- gross inward and outward migration by age and gender from/to other areas of the UK outside Wales.

25. The data pertaining to Welsh counties was then sifted and analysed according to strategic region and the age cohorts considered to be of interest to analysis the resilience of the Welsh language (under 3 years old; aged 3 to 15; aged 16 – 29; aged 30 – 44; aged 45 – 60; aged 60+).

26. The gender data was not analysed as part of this exercise as it was not considered vital to an understanding of the patterns and trends of internal migration for the purpose of this project.

27. **Table A2.4-3** summarises the data.

Table A2.4-3 2017/18 Gross and Net Migration figures by Age Group and Geography

	Rest of Mid and West Wales			South East Wales			North Wales			Areas Outside Wales		
	In	Out	Net	In	Out	Net	In	Out	Net	In	Out	Net
0-2	109	90	19	40	27	13	1	4	-3	98	38	60
3 – 15	374	240	134	108	98	10	8	2	6	374	142	232
16 – 29	819	784	35	450	642	-192	33	36	-3	823	996	-173
30-44	622	469	153	216	206	10	21	14	7	619	369	250
45 – 59	446	369	77	150	115	35	15	15	0	760	251	509
60+	420	311	109	123	114	9	15	13	2	601	347	254
Totals	2790	2263	527	1087	1202	-115	92	84	8	3275	2143	1132

Source: Analysis of raw data supplied by Edge Analytics (October 2019)

Key Findings

28. The following summarises the key findings from analysing the EA figures:

<u>Migration from Carmarthenshire</u>

- A total of 5,672 persons moved <u>from</u> the County during 2017/18.

- Of these, 3,529 moved to <u>other parts of </u>Wales and 2,143 (38%) moved elsewhere <u>outside Wales</u>.

- Of the 3,529 who moved to other parts of Wales,

  o 2,243 (64%) moved to other parts of the Mid and West Wales Region;

  o 1202 (34%) moved to the South East Region; and

  o 84 (2%) moved to the North Wales Region.

- The five largest cohorts to migrate from Carmarthenshire were:

  o 16 – 29 age group - to areas outside Wales (966);

  o 16 – 29 age group to other parts of the Mid and West Wales (784 – 344 of which to Swansea);

  o 16 – 29 age group to the South East Region (642 – 389 of which to Cardiff);

  o 30 – 44 age group to other parts of the Mid and West Wales (469 – 193 of which to Swansea);

  o 30 – 44 age group to areas outside Wales (369).

16 – 29 age groups

29. Of particular concern is to understand movements within the 16 – 29 age group as a possible key driver of the Preferred Strategy. The assessment within the SA Appraisal of the Preferred Strategy is that the PS will benefit the County by the retention of young people.

30. **Table A2.4-3** shows the numbers of people migrating from Carmarthenshire to the rest of Mid and West Wales, South East Wales and rest of UK by age. Further analysis of the 16 – 29 age cohort shows the following:

- A total of 2,455 migrated from Carmarthenshire. Of these:

  o 996 moved outside Wales;

  o 784 moved to other parts of the Mid and West Wales;

  o 642 moved to South east Wales.

- Of the 996 who moved outside Wales:

  o almost half 487(48.9%) were aged 19 to 22 of which 212 (21%) were aged 19;

  o the numbers declined steadily for those aged 23 and over from 85 to 32.

- Of the 784 who moved to other parts of Mid and West Wales:

- a little over a third 289(46.8%) were aged 19 to 22 of which 105 (13.8%) were aged 19;

- the numbers for those aged 23 and over varied between 51 and 70;

- Swansea topped the authorities in terms of choice of destination for all age groups within this cohort.

- Of the 642 who moved to South East Wales:

  - almost half 316 (49.6%) were aged 19 to 22 of which 147 were aged 19;

  - the numbers declined steadily for those aged 23 and over from 54 to 16;

  - Cardiff overwhelmingly topped the authorities in terms of all age groups within this cohort.

Migration to Carmarthenshire

- A total of 7,241 persons moved to the Carmarthenshire during 2017/18.

- Of these, 3,274 (44%) moved to the County from elsewhere outside Wales and 3,967 (56%) moved from other parts of Wales.

- Of the 3,967:

  - 2,789 (70%) moved to Carmarthenshire from other parts of the Mid and West Wales Region;

  - 1,086 (27%) moved from the South East Region; and

  - 92 (2%) moved from the North Wales Region.

- The five largest cohorts to migrate to Carmarthenshire were:

  - 16 – 29 age group from areas outside Wales (823);

  - 16 – 29 age group from other parts of the Mid and West Wales (819 – 324 of which from Swansea and 202 from Ceredigion);

  - 45 – 59 age group from areas outside Wales (760);

  - 30 – 44 age group from other parts of the Mid and West Wales (622 – 282 of which from Swansea);

  - 30 -44 age group from areas outside Wales (619).

Population and Household Movements for 2010/11

31. It is interesting to compare the scale of migration outlined above with that recorded in the 2011 Census. **Table A2.4-4** overleaf provides analysis from Table (DC8201) of the Census 2011 which records where persons lived one year previously to the Census date by ability to speak Welsh.

32. Overall, the table records that:

    - 16,154 persons aged 3 and over moved residence during 2010/11. Of these:

        o 10,545 (65%) moved from addresses within the County itself; and

        o 5,909 (35%) persons aged 3 and over moved to the County from elsewhere during 2010/11.

33. The 5,909 figure above compares to the 6,993 (7,241 less the 248 aged under 3) who are estimated to have moved into Carmarthenshire in 2017/18. It is not possible to make a direct comparison with the people who moved out of the area as the Census table does not record how many people moved out of Wales. However, the figure for those aged 3 and over who moved to other parts of Wales is 2,905. This compares with the 3,408 (3,529- 121) who were recorded as moving to other parts of Wales in 2017/18.

34. Of those who lived at same address, 45% could speak Welsh which compares slightly better than the overall average of 43.9% for the Carmarthenshire.

35. Of those who moved from elsewhere outside the County, 1,499 (25%) were able to speak Welsh. 37% of the 1066 migrants who came from other parts of Wales and 15% of the 427 migrants who came from elsewhere in the UK outside Wales could speak Welsh.

36. This compares to the 4,018 who moved within the County of which 37% could speak Welsh.

Table A2.4-4 Analysis of Address of Residents Age 3 and Over One Year Ago by Ability to Speak Welsh

Carmarthenshire	All categories: Age 3 and over Lived at same address one year ago	All categories: Age 3 and over Lived elsewhere one year ago: Total	All categories: Age 3 and over Lived elsewhere one year ago; within same County	All categories: Age 3 and over Inflow: Total	*All categories: Age 3 and over* *Inflow: Lived elsewhere one year ago outside the area but within 'associated area' (rest of Wales)*	*All categories: Age 3 and over* *Inflow: Lived elsewhere one year ago outside Wales*	**All categories: Age 3 and over** **Outflow: Moved out of the area to rest of Wales**
Total Persons	160788	16854	10945	5909	*3007*	*2902*	**2905**
Percentage in different Geographic Areas			65%	35%	*51%*	*49%*	
Can speak Welsh	72537	5511	4018	1493	*1066*	*427*	**1153**
Percentage of Category who speak Welsh	45%	33%	37%	25%	*35%*	*15%*	**40%**

Source: ONS 2011 Census Table DC8201WA

Table A2.4-5 Analysis of Households (wholly Moving) by Address One Year Previously by Presence of Dependent Children and Ability to Speak Welsh

Carmarthen shire	All Categories				No Adults can speak Welsh				At Least One Adult Can speak Welsh					
	All	No dep Child	With dep child		All	No dep Child	With dep child		All	%	No dep Child	%	With dep child	%
Whole HH same address	69784	51230	18554		33735	24597	9138		36049	52%	26633	52%	9416	51%
Total Moving HH	6012	3826	2186		3892	2505	1387		2120	35%	1321	35%	799	37%
Within same area	3769	2208	1561		2286	1343	943		1483	39%	865	39%	618	40%
Inflow	1566	1132	434		1163	848	315		403	26%	284	25%	119	27%
Outflow to other parts of Wales	677	486	191		443	314	129		234	35%	172	35%	62	32%
Inflow:														
from other parts of Wales	812	565	247		546	376	170		266	33%	189	33%	77	31%
ex Wales	754	567	187		617	472	145		137	18%	95	17%	42	22%

Source: ONS 2011 Census Table DC8203WA

<u>Households</u>

37. In Carmarthenshire, 69,784 whole households lived at same address one year prior to 2011. Of these:
- 33,735 (48%) were households with no adult being able to speak Welsh;
- 36,049 (52%) were households where at least one adult spoke Welsh; Of these:
    - 26,633 with no dependent children where at least one adult spoke Welsh;
    - 9,416 with dependent children where at least one adult spoke Welsh.

38. 6,012 Totally Moving Households (the figure excludes Partially Moving Households), of which:
- 3,769 moved within same County
- 1,566 moved from outside the County
    - 812 moved from other parts of Wales
    - 754 moved from the rest of UK outside Wales
- 677 flowed to other areas of Wales outside the County

39. Of the 2,120 (35%) Moving Households where at least one adult speaks Welsh:
- 1,483 moved within same County. (799 (40%) with dependent children and with at least one adult who speaks Welsh)
- 403 from outside the County (119 with dependent children). Of these:
    - 266 moved from other parts of Wales (77 (31%) with dependent children and with at least one adult who speaks Welsh);
    - 137 from rest of UK outside Wales (42 (22%) with dependent children and with at least one adult who speaks Welsh).

Summary and Conclusions

40. The revised Preferred Strategy is based on the 2019 PG 10-year scenario of an increase in population of 15,115 over the period 2018 – 2033 which in turn leads CCC to conclude that it will require a total dwelling growth of 8,835. This is predicated, in the main, on the assumptions made about current rates of net internal migration as the main driver of population change.

41. The paper sought to try and get a better understanding of whether and how net internal migration assumptions, as the main driver of population, household and dwelling growth would have any implications for the resilience of the Welsh language.

42. Analysis of the gross migration figures show that a significant proportion of net migration in terms of Carmarthenshire (in and out migrants) are internal to Wales. The analysis of the 2011 Census of Population returns for those persons who moved from an address outside the County during the previous twelve months also suggests that a significant proportion (around a third) of in migrants to Carmarthenshire were

from households where at least one adult spoke Welsh. Similarly, around one in six households from outside Wales had at least one adult who speaks Welsh.

43. Whilst past results are, in themselves, no predictor of future outcomes, the evidence presented does suggest that gross in migration is likely to include a significant proportion of households where at least one adult may be able to speak Welsh and thus provide better foundations to plan for enhancing the resilience and vitality of the Welsh language.

<div align="center">*   *   *   *   *   *   *</div>

Appendix 2.5: Implications of Adopting the Preferred PG 10 Year (2019 Addendum) Growth Scenario for the Welsh Language Baseline Trajectory

1. As stated in **Appendix 2.3**, the Welsh Government's (WG) trajectory for reaching the target of one million Welsh speakers by 2050 has been calculated building upon the 2014 population projection and using four main assumptions based on the policy aims of the strategy:
   - Welsh language transmission at home
   - learning Welsh in school
   - learning Welsh through Welsh for Adults
   - improved continuation of Welsh-speaking ability post-16.

2. In its revised Local Development Plan (LDP) Preferred Strategy, Carmarthenshire County Council propose to use the PG 10-year scenario[57] from the 2019 Edge Analytics Report (2019 PG10) and utilise the alternative vacancy rate (Alt. VR) of 3.4% to underpin the future growth requirements for this revised LDP.

3. **Table A2.5-1** is reproduced from the Appendix to the Edge Analytics Addendum Report[58] with the PG 10yr and WG 2014 – based scenarios highlighted.

Table A2.5-1: Carmarthenshire (ex BBNPA) Population, Household and Dwelling Scenarios

Scenario	Change 2018 - 2033				Average per year			Total Dwellings Growth (Census VR)	Total Dwellings Growth (Alt. VR)
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings (Census VR)	Dwellings (Alt. VR)		
PG Long Term	17,811	9.6%	9,726	12.0%	1,516	692	671	10,375	10,065
PG 10yr	15,115	8.1%	8,538	10.6%	1,337	607	589	9,108	8,835
PG Short Term	14,133	7.6%	8,474	10.5%	1,317	603	585	9,040	8,769
WG 2014-based	2,581	1.4%	2,878	3.6%	481	205	199	3,070	2,978

Source: Edge Analytics (September 2019) Appendix A

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[57] As defined by Edge Analytics
[58] Edge Analytics (September 2019) Carmarthenshire Population and Household Forecasts.

4. **Table A2.5-2** below adapts the above table to summarise the net difference in outcomes from the two scenarios for Carmarthenshire outside the Brecon Beacons National Park Area (BBNPA).

Table A2.5-2 Differences in Demographic and Dwelling Requirement Outcomes between the 2019 PG 10 and WG 2014 Scenarios

Scenario	Change 2018 - 2033				Average per year		Total Dwellings Growth (Alt. VR)
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings (Alt. VR)	
PG 10yr	15,115	8.1%	8,538	10.6%	1,337	589	8,835
WG 2014-based	2,581	1.4%	2,878	3.6%	481	199	2,978
Net Difference	12,534	0	5,660	0	857	390	5,857

Source: Edge Analytics (September 2019) Appendix A

5. The Preferred Strategy is based on the 2019 PG 10-year scenario. This scenario identifies the population and household growth outside the Brecon Beacons National Park Area and projects an overall population increase of 15,115 (8.1%) to 201,160 and an increase in the number of households by 8,641 (10.6%). On this basis, the draft LDP identifies a requirement for 8,835 new homes over the revised LDP period 2018-2033. This equates to 589 new homes per year.

6. Based on a projected population of 201,160 and assuming a similar proportion of the population being aged 3 and over (97.2%), this would give a projected population aged 3 and over of 195,527.

7. As discussed in **Appendix 2.3** the trajectory estimate of the Carmarthenshire population aged three and over able to speak Welsh is estimated as 95,608. *Ceteris paribus*, this would result in the proportion of the total Carmarthenshire population age three and over who are able to speak Welsh as 95,608 /195,527 = 48.9%.

8. The effect of this would be a <u>3.1 percentage point</u> reduction in the proportion of Welsh speakers than would be realised under the WG14 based population trajectory scenario (52.0%).

The Impact of Gross Migration figures

9. The Preferred Strategy's assumptions about future growth in population and the assumptions about net inward migration (in terms of what proportion of the population is likley to transmit the Welsh language from one generation to the next ('re-production') has key implications for delivering the trajectory baseline of 95,608

Welsh language speakers. Similarly, the Council's Welsh Learning Education Strategy for pupils and adults will also have key implications.

10. It could prove valuable, therefore, in trying to analyse the 2017/18 migration and other data on past migration to try and understand what effect, if any, the assumptions on net internal migration are likely to have on the percentage of Welsh speakers.

Migration by Age Cohort

2017/18 Statistics

11. **Table A2.5-3** below gives an analysis of the gross in and out migration figures by age cohort between Carmarthenshire, the rest of the Mid and West Wales Region, South East Wales and other areas in the UK outside Wales (the figures for North Wales are excluded as they are very small).

Table A2.5-3 2017/18 Gross and Net Migration figures by Age Group and Geography

	Rest of Mid and West Wales			South East Wales			North Wales			Areas Outside Wales		
	In	Out	Net	In	Out	Net	In	Out	Net	In	Out	Net
0-2	109	90	19	40	27	13	1	4	-3	98	38	60
3 – 15	374	240	134	108	98	10	8	2	6	374	142	232
16 – 29	819	784	35	450	642	-192	33	36	-3	823	996	-173
30-44	622	469	153	216	206	10	21	14	7	619	369	250
45 – 59	446	369	77	150	115	35	15	15	0	760	251	509
60+	420	311	109	123	114	9	15	13	2	601	347	254
Totals	2790	2263	527	1087	1202	-115	92	84	8	3275	2143	1132

Source: Raw data analysis by Edge Analytics

12. The key findings to be drawn out from the above table are:
- the County has net gains from the rest of Mid and West Wales but a net loss to Sount East Wales;
- the County has seen a +376 gain in the number of children aged 3- 15;
- the County attracts more people than it loses from the rest of Mid and West Wales, including a slight gain for those aged 16 – 29;
- the County loses persons aged 16 – 29 to South East Wales but gains slightly on those aged 30 and above; and
- the County loses persons aged 16 – 29 to areas in the UK outside Wales but gains significantly from all groups aged 30 and over with the most significant gain in those aged 45 – 59.

13. The out-migration figures for <u>2017/18</u> suggest the following key characteristics for that year:

- a little under four persons in ten (38%) moved from the County to areas outside Wales with a little over six persons in ten (62%) moving from the County to <u>other parts of Wales;</u>

- a little over four in ten persons (42%) moved from Carmarthenshire to <u>other parts of the Mid and West Wales Region; and</u>

- a little under two persons in twelve (15%) moved to <u>the South East Region.</u>

<u>In Migration</u>

14. The in-migration figures for <u>2017/18</u> suggest the following key characteristics for that year:

- around seven persons in twelve (56%) moved into the County from <u>other parts of Wales</u> with a little under five persons in twelve (44%) moving from areas in the UK outside Wales;

- 2,789 persons - around four persons in ten (38%) moved into the County from other parts of Mid and West Wales which is around 500 less than the persons who moved from other areas outside Wales; and

- 1,086 (15%) moved from South East Wales.

2011 Census

15. The out-migration figures from the 2011 Census for <u>2010/11</u> suggest the following key characteristics for that year:

- Of the 677 persons aged 3 and over who moved elsewhere in Wales around 40% could speak Welsh while one in three wholly moving households had at least one adult who could speak Welsh.

16. The in-migration figures from the 2011 Census for <u>2010/11</u> suggest the following key characteristics for that year:

- Of the 3,007 persons aged 3 and over who moved from elsewhere in Wales around 40% could speak Welsh while one in three wholly moving households who moved from elsewhere in Wales had at least one adult who could speak Welsh.

- Of the 2,902 persons aged 3 and over who moved to the County from elsewhere outside Wales around 15% could speak Welsh while slightly under one in five (18%) wholly moving households who moved from elsewhere outside Wales had at least one adult who could speak Welsh. This percentage rose to 22% of wholly moving households who had at least one dependent child.

Discussion

17. All scenarios assume that net internal migration will continue to be the main driver of population change. Although it is not made explicit, it is assumed here that natural change will continue to be negative thus reducing the pool or stock of existing Welsh speakers over time.

18. The 2019 PG 10 Year Scenario implies an increase in net migration to Carmarthenshire (outside the BBNPA) by 2,033 over and above the Welsh Government 2014 (WG14) population based scenario of around 14,153[59]. The net number of households would increase by 5,600.

19. **Table A2.5-4** reproduces Table 3 from the Edge Analytics report to Carmarthenshire County Council on Demographic Forecasts[60] which provides information on population changes under the various scenarios.

Table A2.5-4 Population change by age group under the demographic scenarios (2018 - 2033)

Scenario	Population Change 2018-2033				Population Change % 2018–2033			
	0-15	16-64	65+	80+	0-15	16-64	65+	80+
PG 10yr	530	-1,091	15,845	8,485	2%	-1%	36%	75%
WG 2014-based	-1,373	-7,735	12,315	7,769	-4%	-7%	28%	66%
Net difference	1,903	6,644	3,530	716	6%	6%	8%	9%

Source: Edge Analytics (November 2018)

3-15 cohort

20. Based on the PG10 scenario, the population aged 0-15 would increase by 2% whilst the WG14 based scenario anticipated a loss of -4%, a net diference of 6%.

21. The net effect of PG10 Scenario over the WG14 based scenario would see an increase of + 1,903   (from 31,847 to 33,750).

Welsh language implications

22. The main influence on the proportion of the cohort able to speak Welsh is likely to be the effectiveness of the education system rather than the transmission of the Welsh language from one generation to the next at home (although evidence suggests that success is more likely if Welsh is spoken at home).

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[59] See Edge Analytics Addendum, Table 3.
[60] Edge Analytics (November 2018) Carmarthenshire Demographic Forecasts updated table.

23. Assuming that Carmarthenshire's Welsh Language Education Strategy would be able to realise 75%[61] of all pupils aged 3 – 15 being able to speak Welsh by 2033, this would be likely to increase the number of Welsh speakers by 1,427.

24. This would increase the number of Welsh speakers over the Trajectory by (95,608 + 1,427) = 97,035.

<u>16 – 64 cohort</u>

25. The WG14 Population Scenario projections anticipate a net decrease of the population in the 16-64 age cohort of -7,735 (-7%) for the period 2018 - 2033. The 2019 PG10 scenario anticipates a net decrease of -1,901.

26. This would give a net increase in the 16 – 64 cohort over WG2014 of + 6,644.

27. The analysis of the 2011 Census by residence one year ago records that 37% of the migrants who came from other parts of Wales spoke Welsh and 15% of migrants who came from elsewhere in the UK outside Wales spoke Welsh.

28. Applying similar percentages to the 2019 PG10 over WG14 would give a net position in terms of the number of Welsh speakers of:

- Net increase of the 16 – 64 cohort = 6,644
- No. from within Wales = 6,644 * 44% = 2,923
- Applying 37% Welsh speaking gives 2,3113 * 37% = 1,082

and

- Net increase of the 16 – 64 cohort = 6,644
- No. from within the rest of the UK outside Wales = 6,644 * 56% = 3,721
- Applying 15% Welsh speaking gives 3,721 * 15% = 558

29. In summary, the PG10 scenario based on the results of the 2011 Census could possibly increase the number of Welsh speakers aged 16-64 over the WG14 scenario by: 1,082 + 558 = 1,630[62]

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[61] Carmarthenshire County Council have yet to publish its Welsh in Education Strategic Plan for 2021 – 2024, this figure is, therefore, posited as a realistic example based on the January 2019 PLASC data.

[62] These figures for in migrants from other parts of Wales are possibly towards the lower scale of the spectrum because the percentage of Welsh in migrants from other parts of Wales is likely to be higher if the target of a million speakers by 2050 is rolled out equally across Wales.

30. The WG14 Scenario projections anticipate a net increase of the population in the 65+ age cohort (including those 80+) of +20,084 (+31%) above the 2014 population.

31. The PG10 scenario gives an increase for the 65+ cohort of 24,830. This represents an increase over the WG14 scenario of +4,746.

32. As stated previously, analysis of the 2011 Census by residence one year ago records that 37% of the migrants who came from other parts of Wales who spoke Welsh and 15% of migrants who came from elsewhere in the UK outside Wales spoke Welsh.

33. By applying similar percentages to the PG10 over WG14 this would give a net position in terms of the number of Welsh speakers of:

- Net increase of the 65+ cohort = 4,746
- No. from within Wales = 2,718 * 44% = 2,088
- Applying 37% Welsh speaking gives 1,196 * 37% = 773

and
- Net increase of the 65+ cohort = 4,746
- No. from within the rest of the UK outside Wales = 4,476 * 56% = 2,507
- Applying 15% Welsh speaking gives 1,522 * 15% = 376

34. In summary, the 2019 PG10 scenario based on the results of the 2011 Census could possibly increase the number of Welsh speakers aged 65+ over the WG14 scenario by: 773 + 376 = 1,149

Welsh language implications

35. Anticipating the likely effects of changing population numbers in the 16+ age groups on the Welsh language is more challenging, particularly since large assumptions are being on the outomes of one year in the past being repeated over twenty years later.

36. Based on assumptions about the characteristics of in-migrants from the 2011 Census, the net change in population scenario figures for 2019 PG10 over WG14 and the future success rate of Carmarthenshire's Welsh Language Education Strategy, the numbers of Welsh speakers could possibly be higher than the WG Trajectory by:

1,427 + 1,630 + 1,149 = 4,206
Total number of Welsh speakers = 95,608 + 4,206 = 99,814

Percentage of Welsh speakers age 3+ = 99,814 divided by 195,527 = 50.5%

This suggests a likely 1.5% percentage point reduction from the WG14 Trajectory scenario (52.0%).

Appendix 2.6: The Evidence Base for a Welsh Language Impact Assessment of the Preferred Spatial Strategy

1. This Appendix aims to try and develop a more robust evidence base that can be used as the basis for undertaking a Welsh Language Impact Assessment of the Preferred Spatial Strategy. It begins by establishing the position for each Cluster at the 2011 Census – the most recent collection of comprehensive data on the use and understanding of the Welsh and English languages.

Table A2.6-1 Cluster Baseline Position[63]

	Cluster	All Usual Residents Aged 3 and Over	Can Speak Welsh	Can Speak Welsh
		Count	Count	Percentage
Cluster 1	Carmarthen and its Rural Areas	32447	15191	46.8%
Cluster 2	Llanelli a Gwendraeth Isaf	70729	22736	32.1%
Cluster 3	Aman a Gwendraeth Uchaf	41010	24069	58.7%
Cluster 4	Dyffryn Teifi	12475	6745	54.1%
Cluster 5	Tywi Uchaf	10071	4742	47.1%
Cluster 6	Western Sir Gâr	9910	4008	40.4%
Totals		176642	77491	43.9%

2. As can be seen above the highest number of Welsh speakers is found within the Aman and Upper Gwendraeth Valleys with 24,069. This is followed closely by the Llanelli and Lower Gwendraeth Cluster with 22,736.

3. The Cluster with the largest percentage that can speak Welsh is also Aman and Upper Gwendraeth Valleys with 58.7%. This is followed by Cluster 4 (Dyffryn Teifi) with 54.1%. Cluster 1 (Carmarthen and its Rural Areas) and Cluster 5 (Tywi Uchaf) both score 46.8% and   47.1% respectively.

4. Although it has the largest number of Welsh speakers Cluster 2 (Llanelli and the Lower Gwendraeth) has the lowest figure in percentage terms.

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[63] An attempt has been made to adjust the total cluster populations to reflect that a small percentage reside within the Brecon Beacons National Park. For the purposes of this exercise it has been assumed that the population (around a 1,000) reside within the Tywi Uchaf Cluster (Cluster 5)

5. Our preferred methodology for establishing Welsh Language Resilience (WLR) is based on normalising the data on number of Welsh speakers and adding the normalised score to the threshold weighting.   Table A2.6-2 shows the results of WLR for each cluster.

Table A2.6-2: Welsh Language resilience score according to cluster

	Cluster	All Usual Residents Aged 3 and Over	Can Speak Welsh	Normalised Count		Can Speak Welsh		WLR = NWS +PWS threshold weighted	
		Count	Count			Percentage		Weighting	Score
Cluster 1	Carmarthen and its Rural Areas	32447	15191	0.56		0.47		1	1.56
Cluster 2	Llanelli and Lower Gwendraeth	70729	22736	0.93		0.32		1	1.93
Cluster 3	Amman and Upper Gwendraeth	41010	24069	1.00		0.59		2	3.00
Cluster 4	Teifi Valley	12475	6745	0.14		0.54		2	2.14
Cluster 5	Upper Tywi	10071	4742	0.04		0.47		1	1.04
Cluster 6	Western Carmarthenshire	9910	4008	-		0.40		1	1.00
	Cyfansymiau	176642	77491.44			43.9%			
	MIN		4008			0.32			
	MAX		24069			0.59			

6. Table A2.6-2 confirms that the Aman and Gwendraeth valleys had the most resilient Welsh language clusters in 2011 due to the large count of Welsh speakers even though its percentage in Welsh terms is below the 70% threshold.

7. Figure A2.6-1 maps out the WLR by cluster and provides an assessment based on their relative position to each other. It confirms that the most resilient cluster is Cluster 3 (Amman and Upper Gwendraeth) with the weakest resilience scored for Clusters 5 and 6 (Upper Tywi and West Carmarthenshire).
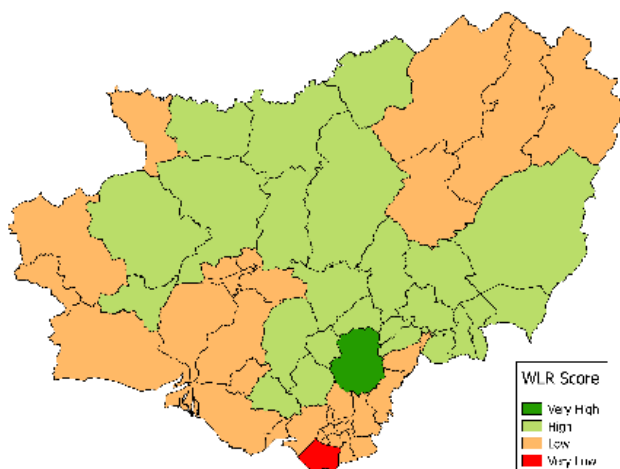
Figure A2.6-1 Carmarthenshire Welsh Language Resilience according to cluster
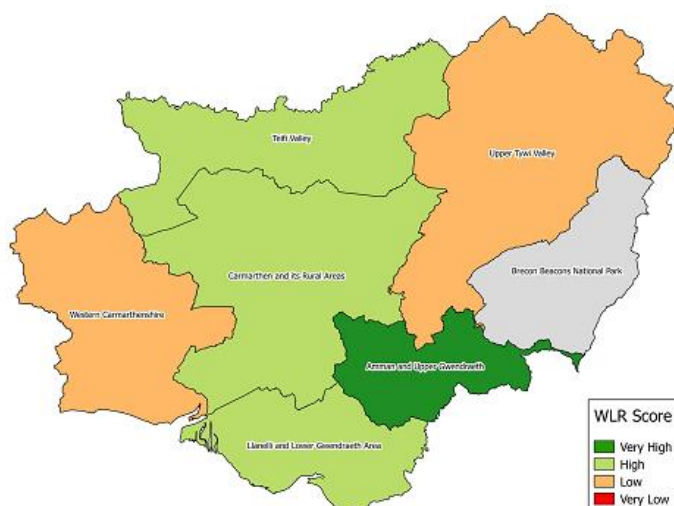
Source: Carmarthenshire County Council Forward Planning Section (December 2019) – adaption of 2011 Census figures for Welsh speakers by ward

8. It is not possible to produce a map showing the cluster's relative scores to the rest of Wales as counts cannot be normalised against a Maximum and Minimum.

9. **Figure A2.6-2** maps out the WLR by ward level based on these ward's relative resilience against wards in the rest of Wales. It confirms that the most resilient ward (Llannon) is located within Cluster 3 with the weakest (Glanymôr) in Cluster 2. Higher areas of resilience are generally found in Clusters 3 and 4 whilst in general lower areas of resilience are identified in Clusters 1, 5 and 6.
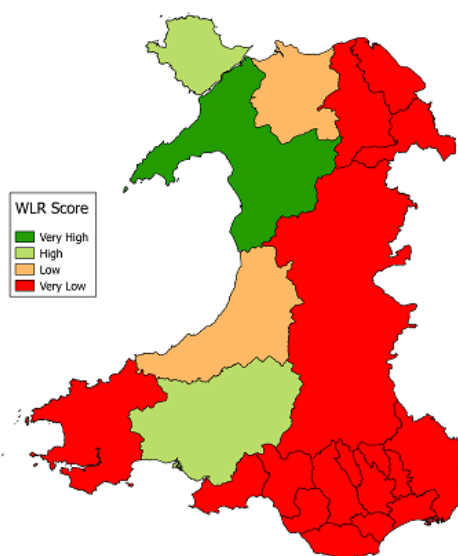
Figure A2.6-2 Welsh Language Resilience in Carmarthenshire wards

Source: Carmarthenshire County Council Forward Planning Section (December 2019) – adaption of 2011 Census figures for Welsh speakers by ward

10. Figure A2.6-3 shows the relative position of Welsh Language Resilience in Carmarthenshire to other Local Authorities in Wales.

Figure A2.6-3: Carmarthenshire Welsh Language Resilience in relation to local authorities in Wales

Source: Carmarthenshire County Council Forward Planning Section (December 2019) – adaptation of Professor David Demeritt analysis of 2011 Census figures for Welsh speakers by Local Authority

11. **Table A2.6-3** analyses the number and percentage of Welsh speakers for each cluster by age group. The maximum and minimum score for both numbers and percentages are highlighted in green and red respectively.

Table A2.6-3: Number and percentage of Welsh speakers by age group in each cluster

		All usual residents aged 3 -15			All usual residents aged 16-64			All usual residents aged 65 and over		
		Total	Can speak Welsh		Total	Can speak Welsh		Total	Can speak Welsh	
	Cluster	Count	Count	%age	Count	Count	%age	Count	Count	%age
Cluster 1	Carmarthen and its Rural Areas	4588	2758	60.1%	20559	8853	43.1%	7169	3639	50.8%
Cluster 2	Llanelli a Gwendraeth Isaf	11147	4778	42.9%	45153	11973	26.5%	14249	5985	42.0%
Cluster 3	Aman a Gwendraeth Uchaf	6322	4600	72.8%	25986	14000	53.9%	8702	5223	60.0%
Cluster 4	Dyffryn Teifi	1820	1407	77.3%	7753	3872	49.9%	2902	1633	56.3%
Cluster 5	Tywi Uchaf	1449	1006	69.4%	6704	2920	43.6%	2918	1251	42.9%
Cluster 6	Western Sir Gâr	1407	843	59.9%	6301	1994	31.6%	2202	820	37.2%
Totals		26,733	15,392	57.6%	112,456	43,612	38.8%	38,142	18,551	48.6%

Residents aged 3 – 15.

12. The highest number of residents able to speak Welsh is found in the Llanelli and Gwendraeth Isaf Cluster (Cluster 2) (4,778) with the lowest number in Western Sir Gâr (Cluster 6) (843). In percentage terms the highest percentage is found in Dyffryn Teifi Cluster 4 (77.3%) with the lowest percentage in Cluster 2 (42.9%).

13. It suggests that in 2011 two of the clusters (Cluster 3 and 4) succeed in turning out over 70% of pupils as bilingual with Cluster 5 narrowly missing the 70%. A further two clusters produce around 60% with Cluster 2 the only cluster where the percentage is below 50%.

14. The collection of PLASC (Pupil Level Annual School Census) data does allow us to monitor and update the position to January 2019. **Table A2.6-4** summarises the position for Carmarthenshire as a whole.

Table A2.6-4: Pupils aged 3 - 16 with ability[64] in Welsh

Carmarthenshire PLASC Data 2019			
Age Group	Total	Ability	%
3 to 4	3465	1630	47.0%
5 to 11	12205	8183	67.0%
11 to 16	10398	7873	75.7%
Totals	26068	17686	67.8%

Source: Carmarthenshire County Council PLASC Data January 2019

15. Whilst it is difficult to compare usual residents age 3 to 15 at the Census 2011 (all usual residents 26,733) with school rolls (23,563), it does suggest that, against a declining school age population aged 3 – 15, the number of Welsh speakers (both fluent and not fluent) aged 3 to 15 has declined slightly (from 15,932 to 15,181) but that the ability to speak Welsh has significantly increased from 57.6% to 64.4%.

16. Within each age group, the ability and fluency of the cohort increases with age as is shown in **Table A2.6-5** below. This augurs well in terms of both a growth and spatial strategy that has as one of its major aims an ambition to retain more young people and grow the Welsh language.

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[64] The Ability score includes pupils 'fluent in Welsh' and 'not fluent in Welsh'.

Table A2.6 -5: Number and percentage of pupils according to language ability and age group

Age Group	Fluent in Welsh		Not fluent in Welsh		Cannot Speak Welsh		Total	Ability (Fluent + Not Fluent)	
	Count	Percentage	Count	Percentage	Count	Percentage	Count	Count	Percentage
3 to 4	544	15.7%	1,086	31.3%	1,835	53.0%	3,465	1,630	47.0%
5 to 11	4,854	39.8%	3,329	27.3%	4,022	33.0%	12,205	8,183	67.0%
11 to 16	4,548	43.7%	3,325	32.0%	2,525	24.3%	10,398	7,873	75.7%
Totals	9,946	38.2%	7,740	29.7%	8,382	32.2%	26,068	17,686	67.8%

The header row above spans "Carmarthenshire PLASC Data 2019" across all columns.

Source: Carmarthenshire County Council PLASC Data January 2019

17. **Figures A2.6-4**, **A2.6-5** and **A2.6-6** present the percentage of the school populations in each cluster according to Welsh language ability according to the Pupil Level Annual School Census data collected in January 2019.

Figure A2.6-4: Percentage of pupils aged 3-4 in Carmarthenshire pre-school provision according to Welsh language ability, 2019
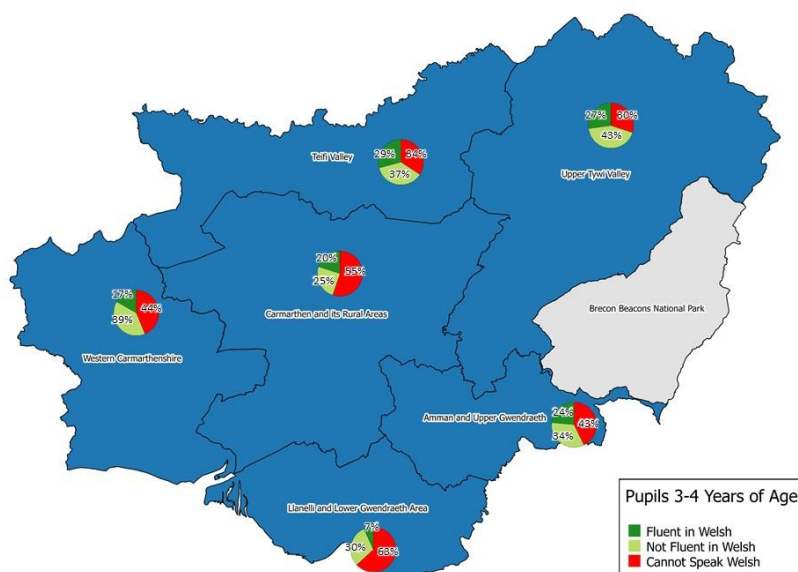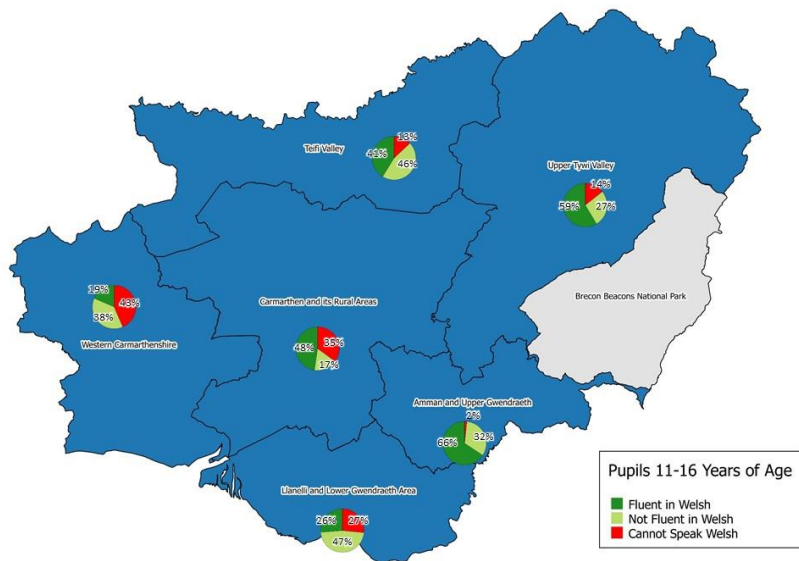

Source: PLASC, January 2019

Figure A2.6-5: Percentage of pupils aged 5-11 in Carmarthenshire primary school provision according to Welsh language ability, 2019
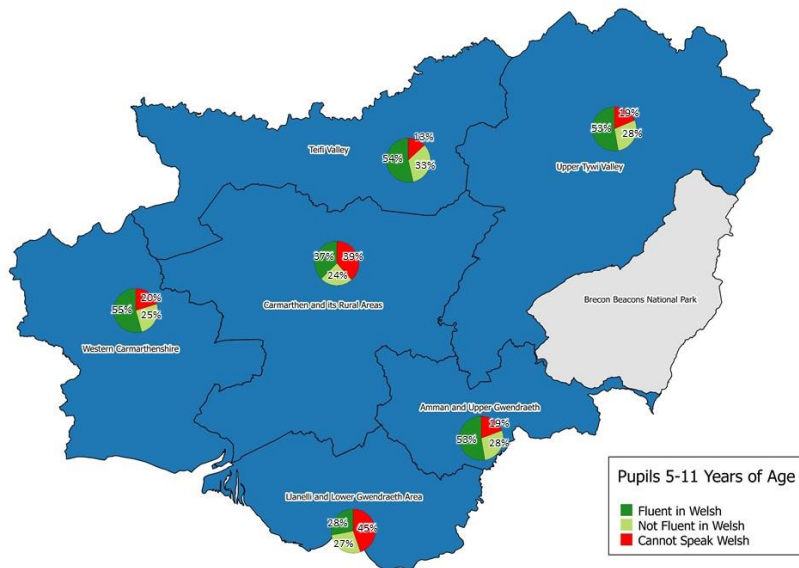
Source: PLASC, January 2019

Figure 2.6-6 Percentage of pupils aged 11-16 in Carmarthenshire secondary school provision according to Welsh language ability, 2019

Source: PLASC, January 2019

Residents aged 16 to 64

18. The highest number of residents able to speak Welsh is found in Cluster 3 (Aman and Gwendraeth Uchaf) (14000) with the lowest number again in Western Carmarthenshire (Cluster

6) (1,994). In percentage terms the highest percentage is found in Cluster 3 (53.9%) with the lowest percentage in Cluster 2 (26.5%).

Residents aged 65+

19. The highest number of residents able to speak Welsh is found in Cluster 2 (Llanelli and Gwendraeth Isaf) (5,985) with the lowest number again in Western Sir Gâr (Cluster 6) (820). In percentage terms the highest percentage is found in Cluster 3 (60.0%) with the lowest percentage in Cluster 6 (37.2%).

2033 Trajectory

20. The Growth Strategy is based on apportioning the preferred level of growth by cluster area. **Table A2.6-6** shows the results of apportioning growth to each cluster and using the Population increase assumed as the basis of Growth to apportion the population growth to each cluster. An assumption is then made about the population aged 3 and over (based on the proportion at Census 2011 of 98%) to arrive at the population trajectory figure for each cluster.

Table A2.6-6: Population growth trajectory by cluster area

Cluster		Number of dwellings in the cluster	Percentage	PG10 Pop Increase	Disaggregation of PG10 Year 2019 Population Projection Increase (15115)	Population aged 3 and over @98%
Cluster 1	Carmarthen and its Rural Areas	1646	16.3%		2,470	2421
Cluster 2	Llanelli a Gwendraeth Isaf	3059	30.4%		4,591	4499
Cluster 3	Aman a Gwendraeth Uchaf	1306	13.0%		1,960	1921
Cluster 4	Dyffryn Teifi	402	4.0%		603	591
Cluster 5	Tywi Uchaf	112	1.1%		168	165
Cluster 6	Western Sir Gâr	461	4.6%		692	678
Total		**6986**	**69.4%**	**15115**	**10,485**	**10,275**

Source: author's analysis and estimate of disaggregation of PG 10 (2019 Addendum) projected growth of population by cluster.

Population Change 2011 – 2018

21. Analysis of the Edge Analytics mid-year estimates data of Population Growth between 2011 and 2018 suggests that the population has grown by 4,685. By apportioning the age cohort group

analysis into the three age groups (aged 3 years and over) used in this analysis provides us with an estimate of the increase in each age group as follows:

Table A2.6-7: Estimated increase in population by age group between 2011 - 2019

Age Group	Estimated Change 2011 - 2018
0 to 2	406
3 – 15	1,292
16 – 64	2,319
65+	668
Total	4,685

Population Change 2018 – 2033

Option 1 (Business as Usual)

22. The background evidence to the current LDP contains projected population estimates up to 2026 based on the Preferred Growth strategy at the time and estimates the consequence of the Preferred Growth Strategy to be a population of 197,100 by 2026. This compares to an estimated population of 195,012 under the PG (2019 Addendum Scenario).

23. **Table A2.6-8** calculates the projected population for the Plan Area by 2033 based on extending the equivalent rate over the 2021-26 period to 2026-31.

Table A2.6-8: projected population growth in Carmarthenshire LDP area by 2033

Census	Mid Year Estimates								LDP 1 Projections		
2011	2012	2013	2014	2015	2016	2017	2018	2021	2026	2033
183,961	184,332	184,669	184,968	185,247	185,754	186,452	187,568	192,740	197,100	199,631

24. This gives us a projected population of 199,631 by 2033 and by assuming that the proportion of the population age 3 and over is 98% of the total population this gives us a figure for the number of residents age 3 and over of 195,638.

25. **Table A2.6-9** calculates the number and percentage of Welsh speakers by cluster and the total for the Plan Area.

Table A2.6-9: Projected number and percentage of Welsh speakers aged 3 and over by 2033

		LDP 1 (Option 1) Projection	
		Residents Age 3+	Welsh Speakers
	Cluster		
Cluster 1	Carmarthen and its Rural Areas	35936	18742	52.2%
Cluster 2	Llanelli a Gwendraeth Isaf	78335	28051	35.8%
Cluster 3	Aman a Gwendraeth Uchaf	45420	29696	65.4%
Cluster 4	Dyffryn Teifi	13817	8322	60.2%
Cluster 5	Tywi Uchaf	11154	5851	52.5%
Cluster 6	West Carmarthenshire	10976	4945	45.1%
Total		195638	95608	48.9%

Preferred Spatial Strategy

26. **Table A2.6-10** reproduces the Edge Analytics table showing the projected population change from 2018 to 2033. Adding both sets of figures gives us a trajectory for population change to 2033 over the 2011 baseline figure.

Table A2.6-10

Age Group	2018	Percentage	2033	Percentage
3 – 15	28,171	15%	28453	14%
16 – 64	114,906	62%	112608	57%
65+	38,844	21%	54,466	28%
Totals	186,568	100%	197,527	100%

Source: Edge Analytics (2019) *Carmarthenshire Demographic Addendum*

27. As is indicated in all population projection scenarios, the main growth in population will occur in the population aged 65 and over with a slight increase in the population aged 3 – 15 and a slight decrease in the population aged 16 to 64.

28. In order to calculate the projected population by 2033 according to cluster, we have apportioned this assumed growth in proportion to the trajectory of housing allocations proposed for each cluster (we have assumed an average household size of 2.2 residents across all clusters). We have also assumed that the number of Welsh speakers is according to our analysis of the impact of the Preferred Growth strategy on the number of Welsh speakers and allocated this according proportionately to each cluster. (**Table A2.6-11**)

Table A2.6-11: Projected number and percentage of Welsh speakers aged three and over by 2033 according to cluster

	Cluster	Preferred growth strategy	Preferred Spatial Strategy	
		Residents Age 3+	Welsh Speakers	
Cluster 1	Carmarthen and its Rural Areas	36283	19567	53.9%
Cluster 2	Llanelli a Gwendraeth Isaf	79092	29285	37.0%
Cluster 3	Aman a Gwendraeth Uchaf	45859	31002	67.6%
Cluster 4	Dyffryn Teifi	13950	8688	62.3%
Cluster 5	Tywi Uchaf	11262	6109	54.2%
Cluster 6	West Carmarthenshire	11082	5163	46.6%
Total		**197527**	**99814**	**50.5%**

Figure 2.6-7 below presents the results of assessing the impact of the Preferred Spatial Strategy Option on the Welsh language in comparison with the Business as Usual (Option 1) Scenario.

Figure 2.6-7: Estimated impact of the Preferred Growth Strategy on the Welsh Language in comparison with the Business as Usual (Option 1)

WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN PREFERRED GROWTH STRATEGY			Welsh Language Resilience f(WLR) = NWS + PWS threshold weighted		MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD			
					Major Positive	Minor Positive	Minor Negative	Major Negative
					Increase of 2.5 percentage points or more in the number of projected LPA Welsh speakers aged three and over above the trajectory	Increase of less than 2.5 percentage points in the number of projected LPA Welsh speakers aged three and over above the trajectory	Decrease of less than 2.5 percentage points in the number of projected LPA Welsh speakers aged three and over above the trajectory	Decrease of 2.5 percentage points or more in the number of projected Welsh speakers aged three and over above the trajectory
					High	Low	Low	High
	Probability	Frequency		Score	2	1	-1	-2
LIKELIHOOD	Experience shows that growth/decline in the population on this scale will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Previous Development Plan	Highly Likely	4	8	4	-4	-8
	Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence to show it occurs at least 5 - 7 times out of 10 in the Previous Development Plan	Likely	3	6	3	-3	-6
	Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence to show it occurs at least 3- 4 times out of 10 in the Previous Development Plan	Possible	2	4	2	-2	-4
	Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence to show it occurs at least 1 - 2 times out of 10 in the Previous Development Plan	Highly Unlikely	1	2	1	-1	-2

Appendix 3.1: Carmarthenshire Draft Deposit LDP – Final Draft Welsh Language Policies

Strategic Policy – SP 7: Welsh Language and Culture
The Plan supports development proposals which safeguard, promote and enhance the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture.

11.172 The Welsh language and culture play an important role in the social, cultural and economic life of Carmarthenshire's residents and visitors. The proportion of Welsh speakers in Carmarthenshire is significantly higher than the Welsh national average and as such is a significant part of the social fabric of the County's communities, providing a strong sense of place and identity.

11.173 Carmarthenshire in its entirety is considered to be an area of linguistic sensitivity. The 2011 Census indicates that 19.0% of the Welsh population are able to speak Welsh, whilst the correlating figure for Carmarthenshire stands at 43.9%. In terms of the geographical breakdown of the proportion of speakers across the County, this is lowest in the Glanymor electoral ward where 19.2% speak Welsh, and highest in Quarter Bach where 68.7% speak Welsh. The proportion of Welsh speakers is higher than the national average across each ward in the County, and it is largely for this reason Carmarthenshire in its entirety is considered to be linguistically sensitive. Additionally, the most recent Census data has shown a substantial decrease in the number of Welsh speakers across the County illustrating the language's vulnerability in Carmarthenshire.

11.174 The Plan seeks to 'promote the Welsh language and culture' and is committed to contributing to the Welsh Government's long-term aim of achieving 1 million Welsh speakers by 2050[65] . To deliver on this aim, the Council will support, promote and enhance the Welsh language as a viable community language by ensuring that there are sufficient and proportionate employment and housing opportunities to sustain both the rural and urban communities in the County and by implementing an effective monitoring framework. In doing so, the Plan seeks to ensure that the local population have the opportunity to remain in Carmarthenshire rather than leave in search of work opportunities and housing, as well as the opportunity to return.   Through aiming for sustainable growth, the Plan will also maximise opportunities for non-Welsh speakers who move to the County to be integrated into community life at a scale and pace that will not undermine the vitality and viability of the Welsh language and culture.

11.175 The need to safeguard, promote and enhance the Welsh language applies to developments proposed across the County and is not restricted to specific areas within the County. Development proposals will be required to acknowledge the official status of the Welsh language and commit to treating the Welsh language no less favourably than the English language.

11.176 Specific policies provide further guidance to ensure that development of an appropriate scale, type and character is delivered to meet the needs of the communities. Furthermore, the Revised LDP will seek to ensure that development occurs at a rate which can be absorbed and assimilated without damaging the character of the community.

11.177 The Plan also seeks to safeguard, promote and enhance the Welsh language in Carmarthenshire through other relevant policy objectives, namely through the provision of housing and affordable housing, promoting a vibrant economy and employment opportunities and the provision and retention of community facilities, amongst others.

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[65] *Cymraeg 2050: A Million Welsh Speakers*, Welsh Government (2017)

WL1: Welsh Language and New Developments
All development proposals throughout Carmarthenshire will be required to safeguard and promote the Welsh language.

Allocated Sites

> The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard, promote and enhance the Welsh language:
> a) Residential developments of 10 or more homes in the Principal Centres and Service Centres;
> b) Residential developments of 5 or more homes in the Sustainable Villages; and,
> c) Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more.

Windfall Sites

> The following proposals on windfall sites will be required to submit a Welsh Language Impact Assessment in support of a planning application as well as a Language Action Plan setting out the measures to be taken to safeguard, promote and enhance the Welsh language:
> d) Developments of 10 or more homes in the Principal Centres and Service Centres;
> e) Developments of 5 or more homes in the Sustainable Villages; and,
> f) Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more.

> Proposals which do not accord with the Plan's housing trajectory (Appendix 7) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site, and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.

> Residential developments for 10 or more homes on both allocated and windfall sites will be required to positively contribute towards the vitality and viability of Welsh language community groups and Welsh language learning opportunities.

11.178 The Welsh Language Action Plan sets out the measures to be taken to safeguard, promote and enhance the Welsh language. The Welsh Language Action Plan should also outline how the development proposes to make a positive contribution towards the community's Welsh language groups. This could, amongst others, include providing support and funding towards organisations and bodies that provide activities, facilities and education for Welsh speakers and learners, and support and funding towards Welsh language classes. Welsh Language Impact Assessments (WLIA) will be required to outline the anticipated impacts of the proposed development upon the Welsh language in the County. Guidance on how to produce a WLIA are contained within the Welsh Language Supplementary Planning Guidance.[66]

11.179 Whilst support for projects can be provided through financial contributions, they may also be provided through other means. Planning permission will be subject to conditions or legal agreements to secure the implementation of the mitigation and enhancement measures proposed within the Action Plan. Further guidance on the content of Welsh Language Action Plans will be provided through Supplementary Planning Guidance.

11.180 The LDP's housing trajectory is outlined in Appendix 7 of the Plan. The impacts of the scale, location and rate of development have been assessed in accordance with the agreed trajectory. Proposals for developments which do not accord with the timescales of the trajectory are consequently not fully assessed. Such proposals will therefore be required to be supported by a phasing plan outlining the number of dwellings to be delivered within each financial year. In such cases, planning permission may be subject to a condition to secure the agreed phasing of delivery where considered necessary.

11.181 For the avoidance of doubt, it should be noted that criterion a, b, d and e noted above should be informed by the LDP's settlement hierarchy as outlined by Policy SP16. The Plan's Strategy provides for organic growth on a small scale within the Rural Villages. It is considered that incremental

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[66] Carmarthenshire County Council (2014), Supplementary Planning Guidance: Welsh Language

development on this scale can make a positive contribution towards the sustainable growth of the Welsh language in rural communities, and any negative impacts are likely to be absorbed by the community. Development of any greater scale is unlikely to be compatible with the Plan's Strategy, and their impacts are therefore unassessed and unknown. In the event that such proposals are presented for consideration, they will need to be accompanied by a full assessment of their likely effects upon the Welsh language.

11.182 The SA/SEA of the LDP is required to assess the likely effects of the LDP upon the Welsh language. This is done iteratively at key stages throughout the Plan's production. The likely anticipated effects are presented in the SA/SEA reports, and further information is available within the LDP's evidence base.

11.183 The LDP provides further guidance on the provision of bilingual advertisements in Policy PSD9 – Advertisements. In order to promote the cultural identity and to safeguard the local linguistic character of Carmarthenshire, the Council will encourage bilingual marketing of new housing and commercial developments as well as encourage Welsh street and development names.

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