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Revised Carmarthenshire Local Development Plan 2018 – 2033 Draft Second Deposit Welsh Language Impact Assessment

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Welsh Language Impact Assessment of Carmarthenshire Revised LDP 2018-2033 Draft Second Deposit

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Contents

| | |
|--|----|
| Contents | 3 |
| KEY DEFINITIONS | 5 |
| Part 1 – Welsh Language Impact Assessment Methodology | 7 |
| 1.1 Introduction | 7 |
| 1.2 The Policy Context - Planning Policy Wales and TAN 20: Planning and the Welsh Language | 7 |
| 1.3 Review of Existing Methodologies | 8 |
| 1.3.1 Sustainability Appraisal/Strategic Environment Assessment | 8 |
| 1.3.2 Current approaches to WLIA among Local Planning Authorities..... | 10 |
| 1.3.3 Planning and the Welsh Language: The Way Ahead (2005) | 11 |
| 1.4 Alternative Approaches to Risk Assessment and Management | 12 |
| 1.4.1 Predicting Resilience Scores..... | 18 |
| 1.4.2 Consequences and Likelihood..... | 18 |
| 1.5 Limitations of Risk Assessment and Management Models | 21 |
| 1.6 Summary and Conclusions | 21 |
| Part 2 - Welsh Language Impact Assessment of the Deposit LDP’s Preferred Strategy | 23 |
| 2.1 Introduction | 23 |
| 2.2 The Context..... | 25 |
| 2.2.1 Welsh Government Guidance | 25 |
| 2.2.2 Future Wales – the National Plan 2040 | 27 |
| 2.2.3 Changes to the Use Classes (UCO) and General Permitted Development (GPDO) Orders .. | 28 |
| 2.2.4 Welsh Language Communities Housing Plan | 28 |
| 2.3 Carmarthenshire County Council..... | 28 |
| 2.3.1 Welsh Language and Planning Policy | 28 |
| 2.3.1 Welsh Language Promotion Strategy | 29 |
| 2.3.2 Welsh in Education Strategic Plan (WESP) 2022- 2032..... | 30 |
| 2.4 Summary of the Findings of the Integrated Sustainability Appraisal (ISA)..... | 31 |

| | | |
|---------------|--|-----|
| 2.4.2 | The ISA’s Assessment of the Reasonable Alternatives for the Preferred Scale of Growth .. | 33 |
| 2.4.3 | Our Assessment | 35 |
| 2.5 | Our High-level Welsh Language Impact Assessment of the Preferred Growth Strategy | 36 |
| 2.4.6 | Scoring the Initial Risk | 39 |
| 2.4.6 | Our High-Level Welsh Language Impact Assessment of the Preferred Spatial Strategy | 42 |
| 2.5.4 | Scoring the Initial Risk | 47 |
| 2.6 | Secondary, Cumulative and Synergistic Effects of the draft Preferred Growth and Spatial Strategies | 50 |
| 2.7 | Recommendations for Managing the Risk | 51 |
| Part 3 – | Welsh Language Impact Assessment of the Deposit Revised LDP Policies | 53 |
| 3.1 | Introduction | 53 |
| 3.2 | Methodology | 53 |
| 3.3 | Secondary, Cumulative and Synergistic Effects of the draft Preferred Strategy | 56 |
| Appendix 1.1: | The Status of the Welsh Language in Local Development Plans in Welsh Local Authorities | 58 |
| Appendix 1.2: | Welsh Language Resilience Management Framework - The Four Components in Detail ... | 59 |
| Appendix 2.1: | Establishing the baseline for the number and percentage of Welsh speakers in Carmarthenshire by 2033 | 78 |
| Appendix 2.2: | Gross Migration 2019-20 and Implications for the WLIA of the LDP Preferred Growth Strategy | 84 |
| Appendix 2.3: | Implications of Adopting the Ten-Year Trend-Based Growth Scenario for the Welsh Language Baseline Trajectory | 94 |
| 2.3.1 | The “Reproduction” Component | 94 |
| 2.3.2 | The “Production” Component | 95 |
| Appendix 2.4: | The Evidence Base for a Welsh Language Impact Assessment of the Preferred Spatial Strategy | 101 |
| Appendix 3.1: | Carmarthenshire Second Deposit rLDP – Welsh Language Policies | 116 |

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 and 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 and 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 comprehensive, realistic and suitable.
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 11, published in February 2021, 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 edition 10 (published December 2018), 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

¹ Welsh Government (February 2021) Planning policy Wales Edition 10, section 3.25.

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 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 2005². Using this guidance, predicted likely effects are scored as follows:

| | |
|----|----------|
| ++ | 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 Manual³ 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.

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

³ Welsh Government (March 2020) Development Plans Manual, Edition 3.

Figure 1.1: Welsh Government Suggested SA/SEA Scoring Matrix⁴

| 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. |

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, updated to August 2022. Of the 24 Development Plans⁵ 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).

⁴ Welsh Government (March 2020) Development Plans Manual, Edition 3

⁵ Gwynedd and Ynys Môn have adopted a Joint Local Development Plan

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.
- 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 WLIA.
- 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)⁶ 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*⁷. 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*.⁸ This provides 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.

⁶ Gwynedd and Ynys Môn Councils (2019) Gwynedd and Ynys Môn Local Development Plan Supplementary Planning Guidance *Creating and Sustaining Distinctive Communities*.

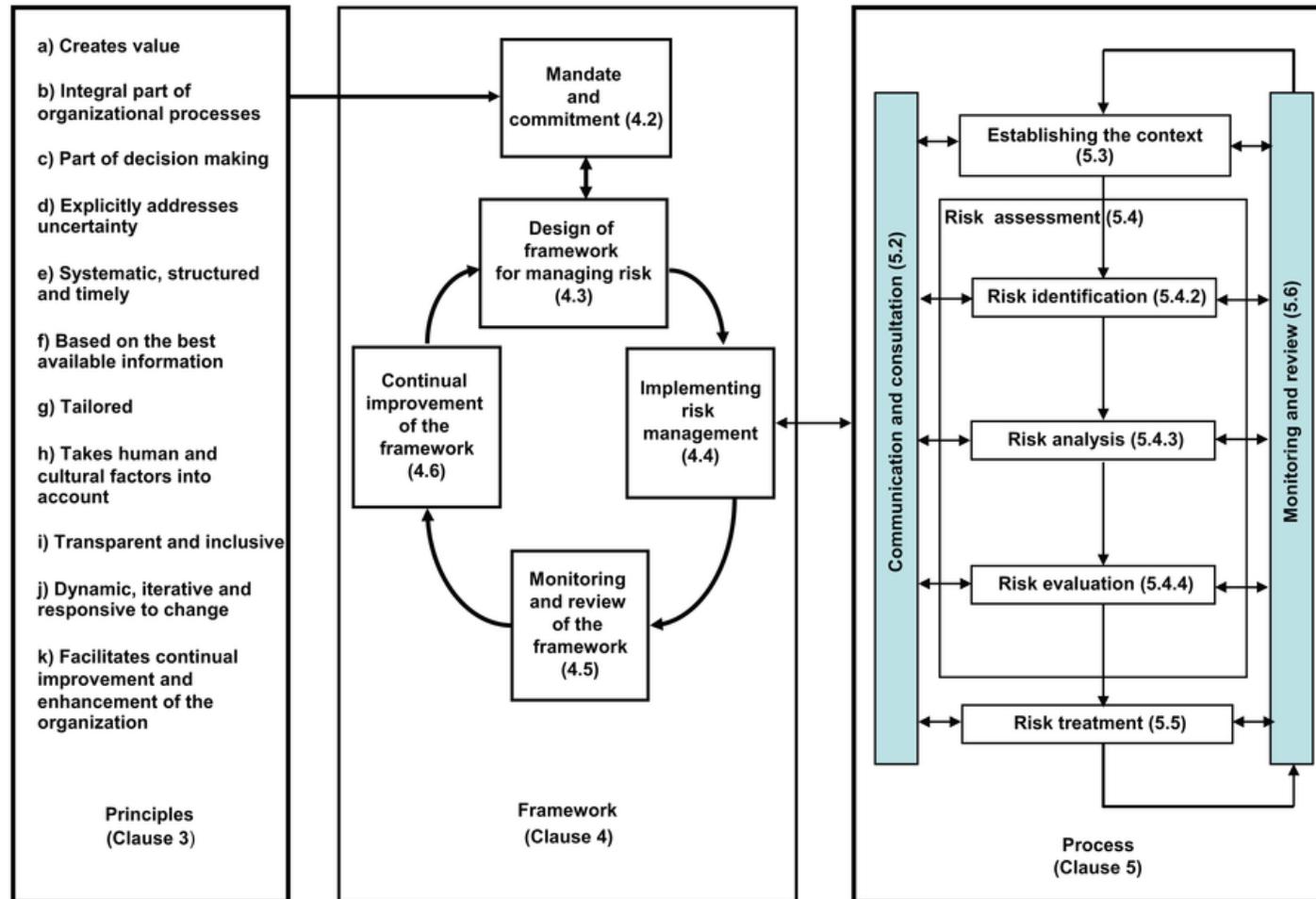
⁷ UK DEFRA/Cranfield University (2011) *Green Leaves III Guidelines for Environmental Risk Assessment and Management*

⁸ International Organization for Standardization (2018) *Risk Management Principles and Guidelines*.

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.

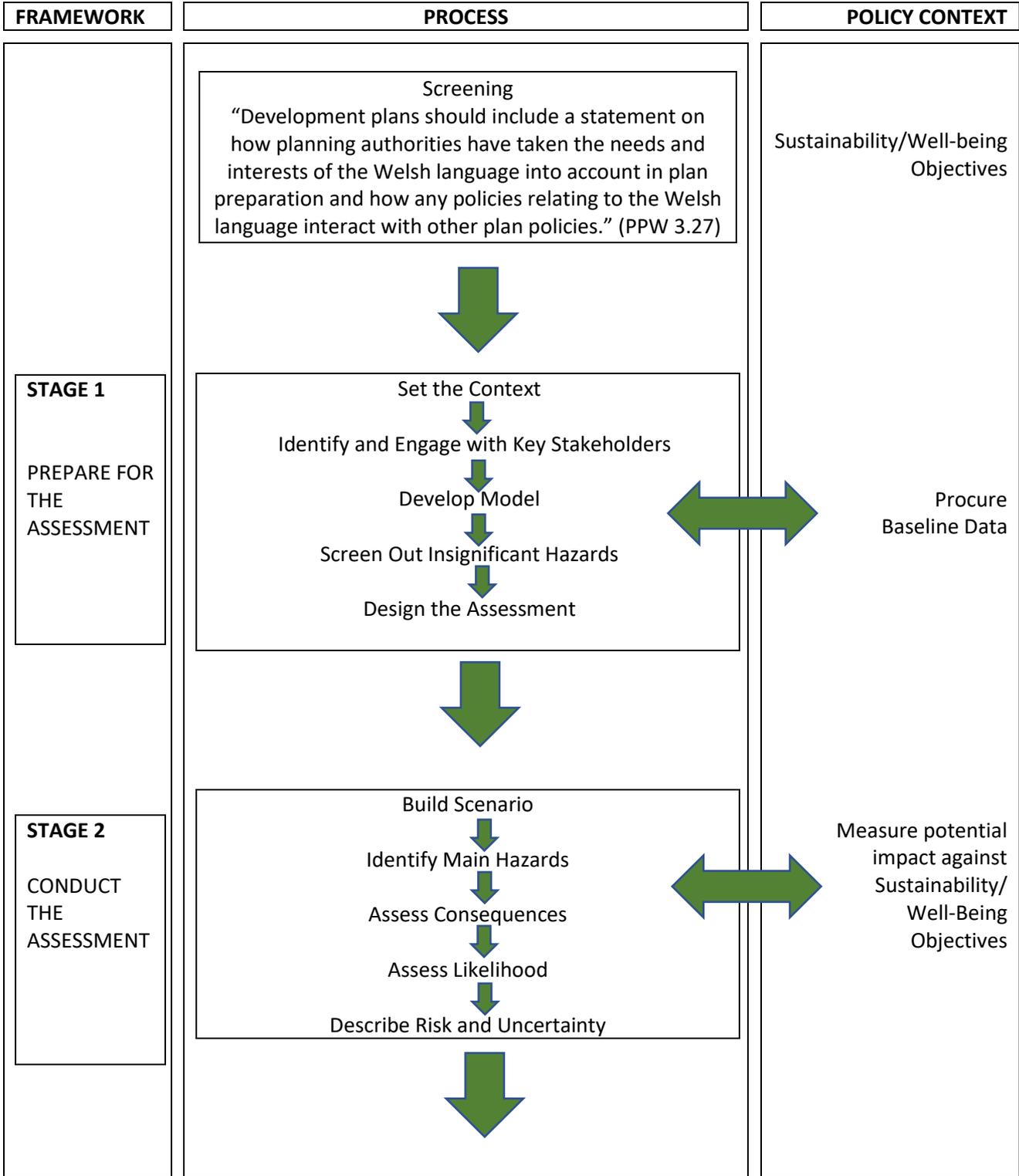
Figure 1.2: The Architecture of Effective Risk Management – the relationship between principles, framework and process⁹



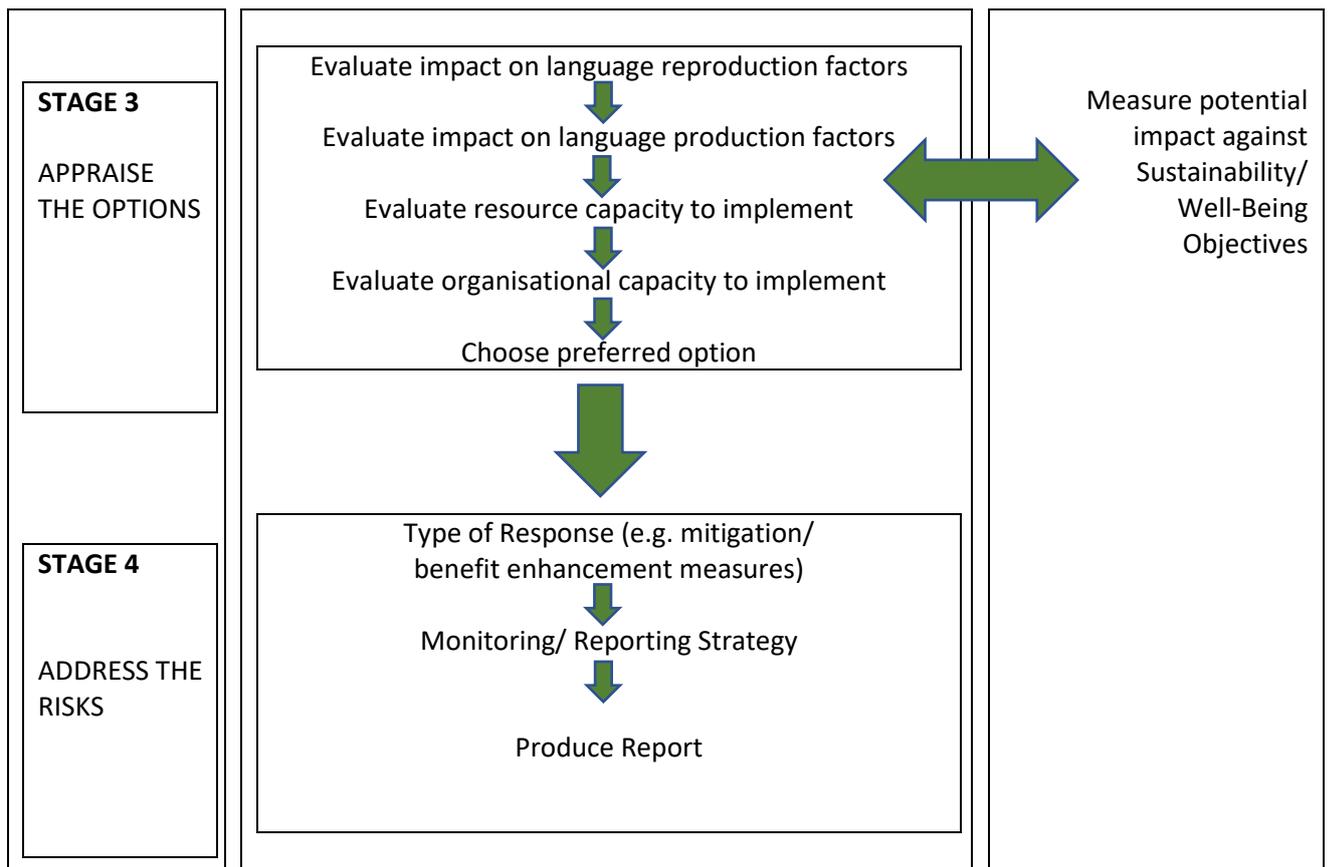
⁹ Source: International Organization for Standardization (2018) *Risk Management Principles and Guidelines*.

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).¹⁰



¹⁰ Adapted from DEFRA/Cranfield University (2011) – “Green Leaves III – Guidelines for Environmental Risk Assessment and Management



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.”*¹¹

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 level of consequence/impact occurring, 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:

| Impact | | Likelihood | |
|----------------|----|--------------------------------|---|
| Major Positive | +2 | Almost Certain/Highly Likely | 4 |
| Minor Positive | +1 | Likely/Probable | 3 |
| Minor Negative | -1 | Realistic Possibility/Unlikely | 2 |
| Major Negative | -2 | Highly Unlikely/ Remote Chance | 1 |

¹¹ HM Treasury (2004): *The Orange Book: Management of Risk- Principles and Concepts*

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 | | | | MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD | | | | | |
|---|--|--|----------------------|---|----------|---|---|---|---|
| | | | | Welsh Language Resilience $f(WLR) = NWS + PWS$ threshold weighted | | Major Positive | Minor Positive | Minor Negative | Major Negative |
| | | | | | | Increase of 2.5 percentage points or more in the percentage 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 percentage 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 percentage 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 percentage 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.

* * * * *

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

2.1 Introduction

1. Part 2 addresses the requirement for a revised Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **revised Growth and Spatial Strategies adopted for the Second Deposit Local Development Plan (rLDP2)**. This has been undertaken and prepared in parallel with the revised Integrated Sustainability Appraisal (ISA) undertaken for rLDP2 and in particular for these strategies.
2. The PCPA 2004 as amended by the PWA 2015 (section 11) confirms the requirement for a Sustainability Appraisal (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 scale¹² and location of change set out in the plan supports the Welsh language and ensure appropriate mitigation measures are in place, if required.”*¹³
3. Section 4 of The Development Plans Manual¹⁴ encourages an integrated approach to undertaking a sustainability appraisal of a development plan (see **Figure 2.1**). The sustainability objectives (SO) against which various impacts of the proposed development plan are assessed contain one objective relating to the future health of the Welsh language¹⁵. This has not changed from the SA adopted at the beginning of the rLDP1 process and for the reasons included in the rLDP1, the SA WLIA, in our view, is not sufficiently robust or SMART¹⁶ for the purposes of a comprehensive Welsh Language Impact Assessment. Whilst recognising that, ideally, the criterion for which impact is to be assessed by the SA and WLIA should be the same we have conducted the WLIA using a different yardstick.

¹² Our emphasis.

¹³ Planning and Compulsory Purchase Act 2004, section 60B (1) (b) and 60B (2) as amended by the Planning (Wales) Act 2015 (section 11).

¹⁴ Welsh Government (March 2020) Development Plans, edition 3.

¹⁵ Encourage growth of the Welsh language and culture.

¹⁶ SMART Specific, Measurable, Achievable, Realistic and Timebound.

Figure 2.1: Development Plans Manual Advice

Integrated Assessment Approach: An Effective and Holistic Approach to Plan Making

4.5 When undertaking an SA, LPAs should consider the value and opportunities for an integrated assessment approach to preparing a development plan. The integration of statutory and key elements such as WBFGA 2015 requirements, Equalities Act, Welsh language, Health Impact Assessment (HIA) and the Environment Act (section 6) (where 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.

4.6 An ISA can maximise efficiencies, avoid duplication, and provide a clear audit trail to communities and plan users on how the range of issues have been considered, and how they have influenced the plan. An ISA approach provides a robust and thorough mechanism to identify issues, assess effects and assist with monitoring in a holistic manner. It will be for each plan making authority to determine whether to integrate the assessments discussed below (not exhaustive) as part of their SA, having regard to legislative requirements and the key issues of the plan area. **Plan making authorities will need to be clear up front about what elements are being screened into the ISA; i.e. those elements that are relevant and can be considered by the development plan. The ISA should use signposting to clearly reference and highlight the specific legal requirement they are addressing.** The development plan system should not be used to secure objectives which are more appropriately achieved through other legislation or mechanisms.

Source: Welsh Government (2020) Development Plans, ed. 3, Development Plans Manual, Section 4.

4. 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.”*¹⁷
5. This assessment is composed of the following elements:
 - A review of the background and context for the assessment.

¹⁷ Op.cit.

- Referencing the more detailed analysis of the WLIA and SA assessments done as part of the initial deposit version of the revised LDP conducted in 2019.
- Identifying and populating any existing gaps to achieve a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Growth Strategy** using the methodology adopted in Part One.
- Identifying and populating any existing gaps to achieve a Welsh Language High Level Impact Assessment of the likely anticipated impacts of the **Preferred Spatial Strategy** using the methodology adopted in Part One.
- Making recommendations of what actions, if any, are needed in order to mitigate any negative impacts of the Preferred Growth and Spatial Strategy.

2.2 The Context

2.2.1 Welsh Government Guidance

6. The Welsh Government’s national planning policy for Wales is contained in Planning Policy Wales (Edition 11). **Figure 2.2** 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 2.2: National Sustainable Placemaking Outcomes



7. 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”.

8. In relation to assessing the likely impacts of a development plan on the Welsh language, section 4.14 of the Manual summarises the legislative requirements and guidance as follows:¹⁸

¹⁸ Welsh Government (June 2019) *Consultation on Development Plans Manual edition 3.*

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.

2.2.2 Future Wales – the National Plan 2040

9. *Future Wales* is the National Development Framework published in March 2021 designed as a planning framework to guide the change and development of Wales over the next two decades.
10. Of immediate relevance to this Impact Assessment are the statements and priorities in the Plan relating to the Welsh language.
 - One of the eleven outcomes the Welsh Government wishes the Plan to achieve is described as:

“A Wales where people live.... in places with a thriving Welsh language.” (Outcome 4)

“The language will be an embedded consideration in the spatial strategy of all development plans.”¹⁹
 - In relation to the Southwest Wales region:
 - It notes that of the population of over 700,000 there are 147,864 (31.8%) Welsh speakers (a 5.4% increase since 2009).
 - It states: *“It is important that Strategic and local Development Plans consider the relationship between strategic housing, transport, and economic growth and the Welsh language”*.
 - It also states: *“Strategic and Local Development Plans should contain settlement hierarchies and growth distribution policies that create the conditions for Welsh to thrive and remain as the community language in the many places where everyday life takes place in Welsh”²⁰*.

¹⁹ Welsh Government (2021) *Future Wales – the National Plan 2040*, page 42.

²⁰ Ibid. Page 143.

2.2.3 Changes to the Use Classes (UCO) and General Permitted Development (GPDO) Orders

11. In October 2022, Welsh Government announced changes to the above two orders designed as part of measures to tackle the issue of second homes and short – term lets in Wales. The UCO is amended to create two new classes “C3 -Dwellings, used as sole or main residences”, “C5 Dwellings, used otherwise than as sole or main residences” and “Class C6 – Short-term Lets”. The GPDO is amended to allow permitted changes between C3, C5, and C6 but can be dis-applied within a specific area by an Article 4 Direction made by a local planning authority on the basis of robust local evidence.

2.2.4 Welsh Language Communities Housing Plan

12. In October 2022, as part of the measures to tackle the issue of second homes and short-term lets on Welsh language communities in addition to the planning measures, Welsh Government announced changes to the property and taxation systems. The announcement covers seven areas including various housing market and economic interventions, the establishment/strengthening of cultural ambassadors, the *Economy, Housing and Welsh Language Roundtable* and the *Commission for Welsh Speaking Communities* and measures to research changes to Welsh place names.
13. Whilst not directly relevant to this Assessment, and whilst the scale of second homes and short-term lets is not, in general, a major issue outside some coastal communities, there is a realistic possibility that the measures may influence the pace and distribution of homes and jobs before the end of the Plan period.

2.3 Carmarthenshire County Council

2.3.1 Welsh Language and Planning Policy

14. Carmarthenshire County 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 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..."*

15. This policy was thus adopted late in the process of preparing the First Deposit Replacement Local Development Plan. The Welsh Language development management policy (WL1) has been adapted to reflect the Council's policy.

2.3.1 Welsh Language Promotion Strategy

16. The Council's long-term vision is *"to make Welsh the main language of the county"*.

17. There are 5 main objectives identified to achieving its aim:

- *"Increase the numbers acquiring basic and further skills in Welsh through the education system and through language transmission in the home.*
- *Increase the confidence of Welsh speakers and therefore the use of Welsh in every sphere of life and encourage and support the county's organisations to make Welsh an increasingly natural medium for their services.*
- *Take purposeful action to positively affect population movements and try to get our young people to settle or re-settle in the county so that the increase in the number of Welsh speakers gained through the education system is not lost. Also, make significant efforts to assimilate newcomers and ensure that new planning developments do not have a detrimental effect on the viability of the Welsh language.*
- *Target specific geographic areas within the county, either because they offer the potential to develop or because they cause linguistic concern to increase the numbers in those areas who can and do use Welsh.*

- *Language marketing & promotion. Raise the status of Welsh including the benefits of bilingualism and the benefits of bilingual education. And by raising awareness of these benefits, attracting more residents of the county to acquire the language.”*

2.3.2 Welsh in Education Strategic Plan (WESP) 2022- 2032

18. Carmarthenshire’s 2022-2032 Welsh in Education Strategic Plan (WESP) presents how the Council intends to achieve the Welsh Government’s outcomes and targets outlined in their Welsh Medium Education Strategy (WMES). The WMES sets out the Welsh Government’s vision for an education and training system that responds in a planned way to the growing demand for Welsh-medium education. The aim is to facilitate an increase in the number of people of all ages able to use the Welsh language with their families, in their communities and in the workplace.
19. Carmarthenshire’s WESP is a key vehicle for creating an improved planning system for Welsh-medium education. The WESP will provide the means for the Welsh Government to monitor the way in which the Council responds and contribute to the implementation of the WMES objectives.
20. The Council must provide information and targets against 7 learning areas or strategic outcomes as follows:
 - **Outcome 1-** More nursery children / three-year olds receive their education through the medium of Welsh
 - **Outcome 2-** More reception class children / five-year olds receive their education through the medium of Welsh
 - **Outcome 3-** More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another
 - **Outcome 4-** More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh
 - **Outcome 5-** More opportunities for learners to use Welsh in different contexts in school
 - **Outcome 6-** An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN)
 - **Outcome 7-** Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh.

21. The Plan details how the Council aims to achieve each of these outcomes over the ten-year period of the Plan and provides a set of targets for each outcome and a pathway for achieving those targets.
22. By September 2032, Carmarthenshire County Council's aspiration is that 75% of all Year 1 pupils will attend Welsh-medium education.

2.4 Summary of the Findings of the Integrated Sustainability Appraisal (ISA)

23. This section reviews of how the impact on the Welsh Language has been considered in the rLDP2 ISA Report²¹ It is noted that the ISA report will summarise the findings of the WLIA as part of its assessment of effects on the Welsh Language (ISA11)..
24. Section 2.4 of the revised ISA 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.”²²

25. The ISA Report 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

²¹ Carmarthenshire County Council (December 2022) *ISA Revised Deposit Local Development Plan 2018-33*

²² Carmarthenshire County Council (November 2019) *Carmarthenshire Revised Local Development Plan: Sustainability Appraisal Report of the Deposit LDP.*

- 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

26. The ISA 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. However, it recognises that, within the context of Welsh Government’s strategy and actions led by *Cymraeg 2050*, the picture without the policy intervention of the Second Deposit rLDP is likely to be one of improvement. **Table 2.1** is an extract from Table 5 of the ISA Report summarising the likely baseline position.

Table 2.1: The Business-as-usual Baseline

| ISA Objective | Future Baseline | Baseline Summary |
|-----------------------|-----------------|--|
| ISA 11 Welsh Language | Improving | Carmarthenshire is linguistically sensitive and has the highest number of Welsh speakers out of any County in Wales. Evidence from the Annual Population Survey suggests that the number of persons aged 3 and over in the county who say they can speak Welsh since the time of the last Census in 2011 has grown significantly. Since March 2011 the number (+9,200) and percentage (+9.56%) of persons aged 3 and over who say they can speak Welsh has grown to March 2018 and by a further 3,500 (5.4%) to March 2022. The national target is for one million Welsh speakers by 2050, and there have been notable increases in recent years. However, it is important to recognise localised changes/declines may occur. Inward migration and other factors (including age structure, and other demographics) may negatively impact the proportion of |

| | |
|--|---|
| | Welsh speakers by challenging language transition, particularly within rural areas in Carmarthenshire which are known strongholds for the Welsh Language. The ability to read, write and understand spoken Welsh fluctuates annually however, since 2014 rates have risen slightly to 45.2%, 42.5%, and 58%, respectively. Coupled with increases in the provision of Welsh medium schools, language immersion is likely to improve rates over the long-term, potentially mitigating the original adverse effect created by inward migration. |
|--|---|

27. An ISA Framework is then developed for each issue. 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 2.2** reproduces the objective and key issue identified for the Welsh Language.

Table 2.2: 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? |

2.4.2 The ISA’s Assessment of the Reasonable Alternatives for the Preferred Scale of Growth

28. The assessment of Strategic Growth Options is contained in section 6.2 of the ISA. This section describes the six new Growth Options developed for the Second Deposit rLDP that were generated and how these were converted to identify the resulting number of dwellings required to deliver the LDP objective. Their ISA score is then assessed against the existing adopted Growth Strategy for rLDP1 (based on PG10 Year/WG2014 projections) LDP dwelling requirement of 589 dwellings per year. **Figure 2.3** reproduces Table 16 from the ISA Report which summarises the score for each Option (see ISA 11 Welsh Language).

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

Table 16 – Summary of the ISA of the rLDP revised Growth Options (see Appendix E for commentary). * in line with WG 2018-based (2018) projection.

| Growth Options | ISA1 Sustainable Development | ISA2 Biodiversity | ISA3 Air Quality | ISA4 Climatic Factors | ISA5 Water | ISA6 Material Assets | ISA7 Soil | ISA8 Cultural Heritage | ISA9 Landscape | ISA10 Population | ISA11 Welsh Language | ISA12 Health and Wellbeing | ISA13 Education and Skills | ISA14 Economy | ISA15 Social Fabric |
|--|------------------------------|-------------------|------------------|-----------------------|------------|----------------------|-----------|------------------------|----------------|------------------|----------------------|----------------------------|----------------------------|---------------|---------------------|
| 1st Deposit rLDP Preferred Growth Option (re-assessed*) | | | | | | | | | | | | | | | |
| PG 10 Year (2019) 8,335 dwellings | + | +/- | - | +/- | + | 0 | + | +/- | +/- | ++ | +/- | +/- | +/- | + | + |
| 2nd Deposit rLDP Preferred Growth Options | | | | | | | | | | | | | | | |
| WG 2018-based (2018) 4,359 dwellings | + | +/- | +/- | +/- | + | 0 | + | +/- | +/- | + | +/- | +/- | +/- | + | +/- |
| “High Population” (2018) 5,670 dwellings | + | +/- | +/- | +/- | + | 0 | + | +/- | +/- | + | +/- | +/- | +/- | + | +/- |
| Ten-year trend (2022) 8,822 dwellings | + | +/- | - | +/- | + | 0 | + | +/- | +/- | ++ | +/- | +/- | +/- | + | + |
| Fifteen-year trend (2022) 9,272 dwellings | +/- | - | - | - | +/- | 0 | +/- | - | - | ++ | - | +/- | +/- | + | + |
| Employment-led (2022) 9,933 dwellings | +/- | -- | -- | - | +/- | - | +/- | - | -- | ++ | -- | +/- | +/- | ++ | + |
| Rebased principal (2022) 10,461 dwellings | +/- | -- | -- | - | +/- | - | +/- | - | -- | ++ | -- | +/- | +/- | ++ | + |

Source: *ibid.*

29. Compared to the BAU scenario, the ISA assesses the impact on the Welsh language as having both positive and negative effects. Figure 2.4 reproduces the commentary made within Appendix E the ISA Report.

Figure 2.4: Commentary on ISA of Strategic Growth Ten-Year Trend-Based Projection (assumes requirement of 8,822 dwellings)

| | | |
|------------------------|-----|---|
| ISA11 – Welsh Language | +/- | This level of growth would likely increase in the numbers of young persons and, as a proportion will be Welsh speakers, have positive effects upon the Welsh Language. This would be supported by Carmarthenshire’s Welsh in Education Strategic Plan which aims to increase the provision of Welsh-medium education. Whilst these factors are proposed to provide an overall likely positive effect, additional information is needed to determine if this level of growth is likely to lead to a sustainable balance between employment opportunities, inward-mitigation, and the Welsh Language. Nevertheless, reference is made to the <u>WLIA</u> which suggests that this level of growth has the possibility of decreasing the percentage of Welsh speakers. |
|------------------------|-----|---|

Source: ISA Report

2.4.3 Our Assessment

30. The commentary assesses that the scale of growth (compared to the BAU Scenario – WG 2018-based of 4,359 dwellings) will result in a greater number of young people being retained in the Plan Area.

31. We concur with the view that there is a realistic possibility that the number and percentage of persons aged 3 and over who can speak Welsh has grown since 2011.

Table 2.4 shows the ability to speak Welsh in Carmarthenshire extracted from the relevant tables of the Annual Population Survey (APS) on Stats Cymru.

Table 2.4: Annual Population Survey – Carmarthenshire change in Welsh Language ability over time

| Date of Survey | All aged 3 and over | Yes, can speak Welsh | Percentage | Change (%) 2011-2018 | Change (%) 2018 – 2022 |
|----------------|---------------------|----------------------|------------|----------------------|------------------------|
| March 2011 | 174,600 | 81,500 | 46.7 | | |
| March 2018 | 177,200 | 90,700 | 51.2 | 9.6 | |
| March 2022 | 176,200 | 95,200 | 54.0 | | 5.4 |

Source: Stats Cymru Annual Population Census – Welsh Language ability

32. **Table 2.4** shows that the number of persons aged 3 and over in the county who say they can speak Welsh since the time of the last Census in 2011. Since March 2011, the number (+9,200) and percentage (+9.56%) of persons aged 3 and over who say they can speak Welsh has grown to March 2018 and by a further 3,500 (5.4%) to March 2022. However, the APS results are sample-based, survey estimates and therefore, subject to variability within confidence levels, particularly at local authority level. The APS estimates of Welsh language ability are historically higher than those produced by the Census.

33. There will be more young people that can speak Welsh as a result of the County’s recently adopted Welsh in Education Strategic Plan (2022-2032). The growth within the 3 – 15 age group will in turn produce more young people with bilingual skills. However, whilst the number of young persons (up to 24) able to speak Welsh is likely to grow, this is likely to be offset by changes as a result of net migration, particularly the later age cohorts of the 16 – 64 age group and the 65+ age group. As the more

ambitious scales of growth are predicated on there being a higher proportion of older age groups, these are more likely to damp the impact of growth in numbers within the younger age groups.

34. **Table 2.5** summarises our assessment of the impact of the reasonable alternatives considered.

Table 2.5 WLIA Assessment of rLDP2 Growth Options

| Growth Option | ISA 11 Welsh Language |
|----------------------|-----------------------|
| PG10 | -ve |
| WG 2018 | +/- |
| WG High Population | +/- |
| Ten-Year Trend Based | +/- |
| 15-year Trend | -ve |
| Employment Led | -ve |
| Rebased Principal | -ve |

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

35. This section provides a high-level impact assessment of the likely impacts on Welsh language resilience of the Preferred Growth Strategy.
36. The revised Preferred Strategy (PS) seeks to deliver an overall population increase of 14,468 additional residents (7.7%), with the requirement for 8,822 new homes (equivalent to 588 new homes per year) and the delivery of a minimum of 3,588 (286 per year 2020 -2033 jobs).
37. Our starting point for conducting the Assessment was to review the assumptions made about the baseline position.
38. **Appendix 2.1** presents our analysis of the Welsh Government’s projected and trajected number of Welsh speakers aged 3 and over from its 2011 Census baseline or the period up to 2050 and their possible consequences for the number of Welsh speakers aged 3 and over for Carmarthenshire by 2033. In summary, the WG Cymraeg

2050 trajectory is calculated using the WG 2014 principal population projection. Assuming the same assumptions to the situation in Carmarthenshire 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).*

Based on the WG14 Principal Variant assumption used in the WG’s analysis 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.”

39. The WG 18 Principal projection forecasts the population aged 3+ to be 188,417. This would result in the proportion of the total Carmarthenshire population aged three and over who are able to speak Welsh as $95,608 / 188,339 = 50.8\%$. The effect of this would be a 1.2 percentage point reduction in the proportion of Welsh speakers than would be realised under the WG14 based population trajectory scenario (52.0%).
40. **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 33%) of in migrants to Carmarthenshire were from households where at least one adult spoke Welsh.

Similarly, around one in six households (15%) from outside Wales had at least one adult who speaks Welsh.

The analysis suggests, that based on the migration rates reported in 2019/20 and the percentages of those who either moved in or out of Carmarthenshire within 12 months at the time of the Census in March 2011, the net number of Welsh speakers increases by 186 per year. When applied to the remainder of the Plan Period (13 years) this suggests that the number of Welsh speakers could increase by 2,418 as a result of net migration.

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.”

41. Our third piece of analysis then sought to understand the key implications of adopting the Preferred 10YTBP Growth Scenario for the Welsh language baseline trajectory. This is presented in **Appendix 2.5** and summarised here as:

“Based on assumptions about the characteristics of in-migrants from the 2011 Census, the net change in population scenario figures for 2022 10YTB projection over WG18 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:

Total number of Welsh speakers = 95,608 + 5231-3,194+ 439 = 98,084

Percentage of Welsh speakers aged 3+ = 98,084 divided by 196,460 = 49.9%

This suggests a realistic possibility of a decrease of 0.9% percentage points over the WG18 Trajectory scenario (50.8%) and a 0.6% percentage point decrease over the First Deposit rLDP Preferred Strategy (50.5%).

42. It is important to note that 55% of the increase is achieved through the WESP intervention rather than as a result of the Preferred Growth Option, although it is also reasonable to note that policy interventions designed to retain or increase the number of young people are likely to feed into a higher number of school pupils (and post 15 young persons) able to speak Welsh and thus boost the overall proportion.
43. It is also important to note that in recent years a high percentage of in-migrants is the result of re-locations from neighbouring counties and from elsewhere in Wales. The percentage of households where at least one adult and a high proportion of dependent children are likely to be able to speak Welsh, will probably increase over time.

Likelihood

44. 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.

45. 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.
46. The relationship between development land take-up and the proportion of Welsh speakers is poorly understood. The analysis of housing completions between 2001 and 2011²³ and changes in the number of Welsh speakers over the same period does suggest an extremely weak correlation. In fact, the analysis of ward areas undertaken by Carmarthenshire County Council suggests a negative correlation between the steepest decline in Welsh speakers and a low number of housing completions.
47. The 2014 University of Wales Trinity St. David study²⁴ 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.
48. In conclusion, therefore, due to the evidence being undeveloped, the likelihood of the above scenario being realised is at present relatively weak.

2.4.6 Scoring the Initial Risk

49. In terms of the scale of likelihood of the magnitude of change (+0.5 percentage points over and above the WG Cymraeg 2050 trajectory) being realised, this is initially scored at +1.

²³ Carmarthenshire LDP (2019) Welsh Language Change and Housing Completions 2001- 2011.

²⁴ 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.

50. In terms of the scale of likelihood of the magnitude of change (-0.9 percentage points below the WG 2018 Principal Population Projection) being realised, this is scored at -1.
51. In terms of the scale of likelihood of the magnitude of change (-0.6 percentage points below the First Deposit Preferred Strategy) being realised, this is scored at -1.
52. As can be seen, all scores predict that the scale of growth relative to the various baselines identified have a relatively small impact with minor negative impacts being scored higher than minor positive impacts.
53. **Figure 2.7** comprises an assessment of the magnitude of the consequence and the likelihood of that consequence.

ISA Score

54. In terms of the ISA scoring system, our assessment is that rLDP2 has a realistic possibility of encouraging and realising an overall growth in the number of Welsh speakers. This is particularly true amongst younger age groups. However, the scale of overall growth in homes and jobs is predicated on the 10-year trend based population projection. This assumes recent levels of net migration which is likely to lead to a population with a higher component of older age groups and would thus dampen the influence of a higher proportion of young people able to speak Welsh. Thus, in terms of ISA Scoring Matrix, our view is that it would be a +/- score.
55. All scores are subject to the caveats previously declared on the quality of data available.

Figure 2.7 Welsh Language Impact Assessment of Second Deposit LDP Preferred Growth Strategy

| WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN PREFERRED <u>GROWTH</u> STRATEGY | | | | | MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD | | | |
|--|--|--|-----------------|---|---|---|---|---|
| | | | | | Major Positive | Minor Positive | Minor Negative | Major Negative |
| Welsh Language Resilience $f(WLR) = NWS + PWS$ threshold weighted | | | | | Increase of 2.5 percentage points or more in the percentage 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 percentage 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 percentage 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 percentage 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 |

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

56. The process of assessing the Welsh Language (WL) Impact of the Preferred Spatial Strategy of the replacement Local Development Plan (rLDP) involved working alongside the ISA assessor to assess six spatial options. This was undertaken as part of the WLIA of the First Deposit rLDP. This is summarised in **Appendix 2.5**.
57. The ISA assessor has taken the view that there is no need to reassess the option in terms of the relevant ISA Objective (ISA 11) at this stage because the Preferred Spatial Strategy has not changed.
58. In our Assessment of the First Deposit rLDP, we were of the view that the Preferred Spatial Strategy did not fully consider how the scale and location of growth, individually and in combination, is likely to impact on the Welsh language but recognised that this remains difficult to assess because the relationship between development land take-up and the proportion of Welsh speakers is poorly evidenced.

The Impact of the Overall Spatial Strategy

59. The Preferred Growth strategy, based on the 10-YTB Projection, identifies a requirement for 8,882 homes by 2033. In seeking to deliver these homes, the Plan includes an additional uplift “to ensure the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues”. A flexibility of 10% through a further 882 homes, is included. This equates to a housing supply of 9,704.
60. This compares with the uplift of 15% included in rLDP1 which equates to 1,325 further homes and a total supply of 10,160.
61. The advantages of the revised Preferred Strategy are claimed as including a better reflection of investment and economic opportunities, opportunities for rural areas, and that growth is better orientated to infrastructure capacity, the community’s needs, and market demand.

62. As identified in Strategic Policy SP3 the housing supply includes housing allocations, affordable housing provision (5 units or more), small housing sites (under 5 homes) and windfall housing opportunities.
63. From a WL impact perspective, the reduction in the uplift from 15% to 10% overall in the Preferred Growth Strategy, together with the effective implementation of Strategic Policy SP3, is more likely to reduce unforeseen distribution of growth on specific locations particularly in communities where the use of the Welsh language is sensitive to change. In our view, Policy WL1 strengthens the Council's ability to ensure that such unanticipated development is screened for adverse impact.

The Impact on Individual Clusters

64. As with SA methodology in general, our assessment starts by trying to identify a 'business-as-usual' (BAU) position.
65. 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'.
66. The existing LDP 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 not possible until the results are published²⁵.
67. Our preferred approach is to assume what might be the position by 2033 in the absence of the Preferred Spatial Strategy. We have sought to project what might be the position if the current LDP spatial strategy were continued but on the basis of the BAU position adopted for the Preferred Growth Strategy. 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..*"²⁶ Based on our calculations of a projected population of 199,631 this would lead to a projected population aged 3 and over of 195,638.

²⁵ Proposed ONS release date for sub-county levels is currently "early 2023"

²⁶ Carmarthenshire County Council (December 2018) Sustainability Appraisal of Draft Deposit LDP, section 5.6

68. This would apportion growth in the number of Welsh speakers (95,608 by 2033) to the six clusters based on their current proportions of the population.
69. 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 98,048.
70. **Table 2.6** compares the allocations of rLDP1 and rLDP2 and assesses their WL impact.

Table 2.6: Comparison of rLDP1 and rLDP2 dwelling allocations by Cluster

| Cluster | Estimated Welsh speaker baseline 2018 | | rLDP1 | rLDP2 | Difference | | Magnitude of Impact |
|-----------|---------------------------------------|------|-------|-------|------------|------|---------------------|
| | Numbers | % | | | Number | % | |
| Cluster 1 | 15,597 | 46.6 | 1680 | 1690 | +10 | 0.6 | - |
| Cluster 2 | 23,344 | 32.0 | 3059 | 2840 | -219 | 7.2 | +ve |
| Cluster 3 | 24,712 | 58.4 | 1306 | 1267 | -39 | 3.0 | - |
| Cluster 4 | 6,925 | 53.8 | 402 | 218 | -184 | 45.8 | +ve |
| Cluster 5 | 4,869 | 46.8 | 112 | 162 | +50 | 44.7 | +ve |
| Cluster 6 | 4,112 | 40.2 | 461 | 647 | +186 | 40.3 | +ve |

Source: Authors' own analysis of rLDP1 and rLDP2 allocations

71. We have calculated the effect of the Preferred Spatial Strategy on the population distribution among the six clusters by apportioning the distribution of allocations onto our estimate of the 2018 populations for each cluster.
72. **Table 2.7** shows the results the likely impact on the spatial distribution of Welsh language speakers when comparing the Preferred Spatial Option against the rLDP 1 ("BAU") Spatial Strategy.

Table 2.7 Change in Number and Percentage of Welsh speakers aged 3+ (2018 – 2033) based on Preferred Spatial Strategy

| | | Baseline 2011 | Baseline 2018 | | 10YTB 2033 Trajectory (Usual Residents 2018+Disaggregation of Population increase) | | |
|--------------|--------------------------------|------------------|---------------|---------------------|--|---|----------------------|
| Cluster | | Welsh speakers3+ | | 2011- 2018 Increase | Welsh speakers3+ 2033 | Percentage Welsh Speaking of Residents 3+ | 2018 - 2033 Increase |
| Cluster 1 | Carmarthen and its Rural Areas | 15191 | 15597 | 406 | 19228 | 50.9% | 3631 |
| Cluster 2 | Llanelli a Gwendraeth Isaf | 22736 | 23344 | 608 | 28778 | 35.7% | 5434 |
| Cluster 3 | Aman a Gwendraeth Uchaf | 24069 | 24712 | 643 | 30465 | 66.3% | 5753 |
| Cluster 4 | Dyffryn Teifi | 6745 | 6925 | 180 | 8537 | 62.7% | 1612 |
| Cluster 5 | Tywi Uchaf | 4742 | 4869 | 127 | 6003 | 54.7% | 1134 |
| Cluster 6 | Western Sir Gâr | 4008 | 4115 | 107 | 5073 | 43.0% | 958 |
| Total | | 77491 | 79562 | 2071 | 98084 | 49.9% | 20593 |

Source: Authors' own calculations based on rLDP1 and rLDP2 allocations

- In terms of the impact on Cluster 1, this suggests that the number of Welsh speakers would be 3,631 higher in 2033 compared to 2018 under the Preferred Spatial strategy.
- In terms of the impact on Cluster 2, this suggests that the number of Welsh speakers would be 5,434 higher compared to 2018 under the Preferred Spatial strategy.
- In terms of the impact on Cluster 3, this suggests that the number of Welsh speakers would be 5,753 higher compared to 2018 under the Preferred Spatial strategy.
- In terms of the impact on Cluster 4, this suggests that the number of Welsh speakers would be 1,612 higher compared to 2018 under the Preferred Spatial strategy.

- In terms of the impact on Cluster 5, this suggests that the number of Welsh speakers would be 1,134 higher compared to 2018 under the Preferred Spatial strategy.
- In terms of the impact on Cluster 6, this suggests that the number of Welsh speakers would be 958 higher compared to 2018 under the Preferred Spatial strategy.

Table 2.8 shows our calculations of the results of comparing the Preferred (10YTBP) Growth Strategy against the PG 10 2019 Growth Strategy used for rLDP1.

Table 2.8: A comparison by Cluster of the Results of Apportioning Predicted Welsh speakers (rLDP1 vs rLDP2)

| | | Preferred growth strategy | Preferred Spatial Strategy rLDP1 (PG 10 2019) | | Preferred Spatial Strategy(rLDP2) (10YTB) | | Difference | |
|--------------|--------------------------------|---------------------------|---|-------|---|-------|------------|----------|
| Cluster | | Residents Age 3+ | Welsh Speakers | | Welsh Speakers | | No. | % points |
| Cluster 1 | Carmarthen and its Rural Areas | 36087 | 19382 | 53.7% | 19046 | 52.8% | -336 | -0.93 |
| Cluster 2 | Llanelli a Gwendraeth Isaf | 78664 | 30890 | 39.3% | 30355 | 38.6% | -535 | -0.68 |
| Cluster 3 | Aman a Gwendraeth Uchaf | 45611 | 29826 | 65.4% | 29309 | 64.3% | -517 | -1.13 |
| Cluster 4 | Dyffryn Teifi | 13875 | 8442 | 60.8% | 8295 | 59.8% | -146 | -1.05 |
| Cluster 5 | Tywi Uchaf | 11201 | 6046 | 54.0% | 5941 | 53.0% | -105 | -0.94 |
| Cluster 6 | West Carmarthenshire | 11022 | 5228 | 47.4% | 5138 | 46.6% | -91 | -0.82 |
| Total | | 196460 | 99814 | 50.8% | 98084 | 49.9% | -1730 | -0.88 |

Source: Authors' own calculations

73. Overall, this suggests that the proportion of Welsh speakers would be 0.9% lower (49.9% compared to 50.8%).

Technical Limitations and Uncertainties

74. The possible weakness of this approach is that the weighting of each cluster in terms of Welsh language speakers remains the same. As the relative targets of the main components of change (e.g., planned effectiveness of the main driver (WESP for 5–15-year-olds) and distribution of net migration across the clusters is not known at this stage, then this has proved difficult to translate into actual robust figures for each cluster. Therefore, the reliability of the predicted results must be treated with caution.

Likelihood

75. A discussion of the characteristics of 'likelihood' of a particular level of magnitude happening, and caveats surrounding any assumptions made is discussed earlier in the assessment.
76. In conclusion, due to the evidence being undeveloped and the evidence supporting the likelihood of the magnitude of the Preferred Spatial Strategy being achieved relatively weak, likelihood is scored as +1.

2.5.4 Scoring the Initial Risk

77. In terms of the scale of likelihood of the magnitude of change for the Preferred Spatial Strategy for rLDP2 against the current LDP being realised, this is initially scored at +1 using the risk assessment matrix reproduced in **Figure 2.8** overleaf and suggests a minor positive result. This score comprises an assessment of the magnitude of the consequence and the likelihood of that consequence.
78. In terms of the current LDP in our view this would be scored as MINOR POSITIVE.
79. In terms of the scale of likelihood of the magnitude of change for the Preferred Spatial Strategy for rLDP2 against the Preferred Spatial Strategy adopted for rLDP1, this is assessed as -1.
80. In terms of the ISA Framework, in our view this would be scored as UNCERTAIN because the location of the growth in Welsh speakers at sub-county level is unclear at present.

Figure 2.8 Predicted Risk Score for the Preferred Spatial Strategy

| WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN PREFERRED <u>SPATIAL</u> STRATEGY | | | | | | | | |
|---|--|--|-----------------|---|---|---|---|---|
| | | | | | Major Positive | Minor Positive | Minor Negative | Major Negative |
| Welsh Language Resilience $f(WLR) = NWS + PWS$ threshold weighted | | | | | Increase of 2.5 percentage points or more in the percentage 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 percentage 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 percentage 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 percentage 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 Growth and Spatial Strategies

81. As referred to above, the Development Plans Manual requires LPAs, as part of the ISA process, to consider how the scale and location of growth individually and in combination, impact on the Welsh language.
82. Within our brief, we have confined our examination to a consideration of how the ISA has assessed the secondary, cumulative and synergistic effects on ISA Objective 11 (*Will the LDP encourage the growth of the Welsh Language and Culture?*) .
83. These effects are considered in relation to secondary, cumulative and synergistic effects on the LDP policies and site allocations.
84. **Table 2.9** reproduces the summary contained in Table 25 of the ISA report on the secondary, cumulative and synergistic effects of policies and allocations.

Table 2.9: Assessment of secondary, cumulative and synergistic effects of all policies and site allocations on ISA Objective 11

| ISA Objective | Overall Score | Description |
|------------------------|---------------|---|
| ISA11 – Welsh Language | + | In keeping with Welsh Language requirements and Carmarthenshire’s linguistic sensitivity, a key consideration of the rLDP is to encourage growth of the Welsh language and culture. This is upheld through dedicated policies SP8 and WL1: Welsh Language and New Developments and is implied through others including PSD1 by requiring development to reflect local context (e.g., cultural characteristics) and PSD9 (advertisements and bilingualism). With considerations made to the number and setting of new development allocations, and additional synergistic influence from requiring proposals to submit a Welsh Language Impact Assessment or Language Action Plan (scale dependent), further development is predicted to cumulatively uphold ISA11 by helping to provide homes for the next generation of Welsh Speakers (encouraging the retention of young people) and provide non-Welsh speaking families (including those from inward migration) access to Welsh-language learning opportunities the long-term, coupled with increases in Welsh-medium schools (and strategic sites). With these requirements in place in conjunction with the sustainable distribution settlement framework (SP3), it is unlikely that the scale of development in both rural and urban communities would discernibly dilute rates of Welsh speaking. |

Source: ISA Report, Table 25

85. There appears to be no specific assessment of the secondary, cumulative and synergistic effects of the preferred growth and spatial strategies.
86. The SA of rLDP1 contains the following conclusion.

“Cumulative, secondary, synergistic and indirect effects

The plan as a whole has also been appraised for cumulative, synergistic and indirect effects”²⁷

²⁷ Op. Cit. Page 48.

87. From our examination and assessment of the likely cumulative, secondary, synergistic and indirect impacts of the Preferred Growth and Spatial Strategies, we conclude that it is extremely difficult at this stage to separate out what effects other factors such as economic, social and environmental uncertainties; the application of Welsh Government policies towards encouraging the growth in the use of Welsh; the spatial effects of the County's WESP; spatial policies at national and strategic levels and those of neighbouring local planning authorities.

2.7 Recommendations for Managing the Risk

88. 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.

89. 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)

90. 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 of scale. 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.

91. 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.
92. 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.
93. 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. This section considers the likely anticipated impacts which the Second Deposit rLDP'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. The raft of policies that support the delivery of Carmarthenshire’s strategic objectives and provide high level links and broad conformity with the Well-Being Goals are brought together in the second deposit rLDP under the heading **Prosperous People and Places – To maximise opportunities for people and places in both urban and rural parts of our county**. These strategic policies aim to address:

“Socio-economic issues including poverty and deprivation facing both rural and urban parts of our County is recognised within this Plan’s “One Carmarthenshire” vision. To this end, this Plan seeks to tackle these issues by maximising opportunities for everyone to maintain or increase their prosperity and sense of wellbeing.

*These opportunities include the provision for new homes including affordable homes and jobs, as well as steering new investment and infrastructural priorities, whilst also respecting the County’s social fabric, **including the Welsh language, culture and its sense of place.**”²⁸*

3.2 Methodology

4. Given the constraints on time and resources, it was agreed that 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, namely: **Strategic Policy**

²⁸ 2nd Deposit Revised Carmarthenshire Local Development Plan 2018-2033, p. 97.

SP8: Welsh Language and Culture (previously SP7) and **WL1: Welsh Language and New Developments**.

5. A copy of early drafts of these two policies were provided in early October 2019. These are reproduced in **Figure 3.1** without their reasoned justifications.

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.

6. 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 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.
7. 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. **Appendix 3.1** reproduces the wording of the policies with their reasoned justifications in full.

Figure 3.2 Revised Welsh Language and Culture Policies

Strategic Policy – SP 8: 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 for that enhance the interests of the Welsh language and culture.

WL1: Welsh Language and New Developments

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

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 5 or more dwellings which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies HOM1 and HOM3; or
- b) Residential development of 5 or more dwellings on allocated or windfall sites that do not address evidence of need and demand for housing recorded in a Housing Market Assessment or other relevant local sources of evidence; or

- c) Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare.

Proposals on unexpected windfall sites for large scale housing development or large scale employment development that would lead to a significant workforce flow are required to submit a Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language.

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.

8. Other modifications to the Reasoned Justification for the policies were originally suggested in light of the WLIA for rLDP1 and further minor amendments to rLDP2 were discussed and accepted.

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

9. As referred to in paragraph 17 of Part 2 above, the new edition of the Development Plans Manual is likely 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.
10. 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 SA²⁹.
11. As there appears to be no specific assessment of the secondary, cumulative and synergistic effects of the preferred strategy, Section 7 provides a summary of the sustainability impacts of the Deposit LDP and provides the following commentary on cumulative, secondary, synergistic and indirect effects:

“Cumulative, secondary, synergistic and indirect effects

²⁹ Carmarthenshire County Council (November 2019) *Sustainability Appraisal of the Revised LDP Report on the Deposit LDP*

*The plan as a whole has also been appraised for cumulative, synergistic and indirect effects*³⁰

12. 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 uncertainties, 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.
13. We score the direct effects of the Preferred Growth Strategy and Preferred Spatial Strategy against the Business-as-Usual 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 rLDP against other factors.

* * * * *

³⁰ Op. Cit. Page 4

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 August 2022)

| Local Development Plans in Wales and Consideration of the Welsh Language (as at August 2022) | | | | | | | | | |
|--|------------------------------|-------------|------------------|---------------------------------------|------------------|---|---|-----------------------------|---------------------------------|
| 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 | LDP2 | 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 | LDP2 | 2016 - 2031 | 2020 | No | No | No | No | No | No |
| Monmouthshire | 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 | LDP2 | 2016 - 2031 | 2020 | Yes | Yes (19.2%+) | Yes | No | Yes(5+) | 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 |

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.³¹ In statistical terms, it can be argued that if a Welsh speaker meets another person, there is at least $(0.7 \times 0.7) = 49\%$ 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.

³¹ 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*).

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.
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 thresholds³²

| 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 | High |

³² Professor D. Demeritt, unpublished working paper for IAITH, 2016.

| | | |
|--|--|----------|
| | 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. | |
| If $20\% \leq PWS < 50\%$, $PWS=1$ | 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 |

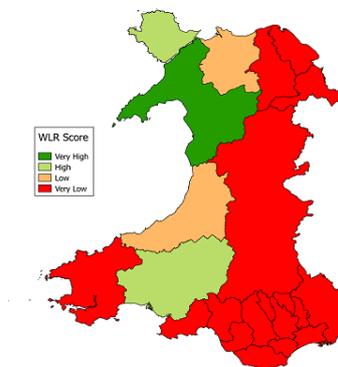
15. For the Carmarthenshire LDP the use of the following equation is recommended for calculating the baseline for assessing the resilience of the Welsh language:

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

where: $0 < WLR \leq 4$

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.

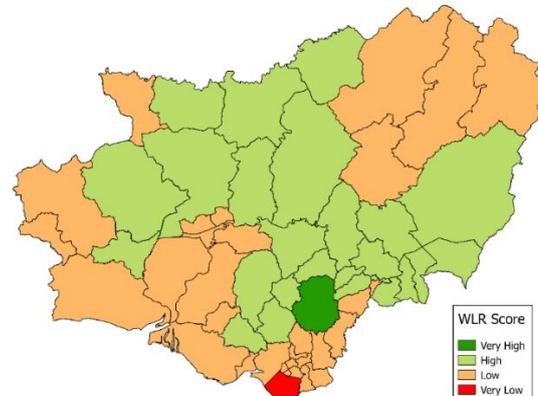
Figure A2-2: Welsh Language Resilience (WLR) at Local Authority level (WLR score calculated using $f(WLR) = NWS + PWS$ threshold weighted)



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.³³ 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
 - 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"³⁴. 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

³³ Op. Cit. Defra (2011) Green Leaves III section 1.3

³⁴ DEFRA (2011) Green Leaves III Section 2.3.3

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;
 - 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.³⁵ This is also a factor that should be noted when attempting to define the possible consequences.
30. **Table A2-1** presents the thresholds for scoring the magnitude of impact / consequence.

³⁵ 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>.

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 level 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.

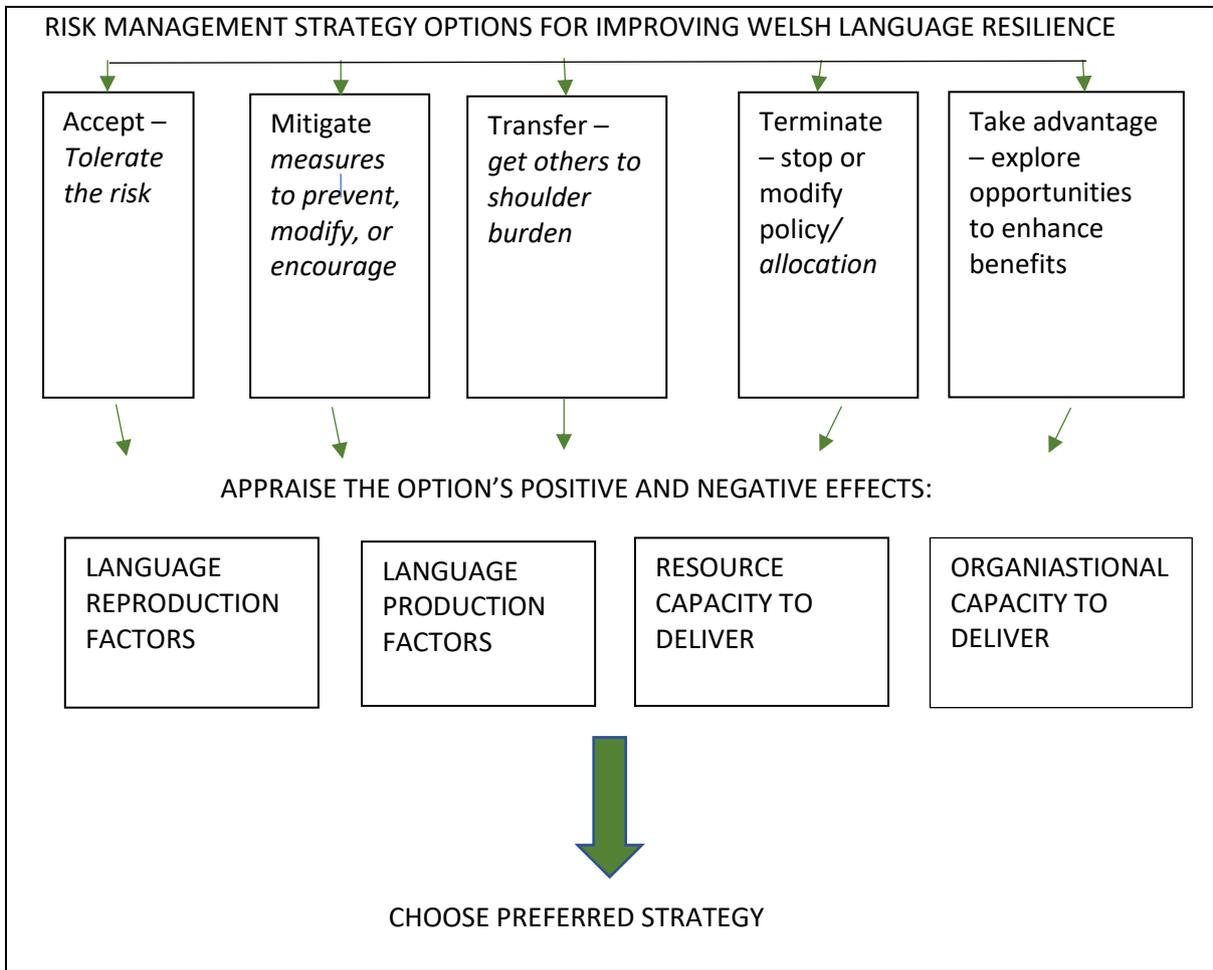
Figure A2-4: Recommended Welsh Language Risk Assessment Matrix

| WELSH LANGUAGE RESILIENCE RISK MATRIX CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN | | | | | MAGNITUDE OF IMPACT/CONSEQUENCES OVER PLAN PERIOD | | | | | |
|---|--|--|-----------------|---|---|----------|---|---|---|---|
| | | | | | Welsh Language Resilience $f(WLR) = NWS + PWS$ threshold weighted | | Major Positive | Minor Positive | Minor Negative | Major Negative |
| | | | | | | | Increase of 2.5 percentage points or more in the percentage 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 percentage 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 percentage 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 percentage 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 benefits³⁶



³⁶ Adapted from *Green Leaves III*, Figure 16.

Step 3.1 Evaluating the Impact on Welsh Language Reproduction Factors

42. The home is the principal domain where Welsh speakers are ‘reproduced’. In 2011, in households where both parents speak Welsh the level of language reproduction was 80%³⁷. In households with one Welsh-speaking parent, Welsh language reproduction was around 40%.³⁸ 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
 - the number of children born into families where both parents can speak Welsh and use the language with their children;
 - the number of children born into families where only one parent speaks Welsh;
 - to what extent, if any, is the language of the home becoming increasingly bilingual/English/ other language-medium;
 - the availability of Welsh-medium childcare provision in the area; and
 - the availability of Welsh-medium and bilingual education provision in the area.
- Community Welsh language resilience
 - 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;
 - to what extent, if any, are fewer Welsh community groups and societies flourishing locally;
 - to what extent, if any, will people’s daily use of Welsh decrease;
 - to what extent, if any, will the resilience of Welsh as a language of daily interaction decrease;
 - to what extent, if any, will the use of Welsh retreat to more limited domains and lack creative freshness.

³⁷ Census data 2011.

³⁸ Census data 2011.

Step 3.2 Evaluating Impact on Welsh Language Production Factors

43. Education is the principal 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 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)³⁹ 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.

³⁹ 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: Establishing the baseline for the number and percentage of Welsh speakers in Carmarthenshire by 2033

Acknowledgements

The demographic statistics used in this appendix have been derived from data supplied by Edge Analytics from their Addendum produced in September 2019 and from the generation of additional tables on gross internal migration produced in October 2019. These in turn derive from the Office for National Statistics licensed under the Open Government Licence v.3.0.

IAITH/BURUM are grateful for the support and co-operation of Carmarthenshire County Council and Edge Analytics in making these available for analysis.

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 2033⁴⁰.

4. As a precursor to the analysis and discussion, it is important to re-emphasize the important differences between a projection and a trajectory.
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.”⁴¹ 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.”⁴²

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)⁴³ 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 A1.1-1** and **Table A1.1-1** 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.

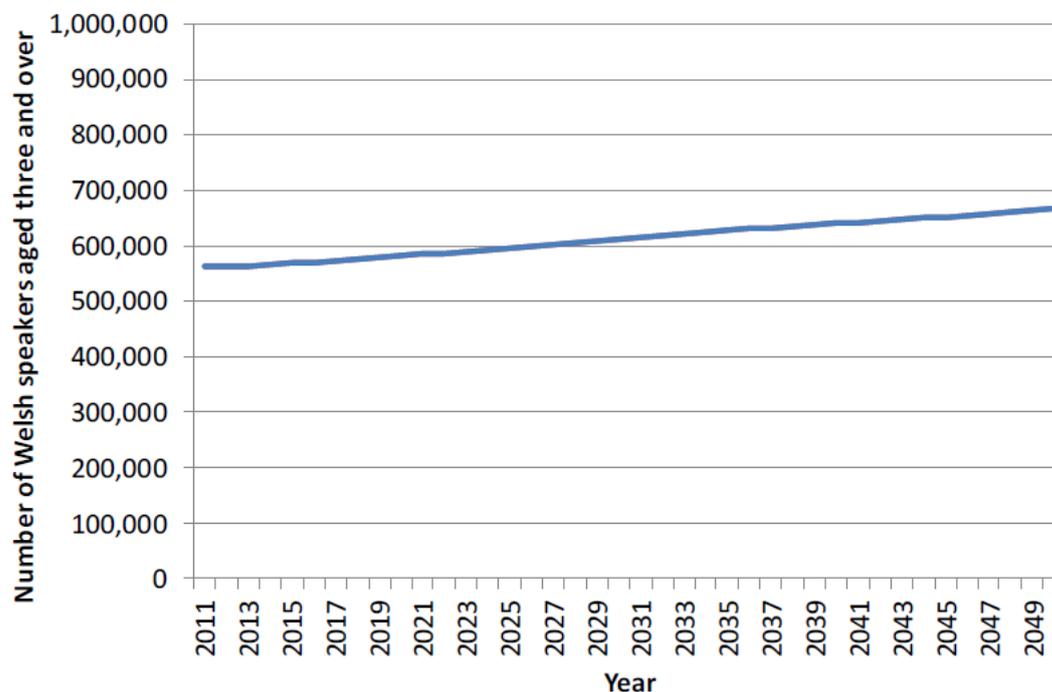
⁴⁰ Welsh Government Statistics for Wales (June 2017) *Technical report: Projection and trajectory for the number of Welsh speakers aged three and over, 2011 to 2050*.

⁴¹ Ibid. p2.

⁴² Ibid. p7.

⁴³ 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 A1.1-1: 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 A1.1-1: 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.

- The more detailed background tables⁴⁴ 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%).

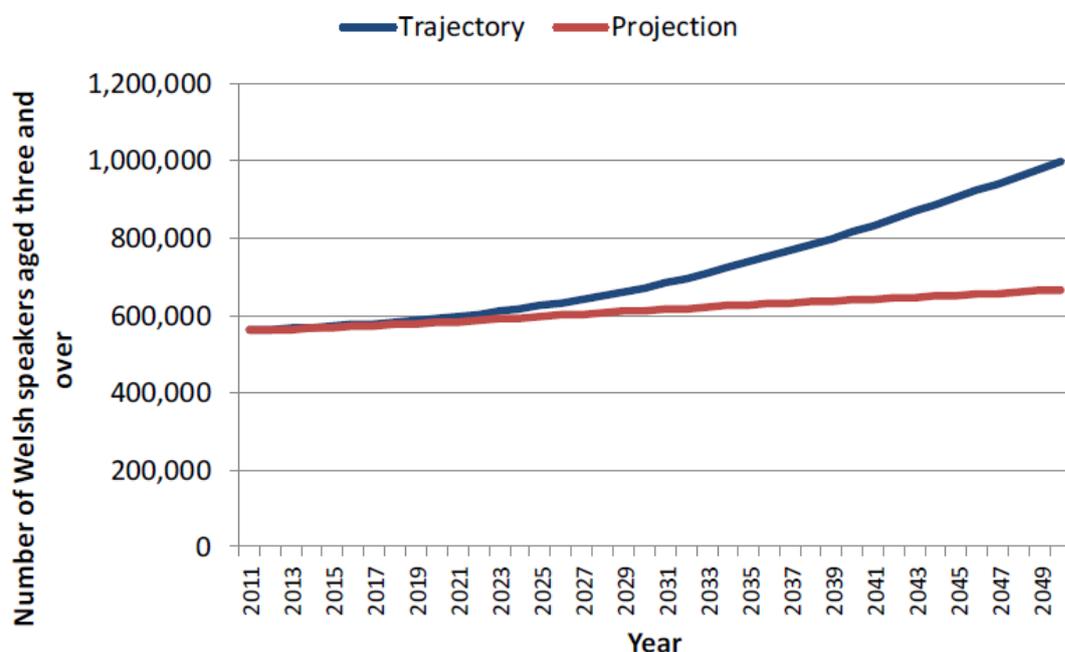
⁴⁴ This data is available at <https://statswales.gov.wales/Catalogue/Welsh-Language>.

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 A1.1** and **Table A1.1** 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 A1.1-2** and **Table A1.1-2** are reproduced from the WG report.

Figure A1.1-2: 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 tables⁴⁵ 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 A1.1-2: Numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050 according to WG trajectory

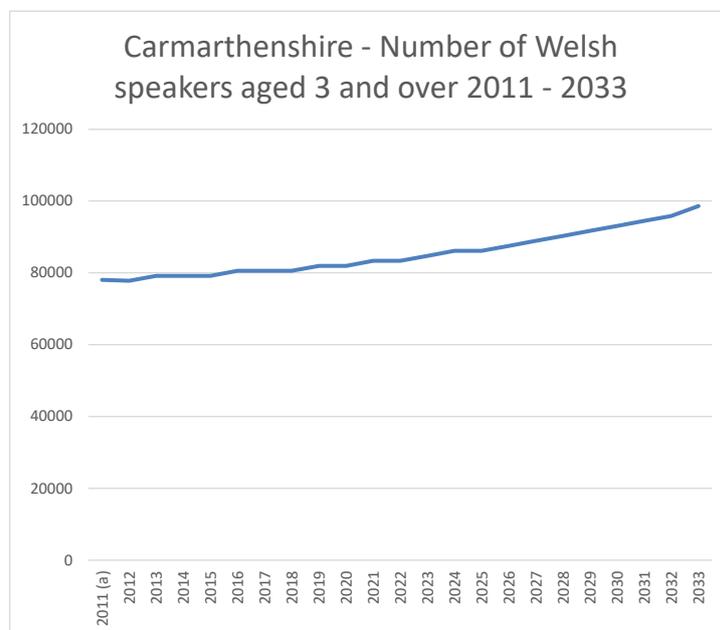
| Year | Number | Percentage |
|------|-----------|------------|
| 2011 | 562,000 | 19 |
| 2017 | 580,000 | 19 |
| 2021 | 600,000 | 20 |
| 2026 | 630,000 | 20 |
| 2031 | 680,000 | 22 |
| 2036 | 750,000 | 24 |
| 2041 | 830,000 | 26 |
| 2046 | 920,000 | 29 |
| 2050 | 1,000,000 | 31 |

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

⁴⁵ 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 A1.1-3** shows the trajectory of the growth in numbers of Welsh speakers in Carmarthenshire based on the overall trajectory for Wales.

Figure A1.1-3 Estimated trajectory for growth in Welsh speakers in Carmarthenshire by 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 2.2: Gross Migration 2019-20 and Implications for the WLIA of the LDP Preferred Growth Strategy

Introduction

1. The 2nd Deposit LDP's draft Preferred Strategy (PS) bases its approach on a population projection of 14,468, a housing requirement figure of 8,882 homes (average of +588 pa.), and a jobs per annum figure of 276⁴⁶.
2. The main Components of calculating annual population change used in modelling population projections are births, deaths, net internal UK migration and net international migration. All models assume that Carmarthenshire will lose population due to natural change (i.e., annual deaths will be greater than annual births) and make a small increase in international migration (around 210 per year). The PS is thus predicated in the main on the assumptions made about current rates of net internal migration as the main driver of population change.
3. 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.
4. As part of the further analysis of net migration, Edge Analytics (EA) provided IAITH/BURUM with summary tables based on the raw data on gross internal migration figures for Carmarthenshire for the year 2019/20.
5. For the purposes of this exercise the data was analysed as follows:

⁴⁶ Based on Turley (October 2022) *Carmarthenshire Housing and Economic Growth Report*.

- gross inward and outward migration by age cohorts from/to other parts of Wales by region.⁴⁷
 - gross inward and outward migration by age cohorts from/to other areas of the UK outside Wales.
- The data provided was sifted and analysed according to age cohorts considered to be of interest to analysis regarding 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+).
 - Data on gender was not requested as it was not considered vital to an understanding of the patterns and trends of internal migration for the purpose of this project.
 - Table A2.2-1** summarises the data.

Table A2.2-1: 2019/20 Gross and Net Migration figures by Age Group and Geography

| Age Group | Rest of Mid & South West Wales | | | South East Wales | | | North Wales | | | Total Wales(ex. Carms.) | | | UK Outside Wales | | |
|--------------|--------------------------------|--------------|------------|------------------|------------|------------|-------------|-----------|-----------|-------------------------|--------------|------------|------------------|--------------|--------------|
| | In | Out | Net | In | Out | Net | In | Out | Net | In | Out | Net | In | Out | Net |
| 0-2 | 75 | 80 | -5 | 27 | 18 | 9 | 3 | 1 | 2 | 105 | 99 | 6 | 60 | 33 | 27 |
| 3-15 | 328 | 285 | 42 | 76 | 54 | 22 | 10 | 6 | 4 | 414 | 345 | 69 | 237 | 112 | 125 |
| 16-29 | 787 | 696 | 92 | 532 | 490 | 42 | 49 | 38 | 12 | 1,369 | 1,223 | 146 | 960 | 808 | 152 |
| 30-44 | 528 | 476 | 52 | 199 | 161 | 38 | 16 | 11 | 5 | 743 | 649 | 94 | 492 | 314 | 178 |
| 45-59 | 406 | 322 | 83 | 131 | 73 | 58 | 14 | 5 | 9 | 550 | 400 | 150 | 560 | 222 | 338 |
| 60+ | 457 | 255 | 202 | 119 | 81 | 38 | 15 | 17 | -2 | 591 | 352 | 239 | 528 | 290 | 238 |
| Total | 2,581 | 2,114 | 467 | 1,084 | 877 | 207 | 107 | 77 | 30 | 3,772 | 3,068 | 703 | 2,837 | 1,779 | 1,059 |

Source: adaptation of Data and Table by Edge Analytics (November 2022)

Key Findings

- The following summarises the key findings from analysing the EA figures:

Migration from Carmarthenshire

- A total of 4,847 persons moved from the County during 2019/20.
- This compares to 5,672 persons who moved from the County during 2017/18 (a reduction of 14.5%).
- Of the 2019/20 total, 3,068 (63.3%) moved to other parts of Wales and 1,779 (36.7%) moved elsewhere outside Wales.
- Of the 3,068 who moved to other parts of Wales,
 - 2,114 (69%) moved to other parts of the Mid and West Wales Region.

⁴⁷ Mid and South West Wales Strategic Plan regions remain combined in the StatsWales reports.

- 877 (29%) moved to the Southeast Region; and
 - 77 (2%) moved to the North Wales Region.
10. The above summary suggests that, compared to the results for 2017/8, not only has there been a reduction in the overall number of persons (gross out-migration) leaving the county, but more (almost 70%) of those moving out of the county are being retained within the wider mid and west Wales region.

Migration to Carmarthenshire

- A total of 6,609 persons moved to Carmarthenshire during 2019/20.
 - This compares to 7,241 persons who moved to the county during 2017/18 (a reduction of 8.7%).
 - Of the 2019/20 total, 3,772(57%) moved to the County from other parts of Wales and 2,837 (43%) moved from elsewhere outside Wales.
 - Of the 3,772 who moved from other parts of Wales:
 - 2,581 (68%) moved to Carmarthenshire from other parts of the Mid and West Wales Region.
 - 1,084 (29%) moved from the Southeast Region; and
 - 107 (3%) moved from the North Wales Region.
11. This suggests that, compared to the results for 2017/8, whilst there has been a small annual reduction in the total number of persons moving into the county there appears to be no significant variation over the two years in the geographical source of the movements.
12. **Table A2.2-2** provides an analysis of the data by age cohort for the base year for the rLDP (2017/18) and the most recent figures provided by Edge Analytics for 2019/20.

Table A2.2-2: Gross In and Out Migration by Age Group

| Age Group | Totals by Age Group (2019/20) | | | |
|--------------|-------------------------------|-------------|--------------|-------------|
| | In | % | Out | % |
| 0-2 | 165 | 2% | 132 | 3% |
| 3-15 | 651 | 10% | 457 | 9% |
| 16-29 | 2,329 | 35% | 2,031 | 42% |
| 30-44 | 1,235 | 19% | 963 | 20% |
| 45-59 | 1,110 | 17% | 622 | 13% |
| 60+ | 1,119 | 17% | 642 | 13% |
| Total | 6,609 | 100% | 4,847 | 100% |

| Age Group | Totals by Age Group(2017/18) | | | |
|--------------|------------------------------|-------------|--------------|-------------|
| | In | % | Out | % |
| 0-2 | 248 | 3% | 159 | 3% |
| 3-15 | 864 | 12% | 482 | 8% |
| 16-29 | 2,125 | 29% | 2,458 | 43% |
| 30-44 | 1,478 | 20% | 1,058 | 19% |
| 45-59 | 1,371 | 19% | 750 | 13% |
| 60+ | 1,159 | 16% | 785 | 14% |
| Total | 7,245 | 100% | 5,692 | 100% |

13. A comparison of figures for 2019/20 and 2017/18 shows that while both overall in-migration and out-migration levels are lower in 2019/20, and out-migration proportions are broadly similar across all age cohorts, there are indications of a possible significant shift between age cohorts of in-migrants. The proportion of in-migrants within the 16 – 29 age cohort has increased from 29% to 35% (in the main at the expense of 3-15 and 45 – 59 age cohorts).
14. When age cohorts are further analysed by geography, the five largest cohorts to migrate from Carmarthenshire were:
- 16 – 29 age group to areas outside Wales (808).
 - 16 – 29 age group to other parts of the Mid and West Wales (696).
 - 16 – 29 age group to the Southeast Region (490).
 - 30 – 44 age group to other parts of the Mid and West Wales (476).
 - 45 – 59 age group to other parts of the Mid and West Wales (322).
15. The six largest cohorts to migrate to Carmarthenshire were:
- 16 – 29 age group from areas outside Wales (960);
 - 16 – 29 age group from other parts of the Mid and West Wales (787);
 - 45 – 59 age group from areas outside Wales (560).
 - 16 - 29 age group from the Southeast Region (532).
 - 30 – 44 age group from other parts of the Mid and West Wales and from areas outside Wales (528 each).
16. The net migration analysis provided by Turley’s⁴⁸ Briefing in Figure 4 is over a longer timeframe and uses different age cohorts. The graph shows a significant spike in net migration between 2017/18 and 2019/20 in the 18 – 24 cohort and a slight decline in

⁴⁸ Carmarthenshire County Council (November 2022) Appendix 3 Report to Cabinet, November 14 2022.

net migration in the 25 – 44 cohort. This suggests that the growth in gross in-migration numbers is related to persons within the 18-24 cohort and the answer may lie in more students being attracted to higher and further educational institutions, but further research is required to better understand these figures.

Population and Household Movements for 2010/11

17. It is interesting to compare the scale of migration outlined above with that recorded in the 2011 Census. **Table A2.2-3** 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.
18. Overall, the table records that:
 - 16,154 persons aged 3 and over moved residence during 2010/11. Of these:
 - 10,545 (65%) moved from addresses within the County itself; and
 - 5,909 (35%) persons aged 3 and over moved to the County from elsewhere during 2010/11.
19. The 5,909 figure above compares to the 6,444 (6,605 less the 165 aged under 3) who are estimated to have moved into Carmarthenshire in 2019/20. It is not possible to make a direct comparison with the people who moved out of the area because 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 3,667 (3,772- 105) who were recorded as moving to other parts of Wales in 2019/20.
20. 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.
21. 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.
22. This compares to the 4,018 who moved within the County of which 37% could speak Welsh.

Table A2.2-3: Analysis of Address of Residents Aged 3 and Over One Year Ago, by Ability to Speak Welsh

| Carmarthenshire | All categories: Age 3 and over | All categories: Age 3 and over | All categories: Age 3 and over | All categories: Age 3 and over | All categories: Age 3 and over | All categories: Age 3 and over | All categories: Age 3 and over |
|--|------------------------------------|-------------------------------------|--|--------------------------------|---|---|--|
| | Lived at same address one year ago | Lived elsewhere one year ago: Total | Lived elsewhere one year ago; within same County | Inflow: Total | <i>Inflow: Lived elsewhere one year ago outside the area but within 'associated area' (rest of Wales)</i> | <i>Inflow: Lived elsewhere one year ago outside Wales</i> | 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 A2.2-4: 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

Households

23. 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 households were:
 - 26,633 with no dependent children where at least one adult spoke Welsh; and
 - 9,416 with dependent children where at least one adult spoke Welsh.
24. In this period, there were 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 moved to other areas of Wales outside the County.
25. 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).

Implications for the Welsh Language Impact Assessment

26. By applying the existing profile of age Group related Welsh speakers (both within Carmarthenshire and the rest of Wales) and combining it with the Census 2011 ratios discussed above **Table A3.1-1** provides an estimate of the potential linguistic abilities of the migration profile provided for 2019/20.

Table A2.2-5: Crude estimate of Impact of Net Migration on the Number of Welsh Speakers

| Age Group | In | | | Out | | | Net Totals |
|---------------|---|--|--|---|--|--|-----------------------------|
| | (1) From Rest of Wales (Children @ 25% Adults @18%) | (2) From Rest of UK (Children @75% Adults@15%) | (3) Possible Gain Welsh speakers (1+2) | (4) To Rest of Wales Children @ 70% Adults @38% | (5) To Rest of UK Children @ 70% Adults @38% | (6) Possible Loss Welsh speakers (4+5) | (7) Possible Net Loss (6-3) |
| 3 – 15 | 103 | 178 | 281 | 242 | 142 | 384 | -102 |
| 16 – 59 | 380 | 302 | 682 | 636 | 1616 | 2,252 | -1,570 |
| 60+ | 106 | 90 | 196 | 134 | 347 | 481 | -284 |
| Totals | 590 | 570 | 1,160 | 1,012 | 2,105 | 3,117 | -1,957 |

Source: Authors' own calculations and assumptions

Assumptions

In-migration: From Rest of Wales Children 5 – 15 average level recorded across Wales; adults 16+ Stats Wales average across Wales; From Rest of UK Children 5 - 15 Performance of Immersion Service; adults Census 2011 percentage

Out-migration: To/From Rest of Wales Children 5-15 2021 County recorded rate of children receiving Welsh medium education; adults % able to speak Welsh, Welsh Language, StatsWales

27. The analysis suggests, that based on the migration rates reported in 2019/20 and crude assumptions made about the proportion of migrants who can speak Welsh of those who either moved in or out of Carmarthenshire, there is a possibility that the net number of Welsh speakers, because of migration, decreases annually by 1957 per year. When applied as an average annual figure to the remainder of the Plan Period (13 years) this suggests that the number of Welsh speakers could possibly decrease by 25,441 over the Plan period because of net migration. This, of course, precludes the readiness and ability of adult in-migrants to learn Welsh. For example, on average, 400 learners attend mainstream courses and more than 300 attend supplementary course each year run by Learn Welsh Carmarthenshire, many of whom may have moved to the county in recent times.⁴⁹

Summary and Conclusions

28. The revised Preferred Strategy is based on the 2022 Ten-Year trend-based projection of an increase in population between 2018 and 2033 of 14,468 which in turn leads CCC to conclude that it will require a total dwelling growth of 8,882. This is predicated, in

⁴⁹ Estyn (2022) Learn Welsh Inspection Report.

the main, on the assumptions made about current rates of net internal migration as the main driver of population change.

29. 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.
30. Overall, the scale of net migration in 2019/20 appears to have reduced significantly compared to the position two years earlier with out-migration down by 14.5% and in-migration by 8.7%.
31. A significant proportion of net migration is internal to Wales. A total of 57% of in-migrants came from other parts of Wales with 39% of the total coming from neighbouring counties in the Mid and South West Region. 43% came from other parts of the UK.
32. A total of 4,847 persons moved out of the County with 44% moving within the same Mid and West Region and a further 18% to the Southeast Region. 36.7% moved elsewhere outside Wales with around one third of these being in the 16 – 29 age cohort.
33. 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 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.
34. 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.

* * * * *

Appendix 2.3: Implications of Adopting the Ten-Year Trend-Based Growth Scenario for the Welsh Language Baseline Trajectory

1. As stated in **Appendix 2.1**, 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(reproduction)
 - learning Welsh in school(production)
 - learning Welsh through Welsh for Adults(production)
 - improved continuation of Welsh-speaking ability post-16 (for the objective of increasing the everyday use of the language)

2.3.1 The "Reproduction" Component

2. The Preferred Strategy is based on the 2022 Ten-Year Trend Based projection (10YTBP).
3. Based on a projected population of 202,036 for 2033 and assuming a similar proportion of the population being aged 3 and over (97.24%), this would give a projected population aged 3 and over of 196,460.
4. 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 $95,608 / 188,339 = 48.6\%$.
5. The WG 18 Principal projection forecasts the population 3+ to be 188,417. This would result in the proportion of the total Carmarthenshire population age three and over who are able to speak Welsh as $95,608 / 188,339 = 50.8\%$. effect of this would be a 1.2 percentage point 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

6. The Preferred Strategy's assumptions about net inward migration (in terms of what proportion of the population is likely to transmit the Welsh language from one generation to the next ('re-production')) also has key implications for delivering the trajectory baseline of 95,608 Welsh language speakers.
7. As discussed in **Appendix 2.2** the key findings with regards to gross and net migration are:
 - Overall, the scale of net migration in 2019/20 appears to have reduced not insignificantly compared to the position two years earlier with out-migration down by 14.5% and in-migration by 8.7%.
 - A significant proportion of in-migration is internal to Wales with 39% of the total coming from neighbouring counties in the Mid and Southwest Regions. 43% came from other parts of the UK.
 - A significant proportion of out-migration is also internal to Wales with 44% moving from neighbouring counties within the same Mid and West Regions and a further 18% to the Southeast Region.
 - Around three out of eight persons moved elsewhere outside Wales with around one third of these being in the 16 – 29 age cohort.
 - 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 suggests that around a third of in migrants to Carmarthenshire were from households where at least one adult spoke Welsh.
 - Similarly, around one in six in migrant households from outside Wales had at least one adult who speaks Welsh.
 - Based on the migration rates reported in 2019/20 and crude assumptions made about the proportion of migrants who can speak Welsh there is a possibility that the net number of Welsh speakers, as a result of migration, decreases annually by 1957 per year.
 - When applied as an average annual figure to the remainder of the Plan Period (13 years) this suggests that the number of Welsh speakers could possibly decrease by 25,441 over the Plan period as a result of net migration

2.3.2 The "Production" Component

8. The production of new Welsh speakers derives from sources outside the home. As is demonstrated in Appendix 2.6 the effectiveness of the Council's Welsh in Education Strategic Plans (WESP), both 2017 – 20 and 2022 -32 versions, will be a critical driver

of Welsh language ability and use amongst primary and secondary school pupils, particularly aged 3 – 15, and thus of overall Welsh language ability and use.

Discussion

9. 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.
10. The 2022 10YTBP implies an increase in residents (outside the BBNPA) by 8,271 over and above the Welsh Government Principal 2018 (WG18) projection of 6,197 residents.⁵⁰ The net number of homes required would increase by 3,777.

Table A3.2-1: 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+ | 0 - 15 | 16 - 64 | 65+ |
| 10YTBP | -1,090 | 2,298 | 16,797 | -4% | -2% | 43% |
| WG 2018 Principal | -1,727 | 3,189 | 11,113 | -10% | -3% | 25% |
| Net Difference | 637 | 891 | 5,684 | 6% | 1% | 17% |

Source: Authors' own calculations (November 2022)

3-15 cohort

11. Based on the 10YTBP Projection, the population aged 0-15 would decrease by -4% whilst the WG2018 Principal Variant Projection(PVP) anticipates a decline of -10%, a net difference of 6%.
12. The net effect of 10YBP Projection over the WG2018 PVP would see a decrease in the 0-15 age group by **637**.

Welsh language implications

13. 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

⁵⁰ Carmarthenshire County Council (November 2022) Report to Cabinet Appendix 3.

language from one generation to the next at home (although evidence suggests that success is more likely if Welsh is spoken at home).

14. The ambition in Carmarthenshire's Welsh in Education Strategic Plan (WESP) is that 75% of all Year 1 pupils will receive their education through the medium of Welsh by 2033. This is built upon a target of 75% for Nursery-aged pupils (3-4 yrs old) and 78.5% of Reception-aged pupils (4-5 yrs old) receiving their education through the medium of Welsh by 2033. By the end of the Plan period, therefore, the ambition is that there would be 698 more pupils per year receiving their education through the medium of Welsh than the baseline figure for 2021, building upon the increase of 4.5 percentage points (around 85 additional pupils) achieved between 2018 and 2021. By 2033, therefore, because most pupils will have gone through the Carmarthenshire education system, it is likely that the proportion of Welsh speakers aged 3-15 is highly likely to be at least 75%.
15. The projected number of pupils aged 3-15 for Carmarthenshire by 2033 is estimated to be 26,158. Should the target of 75% be achieved, this suggests that there is a realistic possibility that 26,158 ($* 75\% = 19,618$) pupils may be able to speak Welsh by the end of the plan period. This represents a gross increase of 4,104 ($19,618 - 15,414$) over the figure recorded in the 2011 Census.
16. The assumption made for the baseline trajectory (the WG Trajectory) is that by 2031 55% of pupils aged 15 will be able to speak Welsh. For Carmarthenshire this would represent 26,158 ($* 55\% = 14,387$). The difference represents a gross increase of $19,618 - 14,387 = 5,231$.
17. This would increase the net number of Welsh speakers over the Trajectory by $(95,608 + 5,231) = 100,839$.

16 – 64 Age Group

18. The 10YBP projection anticipates a net decrease of the population in the 16-64 age cohort of -2,298 (-2%) for the period 2018 - 2033. (The WG 2018 Projection anticipates a 3,189 reduction (-2.9%)).
19. This would give a net positive increase in the 16 – 64 age group over WG2018 of + 891. Regarding the change in the 16 – 64 age group, the WG2018 projection anticipates a net increase of 1,296 in the 60 – 64 age group.

20. The analysis in **Table A2.2.5** indicates that there is a realistic possibility that of the annual net in-migration figure of 1,058 in the 16 – 59 age group, there would be a net loss of 213 Welsh speakers per year. Over 15 years, this would amount to a net loss of 3,194.
21. **Table A2.2.5** suggests that there would be a slight net gain in the 60+ age group of 29 per year. The 60 – 64 age group is unlikely to take a significant proportion of this figure and so it is assumed that in terms of Welsh speaking ability, the net migration figure will be 0.
22. In summary,
- The 10YTBP based on the results of the 2011 Census could possibly decrease the number of Welsh speakers aged 16-59 over the WG18 scenario by - 3,194⁵¹
 - This would change the net number of Welsh speakers recorded in paragraph 17 above by:

$$(95,608 + 5,231 - 3,194) = 97,645$$

65+ cohort

23. The WG14 Scenario projections anticipate a net increase of the population by 2033 in the 65+ age group of +20,084 (+31%) above the 2014 population.
24. The WG2018 PVP anticipates a net increase of the population in the 65+ age group of 11,113 (+25%) by 2033 above the 2018 population.
25. The 10TBP forecasts an increase for the 65+ cohort of 16,797 by 2033 since 2018. This represents an increase over the WG2018 PV Projection of +5,684.
26. The analysis in **Table A2.2.5** indicates that there is a realistic possibility that of the annual net in-migration figure of 477 in the 60+ age group, there would be a net gain of 29 Welsh speakers per year. As described above, it is unlikely that there would be a gain if the 59 – 64 age group is taken away. Over 15 years, this would amount to a net gain of 439.
27. In summary,

⁵¹ 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.

- For the 10YTBP, based on the results of the linguistic ability of migrants as profiled in the 2011 Census, this could possibly increase the number of Welsh speakers aged 60+ over the WG18 scenario by 439.⁵²
- This would change the net number of Welsh speakers recorded in paragraph 25 above by:

$$(95,608 + 5,231 - 3,194 + 439) = 98,084$$

Welsh language implications

28. 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 based on the outcomes of one year in the past being repeated over twenty years later.
29. Based on assumptions about the characteristics of in-migrants from the 2011 Census, the net change in population scenario figures for the 2022 10YTB projection over WG18 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:
- Total number of Welsh speakers = $95,608 + 5,231 - 3,194 + 439 = 98,084$
- Percentage of Welsh speakers aged 3+ = $98,084$ divided by $196,460 = 49.9\%$.
30. This suggests a realistic possibility of a decrease of 0.9% percentage points over the WG18 Trajectory scenario (50.8%). It is important to note that 55% of the increase is achieved through the WESP intervention rather than as a result of the Preferred Growth Option, although it is also reasonable to note that policy interventions designed to retain or increase the number of young people are likely to feed into a higher number of school pupils able to speak Welsh and thus boost the overall proportion.
31. It is also important to note that in recent years a high percentage of in-migrants is the result of re-locations from neighbouring counties and from elsewhere in Wales. The percentage of households where at least one adult and a high proportion of

⁵² As above.

dependent children are likely to be able to speak Welsh, will probably increase over time.

* * * * *

Appendix 2.4: 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. At the time of writing this report, the more recent 2021 Census results pertaining to the Welsh language are expected to be released in early 2023.

Table A2.4-1: Cluster Baseline Position⁵³

| | | All Usual Residents Aged 3 and Over | Can Speak Welsh | Can Speak Welsh |
|---------------|--------------------------------|-------------------------------------|-----------------|-----------------|
| Cluster | | 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% |

Source: Author's own analysis of Census 2011 data

2. As can be seen in **Table A2.4-1** 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.

⁵³ 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).

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.
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 A2.4-2** shows the results of WLR for each cluster.

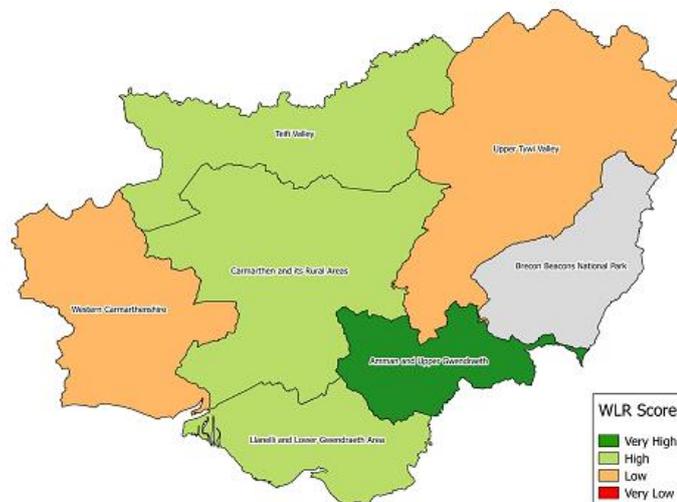
Table A2.4-2: Welsh Language resilience score according to cluster

| | | All Usual Residents Aged 3 and Over | Can Speak Welsh | Normalised Count | Can Speak Welsh | WLR = NWS +PWS threshold weighted | |
|-----------|--------------------------------|-------------------------------------|-----------------|------------------|-----------------|-----------------------------------|-------|
| Cluster | | Count | Count | | Percentage | Weighting | Score |
| Cluster 1 | Carmarthen and its Rural Areas | 32447 | 15191 | 0.76 | 46.8% | 1 | 1.76 |
| Cluster 2 | Llanelli and Lower Gwendraeth | 70729 | 22736 | 1.13 | 32.1% | 1 | 2.13 |
| Cluster 3 | Amman and Upper Gwendraeth | 41010 | 24069 | 1.20 | 58.7% | 2 | 3.20 |
| Cluster 4 | Teifi Valley | 12475 | 6745 | 0.34 | 54.1% | 2 | 2.34 |
| Cluster 5 | Upper Tywi | 10071 | 4742 | 0.24 | 47.1% | 1 | 1.24 |
| Cluster 6 | Western Carmarthenshire | 9910 | 4008 | 0.20 | 40.4% | 1 | 1.20 |
| Totals | | 176642 | 77491.44132 | | 43.9% | | |
| MIN | | | 4008 | | 0.32 | | |
| MAX | | | 24069 | | 0.59 | | |

Source: Author's own analysis of Census 2011 data

- Table A2.4-2** confirms that the Aman and Gwendraeth valleys had the most resilient Welsh language cluster in 2011 relative to the rest of Carmarthenshire due to the large count of Welsh speakers. In terms of the rest of Wales, the percentage is below the 70% threshold which is the minimum threshold commonly used to define a resilient Welsh speaking area.
- Figure A2.4-1** 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).

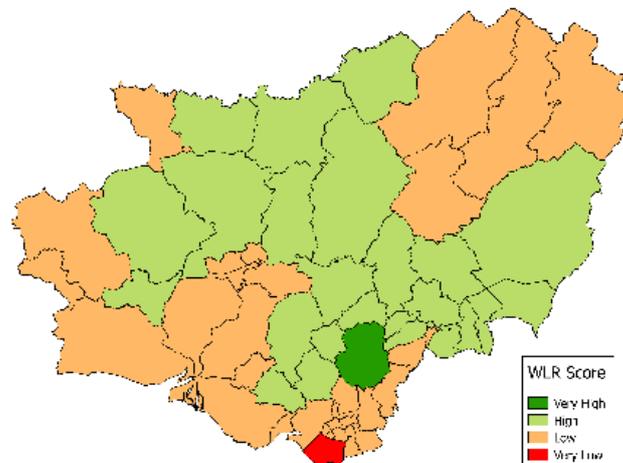
Figure A2.4-1: Carmarthenshire Welsh Language Resilience according to cluster



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 Maximum and Minimum similar clusters.
9. **Figure A2.4-2** does, however, map out the WLR by ward level based on these ward’s relative resilience compared to 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 (Carmarthen and to the southern end of the cluster), 5 and 6.

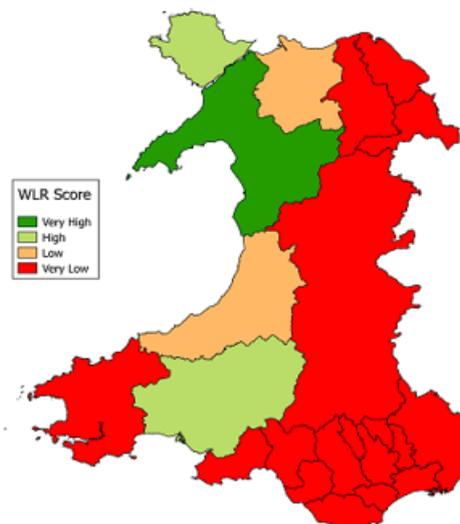
Figure A2.4-2: Welsh Language Resilience in Carmarthenshire wards



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

10. **Figure A2.4-3** shows the relative position of Welsh Language Resilience in Carmarthenshire to other Local Authorities in Wales.

Figure A2.4-3: Carmarthenshire Welsh Language Resilience in relation to local authorities in Wales



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

11. **Table A2.4-3** 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 A2.4-3: 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% |

Source: authors' own analysis of Census 2011 data

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 being the only cluster where the percentage is below 50%.
14. The annual collection of PLASC (Pupil Level Annual School Census) recorded each January) data does allow us to monitor and update the position in relation to pupils aged 5 – 15 and their ability in Welsh, as reported by their parents. While this data needs to be treated with caution regarding its reliability, it does provide an indication of parents' perceived levels of their children's fluency in Welsh. **Table A2.4-4** summarises the position for Carmarthenshire pupils as a whole in January 2019 which corresponds closest to the Second Deposit LDP baseline.

Table A2.4-4: Pupils aged 5 – 15 with ability⁵⁴ in Welsh

| Carmarthenshire PLASC data 2018/2019 | | | | | | | | | |
|--------------------------------------|-----------------|--------------|---------------------|--------------|--------------------|--------------|---------------|-------------------------------|--------------|
| Age groups | Fluent in Welsh | | Not fluent in Welsh | | Cannot speak Welsh | | Total | Ability (Fluent + Not Fluent) | |
| | Count | Percentage | Count | Percentage | Count | Percentage | | Count | Percentage |
| 5 to 10 | 4,855 | 39.8% | 3,330 | 27.3% | 4,020 | 32.9% | 12,205 | 8,185 | 67.1% |
| 11 to 15 | 4,075 | 42.2% | 3,190 | 33.1% | 2,380 | 24.7% | 9,645 | 7,265 | 75.3% |
| Totals | 8,930 | 40.9% | 6,520 | 29.8% | 6,400 | 29.3% | 21,850 | 15,450 | 70.7% |

Source: Welsh Government PLASC Data January 2019⁵⁵

15. Whilst it is difficult to compare usual residents aged 3 to 15 at the Census 2011 (all usual residents 26,733) with school rolls (pupils aged 5-15) , **Table A2.4-4** does suggest that, against a declining school age population, the ability to speak Welsh has significantly increased from 57.6% to 70.7%.
16. This trend is reinforced by the PLASC returns for 2021/22 as shown in **Table A2 6-5**.

Table A2.4-5: Pupils aged 5 – 15 with ability⁵⁶ in Welsh

| Carmarthenshire PLASC data 2021/2022 | | | | | | | | | |
|--------------------------------------|-----------------|--------------|---------------------|--------------|--------------------|--------------|---------------|-------------------------------|--------------|
| Age groups | Fluent in Welsh | | Not fluent in Welsh | | Cannot speak Welsh | | Total | Ability (Fluent + Not Fluent) | |
| | Count | Percentage | Count | Percentage | Count | Percentage | | Count | Percentage |
| 5 to 10 | 4,175 | 34.7% | 6,485 | 53.9% | 1,370 | 11.4% | 12,030 | 10,660 | 88.6% |
| 11 to 15 | 4,265 | 42.3% | 3,845 | 38.2% | 1,965 | 19.5% | 10,075 | 8,110 | 80.5% |
| Totals | 8,440 | 38.2% | 10,330 | 46.7% | 3,335 | 15.1% | 22,105 | 18,770 | 84.9% |

Source: Welsh Government PLASC Data March 2022

17. Again, this shows that the ability of pupils to speak Welsh (as assessed by parents) continues to grow rapidly with **Table A2.4-5** suggesting that the number and percentage of pupils with the ability to speak Welsh at primary school age, in

⁵⁴ 'Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents.

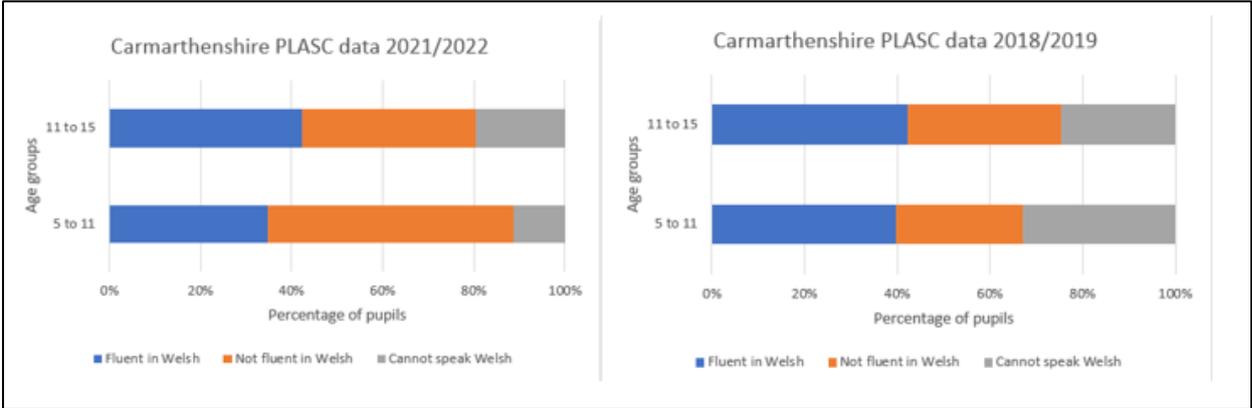
⁵⁵ ['Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents, of pupils aged 5 and over in primary schools by local authority \(gov.wales\)](#) and ['Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents, of pupils aged 11-15 in secondary schools by local authority \(gov.wales\)](#). The Ability score includes pupils 'fluent in Welsh' and 'not fluent in Welsh'. The data includes all pupils categorised by parents as "Not Applicable"

⁵⁶ 'Ability to Speak Welsh' & 'Speaking Welsh at Home', as assessed by parents.

particular, has grown from 8,185 (and 67.1%) to 10,660 (and 88.6%). Similarly, the count of the numbers and percentages who were assessed as “cannot speak Welsh” has declined from 4,020 (32.9%) to 1,370 (11.4%).

- 18. However, the overall numbers of pupils aged 5 -15 who speak Welsh fluently is a cause for concern as this group has declined by 490 from 8,930 (40.0%) in 2019 to 8,440 (38.2%) in 2022. Research indicates that children and young people who speak Welsh fluently and speak Welsh at home are likely to be those who use the language outside the classroom and may therefore reflect a decline in the resilience of the language in community use.
- 19. Within each age group, the ability and fluency of the cohort increases with age. This augurs well in terms of both a growth and spatial strategy that has as one of its main aims an ambition to retain more young people and grow the Welsh language.

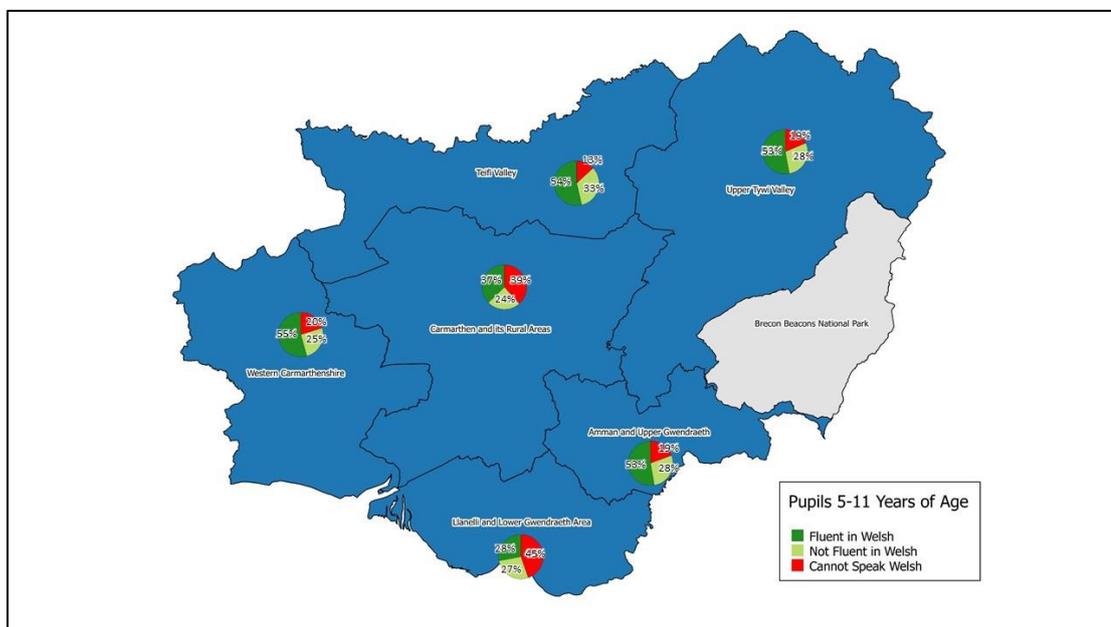
Figure A 2.4-4: Change in percentage of Carmarthenshire pupils aged 5-11 and 11-15 according to Welsh language ability between 2019 and 2022



Source: Welsh Government PLASC data, January 2019 and 2022

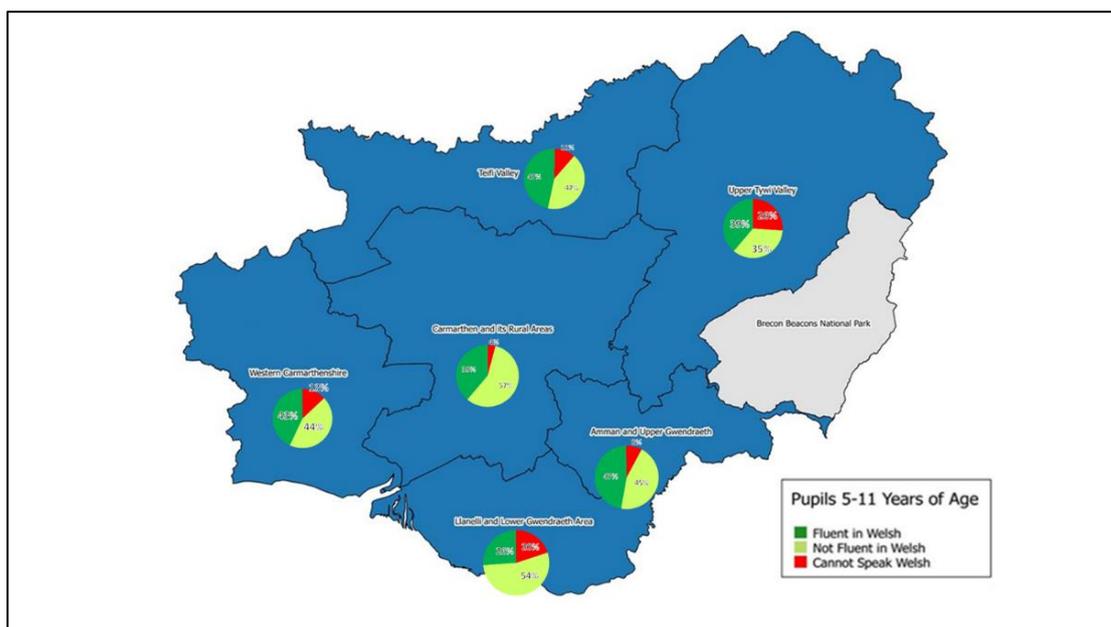
- 20. **Figures A2.4-5, A2.4-6, A2.4-7, A2.4-8** present the percentage of the school populations in each cluster according to Welsh language ability according to the Pupil Level Annual School Census data collected in January 2019 and January 2022.
- 21. These figures reflect a clear pattern that is also found in Tables **A2.4-4** and **A2.4-5**, as well as **Figure A 2.4-4**. That is, the ‘Not Fluent in Welsh’ category has grown at the expense of the ‘Cannot speak Welsh’ category as well as the ‘Fluent in Welsh category’. This is more pronounced in some areas, with the starkest example being ‘Carmarthen and its Rural Areas’ amongst the 5-11 age group.

Figure A2.4-5: Percentage of pupils aged 5-11 in Carmarthenshire primary schools according to cluster and according to Welsh language ability, January 2019



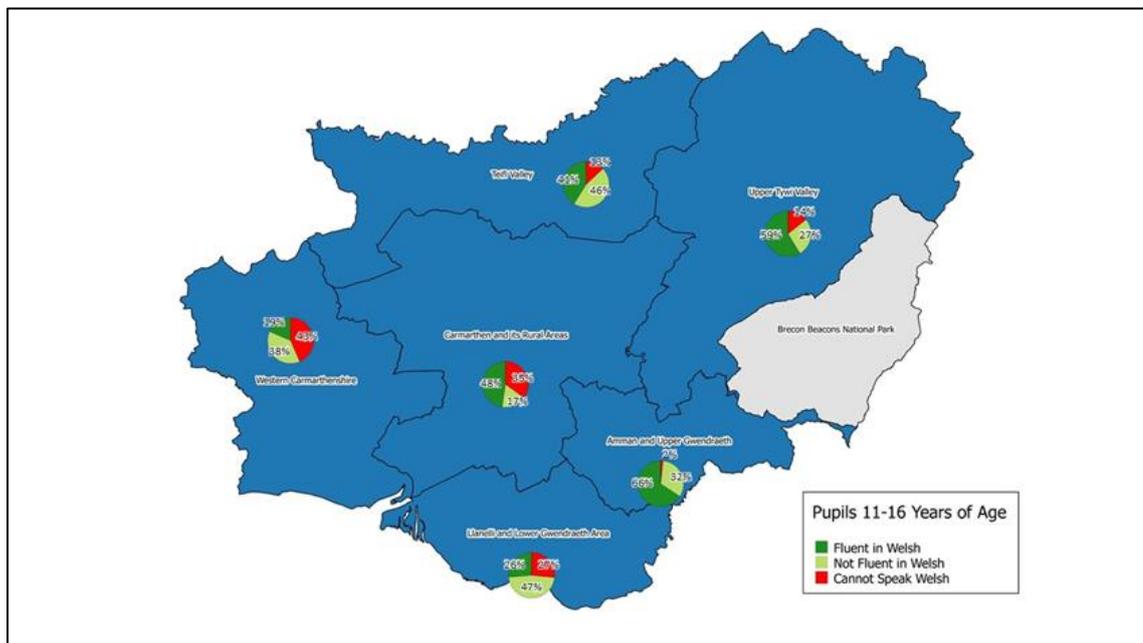
Source: PLASC, January 2019

Figure A2.4-6: Percentage of pupils aged 5-11 in Carmarthenshire primary schools according to cluster and according to Welsh language ability, January 2022



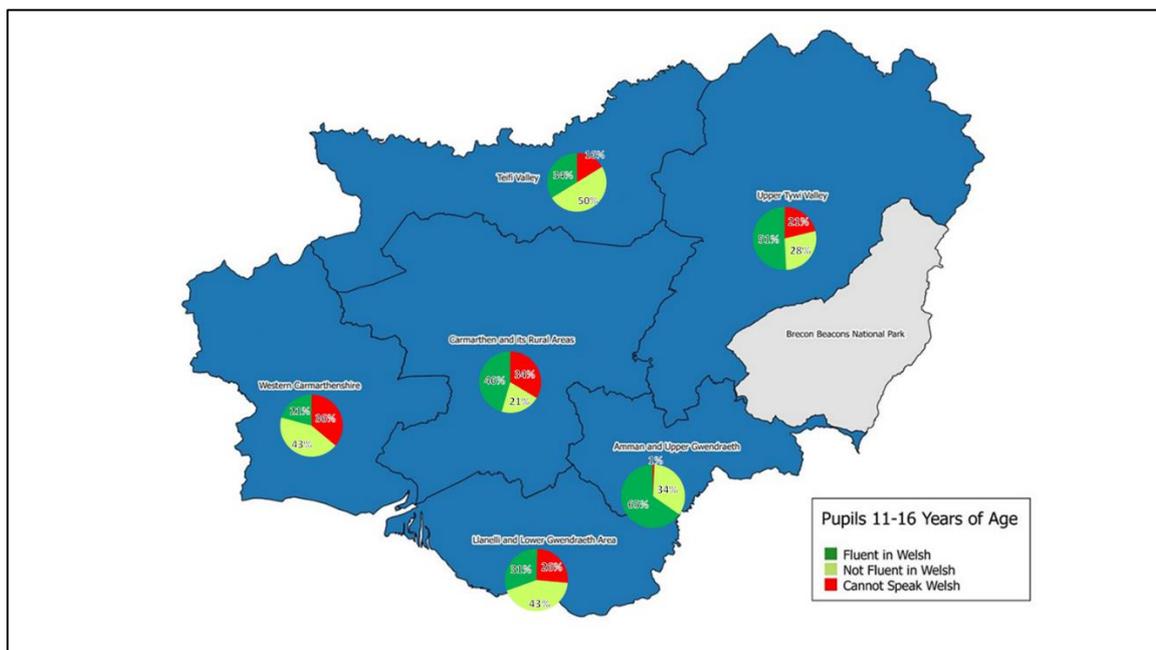
Source: PLASC, January 2022

Figure A2.4-7: Percentage of pupils aged 11-16 in Carmarthenshire secondary schools according to cluster and according to Welsh language ability, January 2019



Source: PLASC, January 2019

Figure A2.4-8: Percentage of pupils aged 11-16 in Carmarthenshire secondary schools according to cluster and according to Welsh language ability, January 2022



Source: PLASC, January 2022

Residents aged 16 to 64

22. The highest number of residents recorded in the Census 2011 as being 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+

23. The highest number of residents able to speak Welsh is found in Cluster 2 (Llanelli and Gwendraeth Isaf) (5,985) with the lowest number 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

24. The Growth Strategy is based on apportioning the preferred level of growth by cluster area. **Table A2.4-6** 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 97.2%) to arrive at the population trajectory figure for each cluster.

Table A2.4-6: Population growth trajectory by cluster area

| Cluster | | Estimated no. of units in the cluster(HOM1 Land Allocations) | Percentage | 10yTB Pop Increase | Disaggregation of 10YTB 14468 Pop Increase | |
|--------------|--------------------------------|--|---------------|--------------------|--|---------------|
| | | | | | Population aged 3 and over @97.2% | |
| Cluster 1 | Carmarthen and its Rural Areas | 1690 | 24.8% | | 3,583 | 3483 |
| Cluster 2 | Llanelli a Gwendraeth Isaf | 2840 | 41.6% | | 6,021 | 5853 |
| Cluster 3 | Aman a Gwendraeth Uchaf | 1267 | 18.6% | | 2,686 | 2611 |
| Cluster 4 | Dyffryn Teifi | 218 | 3.2% | | 462 | 449 |
| Cluster 5 | Tywi Uchaf | 162 | 2.4% | | 343 | 334 |
| Cluster 6 | Western Sir Gâr | 647 | 9.5% | | 1,372 | 1333 |
| Total | | 6824 | 100.0% | 14468 | 14,468 | 14,063 |

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

Population Change 2011 – 2018

25. 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. **Table A2.4 -7** shows estimated of the increase in each age group by apportioning the age cohort group analysis into the three age groups (aged 3 years and over.)

Table A2.4-7: Estimated increase in population by age group between 2011 – 2018

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

Source: Authors' own analysis based on Edge Analytics (2019) Addendum Report

Population Change 2018 – 2033

Option 1 (Business-as-usual)

26. 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).
27. **Table A2.4-8** 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 A2.4-8: 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 |

28. This gives us a projected population of 199,631 by 2033 and by assuming that the proportion of the population aged 3 and over is, at present, 97.24% of the total population, this gives us a figure for the number of residents aged 3 and over of 195,638.
29. **Table A2.4-9** calculates the number and percentage of Welsh speakers by cluster and the total for the Plan Area.

Table A2.4-9: Projected number and percentage of Welsh speakers aged 3 and over by 2033 (Business-as-usual)

| | | LDP 1 (Option 1) Projection | | |
|--------------|--------------------------------|-----------------------------|----------------|--------------|
| Cluster | | Residents Age 3+ | Welsh Speakers | |
| 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% |

Source: Author's own calculations

Preferred Spatial Strategy

30. **Table A2.4-10** 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 A2.4-10: Projected population change Carmarthenshire 2018 - 2033

| Age Group | 2018 | Percentage | 2033 | Percentage |
|-----------|---------|------------|---------|------------|
| 3 – 15 | 28,171 | 15% | 28453 | 14% |
| 16 – 64 | 114,906 | 62% | 112608 | 57% |
| 65+ | 38,844 | 21% | 55,641 | 28% |
| Totals | 186,568 | 100% | 196,702 | 100% |

Source: Authors' own calculations

31. 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.
32. 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 2.26 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 proportionately to each cluster (Table A2.4-11).

Table A2.4-11: Projected number and percentage of Welsh speakers aged three and over by 2033 by cluster

| Table A2.4-11 Projected number and percentage of Welsh speakers aged 3 and over by 2033 by cluster | | | | | | | | | | |
|--|--------------------------------|-----------------------------|----------------|--------------|---|----------------|--|-------------|------------|--|
| Cluster | | LDP1 Projections (Option 1) | | | Preferred Growth Strategy (rLDP2) (10YTB) | | Preferred Spatial Strategy (rLDP2) 10YTB | | Difference | |
| | | Residents Age 3+ | Welsh Speakers | | Residents Age 3+ | Welsh Speakers | No. | % points | | |
| Cluster 1 | Carmarthen and its Rural Areas | 35936 | 18742 | 52.2% | 36132 | 19,567 | 54.2% | 825 | 2.2 | |
| Cluster 2 | Llanelli a Gwendraeth Isaf | 78335 | 28051 | 35.8% | 78761 | 29,285 | 37.2% | 1234 | 1.5 | |
| Cluster 3 | Aman a Gwendraeth Uchaf | 45420 | 29636 | 65.4% | 45667 | 31,002 | 67.9% | 1306 | 2.8 | |
| Cluster 4 | Dyffryn Teifi | 13817 | 8322 | 60.2% | 13892 | 8,688 | 62.5% | 366 | 2.6 | |
| Cluster 5 | Tywi Uchaf | 11154 | 5851 | 52.5% | 11215 | 6,109 | 54.5% | 257 | 2.2 | |
| Cluster 6 | West Carmarthenshire | 10976 | 4945 | 45.1% | 11035 | 5,163 | 46.8% | 218 | 2.0 | |
| Total | | 195638 | 95608 | 48.9% | 196702 | 99814 | 50.7% | 4206 | 1.6 | |

Source: Authors' own calculations

* * * * *

Appendix 3.1: Carmarthenshire Second Deposit rLDP – Welsh Language Policies

Strategic Policy – SP 8: 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’⁵⁹ and is committed to contributing to the Welsh Government’s long-term aim of achieving 1 million Welsh speakers by 2050. 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.

WL1: Welsh Language and New Developments

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

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 5 or more dwellings which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies HOM1 and HOM3; or

b) Residential development of 5 or more dwellings on allocated or windfall sites that do not address evidence of need and demand for housing recorded in a Housing Market Assessment or other relevant local sources of evidence; or ,

c) Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare.

Proposals on unexpected windfall sites for large scale housing development or large scale employment development that would lead to a significant workforce flow are required to submit a Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language.

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.

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. The Welsh Language Supplementary Planning Guidance⁶¹ provides further guidance on when a WLIA is required, clarifying what constitutes a large scale development, as well as how to produce a WLIA.

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 The Plan’s Strategy provides for organic growth on a small scale within the Rural Villages and policies HOM1 and HOM3 build upon this allowing development of appropriate scale and in appropriate locations. It is considered that incremental 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. Unforeseen development of significant scale which is not allowed for in the Plan’s policies may not 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 ISA 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 ISA report, 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. Additional guidance on providing Welsh street names is provided in Carmarthenshire’s Street Naming and Numbering Policy.

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