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Revised 2018-2033
Local Development Plan

Draft Supplementary Planning Guidance
Welsh Language

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Carmarthenshire
County Council

DRAFT SUPPLEMENTARY PLANNING GUIDANCE

WELSH LANGUAGE

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1. Introduction

1.1 This Supplementary Planning Guidance (SPG) is one of a series of guidance notes that has been produced to supplement and support the Revised Carmarthenshire Local Development Plan (LDP). It provides further guidance and, where applicable, elaborates on how policies and proposals of the Development Plan are to be implemented. This SPG in particular supplements the consideration and application of Strategic Policy 8: Welsh Language and Culture and WL1: Welsh Language and New Developments. It also shows ways in which the planning system can deliver the Welsh Government and Carmarthenshire County Council objectives and targets for protecting, promoting and enhancing the use of the Welsh language. The SPG is intended to give greater detail on specific issues than is possible or appropriate in the Carmarthenshire LDP. The SPG does not apply to the area of Carmarthenshire which falls within the Brecon Beacons National Park.

1.2 In interpreting this guidance, regard should also be had to the other pertinent policies of the LDP. This SPG should be read alongside Topic Paper: The Welsh Language[1] which has been produced as supporting information to the preparation of the LDP.

1.3 This guidance is intended to ensure that all parties, including decision makers and applicants, receive clear advice and information in respect of the requirements in relation to the Welsh language, and the consideration of proposals where they may have an effect on the Welsh language within communities.

1.4 The Council will have regard to this SPG when making planning decisions. It is a material consideration in the determination of planning applications and appeals, alongside the policies and provisions of the LDP and other SPG.

1.5 In accordance with good practice, applicants are encouraged to discuss developments with officers before submitting an application.

[1] welsh-language-topic-paper-cover-eng-_merged.pdf (gov.wales)

2. Status of the Supplementary Planning Guidance

2.1 This SPG is subject to a 6-week consultation exercise conducted in a manner consistent with that set out within the Delivery Agreement for the Revised Local Development Plan (rLDP). The rLDP and its associated documents (of which this guidance forms a part) will progress through an examination in public conducted by an independent Planning Inspector, following which it will be adopted under the aegis of and concurrent with the rLDP.

3. The Welsh language in Carmarthenshire

3.1 The Welsh language plays an important role in the social, cultural and economic lives of residents of, and visitors to, Carmarthenshire. The county is home to 72,800 Welsh speakers (Gwynedd is the only local authority with a higher number), which is equivalent to 39.9% of its population. According to the 2021 census data, there are 538,300 Welsh speakers who compose 17.8% of the population of Wales. Carmarthenshire is the county with the fourth highest percentage of Welsh speakers in the country.

3.2 Between 2011 and 2021, census data shows that the percentage of Welsh speakers in Carmarthenshire fell from 43.9% to 39.9%. This is the largest drop in percentage points of any local authority area in Wales for the second census running. It should be noted, however, that this drop is smaller than in the last census (a 6.4% drop was reported between the 2001 and 2011 censuses). This decline is not unique to Carmarthenshire, and it is the case that most local authorities in Wales were subject to similar decreases. Increases in the percentage of Welsh speakers were recorded in only four local authority areas (Cardiff, Vale of Glamorgan, Rhondda Cynon Taf and Merthyr Tydfil). Other parts of 'Y Fro Gymraeg' (the Welsh speaking heartlands) also saw reductions in the percentage and numbers of Welsh speakers. Various agencies including Welsh Government has raised concerns about the future of the Welsh language in these areas where the language has traditionally been at its strongest.

4. Planning and the Welsh language

4.1 New development can potentially have both beneficial as well as harmful effects and consequences on the Welsh language and communities. Beneficial effects/consequences can occur if development encourages Welsh speakers to remain in their communities by providing housing opportunities (both market and affordable), by providing employment opportunities (particularly employment which requires Welsh language skills), and also in instances where it supports the viability of community facilities, such as schools. Harmful effects/consequences can occur when a disproportionate number of non-Welsh speakers move into a community which can often have cumulative effects by reducing the use of the Welsh language among Welsh speakers. It is the impact of development on the community, rather than on particular individuals, that is relevant to the planning system.

4.2 Since the publication in 1998 of Circular 53/88, the Welsh language has been an important planning consideration in the creation of land use policies and in the decision-making process on planning applications.

4.3 Nevertheless, the isolation of the exact effect and eventual consequence of an individual development on language use in a given spatial community over a period of time is a matter that is difficult to analyse and prove decisively. Ensuring a thriving Welsh language in spatially defined communities in Wales will depend on a wide variety of factors, including those which relate to education, demography, community changes and capacity, housing access, and a sound economic base, all of which are intrinsically linked. These economic, social and environmental factors influence one another and change in one aspect can often affect another aspect.

4.4 A high-level Welsh language impact assessment of the second draft deposit rLDP was conducted as part of the rLDP process (revised-carmarthenshire-local-development-plan-2018-2033-draft-second-deposit-welsh-language-impact-assessment.pdf (gov.wales)). This SPG gives further guidance on the methodology for conducting a Welsh Language Impact Assessment (WLIA) of developments for which planning application is sought.

5. The Legislative and Policy context

The Legislative Context

Planning status

5.1 Section 31 of the Planning (Wales) Act 2015 amends section 70 of the Town and Country Planning Act 1990 by adding the following clause: "*any considerations relating to the use of the Welsh language, so far as material to the application*." This means that it is incumbent when making a decision on a planning application to include considerations in relation to the Welsh language, where it is relevant to that application.

Well-being of Future Generations (Wales) Act 2015

5.2 From 1 April 2016, local planning authorities must demonstrate, for each planning application determined, they have considered how the application complies with the Well-being of Future Generations Act 2015.This means working towards achieving the seven well-being goals including the well-Being Goal of "a vibrant culture and thriving Welsh language". However, the development plan where relevant to the application and other relevant material considerations remain the primary considerations when determining applications.

The National and Regional Policy Context

Planning Policy Wales

5.3 PPW reinforces the role of the planning system to support the delivery of sustainable development and the Well-being of Future Generation goals. Within the context of Strategic and Spatial Choices aspect of Placemaking "the land use planning system should 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". (para. 3.25). Paragraph 3.28 goes on to state "considerations relating to use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission."

5.4 In terms of assessing impact on the Welsh language "If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language. Any such areas should be defined clearly in the development plan."

Technical Advice Note (TAN) 20

5.5 In relation to development management, TAN 20's guidance can be summarised as follows:

- A WLIA may be undertaken for a large development on a windfall site in an area it has defined as linguistically sensitive.
- Large developments would normally be defined as 10 or more residential developments or developments over 1000 sq. metres or 1 hectare but LPAs may set locally-appropriate thresholds in the LDP, based on evidence.
- The LPA is responsible for conducting any assessment and for determining its form.
- Impact assessments may be conducted for any type of windfall development proposals but LPA's should carefully consider what benefit is expected from assessing employment, commercial or retail development. Evidence from the language impact assessment may be material to the application and may inform whether measures to mitigate or enhance the impacts of the development on the Welsh language may be applied.
- Circumstances in which the LPA expect mitigation or enhancement measures to be applied should be identified in the LDP while further matters of detail may be set out in supplementary planning guidance (SPG).
- Mitigation measures may be applied to the permission either through conditions or section 106 obligations.

Cymraeg 2050

5.6 In 2017, Welsh Government published Cymraeg 2050: A million Welsh speakers.[2] This document sets out a national, thirty-three-year strategy to increase the number of persons in Wales who can speak Welsh by nearly 80% from the 562,000 recorded in the 2011 population census and doubling its everyday use by the Welsh public from 10% to 20%.

5.7 "Our vision is to secure favourable circumstances throughout the country that support language acquisition and use of Welsh language skills. We want to see an increase in language transmission in the family, early introduction of Welsh to every child, an education system that provides Welsh language

[2] Cymraeg 2050: Welsh language strategy | GOV.WALES

skills for all, and greater appreciation of Welsh language skills in the workplace. At the same time, we are committed to supporting people to use Welsh socially, at work, and when accessing services."[3]

5.8 Where material to the application, a Welsh language impact assessment should assess the likelihood that the proposed development will result in more people learning Welsh and an increase in people's daily use of Welsh in line with Cymraeg 2050 targets.

The Local Context

Carmarthenshire Welsh Language Promotion Strategy 2023 - 2030

5.9 The local authority's aim is to "make Welsh the main language of the County. Our aim is to restore Welsh to a language spoken and used by the majority of our inhabitants consistently, and in all aspects of life." The vision that gives direction to the efforts of the local authority and its partners is set out in the strategy:

"We want to see an increase in the proportion of Carmarthenshire residents who can speak Welsh and use their Welsh consistently. We want to see the Welsh language as a working and operating norm in the County's public institutions and increasingly prevalent in the County's businesses. We want our young people to see a future for themselves in the County in sustainable and prosperous Welsh communities, economically, culturally and socially."[4]

Welsh in Education Strategic Plan (WESP) 2022- 2032

5.10 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

[3] Op. Cit.., p. 7

[4] welsh-language-promotion-strategy-23-28.pdf (gov.wales) p.5.

with their families, in their communities and in the workplace.

5.11 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.

5.12 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.

5.13 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.

5.14 By September 2032, Carmarthenshire County Council's aspiration is that 75% of all Year 1 pupils will attend Welsh-medium education.

<u>The Revised Carmarthenshire Local Development Plan 2018-33 Draft Second Deposit</u>

5.15 The draft second deposit rLDP provides broad policies along with land allocations for the main uses such as housing, employment and retail, help shape the future of the Plan area in a physical and environmental way as well as influencing it in economic, social, cultural and linguistic terms. The

Scheme therefore seeks to:

1. provide direction for the Local Planning Authority to make rational and consistent decisions on planning applications by providing a policy framework consistent with national policy; and
2. steer development to appropriate locations over the period to 2033.

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.

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.

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 unanticipated 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.

PSD9: Advertisements

Proposals for advertisements (which are subject to planning control) will be strictly controlled and will be expected to comply with the following:

a. That their design, scale, materials, and siting have full regard to the building, structure, and/or land on which they are displayed;
b. There are no adverse effects on the landscape / townscape, or the setting and integrity of the historic environment;
c. That they do not constitute a hazard to public safety especially when sited on roads;
d. That they safeguard, and positively enhance the Welsh language in the County by providing bilingual signage. Regard should also be had to the provisions of Policy SP8 - The Welsh Language and Culture.

Proposals for poster hoardings and advertisement signs should not lead to the proliferation or concentration of individually acceptable signs within the countryside.

New developments and streets will be expected to have Welsh names.

What developments are covered by SP8 and WL1?

5.16 Development proposals come in many forms, from large factory sites to householder extensions. The Development Management Manual explains that development management (DM) should "be proportional to the scale and complexity of the potential impact of the proposal on the public interest".

5.17 Policy WL1 requires all development proposals, throughout the LDP area (that require express approval through the submission of a planning application) to give due consideration of the need to safeguard, promote and enhance the interests of the Welsh language. The DMM Guidance, however, requires requests for additional information to be reasonable and

proportionate to the proposal. The majority of householder, minor or incremental physical changes to land or buildings (operational development) or material changes of use (operational changes to the way land is used) are highly unlikely on their own to have a significant impact on the public interest of advancing a thriving Welsh language. Further guidance on what additional information may be required in cases of concerns around cumulative impacts are given below.

5.18 Strategic Policy SP1 makes clear that one of the goals of the LDP is to help promote the interests of the Welsh language by seeking to ensure that all developments safeguard, promote and enhance those interests.

5.19 In terms of overall growth, the high level Welsh Language Assessment of the preferred strategy concludes that, compared to the current LDP (business as usual), the draft second deposit rLDP has a realistic possibility of helping to safeguard, promote and enhance those interests, albeit with the risk that the benefits of retaining a higher proportion of young people may be outweighed by attracting a disproportionately higher number of inward migration of older people to live in the rLDP area.

5.20 In terms of location, the high-level Welsh Language Assessment of the preferred spatial strategy concluded that, compared to the current (business as usual) strategy, the Plan is likely to have a minor positive effect on the interests of the Welsh language by providing opportunities for appropriate scale sustainable development to happen across the rLDP area at all four tiers and all six clusters.

5.21 In terms of the requirements of SP1 (and of PPW and TAN 20), all development proposals that are in accordance with the draft second deposit rLDP (that is on allocated land and in accordance with the planned release of such allocations) are presumed to be covered by the WLIA of the plan itself unless material considerations (including new information) relating to the health and resilience of the Welsh language outweigh the policies and proposals of the Plan.

5.22 The draft second deposit rLDP assumes that 8,822 dwellings will need to be delivered in the Plan area to meet housing requirements during the period up to the end of the plan in 2033. In delivering the number of homes set above, this Plan includes an additional flexibility as part of its supply (uplift)

to ensure the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues. A 10% flexibility through a further 882 homes, is included to ensure we meet the need identified.

5.23 The County Council has categorised the whole county as linguistically sensitive and Policy WL1 covers all significant developments, including housing, employment, retail and commercial development. Thus, the LPA will require all housing and employment generating development proposals on windfall sites, including those not anticipated and/or falling outside settlement limits, that are likely to have a significant impact be disproportionate to on the number of Welsh speakers in the community, to screen and/or conduct a Welsh language impact assessment.

5.24 Planning Policy Wales states that, "If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language. Any such areas should be defined clearly in the development plan."

5.25 TAN 20 states: "When a LPA receives a proposal for a large development on a windfall site in an area it has defined as linguistically sensitive or significant, an assessment of the likely impact of the development on the Welsh language may be undertaken."

5.26 The County Council has categorised the whole county as linguistically sensitive. Thus, the LPA will require all housing- and employment-generating development proposals on windfall sites, including those not anticipated and/or falling outside settlement limits, that are likely to be disproportionate to the number of Welsh speakers in the community, to screen and/or conduct a Welsh language impact assessment.

Welsh Language Impact Assessments

5.27 Welsh Language Community Profiles (WLCP) and Welsh Language Impact Assessments (WLIA) are both important steps in the development management process where relevant. While they are often confused with Welsh language statements and one another, they each play a different and distinct role. Put simply, Welsh language profiles describe the host community where the proposal is to take place while Welsh language

impact assessments define the proposed activity and what effect it will have on the host community.

What are Welsh Language Community Profiles (WLCP)?

5.28 Welsh Language Community Profiles (WLCP's) investigate the Welsh language characteristics of the host community and result in detailed documents which define the Welsh language values associated with the context of the proposal. It will help the reader (developer, consultee, decision maker) to understand the sensitivity of the host community to various scales of development. WLCP's involve profiling through researching and collecting relevant information about the values of a 'receiving host community' (e.g. field surveys, public or purchased data, literature reviews and other methods).

5.29 A WLCP provides the basis on which to prepare a Welsh Language Action Plan and/or Welsh Language Impact Assessment required under Policy WL1.

What are Welsh Language Impact Assessments?

5.30 In comparison, a Welsh Language impact Assessment (WLIA) is required where the proposal (whether its nature, size or location) a priori, is deemed to have likely significant effects on the Welsh language communities. Carmarthenshire LPA's view is that unforeseen developments above a certain scale (i.e., those on windfall sites) have not been taken into consideration in determining the nature, scale and location of growth in the rLDP and therefore need to be assessed for likely significant effects and whether actions need to be taken to avoid, reduce, or mitigate adverse harm or enhance benefits to the host community.

5.31 WLIA is a tool to identify potential Welsh language and other relevant socio-economic impacts of a project on a host community prior to decision making. It not only identifies the sensitivity of the receptor community (as in WLCPs) but also looks at the characteristics of the proposed development, carries out an in-depth examination of the effects that proposed activity will have on the receptor community (and may offer suggestions of alternatives) and makes a judgment about the likely magnitude of the impact on the host community.

5.32 Typically, a WLIA will methodically examine the effect of each activity on each value or aspect of the site. For example, the proposed activities of preparation, construction and eventual occupation of a housing development might each be assessed against the values of populations, migration trends, schools, and community services. A WLIA also facilitates the development management process and helps the decision-making authorities decide whether a proposal should be approved of or not. Appendix 3 describes the methodology to be used in undertaking a WLIA.

Regeneration and Mixed-Use Sites (Policy SG1)

5.33 The Plan makes provision for ten sites of mixed-use allocations across the Plan area. The mix of uses varies by site and can consist of one or more of the following uses:

- residential
- industrial
- commercial
- retail
- leisure
- education
- community
- amenity
- visitor accommodation
- visitor attraction
- heritage
- energy from waste.

5.34 The Plan notes that the development of individual sites will be further considered and planned in a planned and co-ordinated way in the form of development briefs. The high level WLIA of the Plan has taken into account the overall scale and location of development but not the likely impact of these mixed-use regeneration sites on their host communities or on ways in which the interests of the Welsh language can be safeguarded, promoted and enhanced as per Policy SP8. The development of the Regeneration and Mixed-Use Site Briefs will further consider how the interests of the Welsh language can be safeguarded, promoted and enhanced.

5.35 Further guidance on housing windfall sites and employment generating windfall sites is given below.

The supply of new housing and identifying impact on the Welsh language

5.36 Planning Policy Wales states in paragraph 4.2.21:
"Where new housing is to be proposed, development plans must include policies to make clear that developers will be expected to provide community benefits which are reasonably related in scale and location to the development. In doing so, such policies should also take account of the economic viability of sites and ensure that the provision of community benefits would not be unrealistic or unreasonably impact on a site's delivery."

5.37 TAN 20 reinforces the link between new development proposals and the potential impact on the Welsh language by reinforcing the opportunity for LPA's to use conditions or section 106 agreements to mitigate impact or enhance benefits.

5.38 This is reinforced in Policy INF1:

INF1: Planning Obligations

Where necessary, planning obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable. Contributions will be required to deliver or fund improvements to infrastructure, community facilities and other services and facilities to address requirements or impacts arising from new developments.

5.39 Policy WL1 carries an expectation that all new developments need to safeguard, promote and enhance the Welsh language which includes allocated sites. Section 7 describes measures to protect, promote, and enhance the Welsh language that the developer may wish to consider in preparing proposals.

5.40 The Plan's growth and spatial strategy seeks to balance the Council's strategic and regeneration objectives with the delivery of the Community's needs. In terms of the interests of the Welsh language, this includes striking an appropriate balance between creating new opportunities to retain and attract new Welsh speakers and avoiding a scale of new development that might result in a dilution or loss of the number of communities where Welsh is used daily as a preferred medium of communication or undermining or

harming the possibility of creating new communities where Welsh is used daily as a medium of communication.

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

5.42 The Plan identifies four components of housing supply – commitments, allocated sites, large windfall sites, and small windfall sites.

5.43 The high-level Welsh language impact Assessment of the Plan has already assessed the likely impact of the commitments and allocations on the Plan area as a whole and the likely impact of the distribution of such sites within the proposed settlement framework. However, the Assessment has not conducted an assessment of likely impacts on individual host communities.

Commitments

5.44 Commitments are those sites which include dwellings that have been started since the Plan start date of 1st April 2018 or extant units that form part of sites that have been started and have valid planning consent.

5.45 Because such sites have already received planning consent, the Plan has factored in their likely impact on resilience of the Welsh language in the Plan area and thus there is no further requirement to screen for impact unless required as part of the decision conditions.

Allocated Sites

5.46 Housing allocations are defined in the Plan as sites which can accommodate 5 or more dwellings. Policy HOM 1 and the Proposals Map and Insets identify these sites. HOM1 lists parcels of land for 5 or more dwellings allocated for housing in the draft second deposit rLDP, together with an estimated delivery timescale categorised into three periods (1-5, 6-10,11-14).

5.47 Proposed allocations have been distributed with regard to ensuring the goal of sustainable communities including the interests of the Welsh language and have thus taken existing commitments into consideration in the

calculation of meeting the housing requirement, both in terms of each Cluster and each Tier within individual clusters.

5.48 The Site Trajectory Schedule also defines the LPA's assumptions as to what scale and when allocations are to be brought forward and developed. The trajectory will be reviewed and re-modelled as the information for the Annual Monitoring Report is collected and analysed against the assumptions made in the draft Plan about the wider social, economic, cultural and environmental context and conditions.

5.49 The exception to not having a requirement to conduct a Welsh language impact assessment as required by Policy WL1 is in the case where developers wish to develop a site at a faster rate than that envisaged in the draft second deposit rLDP.

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.

5.50 If developers propose to submit applications which identify a need to deliver dwellings at an accelerated and faster rate than the Plan's housing trajectory Proposals, they are advised to contact the LPA as early as possible for a screening opinion.

5.51 Should applications be brought forward that significantly divert from the trajectory and are initially viewed by the LPA as of concern in terms of the linguistic sensitivity of the whole or part of the LDP area then the LPA may require the applicant to produce evidence that the pace of development is likely to contribute positively to the overall aim of the Plan which is to safeguard, promote and enhance the interests of the Welsh language.

5.52 Should proposals for these sites be made that have a realistic possibility of being delivered on time or later than the stated delivery timescale, then such proposals will not require a Language Action Plan but would be expected to include as part of their Planning Statement a consideration how they have taken the interests of the Welsh language into consideration.

5.53 Developers of proposals on allocated sites of 10 or more dwellings would be expected to prepare a draft Language Action Plan as part of the Pre-application Consultation process.

5.54 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;

5.55 A number of policies (e.g. HOM3, VE3 and VE4) refer to the LPA's concern that the accumulation of individual proposals may cause intensification or overconcentration of developments either in certain locations or over a short period of time. The LPA is required, as part of the LDP preparation to prepare a housing trajectory. A housing trajectory is "a summary of site-specific phasing information for all sites within the plan, including windfall development. A housing trajectory is the key mechanism to demonstrate how all sites will be delivered in the identified timescales, throughout the whole plan period, to meet the dwelling requirement."[5]

5.56 The dwelling requirement includes an allowance over and above the new homes requirement. The new homes requirement identified under the preferred growth option is a total of 8,822 homes or an average of 588 homes per year over the period 2018 – 33. The dwelling requirement includes an allowance of 10% over the homes requirement or 882 dwellings.

5.57 An accumulation of individual proposals significantly over and above what has been identified as the dwelling requirement for each settlement may cause concern about the likely effect on the Welsh language. The accumulation of such development proposals may, therefore, trigger a requirement from the local planning authority for a statement from the

[5] Welsh Government (2020) Development Plans Manual, section 6.64

applicant explaining how the proposal has taken the needs of the Welsh language into consideration.

5.58 Should proposals for allocated sites of 5 or more dwellings be made for their development in advance of the estimated delivery timescale then a Language Action Plan will be required.

5.59 For proposals involving 10 units or more a draft Action Plan would be expected to be prepared as part of the Pre-application Consultation process.

Scenario 1

The Llanun Tier 2 settlement (Service Centre) has a designated site with a potential for 20 dwellings. The HOM1 Policy sets out the sites to be provided towards the end of the Scheme period, over Years 6-10 and 11-15. The developer is seeking planning permission to deliver all twenty dwellings in Years 6 and 7 citing pressure on demand.

The developer initially produces a Welsh Language Community Profile (WLCP - see section 5.28 above) following the Council's suggested template. Having produced the WLCP the developer contacts the Local Planning Authority early for an opinion on whether a Welsh Language Action Plan (WLAP) is needed to eventually accompany the application.

The LPA notes that there is a realistic possibility of a material adverse impact on the community and determines that a WLAP is necessary.

The developer prepares a WLAP to form part of the case which it proposes to present to the community and other key stakeholders as part of its pre-application consultation process.

Windfall sites

Proposals on unanticipated 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.

Windfall Sites

5.60 Windfall sites are generally described as "sites that are not allocated or committed in a plan"[6]. Each LPA is required in preparing a plan to make an assumption about the level of windfall sites that the plan makes in delivering the dwelling requirement, based in the main on extrapolating past trends.

5.61 For the rLDP such sites will include:

- Small windfall sites - sites for less than 5 units or infill sites
- Large windfall sites – sites of 6 units or more

5.62 The rLDP's Settlement boundaries have been drawn in a manner to match an extrapolation rate coming forward in line with the Plan's strategy and include sites that *could possibly be identified from the candidate site selection process or from Urban Capacity Studies*.

<u>The contribution of Small Windfall Sites</u>

5.63 The Plan's dwelling requirement contains an assumption, based on extrapolating past trends, that up to 1575 dwellings have a realistic possibility of being delivered on small windfall sites over the Plan period. These have been identified by Tier and Cluster.

5.64 Of these an assumption has been made that the allowance of an uplift of 10% to Tier 4 settlements will be taken up during the remainder of the Plan period resulting in 212 dwellings.

5.65 Deducting 534 for completions on small windfall sites over the period (April 2018 – March 2023) and 212 for Tier 4 from the anticipated 1575 dwellings leaves an expected contribution from anticipated small windfall sites of 829 dwellings for the remainder of the Plan period.

5.66 Any new housing development proposals on small windfall sites of two or more dwellings within settlement limits will be expected to prepare a Welsh language action plan explaining how their proposal will contribute to safeguarding, promoting or enhancing Welsh language interests. Further guidance on what is regarded as a proportionate level of actions is

[6] See for example Op.cit. Table 18, page 119

described in Appendix 3.

5.67 All development proposals in Tier 4 settlements will be required to prepare a Welsh language action plan explaining how their proposal will contribute to safeguarding, promoting or enhancing Welsh language interests. Further guidance on what is regarded as a proportionate level of actions is described in Appendix 3.

Scenario 2

The Tier 3 Sustainable Village settlement of Pontdau includes a plot of redundant land previously used as a car park. The developer seeks planning permission to build four dwellings.

The developer initially produces a Welsh Language Community Profile (WLCP - see section 5.28 above) following the Council's suggested template. Having produced the WLCP the developer contacts the LPA at an early stage for an opinion on whether a Welsh Language Action Plan is required to accompany the eventual application.

The LPA, having reviewed the number and take up of allocated sites within the settlement and its impact on the vitality of the language in the community concludes that the development is unlikely to have a significant adverse impact on the community.

The LPA invites the developer to consider what measures could be undertaken to safeguard, promote and enhance the interests of the language.

The contribution of Large Windfall Sites

Note: The following section will be subject to future iterations and updating to reflect emerging evidence and in response to the issues raised through the representations received to, and the examination of the Revised LDP.

5.68 The Plan's dwelling requirement contains an assumption/anticipation that up to 875[7] dwellings are likely to be realised on anticipated large windfall sites. This is based on an analysis of the potential sites allocated in LDP1

[7] This is calculated as 866 from Appendix 3 Table

being delivered during the rLDP period as at October 2022.

5.69 Over 86% of anticipated existing LDP 1 windfall sites are in Clusters 1 – 3.

5.70 Over the Plan period (2018 – 33), therefore, the Plan's settlement boundaries contain an anticipated number of windfall sites (both large and small) that are assessed as being capable/likely to be brought forward within the Plan period. This is equivalent to a total of 875 dwellings or, on average 80 dwellings per year.

5.71 Sites capable of accommodating 5 or more dwellings feature as allocated housing sites within the Plan and identified under Policy HOM 1. Therefore, any new greenfield, brownfield or conversion proposals for sites of 5 or more dwellings not identified in the Proposals Map (or as anticipated large windfall sites in Appendix 3 of the Housing Growth and Spatial Distribution Topic Paper) will be regarded as unanticipated windfall sites. Therefore, in accordance with Policy WL1 proposals for 5 – 9 dwellings, proposals will be subject to a requirement to screen for likely effects on the Welsh language, and to produce a Welsh Language Action Plan whether located within the development limits of a defined settlement in Tiers 1,2, or 3 or not.

5.72 Proposals for large sites not identified as anticipated windfall sites in rLDP Appendix 3 will also be required to undertake a Welsh Language Impact Assessment.

5.73 For proposals involving 10 dwellings or more, a draft Welsh language Impact Assessment and Action Plan would be expected to be prepared as part of the Pre-application Consultation process.

5.74 Appendix 7 of the Plan shows the rLPA's anticipated profile of the dwelling requirement over the Plan period. Table 5.1 below summarises the number of dwellings per Tier and per Cluster that are identified in the Appendix.

Table 5.1 Summary of Appendix 7 of the Deposit Plan Showing Allocations, Anticipated Contributions and Allowances by Tier and Cluster

TABLE 5.1 TO BE INSERTED

Scenario 3

The Tier 2 Principal Centre settlement of Caertri includes a plot of redundant land that was previously used as a bus depot which unexpectedly closed in 2025. The developer seeks planning permission to build fifteen dwellings.

The development is an unanticipated large windfall site and thus in accordance with Policy WL1 the developer will be required to include a Welsh Language Community Profile (WLCP) a Welsh Language Impact Assessment (WLIA) and a Welsh Language Action Plan (WLAP).

The developer prepares the WLCP, WLIA and proposed WLAP to form part of the case presented to the community and other key stakeholders as part of its pre-application consultation process.

The supply of new employment sites and identifying impact on the Welsh language

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

5.76 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:

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.*

5.77 Planning Policy Wales expects LPA's in their local development plans to provide land for employment at an appropriate scale and locations. *"Planning authorities should give their support to provide sufficient land to meet the needs of the employment market at a strategic and local level. Development plans should identify the requirement for employment land, allocate an appropriate mix of sites to meet demand and formulate a framework for the protection of employment sites of strategic and local importance*."

Commercial and Industrial Development

5.78 The draft second deposit rLDP makes provision for 71.21 hectares of employment land which is based on a scale of growth that meets

anticipated demand but also includes an element of flexibility to meet unanticipated demand. Employment land is defined in terms of industrial and office land (Use Class B) and thus does not include land for retail, financial, and commercial uses and land for other unique uses such as hotels, scrap yards, energy filling stations and motor sales.

5.79 The draft second deposit rLDP includes the following Strategic Sites

- Pentre Awel, Llanelli (PrC2/SS1)
- Yr Egin, Caerfyrddin (PrC1/SS1

5.80 The remainder of industrial and office land has been distributed to align with the hybrid option and includes 28.5 hectares (of which 9.9 hectares is committed) in the Ammanford/Cross Hands Growth area and 6.5 hectares (of which c.3.5 hectares is committed) in the Service Centres. There are no allocations in the Sustainable and Rural Villages (Tiers 3 and 4).

Industrial Land

5.81 Policy EME3 identifies a list of 40 allocated sites where proposals for B1, B2 and B8 uses will be allowed.

5.82 Policy WL1 requires proposals with a total floorspace of 1,000 sq. m, or more or a site measuring more than one hectare to prepare a Welsh language action plan. Table 5.2 lists allocated sites by location where proposals with a site measuring more than 1 hectare could possibly come within this requirement.

Table 5.2: Sites measuring more than 1 hectare by location

Location	Site Name	Site Reference	Ha.
Carmarthen	Cillefwr Industrial Estate	PrC1/E1	4.167
	Land west of Cillefwr Road West	PrC1/E1(i)	2.0
	Land north of Alltycnap Road	PrC1/E1(ii)	1.215
	West Carmarthen	PrC1/MU(i)	4.53
	Pibwrlwyd	PrC1/MU(ii)	8.95
	Yr Egin	PrC1/SS1	1.04
Llanelli	Dafen	PrC2/E2	17.223
	Land east of Calsonic	PrC2/E2(i)	4.457

	Land west of Gestamp Tallent	PrC2/E2(ii)	1.547
	Land at Heol Aur	PrC2/E2(iii)	1.657
	Land west of Heol Gors	PrC2/E2(iv)	1.449
	Land west of the Beacon	PrC2/E2(vi)	1.881
	Land east of Air Ambulance base	PrC2/E2(vii)	1.316
	Land at Llanelli Gate, off Heol Aur	PrC2/E2(viii)	3.755
Cross Hands	Cross Hands East	PrC3/E1	8.7
	Cross Hands West Food Park	PrC3/E2	5.647
	Land west of Castell Howell	PrC3/E2(i)	1
	Land south of Heol Parc Mawr	PrC3/E2(ii)	2.712
	Land north of Dunbia	PrC3/E2(iii)	1.935
	Cross Hands Business Park	PrC3/E3	4.76
	Heol Stanllyd (West)	PrC3/E3 (i)	2
	Heol Stanllyd (South)	PrC3/E3 (ii)	2.156
Capel Hendre	Parc Hendre	PrC3/E7	8.112
	Parc Hendre(West)	PrC3/E7(i)	2.651
	Parc Hendre(North)	PrC3/E7	1.955
	Parc Hendre (East)	PrC3/E7	1.05
	Parc Hendre(South)	PrC3/E7	2.942
	Dyfatty	SeC4/E1	3.036
Whitland	Land south of former Creamery	SeC19	1.321

5.83 Developers who have a proposal involving a floorspace of more than 1,000 sq. m., a site measuring more than 1 hectare for part or the whole of these sites or a significant workforce flow of more than 50 employees are advised to request a screening opinion from the LPA whether they will be required to submit a Language Action Plan.

5.84 Screening involves taking an initial look at the potential impacts of the proposal on the local community and any specific groups of Welsh language users within it. It should highlight any potential Welsh language risks or benefits and any groups that may be affected. The outcome of the screening is a decision as to whether a Welsh language Action Plan to identify specific measures to protect, promote or enhance the language is

required or not. It should provide an explanation of how the decision was reached.

Scenario 4

The Tier 1 (Principal Centre) settlement of NantPedwar has an allocated employment site with potential of 5 hectares. The developer seeks planning permission to develop a 1,500 sq. metre for B2 (manufacturing) which is expected to generate 35 FTE jobs.

The developer initially produces a Welsh Language Community Profile (WLCP - see section 5.28 above) following the Council's suggested template. Having produced the WLCP the developer contacts the LPA at an early stage for a view on whether a Welsh Language Action Plan (WLAP) is required to accompany the eventual application.

The LPA undertakes a Screening Exercise and identifies that there is a realistic possibility that there will not be a significant adverse impact on the community and decides that a WLAP is not required.

The LPA invites the developer to consider what measures could be undertaken to safeguard, promote and enhance the interests of the language.

Windfall Industrial Sites

5.85 Policy EME4 covers Employment Proposals on non-allocated sites) and is composed of two elements:

- Element 1 – non-allocated sites within development limits of a defined settlement
- Element 2 – non-allocated sites outside the development limits of a defined settlement

5.86 The Employment Land Report 2022, in reviewing the LPA's experience of implementing Local Development Plan 1 and developments on windfall sites concluded:
"The cases where permission was granted (on windfall sites) are generally quite small in size, but together they are equivalent to several hectares. Together since the adoption of the current LDP, these 'windfall sites' amount to 20.36ha of land (4.71ha during the 2020-22 Employment Land Review period)."

5.87 Therefore, based on past performance and the planned availability of employment sites over the plan period, the LPA does not anticipate receiving applications for large scale windfall employment site development.

5.88 However, should such proposals be received then they would be subject to the following provision of Policy WL1:
Proposals on unanticipated windfall sites for ..... 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.

Scenario 5

The Tier 2 Service Centre settlement of PumpMynach includes, within its development boundary a plot of redundant land previously used as a repair garage. The developer seeks planning permission construct an office block (B1) with a net internal floorspace of 1,020 sq. metres which is expected to create 85 FTE jobs.

The developer initially produces a Welsh Language Community Profile (WLCP - see section 5.28 above) following the Council's suggested template. Having produced the WLCP, the developer contacts the LPA at an early stage for an opinion on whether a Welsh Language Impact Assessment (WLIA) and Welsh Language Action Plan (WLAP) is required to accompany the eventual application.

The LPA undertakes a Screening Exercise and identifies that there is a realistic possibility that there will be a significant impact on the host community and decides that a WLIA and proposed WLAP is required and that this should be undertaken to feed into the pre-application consultation process.

5.89 Details of how to conduct a Welsh Language Impact Assessment are contained in Section 6 and Appendix 3.

The supply of new rental, commercial and other major employment generating proposals

5.90 This aspect of the policy covers the following use classes:

- Class A1 – shops
- Class A2 – financial and professional services
- Class A3 – food and drink

- Class C1 – hotels
- Class C2 – residential institutions
- Class D1 – non-residential institutions
- Class D2 – assembly and leisure
- Sui generis

New retail, commercial, leisure, and cultural developments

5.91 The Carmarthenshire Retail Study Update (January 2023) describes Carmarthenshire as having "a well-established network of (retail) centres that currently serve their respective areas". Table 3.2 analyses main centres by the number of retail outlets (Classes 1- 3 and Sui Generis) and identifies a total of 1,227 in the nine main centres and a further 117 at other, out of town centres at Cydweli and Cross Hands. The table notes that the county has (at 20%) a higher-than-average vacancy rates with Llanelli town centre being particularly hard hit (at over 26%). Employment figures are not provided but the County's 2021 Census profile records that there were 12,435 employed in "Wholesale and retail trade", a further 3,710 in "accommodation and food services" and 1,362 employed in "Financial and insurance activities" during the week before the census.

5.92 The Study notes that recovery is likely to be slow and therefore does not anticipate much demand for additional space before 2027 and therefore the Plan does not anticipate much demand over and above allocations within the Plan.

5.93 Retail and town centre policy is covered by Policy SP2 and is divided into two categories:

- Retail and town centres;
- Retail and shopping outside town centres.

5.94 Retail and town centre policy in general seeks to restore, maintain and enhance the vitality, vibrancy and attractiveness of the existing retail hierarchy (see Policy SP2 for description). In line with the general requirements of SP1 retail, commercial and leisure development proposals will be expected to safeguard, promote and enhance the interests of the Welsh language. Following the high-level Welsh language impact assessment of the Plan there is an expectation that most developments within town centres, subject to sub-paragraphs a to c, will support the interests of the Welsh language although the LPA encourages developers of

new uses, through Policy SP8, to plan how they will safeguard, promote and enhance the interests of the Welsh language. Where such new developments include an element of advertising or place naming, then such proposals will also be subject the provision of Policy PSD9 relating to the use of the Welsh language on content and on naming streets and centres.

Scenario 6

The Proposals Map for the Tier 1 (Principal Centre) settlement of SantChwech identifies a boundary for its Town Centre. The developer seeks planning permission to re-develop a 600 sq. metre infill site for A1 retail use which is expected to generate 32 FTE jobs.

The developer initially produces a Welsh Language Community Profile (WLCP - see section 5.28 above) following the Council's suggested template. Having produced the WLCP, the developer contacts the LPA at an early stage for an opinion on whether a Welsh Language Action Plan (WLAPP is required to accompany the eventual application.

The LPA undertakes a Screening Exercise and identifies that there is a realistic possibility that there will not be a significant adverse impact on the community and decides that a WLAP is not required.

The LPA invites the developer to consider what measures could be undertaken to safeguard, promote and enhance the interests of the language, including the use of bilingual or Welsh only name for the shop.

Scenario 7

The Proposals Map for the Tier 2 (Service Centre) settlement of Llansaith identifies a boundary for its Town Centre. The developer seeks planning permission to develop a 1500 sq. metre mid-market fitness centre (D3) which is expected to generate 15 FTE jobs.

The developer initially produces a Welsh Language Community Profile (WLCP - see section 5.28 above) following the Council's suggested template. Having produced the WLCP, the developer contacts the LPA at an early stage for an opinion on whether a Welsh Language Impact Assessment (WLIA) and Welsh Language Action Plan (WLAP) are required to accompany the eventual application.

The LPA undertakes a Screening Exercise and identifies that there is a realistic possibility that there will not be a significant adverse impact on the community and decides that a WLIA and WLAP are not required.

The LPA invites the developer to consider what measures could be undertaken to safeguard, promote and enhance the interests of the language, including the

5.95 Outside the defined town centre boundaries (convenience stores subject to sub-paragraph d) of Policy SP2 and other forms of retail, commercial, leisure and cultural facilities) where such stores/provision are for 1,000 sq. m. of floorspace or more or a site of more than 1 ha., then a WLIA will be required and prepared as part of the Pre-application Consultation process.

The visitor economy

5.96 The plan notes that "tourism is a key component of Carmarthenshire's economy". Over 5.1 million tourist days were spent in the county, generating £412 million of revenue in 2021, and having 1300+ establishments. FTE employment in 2013 was estimated at over 5,000 jobs (on the basis of £250 million revenue) and so could be expected to have grown to over 8,000 before the Covid-19 pandemic in 2020.

5.97 In terms of Welsh language impact, the source of impact is comprised of two main elements:

- Visitor Attractions and Facilities (Policy VE1)
- Accommodation (Policies VE 2, VE3, and VE 4).

Visitor Attractions and Facilities (Policy VE1)

5.98 Whilst recognising the economic benefits of tourism the Plan's clear message is that "there should be no social, economic and environmental harm arising from the proposal". The Plan's Policies does not have site specific allocations for visitor attractions and facilities (other than relevant sites described as Strategic Reserve sites – see below). There is an expectation that visitor new attractions and facilities should be "directly located within or directly related to a settlement defined in Policy 3" and that a sequential test be adopted to identify an appropriate site (e.g. previously used rather than greenfield sites). All proposals are thus regarded as windfall sites. Thus, major development sites with the provision of a building(s) where the floorspace created exceeds 1000 sq. metres or a development carried out on a site of 1 hectare or more will be required (as part of the statutory pre application community consultation) to undertake a Welsh language impact assessment.

Accommodation (Policies VE 2, VE3, and VE 4)

5.99 The Plan adopts a similar approach to visitor accommodation with all proposals required to reflect and respect the role and function and sense of

place of the (host) area. In relation to Policies Ve3 and Ve4, the Plan notes the Council's concern about the possible social, economic and environmental impact of over intensification of such developments in certain parts of the county. The developer will be asked to include a Welsh language action plan for proposals in such areas and a Welsh language impact assessment on major development sites with the provision of a building(s) where the floorspace created exceeds 1000 sq. metres or a development carried out on sites of 1 hectare or more (as part of the statutory pre application community consultation).

Scenario 8

A developer seeks planning permission to develop a 5 ha. visitor complex which includes a mixture of 100 self-catering units, an 80-bed budget hotel and an all-weather 200 sq. m. leisure dome. The complex is expected to generate up to 115 FTE jobs. The Proposals Map for the closest Tier 3 (Village) settlement of Pentrewyth shows that the site is outside the development a boundary.

The development is classified as a large unanticipated windfall site and thus in accordance with Policy WL1 the developer will be required to include a Welsh Language Community Profile ((WLCP) - see section 5.28 above), Welsh Language Impact Assessment (WLIA) and proposed Welsh Language Action Plan (WLAP) with the application.

The developer initially produces the WLCP, WLIA and WLAP following the Council's suggested templates and the findings are presented to the community and other stakeholders as part of the pre-application consultation process alongside the proposals and other impact studies.

Strategic reserve sites (Policy SG2)

5.100 The Plan includes provision for the release of four reserve sites (at Llangennech, Burry Port and Cross Hands) if the allocated sites (under policies HOM1, EME1 and SG1) fail to contribute as expected to the delivery of the Plan's strategy.

5.101 The high level WLIA of the Plan has taken into account the overall scale and location of development but not the likely impact of these strategic reserve sites on their host communities or on ways in which the interests of the Welsh language can be safeguarded, promoted and enhanced as per Policy

SP8. As these strategic reserve sites have unanticipated windfall site status their release and eventual development will be subject to undertaking a Welsh Language Impact Assessment. The development of the Regeneration and Mixed-Use Site Briefs will further consider how the interests of the Welsh language can be safeguarded, promoted and enhanced.

Pembrey Peninsula (SG 2)

5.102 The Plan includes provision for supporting unlocking the potential of the Peninsula as a destination to stay, play and work although no specific visitor accommodation, leisure or employment allocations are made. The policy stipulates that any such proposals should be sensitive to its ecological status and current use.

5.103 The high level WLIA of the Plan has taken into account the overall scale and location of development but not the likely impact of specific proposals for Pembrey on its neighbouring communities or on ways in which the interests of the Welsh language can be safeguarded, promoted and enhanced as per Policy SP8. Any major development on Pembrey will have the status of and unanticipated windfall site its development will be subject to undertaking a Welsh Language Impact Assessment The development of the proposed Pembrey SPG will further consider how the interests of the Welsh language can be safeguarded, promoted and enhanced.

6. Assessing the likely impact of relevant proposals

Preparing a Welsh Language Community Profile

6.1 A Welsh Language Community Profile (WLCP) sets out the Welsh language characteristics of the proposed development's host community. Developers should refer to the LPA's Welsh Language Community Profile data (Appendix 1) in preparing their WLCP.

How to gather evidence and conduct a Welsh Language and Culture Impact Assessment

6.2 Welsh language and culture impact assessment (WLIA) is a process intended to identify and assess the likely significant linguistic and cultural impacts of a proposed development, in order to inform decision-making. It should identify at an early stage the Welsh language and culture interests likely to be affected by such a development. It should ensure that the impacts of projects likely to have a significant effect on the Welsh language and culture are thoroughly investigated, understood and considered before deciding whether or not to grant consent. Details on the methodology of conducting a WLIA are set out in Appendix 3.

6.3 Impact assessments typically start with developing a conceptual model which seeks to identify the relationship between the source (in this instance the proposed development) the receptor (the host community) and the pathway of influence. This relationship is defined primarily as being due to the likelihood of the proposed development introducing significant levels of new people into a host community. The impact of different types and scale of development is likely to vary, therefore, according to both the nature of the development and the linguistic resilience (defined broadly as the proportion of Welsh speakers) of the area where the proposed development is to take place. The issues that will need to be addressed, and therefore the information that will be necessary to reach a reasoned decision will also vary.

6.4 The Town and Country Planning Order 2012 (Development Control Procedure) (Wales) (DMPWO) provides a Standard Application Form for planning applications in Wales and states the requirements of a 'valid' application. In order to register the applications as 'valid', applicants must

provide all information set out on the Standard Application Form, e.g., plans, diagrams and certificates and any additional supporting assessments. A local planning authority may refuse to accept an application if the appropriate information is not provided.

Principles

6.5 When the Welsh language is a relevant planning consideration, determining whether a development is likely to have a positive or negative impact, and determining the likely scale of that impact on the linguistic character of an area, is complex. Even with full information, it would not be easy to measure because the planning system cannot predict or control personal characteristics (such as the ability to speak Welsh in the future or the dynamics of its use). Furthermore, the planning system cannot discriminate on the basis of the language ability of applicants for planning consent nor the language ability of the individuals who will occupy or make use of property.

6.6 Assessing likely impact on the Welsh language shares principles, frameworks and processes similar to those seen in other areas where likely impacts need to be assessed and managed such as, environmental impact assessments and sustainability assessments.

6.7 The International Organization for Standardization (International Standards Organization ISO) has published International Standard 31000 on Risk Management.[8] Although worded in terms of risk (or negative likely impact) the same framework, principles and processes are also appropriate for thinking in terms of maximizing benefits. ISO 31000 provides generic principles and guidelines for use across all organizations and recognizes the following features of effective risk management/opportunity maximisation:

1. describing and establishing the context.
2. identifying, analysing, assessing, and facing risk or opportunities; and
3. undertake activities to communicate and consult with stakeholders throughout the process.

6.8 The ISO 31000 also encourages assessors to adopt the following process:

[8] ISO14001 (2018) *Risk Management Principles and Guidelines*

Step 1 - Prepare for the Impact Assessment including accurately defining the problem or issue at hand and designing the assessment.

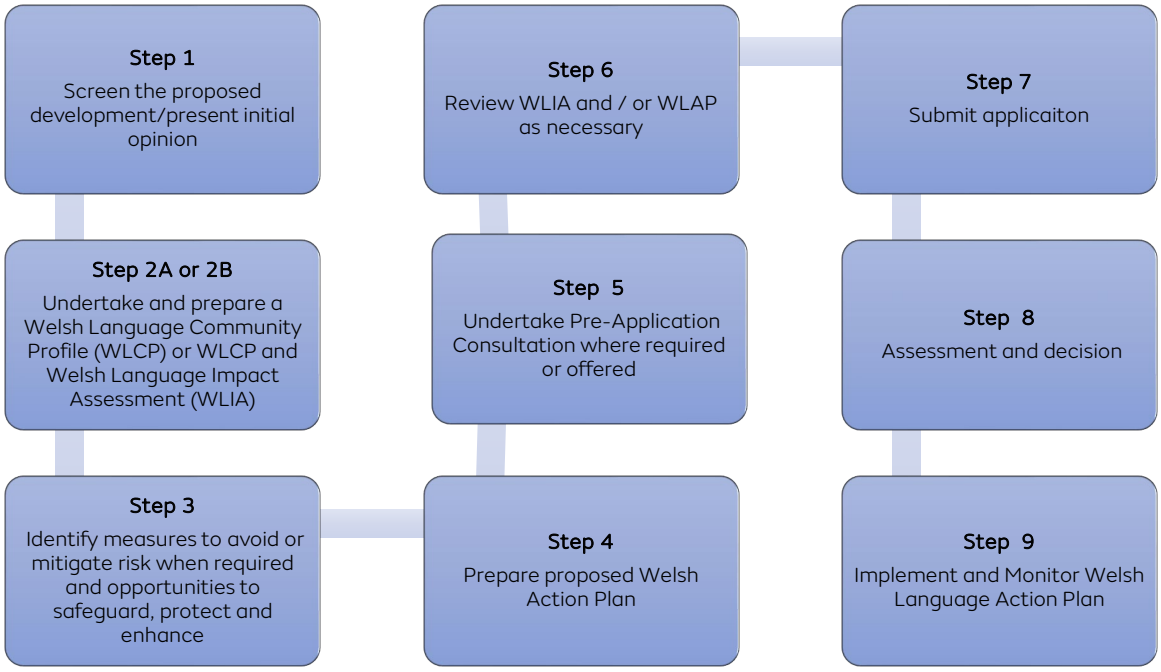
Step 2 – Undertake the Impact Assessment.

Step 3 - Identify and choose the viable options and select a 'Preferred Strategy' to maximize the benefits or face and/or address risk.

Step 4 - Prepare and propose an Action Plan within the selected Preferred Strategy.

6.9 Figure 6.1 gives an illustration of the process of putting together a proposed development before conducting either pre-application consultation or submitting an application and then the ensuing process assessment and decision making by the Planning Authority. It focuses on incorporating considerations about the viability of the Welsh language in relevant developments.

Figure 6.1: The process of assembling, assessing and making decisions about a proposed development



Step 1: Screen the development and make an initial opinion

6.10 Figure 6.1 explains the process of screening the proposed development and forming an initial opinion. In line with the principle of communicating and consulting with stakeholders throughout the process, it emphasizes the need to engage and consult with the planning service and other stakeholders during the lead up to the submission of a planning application.

6.11 Screening will allow an initial opinion that:

1. allows an opportunity for likely significant effects on the use of the Welsh language to be identified;

2. ensures that all potentially significant Welsh language interests and effects
on the language are considered at the outset and particularly at the scoping stage;

3. encourages potential applicants to apply for a scoping opinion from the local
planning authority and engage as early as possible with stakeholders promoting the use of the Welsh language and other stakeholders likely to be affected by, or have an interest in, the proposed development, to establish what and how Welsh language interests are likely to be significantly affected;

4. agrees through the scoping process, or otherwise, the effects to be assessed,
the information required, including the way in which baseline information will
be gathered, the assessment methodology, the timing and coverage of surveys
and the criteria for predicting and evaluating the significance of the effects;

5. agrees the scope for avoiding, mitigating or compensating for adverse effects on the use of the Welsh language, and ensure these are clearly stated in the Welsh language statement.

6. ensures the WLIA process is used to full advantage to identify opportunities to safeguard, protect and enhance Welsh language interests.

6.12 Figure 6.3 also clarifies when a Welsh Language Action Plan (WLAP) or Welsh Language Impact Assessment (WLIA) may or may not take place.

Figure 6.2: Step 1) The pre-application period – procedures for screening the proposed development and forming initial opinion

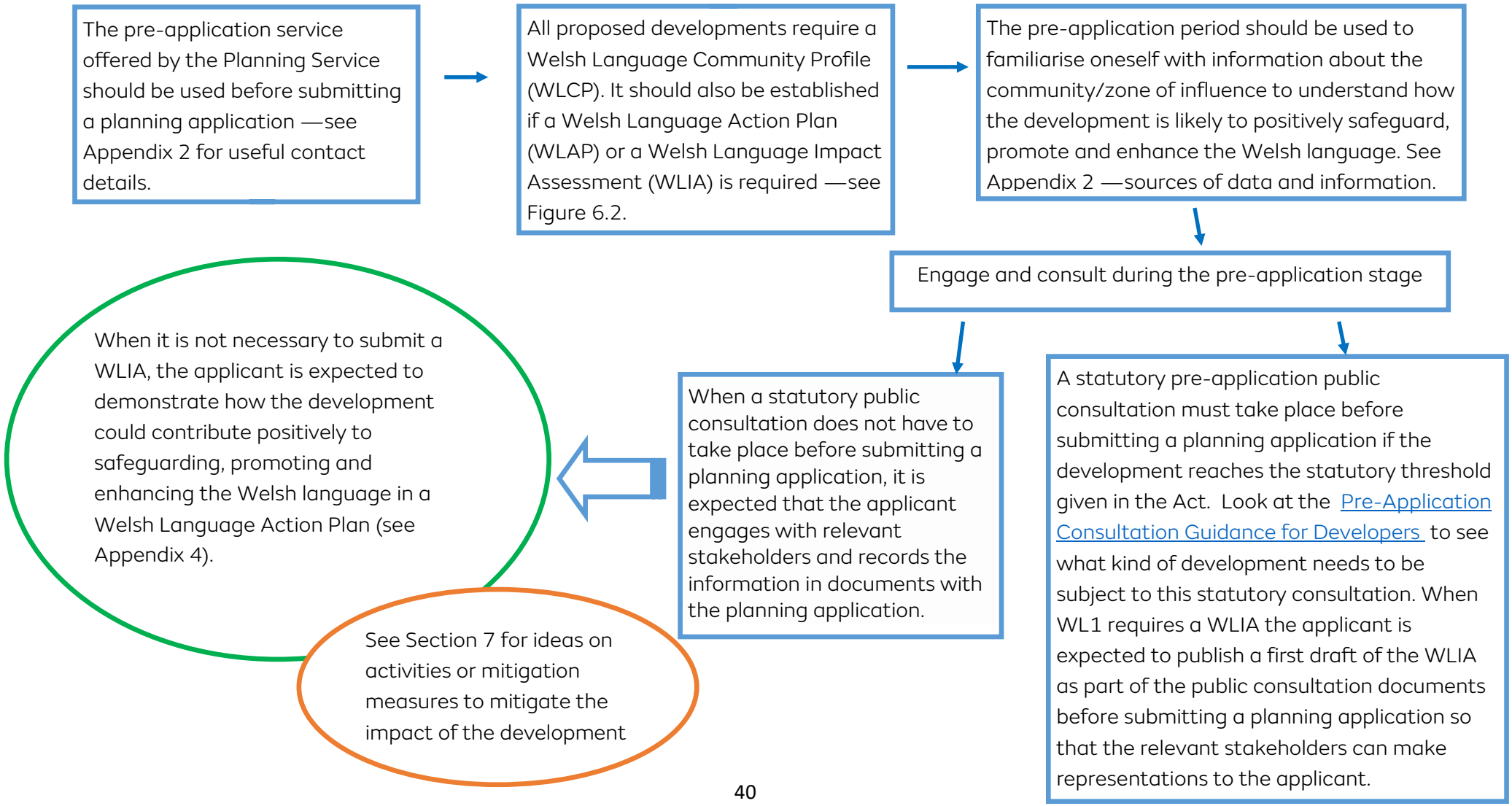
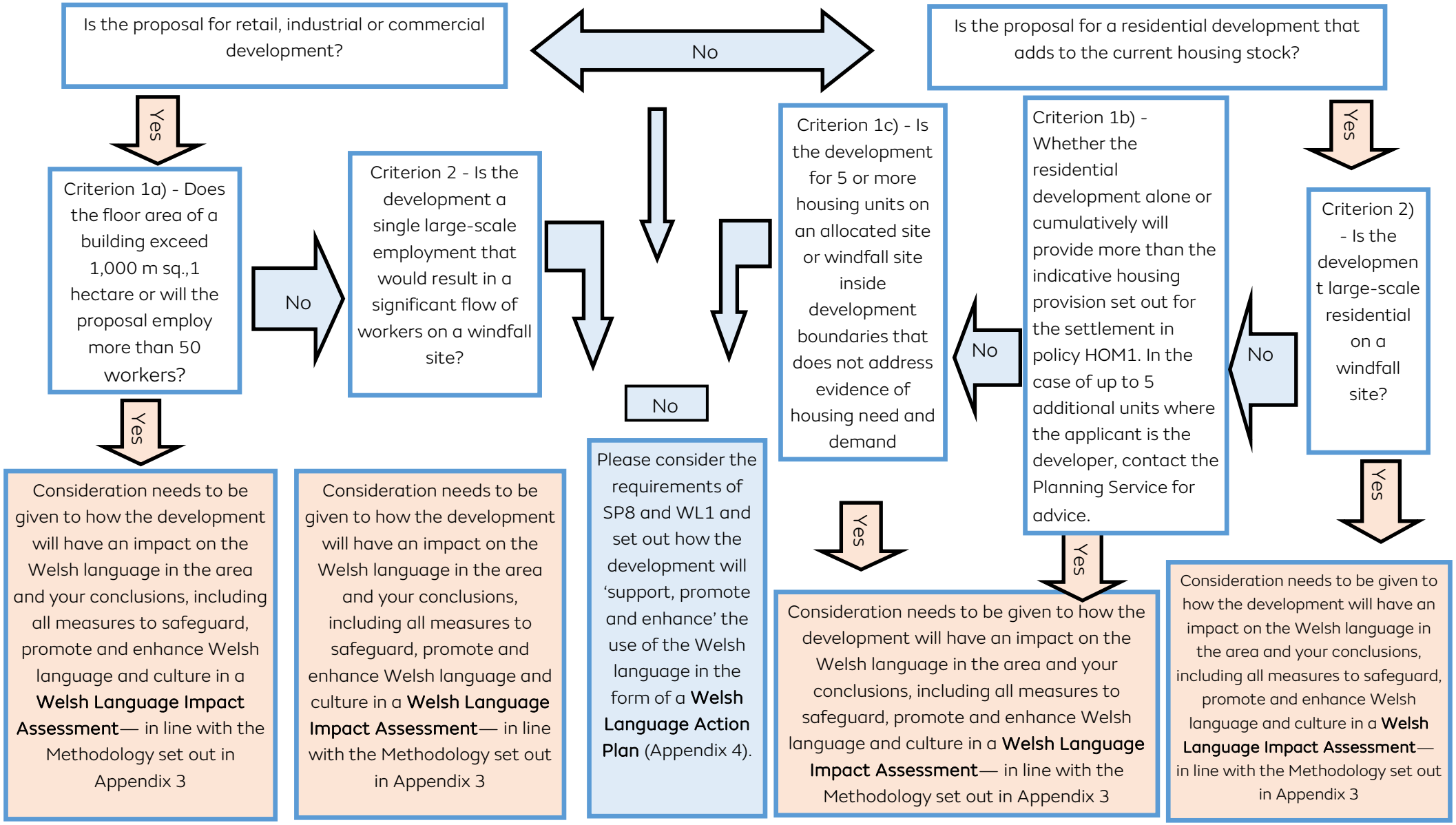


Figure 6.3: Steps in screening the proposed development for Welsh Language Impact Assessment requirement



7. Mitigation steps and measures to protect, promote and enhance the use of Welsh

7.1 The following list outlines examples of possible mitigation measures that could be included in development proposals to safeguard and promote the Welsh language where there would be an adverse effect on the Welsh language. The list is not exhaustive and some are governed by Planning Obligations, whereas others may be more appropriate as conditions or unilateral undertakings.

7.2 The list should also be read alongside the SPG on Planning Obligations. Any mitigation sought will be required to have a direct relationship with the planning permission and its requirements must be reasonably related in scale and kind to the proposal and should not make development unviable.

7.3 It should be noted that the following mitigation measures can be applied to development on sites allocated in the rLDP as well as windfall sites.

Housing

- Phasing the number of houses to be built. The proposed phasing of a development should reflect the requirements set out within this SPG and, where required, the application should be accompanied by an agreed phasing schedule.
- Provision of affordable housing for local needs in accordance with the provisions of the LDP and SPG on affordable housing.
- Agreements to provide for people on the local housing register.
- Bilingual marketing of the development.

Employment (all types including retail)

- Commitment to prioritising local companies in the procurement of labour contracts and use of local supply chains.
- Provision of bilingual signs within and outside the establishment.
- Commitment to developing the Welsh language skills of the workforce by supporting access to free Welsh language training, paying for some staff language training, adopting best practice in providing opportunities for staff to use Welsh in the workplace.
- Gain Welsh Language Commissioner support in creating a Welsh Language Development Plan that gives a charity or business a clear plan to follow, to maintain, and develop their Welsh language services over time. A Welsh Language Development Plan also demonstrates to public sector funding bodies that Welsh language requirements are being met.
- Sign up to the Welsh Language Commissioner's *Cynnig Cymraeg*

(Welsh Offer) scheme for charities and businesses and gain accreditation.

Education

- Support and funding for Welsh language learning and Welsh immersion education for latecomer children and young people (aged 7 – 18).
- Support and funding for Welsh language and cultural initiatives, including projects to facilitate and promote the use of Welsh in communities.
- Support for the provision of school places in a local Welsh medium school.
- Support and funding for language and cultural awareness training and initiatives for non-Welsh speakers.

7.4 Applicants are expected to liaise with competent officers within the Authority (e.g. planning officers, Welsh language officers, housing officers and education officers) and with the Mentrau Iaith as soon as possible during the process of preparing a planning application to discuss mitigation and enhancement measures. Regard should be given to the Carmarthenshire Welsh Language Promotion Strategy. Regard should also be given to rLDP policy GP5 which notes that proposals for advertisements should safeguard, and where possible positively enhance, the Welsh language in the County. Planning officers shall encourage all applicants to fulfil the policy's aim of providing bilingual signage throughout the County.

7.5 Planning consent must include the agreed Welsh language impact mitigation or enhancement measures either through planning conditions or by Section 106 obligations. It is important to note that commuted sums cannot be ensured through a planning condition and would need to be ensured through a Section 106 agreement. The Authority may raise a Community Infrastructure Levy on new developments in order to pay for the infrastructure that is necessary for growth such as providing new health or education services. The Carmarthenshire Welsh Language Promotion Strategy, Welsh in Education Strategic Plan and the Carmarthenshire Well-being Plan will be relevant in order to inform Community Infrastructure Levy requirements.

8. Monitoring

8.1 The LPA is required to monitor the success of the Plan's strategy and policies. The LPA will produce the findings of the monitoring in an Annual Monitoring Report (AMR) which will be the LPA's main mechanism for reviewing the relevance and success of the LDP and identifying any necessary changes.

8.2 The new Monitoring Framework is currently being developed ready to be put in place once the draft second deposit rLDP is adopted.

8.3 The current LDP's Annual Monitoring Framework has an indicator (Indicator 44) which measures:
"the number of planning permissions granted for residential developments of five or more dwellings in areas where 60% or more of the population speak Welsh."

8.4 This reflects the tenor of policy SP18 The Welsh Language in the current LDP:
"The interests of the Welsh language will be safeguarded and promoted. Proposals for residential developments of 5 or more dwellings in Sustainable Communities and 10 or more in Growth Areas, Service Centres, and Local Service Centres, located on sites within communities where 60% or more of the population are able to speak Welsh, will be subject to a requirement for phasing."

8.5 The new rLDP Monitoring Framework is likely to include an enhanced set of indicators that reflect the scope of SP8 and WL1. Such indicators could include:

- Identification of the proportion of major approvals that include measures to safeguard, promote and enhance the interests of the Welsh language.
- The number of residential approvals of 5 or more that provided a Welsh Language Strategy and Action Plan,
- The number of residential approvals which do not accord with the Plan's housing trajectory providing a phasing plan having to demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.
- The number of retail, commercial or industrial approvals with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare. of 1,000 sq. M. that provided a Welsh Language Strategy and Action Plan as part of the development application process.
- The number of retail, commercial or industrial approvals that have a Welsh Language Commissioner approved Welsh Language

Development Plan.

- The proportion of advertisements (that are subject to planning control) that provide bilingual signage.

8.6 In order to support the gathering of further information for analysis to understand trends amongst Welsh speakers in Carmarthenshire, developers of approved housing sites of five or more units or large-scale retail, commercial and industrial approved proposals may also be requested to gather data from the prospective first occupiers of their sites in order to ascertain where they lived before purchasing their new property. This should assist in ascertaining whether there is a correlation between new developments and a decrease in the proportion of Welsh language speakers in the community.

Appendix 1: Community Welsh Language Profile Data

Developers should contact the LPA for guidance on preparing a Welsh Language Community Profile.

Table A1.1: Proportion of Welsh speakers by Electoral Ward according to 2021 Census.

Ward	% Welsh Speakers (2021 Census)
Abergwili	55.1
Ammanford	47.3
Betws	50.1
Bigyn	20.6
Burry Port	29.9
Bynea	25.4
Carmarthen Town North and South	34.2
Carmarthen Town West	34.3
Cenarth and Llangeler	46.9
Cilycwm	42.6
Cwarter Bach	59.4
Cynwyl Elfed	48.3
Dafen and Felinfoel	24.6
Elli	32.0
Garnant	50.7
Glanamman	48.2
Glanymor	19.2
Glyn	54.1
Gorslas	58.4
Hendy	38.1
Hengoed	31.8
Kidwelly and St Ishmael	37.6
Laugharne Township	20.1
Llanboidy	47.4
Llanddarog	55.7
Llandeilo	45.1
Llandovery	37.3
Llandybie	51.4
Llanegwad	48.3
Llanfihangel Aberbythych	46.0
Llanfihangel-ar-Arth	53.4
Llangadog	47.2
Llangennech	36.4
Llangunnor	48.0
Llangyndeyrn	50.2
Llannon	57.0

Llanybydder	51.7
Lliedi	26.0
Llwynhendy	21.8
Manordeilo and Salem	44.9
Pembrey	28.8
Penygroes	56.3
Pontyberem	60.7
Saron	47.5
St. Clears and Llansteffan	44.5
Swiss Valley	29.8
Trelech	47.0
Trimsaran	44.9
Tycroes	41.3
Tyisha	18.9
Whitland	37.0

Additional Welsh language data is available in the Revised 2018-2033 Local Development Plan Topic Paper: The Welsh Language (February 2023) welsh-language-topic-paper-cover-eng-_merged.pdf (gov.wales).

It may be helpful for the developer to have regard to Table A1.2 to establish the degree of sensitivity. Table A1.2 presents the distribution of electoral wards against scales of Welsh language resilience. The table shows that there are no wards where Welsh is the socially dominant language (although there are likely to be communities within wards where Welsh is more socially dominant). Within Category 2 there are 14 wards where the Welsh language is likely to play a major, if not necessarily dominant, role both within social interaction and within the educational domain. Within Category 3 there are 35 wards with areas which may contain substantial numbers of Welsh speakers. However, the language is unlikely to be the predominant language of social interaction in the public sphere. Finally, within Category 4 there are two wards where there are low levels of Welsh speakers, and Welsh is likely to be rarely spoken in public.

Table A1.2: Distribution of Carmarthenshire Electoral wards against scales of language resilience

PWS threshold weightings	Description and rationale	Resilience score	Wards in Carmarthenshire
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	None

If 50≤PWS<70%, PWS=2	The Welsh language plays a major, if not necessarily dominant, role both within social interaction, and within the educational domain. These communities are more bilingual in nature. Use of Welsh is heard frequently on the street and Welsh is used extensively in the formal and social life of the area. However, it is not necessarily the dominant language.	High	Pontyberem Cwarter bach Gorslas Llannon Penygroes Llanddarog Abergwili Glyn Llanfihangel ar Arth Llanybydder Llandybie Garnant Llangyndeyrn Betws
If 20%≤PWS<50%, PWS=1	Such areas contain substantial numbers of Welsh speakers. However, the language is not the predominant language of social interaction in the public sphere and its use is restricted, often to the home and to private interaction among select groups.	Low	Cynwyl Elfed Glanaman Llanegwad Llangeinor Saron Llanboidy Rhydaman Llangadog Trelech Cenarth a Llangeler Llanfihangel Aberbythych Llandeilo Manordeilo a Salem Trimsaran San Clêr a Llansteffan Cilycwm Tŷ Croes Hendy Cydweli a St Ishmael Llanymddyfri Hen Dŷ Gwyn Llangennech Tref Caerfyrddin Gorllewin Tref Caerfyrddin Gogledd a De Elli Hengoed Llansawel Swiss Valley Pembre Lliedi Bynea Dafen a Felinfoel Llwynhendy Bigyn Talacharn

If <20% PWS PWS=PWS	Predominantly non-Welsh speaking area where Welsh is rarely heard 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	Glanymôr Tyisha

Appendix 2: Contacts and Links for Further Information

- For enquiries on all planning policy matters including the LDP please contact:

  Forward Planning, Planning Services, Council Offices, 8 Spilman Street, Carmarthen SA31 1JY.Tel: 01267 228818
  Email: Forward.Planning@carmarthenshire.gov.uk

- For Development Management and pre-application enquiries please contact:

  Development Management (Carmarthen Office), Planning Services, Council Offices, 8 Spilman Street, Carmarthen SA31 1JY.

  Development Management (Llanelli Office), Planning Services, Tŷ Elwyn, Llanelli SA15 3AP. **Development Management (Llandeilo Office)**, Planning Services, Civic Offices, Crescent Road, Llandeilo, Carmarthenshire.

  Tel: 01267 234567
  Email: Planning@carmarthenshire.gov.uk

- For enquiries on education matters please contact:

  The Department for Education and Children, Building 2, St. David's Park, Job's Well Road,Carmarthen, SA31 3HB

  Tel: 01267 246500
  Email: ECS@carmarthenshire.gov.uk

Links for Further Information

Carmarthenshire LDP Annual Monitoring Reports:
Annual Monitoring Report (AMR) (gov.wales)

Menter Gorllewin Sir Gâr: https://www.mentergorllewinsirgar.cymru/?lang=en

Menter Dinefwr: https://linktr.ee/menterdinefwr?fbclid=IwAR0n6ycCBFperDxBvB-ISoXsWgvVmlO7GvDMzFuelGdTDXu7BDpxrnjqOUg

Menter Cwm Gwendraeth Elli: https://www.facebook.com/MenterCwmGwendraethElli/

Comisiynydd y Gymraeg / Welsh Language Commissioner:

https://www.comisiynyddygymraeg.cymru/

Reference Links

Future Wales: the national plan 2040 (February 2021) Future Wales: the national plan 2040 | GOV.WALES

Planning Policy Wales, edition 11, Welsh Government (February 2021):Planning policy Wales | GOV.WALES

Technical Advice Note 20: Practice Guidance, Welsh Government (October 2017): Technical advice note (TAN) 20: planning and the Welsh language | GOV.WALES

Carmarthenshire Welsh Language Promotion Strategy 2023-2028: https://democracy.carmarthenshire.gov.wales/documents/s72542/Welsh%20Language%20Promotion%20Strategy.pdf

Carmarthenshire Welsh in Education Strategic Plan 2022-2032: Welsh in Education Strategic Plan (WESP) (gov.wales)

The Carmarthenshire Local Well-being Plan 2023 – 2028: psb-well-being-plan.pdf (thecarmarthenshirewewant.wales)

Appendix 3: Methodology for preparing a Welsh Language Impact Assessment

Purpose of the Assessment

1. The purpose of the Assessment is to establish the likely impact of the proposed development on communities in general, and on the Welsh language more specifically and, if appropriate, identify measures that will either mitigate negative effects, or protect/enhance/spread positive effects. It will help ensure the linguistic implications of a relevant proposed development are fully explored before planning decisions are made. The scale and period of effects (positive and negative) will depend on the nature and type of the development, and its relationship with the community. The Assessment is a structured process that enables the Welsh language to be taken into account when considering proposals for change. The results of the Welsh language Impact Assessment should be set out in a structured report.

2. The Methodology given in this Appendix is in three parts. This is the methodology that must be followed for undertaking the Assessment. It is a process where information about the likely effects of a proposed development is collected, assessed and taken into account by the applicant, as part of the work of formulating the proposal. The methodology will also be checked by competent officers within the Authority before the decision maker decides whether or not to grant consent.

Who should prepare the Assessment?

3. Due to the location and scale of the proposed development, an applicant is expected to employ a qualified person or group of consultants who will include a qualified person to carry out the work. Doing so will ensure the completeness and quality of the Assessment and its report. The report on the Assessment is expected to include a statement outlining their relevant expertise, qualifications or experience, sufficiently to show that this is true. A 'competent person' from the Welsh language perspective will have an accredited Language Planning qualification; experience or training in linguistic planning and/ or a Town and Country Planning qualification.

4. Engagement and undertaking a series of activities before submitting a planning application is a key part of preparing applications that require a Welsh Language Impact Assessment Report. It is expected that key stakeholders will play a full part in steps A – C described below.

The methodology – process and assessment

5. There are 3 main stages to follow in the process of undertaking a Welsh Language Impact Assessment of the relevant proposed development (see Figure A3.1 below):

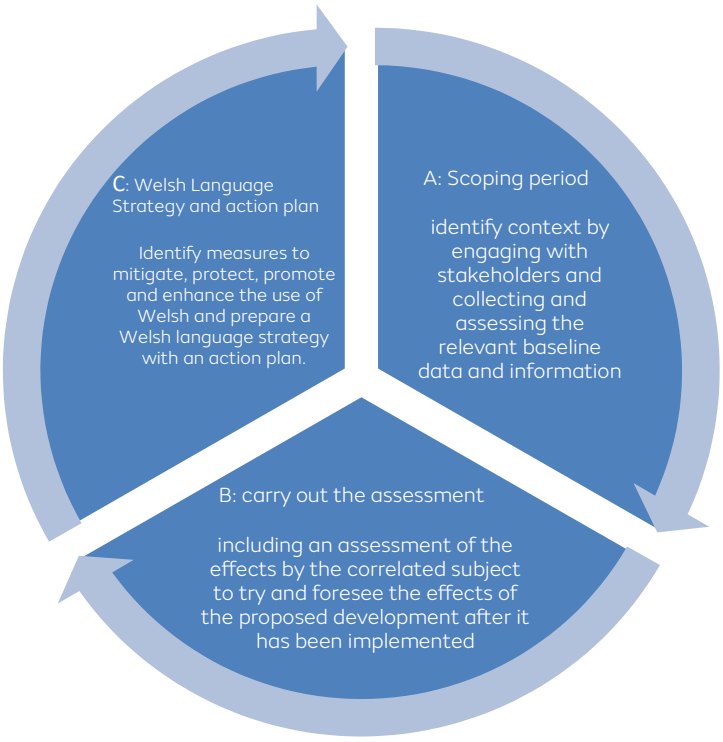


Figure A3.1: The 3 stages of undertaking a Welsh Language Impact Assessment

6. Engagement and consultation is a key part of each of the three stage process described above.

STAGE A1) SCOPING PERIOD (IDENTIFYING THE CONTEXT) - IDENTIFYING RELEVANT BASELINE INFORMATION

7. It is important that the Welsh Language Impact Assessment process, like any other assessment, starts early to enable the applicant and his/her advisers to identify the appropriate issues and analyse them as they prepare the details of the proposed development. Broadly speaking, the scoping work will include the following, and these should be recorded:

I. Description of the proposed development;
II. Definition of the area that the development could influence directly or indirectly. The extent of the area will depend on its type of development, its scale and location;
III. Document the current 'state' of the specified communities/area, and in particular the Welsh language, which forms part of the baseline to base an assessment upon it;

IV. Document assumptions/projections for the specified communities/area, in order to seek a picture of the direction of change (rather than definite figures) predicted in this identified area based on trends, without the intervention of the development;

V. Document the objectives of the Local Development Plan and the relevant policies, and document the objectives of the Welsh Language Promotion Strategy, Local Wellbeing Plan, and the Council's Plan.

Data sources for the scoping work

8. Appendix 2 of this Supplementary Planning Guidance contains information on a number of current recognised relevant data sources for the Welsh language. Data/information will be updated fairly regularly and there is a possibility that additional sources will emerge. Therefore, when gathering information about the area of influence at the time of preparation for the development, there should be a thorough inquiry into the existence of latest data as well as additional data that may only be available at a local level about the Welsh language and the wider communities. Local stakeholders, such as Community and Town Councils, have data and information that will only be available locally, especially information on infrastructure (facilities and services) within settlements and their role in promoting the Welsh language.

Identifying the area of influence

9. Identifying the area that the proposed development might influence is important. The area of influence is unlikely to respect the development boundaries of settlements, or perhaps individual wards. Depending on the scale and type of development, the area of influence can include the Travel to Work Area and/or the Housing Market Area. Early discussions with the Planning Authority and other stakeholders, such as other services within the Councils and Mentrau Iaith, will be beneficial to the task of establishing and analysing the evidence and conducting the assessment. As, for example, in the case of retail impact studies or employment studies, a map will be required in the report, together with a record of the reasons for choosing the area of influence. A record of discussion with appropriate stakeholders should be included. The map should record the number and percentage of all Welsh language speakers at a community and ward level.

Profile of the population now and in the future

10. When considering the information that should be collected in the context of the Welsh language, it is recommended that the numbers and percentage of the Welsh speaking population (including learners) are used, dividing those speakers by age group, in order to understand what the impact of the development might be on the linguistic composition of the area over a period of time.

11. Data about language transmission in the home within the locality should also be analysed. The language of children younger than three years old is not recorded in the Census. Other sources can provide the information to establish a baseline and complete assumptions,

namely Mudiad Meithrin data and Flying Start data. Understanding the situation of the language in the different age groups gives a picture of the vitality of the language now, and can also offer a picture of the language in the area over the next decades if current trends continue and if the development did not happen.

12. The question that needs to be addressed and evidenced is: How does the proposed development contribute to or impact on projections of change necessary to maintain or increase the number and percentages of Welsh speakers in the area affected? This stage offers an opportunity to identify future issues in the area, and by carrying out the assessment, how the proposed development can affect them (positively or negatively).

13. The impact of a proposed development in area of influence where the use of Welsh is not such a prominent feature in the community can be different from the effect in an area where there is a higher percentage of Welsh speakers, and where the daily use of Welsh is more prominent. This analysis must be recorded.

Profile of the infrastructure in the influence area (facilities and services for public use)

14. When considering the information that should be gathered in the context of the wider communities, the availability of local facilities for public use must be understood - shops, GP surgeries and other public services, community centres, halls, schools, etc. When engaging with relevant stakeholders, a picture can be obtained of which of these facilities offer services or activities in Welsh. If the information is not available, an applicant is expected to take steps to fill the gap.

Engagement at the scoping stage

15. Every development, regardless of size, can benefit from effective engagement / consultation. Firstly, it conforms to one of the ISO 31000 principles which is "*activities to communicate and consult with stakeholders throughout the process*[2] Secondly, identifying the characteristics of the community and the factors that influence the places (domains) that are important to the vitality of the language at an early stage offers the best opportunity to ensure that Welsh is a consideration in the development of the proposal. The nature and scope of consultation will be in accordance with the requirements of PA Wales Act and the expectation of the Pre-application Community Consultation: Best Practice Guidance for Developers (Welsh Government, December 2021). Consultation typically involves consulting with three groups of people, namely:
    - people who occupy or own property near the application site;
    - community consultees, including Community Councils and Councillors (Local Members); and
    - specialist consultees.

16. Details on the identity of specialist consultees and when they should be consulted are

provided in Schedule 4 of the DMPWO[9]. The identity of the specialist consultees listed in Schedule 4 which are relevant to the proposed development, will be determined by carrying out tests on the description of the development. Annex 2 of the Pre-application Community Consultation: Best Practice Guidance for Developers provides those tests.

17. Welsh Government notes that the applicant may identify additional, valuable consultees not listed in Schedule 4 of the DMPWO. The applicant will be expected to consult with the relevant language initiative e.g. one of the mentrau iaith in Carmarthenshire (see Appendix 2). Creating a timetable of consultation activities at the beginning of the project will assist to achieve the non-statutory and statutory, engagement activities, at the correct time. It can also assist to ensure that the statutory requirements are met.

18. Carmarthenshire County Council offers a pre-application advice service (Pre-Application Stage (gov.wales)). Appendix 2 of the Supplementary Planning Guidance includes the addresses of key stakeholders. The timing of such informal discussions is at the discretion of the applicant; but, in general, it will be extremely beneficial for these to happen as soon as the applicant is in a position to provide enough information to form the basis for discussion. It will be an opportunity for planning officers to draw the applicant's attention (and/or those who will advise him/her) to any gaps in information he/she has collected. The Planning Officer will ask for information from relevant officers within the Council. The applicant may request that any preliminary information currently provided be treated confidentially by the Planning Authority.

[9] The Town and Country Planning (Development Management Procedure) (Wales) Order 2012, Management Manual, development-management-manual.pdf (gov.wales).

19. Table A3.1 below provides a template to record the required information

Table A3.1: Template to record discussion with stakeholders	
Consult with stakeholders and engage in the activities required to address the identified risks and benefits	
Which local groups/ organisations/ officers were consulted	Details of feedback received

STAGE A2) SCOPING PERIOD (IDENTIFYING THE CONTEXT) – ANALYSING THE INFORMATION

20. The purpose of this part of the scoping period is to analyse the information gathered during Stage A1 in order to identify key issues about the community and the Welsh language. This will help to obtain an initial picture of the potential impacts associated with the development. The conclusions must be recorded in the Report on the Welsh Language Impact Assessment.

STAGE B) UNDERTAKING THE ASSESSMENT

21. As with the Environmental Impact Assessment process, the process of carrying out the Welsh Language Impact Assessment needs to consider and record the following, referring to the background information and analysis above (i.e. Stage A1 & Stage A2):

- who (e.g. a particular age group)/ what (e.g. local school) is likely to be affected
- type of effect (i.e. positive, negative, neutral, direct, indirect)
- likelihood of the effect occurring (i.e. firm, uncertain, can be reversed, cannot be reversed)
- potential cumulative effects

Part 1: Complete the Welsh Language Impact Assessment

22. In order to complete the Welsh Language impact Assessment of the proposed development, the relevant parts of the Welsh Language Impact Assessment matrix shown in table 8.3 below should be completed. You will need to consider the inter-relationship between the factors, e.g. the Welsh language population and the housing market and the area's economy. The template must be used in your report on the Assessment. If a positive or negative impact is identified, it will be necessary to consider if any positive effect can be improved, or how you will control negative effects. Those activities must be recorded in Stage C below.

23. The sample risk/ benefits matrix in Figure A3.2 can be used to identify the risk and the likelihood of the effects.

Figure A3.2: Sample Risk/ Benefits Matrix

WLIA OF LARGE WINDFALL SITES				Baseline (Census 2021) Number of persons aged 3 or more able to speak Welsh in the relevant Lower Super Output Area (LSOA) =	Anticipated Impact over 20 years			
					Decrease of up to 2% over and above the trajected number of speakers (business as usual scenario)	Decrease of 2% and over but less than 5% the trajected number of speakers (business as usual scenario)	Decrease of 5% and over but less than 10% above the trajected number of speakers (business as usual scenario)	Decrease of 10% and over above the trajected number of speakers (business as usual scenario)
			Magnitude Score		1	2	3	4
	Probability	Frequency	Likelihood Score	Description	Small	Medium	Significant	Substantial
LIKELIHOOD	It would be expected to occur in almost all similar devvelopments	Evidence to demonstrate that it occurs 9 times out of 10 in the last x years (say 20 years)	4	Amost Certain	4	8	12	16
	It would be expected to occur in the majority of similar devvelopments	Evidence to demonstrate that it occurs 5-8 times out of 10 in the last x years (say 20 years)	3	Likely	3	6	9	12
	It would be expected to occur in the minority of similar devvelopments	Evidence to demonstrate that it occurs 2 but less than times out of 10 in the last x years (say 20 years)	2	Unlikely	2	4	6	8
	It would be expected to occur in a very small number of similar devvelopments	Evidence to demonstrate that it occurs less than 2 times out of 10 in the last x years (say 20 years)	1	Highly Unlikely	1	2	3	4

Table 3.2: Welsh language impact assessment Matrix

LANGUAGE AND MOBILITY OF POPULATION (this issue is common to Housing development and Employment development)	Score			Comments
Explain, with full evidence, whether the development is likely to result in a change in the composition of the population in the area now and in the future, and in particular in terms of contributing or affecting the linguistic constitution.	Effect (E) 1, 2, 3 or 4	Likelihood (T) 1, 2, 3 or 4	Composite score 1 - 16	
• How is the development going to ensure opportunities for people to stay in their community?				
• Is there a likelihood that the development will attract additional people to the community? If it will, how many are expected? Where will they come from? How many and what percentage are likely to be Welsh speakers?				
• Is there a likelihood that local people will migrate from the community as a result of the development?				
• Is the development likely to result in a change in the age structure of the community: more or fewer children, young people, middle-aged people, older people?				

• Is there a likelihood that there will be a change in the balance between Welsh speakers (including learners) and individuals with no ability in Welsh?				

• Is the change likely to be permanent or temporary?					
Record your analysis with evidence, noting who will be affected (e.g. a specific age group); what kind of effect; likelihood of the effect to occur; and potential cumulative effect. You can use the sample risk matrix in Figure 3.2 to record the effect and the likelihood of the effect. Use a separate page if more space is needed.....					
	Composite score				
What is the benefit?	**What is the risk?**				

Please go to Stage C to show how you will ensure the benefit, and if possible, spread the benefit	Please go to Stage C to show how you will manage the risk (get rid of it or reduce it to an acceptable level)				
VISUAL ELEMENTS (this issue is common to Housing development and Employment development)		**Score**			**Comments**
Explain, with evidence, how the development will affect the Language Visibility in the area, in terms of promoting the unique culture of the area.		**Effect (E)** **1, 2, 3 or 4**	**Likelihood (T)** **1, 2, 3 or 4**	**Composite score** **1 - 16**	
• Will the development increase visibility of the language?					
• Corporate image and branding - signs and advertisements on the site that are under the control of planning, e.g. advertising signs/ marketing of new housing site, signs and advertisements to customers in public places on an employment site					
• Site name or development – will it keep an old Welsh name or will any new name be derived from historical, geographical or local links to the area, if practicable					

Record your analysis with evidence, noting who will be affected (e.g. a specific age group); what kind of effect; likelihood of the effect to occur; and potential cumulative effect. The sample risk matrix in Figure 3.2 could be used for the identification of the impact and probability of the effect.				

Use a separate page if more space is needed.....					
Composite score					
What is the benefit?	**What is the risk?**				
Please go to Stage C to show how you will ensure the benefit, and if possible, spread the benefit	Please go to Stage C to show how you will manage the risk (get rid of it or reduce it to an acceptable level)				

QUALITY OF LIFE INCLUDING COMMUNITY INFRASTRUCTURE (discuss the following by type of development)	Score			Comments
Explain, with full evidence, how the development affects the community's quality of life (public amenities and community facilities and services).	Effect (E) 1, 2, 3 or 4	Likelihood (T) 1, 2, 3 or 4	Composite score 1 - 16	
• To what extent does the development affect public amenity/ the environment in the area? Will the area be more/ less desirable to live in?				
• How adequate is the availability of childcare and pre-school places in the locality				
• How adequate are the number of school places in the local area? Would the development be likely to call for more places or is there enough space in the schools? Are there enough resources so that schools can continue to fulfil their role in producing fluent Welsh speakers?				

• How would the development be likely to affect the balance between non-Welsh speaking pupils and Welsh speaking pupils at school? Would more places be needed in the immersion unit? Are there enough resources to provide facilities and opportunities so that children from non-Welsh speaking homes and those who have learned Welsh as a second language can use and improve their Welsh and become part of the Welsh community?				

• Would the development increase demand for local facilities and services?				
• To what extent does the development have a positive or negative impact on existing facilities or services?				
• How will the development maintain or create new opportunities to promote the Welsh language in local facilities and services such as halls, shops, and so on?				
• Does the development have the potential to have a positive or negative impact on the activities of different groups that are active in the community which were identified in the profiling work, e.g. nursery organizations, the Urdd, voluntary groups? What is the capacity of local providers to cope with the change?				
• How could the Welsh community and its institutions integrate the development?				

Record your analysis with evidence, noting who will be affected (e.g. a specific age group); what kind of effect; likelihood of the effect to occur; and potential cumulative effect. The sample risk matrix in Figure 3.2 could be used for the identification of the impact and probability of the effect.				

Use a separate page if more space is needed…….					
	Composite score				
What is the benefit?	What is the risk?				
Please go to Stage C to show how you will ensure the benefit, and if possible, spread the benefit	Please go to Stage C to show how you will manage the risk (get rid of it or reduce it to an acceptable level)				
THE HOUSING MARKET		Score			Comments
Explain, with evidence, how the development is likely to affect the housing market in the area now and in the future, and in particular in terms of contributing or affecting the linguistic constitution.		Effect (E) 1, 2, 3 or 4	Likelihood (T) 1, 2, 3 or 4	Composite score 1 - 16	
• Expected market price for the houses, and how this compares with household income locally.					

• Would the development be likely to have a positive or negative impact on the average house price in the area affected?				

• Affordable housing contribution and how this compares with policy requirements				
• Expected or proposed rate of development. Would it happen slowly?				
• Housing mix and how it compares with policy requirements, County or local surveys, or other sources of information				
• Housing numbers and how this compares with the demand for housing and the supply of housing given in the Plan, and those granted since the adoption of the Plan				
• Increased potential impact the development could have, taking into account any other relevant recent developments in the local area				
• Would the development increase the demand for private rented housing, which would mean less stock available to local households?				

Record your analysis with evidence, noting who will be affected (e.g. a specific age group); what kind of effect; likelihood of the effect to occur; and potential cumulative effect. The sample risk matrix in Figure 3.2 could be used for the identification of the impact and probability of the effect.				

Use a separate page if more space is needed…….					
	Composite score				
What is the benefit?	What is the risk?				
Go to Stage C to show how you will ensure the benefit, and if possible, spread the benefit	Go to Stage C to show how you will manage the risk (get rid of it or reduce it to an acceptable level)				
ECONOMIC FACTORS		Score			Comments
Explain, with evidence, how the development affects the economics of the local area.		Effect (E) 1, 2, 3 or 4	Likelihood (T) 1, 2, 3 or 4	Composite score 1 - 16	
• How does the development contribute to existing employment opportunities in the area?					

• Does it promote economic diversity in the local area, i.e. creating jobs that are not available locally?				
• Number of full and/or part-time jobs				
• Skills that are necessary for the business or organization and how this compares with local people's labour skills (within the Travel to Work area)				
• Salaries that will be offered and how these compare with average salaries in the area				
• Labour skills of local people (within the Travel to Work area) and the likelihood according to the above assessment that the jobs will be filled from among the local population				
• Is it likely to have to search outside the local area for employees, e.g. for specialist skills				
• Will a front-line service be provided to the public?				
• Which language skills are essential and desirable for the jobs created by the development. These will need to be defined as part of the development's Welsh language plan (voluntary or statutory)				
• Language skills that will be necessary to integrate into the local community, i.e. what language would be necessary for different types of jobs				

• Increased potential impact the development could have, taking into account any other relevant recent developments in the local area				
• Is the development likely to have a positive impact on current local businesses, e.g. by offering				

business opportunities to supply the requirements of the new business for goods?					
Record your analysis with evidence, noting who will be affected (e.g. a specific age group); what kind of effect; likelihood of the effect to occur; and potential cumulative effect. The sample risk matrix in Figure 3.2 could be used for the identification of the impact and probability of the effect. Use a separate page if more space is needed.....					
Composite score					
What is the benefit?	**What is the risk?**				

Please go to Stage C to show how you will ensure the benefit, and if possible, spread the benefit	Please go to Stage C to show how you will manage the risk (get rid of it or reduce it to an acceptable level)				

STAGE C) – IDENTIFYING MITIGATION/ PROTECTION/ IMPROVEMENT/ ENHANCEMENT SPREAD MEASURES

24. Every good decision will depend on an effective analysis of options. Option appraisal is the process of identification and selection of the most appropriate risk management strategy within the limitations of the situation. Normally, this requires following a process of scoring or weighting options on how to reduce the risk to an acceptable level. As a result, of evaluating the options and drawing conclusions you can then proceed to select the 'preferred strategy', which is the ' best ' strategy for the situation and the one who receives the approval of the developer, the stakeholders and partners.

25. Evaluation requires you to follow some, if not all, of the follow-up action:
    - establish clearly what is the outcome you are trying to achieve;
    - Identify the possible options to achieve that outcome;
    - Clearly established what are the criteria used to evaluate;
    - Select the most appropriate tool to implement each option;
    - Identify the impact of each option;
    - Compare the advantages and disadvantages of each option and reach a conclusion.

26. Usually, the risk management options are one of the following:

- TERMINATE – get rid of a proportion of the risk where possible;
- TOLERATE – accept the risk by choosing not to intervene;
- TRANSFER – sharing or moving elements of the risk by sharing with stakeholders or other partners or use technology, new processes or new investment;
- MITIGATE - modification of the effects of the development by putting developing plans in place

27. You will also need to consider how to TAKE ADVANTAGE of OPPORTUNITIES arising from the risk to initiate new opportunities.

28. If a positive or negative impact is identified in Stage B above, it will be necessary to consider if any positive effect can be improved upon or show how you will control negative effects. If significant negative effects are not acceptable, consideration must be given to whether it is possible to take steps to reduce the risk to an acceptable level. It should be borne in mind that there is a strong possibility a planning application can be refused by the local planning authority in accordance with WL1 if the assessment identifies a significant negative impact is likely. Therefore, consideration should be given to determine if there is an alternative option that would

be likely to reduce the risk to an acceptable level. It should be recognised that it is not possible, in practice, to eliminate risk entirely. This will help to choose what options are available to be included in a Welsh Language Strategy and an accompanying Action Plan.

29. Table A3.3 generally sets out what kind of response to consider depending on the composite score.

Table A3.3 Response options				
	Positive	Response options	Negative	Response Option
Likely Significant		MAXIMISE		TERMINATE
Unlikely Significant		MAXIMISE		MITIGATE
Small Likely		MAXIMISE		MITIGATE
Small Unlikely		MAXIMISE		TOLORATE

30. Section 7 includes a list of possible activities that can be used to ensure positive effects and to manage risks of negative effects. Those activities should be recorded in the WLIA, indicating how and when the activities will be carried out. This is essential to show that the measures can be realised. Possible measures should be discussed with the Mentrau Iaith and the Planning Officer, who will discuss with relevant officers within the Councils, e.g. education officers, Welsh language officers and economic development officers.

31. Table A3.4 below provides a template to record the necessary information.

Table A3.4: Record of measures/activities to protect, promote and enhance or mitigate threats to the use of Welsh					
What is the Benefit or Risk identified in Stage B above?	Possible measure /activity to control the benefit or risk	What does the activity achieve?	How will the benefit/ mitigation be achieved?	What is the timetable for delivery?	Monitoring method and frequency

Appendix 4: Producing and monitoring a Welsh Language Action Plan

A Welsh Action Language Plan (WLAP) will set out and track the proposed steps that will be taken to safeguard, promote and enhance the acquisition of Welsh language skills and use of Welsh as relevant, and in proportion to the scale and anticipated impact of the development. The WLAP will also outline key stakeholders to engage and work with, timelines and resources required.

The WLAP should:

i. reiterate the evidence of the Welsh Language Community Profile
ii. state the aim and scope of the development
iii. where relevant, summarise the findings of the Welsh Language Impact Assessment
iv. set out the measures to mitigate any potential negative impacts
v. set out the steps to safeguard, promote and enhance the Welsh language
vi. identify timescales and responsibilities
vii. set out process for monitoring the implementation of the WLAP

Developers should use or adapt the template provided below.

Activity	Description / Overview	Actions / Opportunities	Stakeholders / Resources	By When /Update
1. COMMUNICATIONS				
Communications		•		
Branding		•		
Signage		•		
2. PROCUREMENT & CONSTRUCTION				
	○			
		•		
3. EDUCATION, SKILLS & TRAINING				
Apprenticeships and placements				
Welsh language skills		•		
		•		
4. XXXXXXX				
		•		
5. XXXXX				

Activity	Description / Overview	Actions / Opportunities	Stakeholders / Resources	By When /Update
	•	•		
6. XXXXX				
		•		
7. XXXXX				
		•		
		•		
8. XXXX				
9. Other				
		•		