Background Paper 20

The Welsh Language
And A Community Linguistic Impact Assessment

July 2016
Introduction

1.1. Snowdonia has a strong ethos and character as a result of a combination of special features – the rugged mountains, language and heritage. Language is part of an area’s culture, and culture cannot be separated from the language which has fed it over the ages. It is people who have lived in and changed the landscape, and the Welsh language is integral to them. Without language, without community Snowdonia would be a poorer place today.

1.2. The continuity of the language into the future forms a part of conserving our heritage and our children’s heritage and also of achieving National Park purposes, and the associated duty to foster the economic and social welfare of local communities. Neither language nor society remains static. There are several factors which affect our way of living and the way in which we develop and interact with each other.

1.3. Welsh is at the heart of the National Park’s cultural and community identity as a living and sustainable language in these communities. Map 1 shows the distribution of Welsh speakers in the National Park on the basis of the 2011 Census. There has been a decline of 3.5% in the number of Welsh speakers between the 2001 and 2011 census which is higher than the average of 2% over Wales.
1.4. Map 1: Distribution of Welsh speakers as a proportion of the population aged 3 and over: 2011 Census

% of Welsh Speakers by community councils 2011
1.5. Map 2: Distribution of Welsh speakers as a proportion of the population aged 3 and over: 2001 Census

% of Welsh Speakers by community councils 2001

* although the shadings in map 1 and map 2 may look similar, the legend notes that the colours represent different percentages between each maps. Therefore, please take the legend into consideration whilst looking at the maps. Map 3 on the following page shows the percentage change in Welsh speakers between the 2001 census and 2011 census.
1.7. There has been a steady decline in the number of Welsh speakers in the Park between 1951 and 2011. Between 1971 and 1991, the proportion fell from 77% to 65%. This decline is still continuing. Between the 2001 and 2011 census there has been a reduction of 3.5% in the number of people who were able to speak Welsh in the Park (down 62.1% to 58.6%). Nevertheless, when compared to the national average of 19% of Welsh speakers over the whole of Wales in 2011, the levels in
the Park is above average. The average of 58.6% masks a considerable variation, 
because in some communities the percentage is as high as 80.4% (Llanuwchlyn) 
whilst there are lower proportions (26-40%) in some communities such as Conwy, 
Arthog, Aberdyfi, Penmaenmawr.

1.8. Demographic changes include a decline in the proportion of resident 20-29 year 
olds, a higher than average proportion of retired people (20.5%, compared with 
16.1% for Wales) and a growth in the proportion of 60-84 year olds. More people 
are moving into the area than are moving out and this has contributed significantly 
to the substantial increases in house prices in the area. A number of possible 
factors influencing these changes include the changing pattern of second homes / 
retirement homes and external growth in economic opportunities for Welsh 
speakers.

1.9. There is no intention to deal with all of the factors which influence language in 
great detail in this paper but it is possible to deal with some basic elements such 
as employment and housing which are obviously crucial in supporting language 
and the community.

1.10. External buying power, including second home ownership has contributed to the 
increase in house prices. Because of changes in the Census for 2011 it is not 
possible to say with certainty how many second homes there are within the Park 
but the subject is still considered to be an important one and a burning issue. 
During the 2001 census it was estimated that there are approximately 1600 
second homes in the Park with the highest percentage in Aberdovey (49%). These 
figures reflect a 5% reduction in the number of second homes since 1991. In 
addition to this, in the past, youth migration from the area has been a reflection of 
the lack of quality employment opportunities.

1.11. It is external influences such as the national housing market and interest rates that 
have had the greatest impact on the local housing market. Since the economic 
recession in 2008 house prices have not increased significantly in the National 
Park but wages have not increased either. First-time buyers are still unable to 
compete in the market and difficulties with borrowing money has aggravated the 
situation. It is anticipated, despite the weakening in local house prices, the low 
average income of the area still means that a large proportion of the population of 
Snowdonia cannot afford to buy the homes for sale on the local housing market.

1.12. Even in the short term, this is likely to undermine communities by forcing 
young people in particular to look for work and homes outside the area, and in 
doing so, it will undermine the interests of the Welsh language and the decline of 
3.5% between 2001 and 2011 will continue the trend set in the past. Crucially, in 
Gwynedd, during 2010/11 650 more people moved away than moved in and this 
trend is also true true in people aged 25-29.

1.13. Some may feel that language, culture and identity are unimportant in a modern 
international life and that there is a need to adopt a more inclusive and open 
attitude. Others believe that there is nothing special to conserve in Snowdonia 
except for the landscape and the environment and that we should not really be 
concerned about the decline of the community and the language. We could also 
argue the opposite, that more needs to be done to foster and interpret that which 
is different and unique in a Welsh community.

1.14. Previous opinions of Snowdonia reveal that:

- The traditional native language is a part of the cultural heritage of Snowdonia
More use of the Welsh language should be made in order to increase the awareness of visitors of just how unique Snowdonia actually is

Welsh speakers should be encouraged to take part in the outdoor activity industry

Economic development could help conserve the cultural heritage of the area

Traditional folklore should be used as a means of increasing tourism

1.15. It seems from the opinions mentioned above that people consider language to be a part of cultural heritage and that cultural heritage can be a means of revitalising tourism and the economy. We can also conclude from the above that more needs to be done to strengthen and interpret culture and those things which are different in the area. We mustn’t forget that a different language, and place names provide the visitor from other parts of Britain with an interesting experience and there is a need to take advantage of this. As far as traditional folklore is concerned, how many people know the story of Gelert before they visit Beddgelert and is this their main reason for visiting in the first place. In comparison, how many people are aware of the story of Branwen and Cantref Gwaelod.

1.16. The state of the economy and the opportunities for employment affect the growth and location of population. In Snowdonia there needs to be a balance between creating good jobs without destroying the environment and the landscape which is already a way of conserving and creating jobs. The agriculture industry is undergoing radical reform and with schemes such as Tir Gofal the emphasis is moving from producing as much as possible toward conserving the land. The Single Farm Payment came into force in 2005 with the emphasis on good environmental standards and one payment for the land holding. Because in many rural areas the agriculture industry has maintained the population and Welshness, change within the industry is likely to affect the community and the way of life. New opportunities will be needed to diversify or to produce specialist food arise which can increase value. The main opportunities to diversify arise from the tourism industry and so the industry should not be considered as secondary – one should make the most of it in a sustainable way, and take advantage of the substantial number of people who are attracted to the area.

1.17. In the future it is likely that many more people will work from home and there will be less distinction between home and work locations. This will mean less travelling, but as a result, people will become more discerning about where they live. Therefore, it is likely that there will be more competition in the local housing market from incomers because Snowdonia is an attractive place to live in comparison with most places in the UK.

1.18. Numbers of factors, frequently indiscernible, affect language and community. Obviously education and the media are very significant influences. The Welsh language and education policies of Gwynedd and Conwy support the growth and development of the Welsh language throughout the National Park. The prosperity and conservation of the language is all a part of securing a strong and sustainable community. This should not be forgotten when preparing new policies. Creating a strong and stable economy is all important in enabling local people to achieve their potential and in providing opportunities for young people to choose a future in their locality.

1.19. There is a need to add value to the tourism industry because this is where the greatest potential lies for further development. Also there is a need to work proactively to interpret and take pride in Welsh culture and heritage and to show visitors that the language is alive, and an integral part of making Snowdonia different.
1.20. The Authority administers a fund (CAE fund) provided by the Welsh Assembly Government to encourage and to nurture innovation in sustainable development, to establish exemplar projects and to encourage opportunities for employment, whilst also fostering community cohesion.

1.21. Snowdonia has a strong sense of place, reflected in its rich cultural heritage, with the Welsh language celebrated through music, literature, poetry, art and architecture. The Authority is committed to conserving and enhancing cultural heritage and promoting understanding of special qualities through:

- its Welsh language education service, including 'Blas o'r Plas' taster sessions at Plas Tan y Bwlch and its successful outreach work
- professional and cultural / leisure courses
- publications and the website and
- providing opportunities for developing understanding of wildlife and countryside
- promoting understanding of the importance of our built heritage
- support – financial and officer time for projects which help to strengthen community understanding of and commitment to cultural heritage
- recognition of the different commitments within the community to conserving our cultural heritage and to nurturing its future development
Planning and the Welsh Language

1.22. 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.

1.23. The Welsh Government published Technical Advice Note (Wales) 20 "The Welsh Language - Unitary Development Plans and Planning Control" was back in June 2000 and the Welsh Assembly Government policies relating to this matter are included in Planning Policy Wales [2002]. These documents show how local planning authorities should, in plan production or in making planning decisions, need to consider the needs and interests of the Welsh language, and in so doing contribute to its well being. Thus, the language is undoubtedly a major consideration in planning.

1.24. In 2003 the Assembly published Iaith Pawb, a National Action Plan for a Bilingual Wales. This document has 5 key targets to achieve the aim of establishing a truly bilingual nation by 2011. In the context of land use the two that are most relevant are:

- That the percentage of people in Wales who can speak Welsh has risen 5 percentage points from the figure revealed in the 2001 census;
- That the fall in the number of communities where Welsh is spoken by over 70% of the population is stopped.

1.25. In 2003, because of problems with using National Guidance, 16 local authorities, the Welsh Language Board, the Home Builders Federation and the Assembly commissioned the Bartlett School of Planning at University College, London (UCL). The purpose of the work was to discover specific methods for implementing the national guidance.

1.26. The main findings of this work were:

- Local Authorities should use a Linguistic Profile Creation Resources Package in developing policies to assess whether or not the Welsh language was part of the social make-up of the communities in their area.
- A Methodology should be used for Assessment of Impact on Language so that local planning authorities could assess the likely impact on any development proposals against the five dimensions of community life.

1.27. A Planning Sub-Group was formed to develop the practical aspects of the UCL work, which led to the publication of the report ‘Planning and the Welsh Language – the way ahead’ (2005). However up till now the Assembly has not responded officially to this report and it has not received official status.

1.28. Drawing on the research ‘Planning and the Welsh Language – the way ahead’ Snowdonia National Park Authority introduced a technical guidance in April 2007 as a six month pilot scheme. The document provided guidance about the manner in which the Authority deals with developments which may have an effect on the future of the Welsh language within communities. Following the pilot period the Authority adopted the Technical Guidance. The technical guidance ‘Planning and the Welsh language’ is a material planning consideration when decisions are made on planning applications.
Community and Linguistic Impact Assessment of the Deposit Eryri Local Development Plan

1.29. As a Planning Authority the National Park Authority has a degree of control over the quantity and location of new development opportunities. This includes the number of new houses to be built during the period of the new development plan. Large scale housing development unrelated to the size and needs of the community are known to have a harmful impact on the language and cultural character of communities. The influx of a proportionately large number of non-Welsh speaking residents to a community is likely to undermine predominantly smaller Welsh speaking communities making assimilation difficult.

1.30. On the other hand it is considered that some additional employment and housing of the right type and scale to meet local needs may be required to sustain existing communities. The likely growth should be proportional to the socio-economic needs of the community and its likely capacity for change over time without harming the language.

1.31. The Eryri Local Development Plan has had regard to national policy including Iaith Pawb and the Wales Spatial Plan.

1.32. Work on preparing the Eryri Local Development Plan has identified that the Welsh Language is part of the social fabric of all Snowdonia National Park’s communities.

1.33. Vision and Objectives - The vision for Snowdonia in 2035 includes having a ‘thriving bilingual and inclusive communities’.

1.34. The Eryri Local Development Plan also includes objectives to:
   - Promote measures to encourage development that supports the vibrancy of the Welsh language and to protect communities from developments that are insensitive to impact on the Welsh language.
   - Support development which meets the housing needs of the local community, having special regard to affordable housing for local people.

1.35. In the main, the Eryri Local Development Plan housing and employment policies and allocations are the ones that are most likely to have socio-economic impacts.

1.36. This assessment attempts to view communities in a holistic manner, giving due regard to language as an element which is an integral part of community activity and life. This can be considered as a sustainable methodology in which a number of economic, social and environmental elements influence one another and where change in one dimension impinges on another. The sustainability processes for preparing the Local development Plan has also made links between the Welsh language and other social, economic and environmental considerations transparent.

1.37. The Community and Linguistic Impact Assessment methodology comprises a checklist to allow the authority to make an assessment of the likely impact of the deposit local development plan against five aspects of community life:
   - Population (levels and the characteristics of that population)
   - Quality of life (therefore providing the impetus for people to remain, leave or move to the community)
• The economy (affecting employment opportunities for different groups as well as the cost of living and, more specifically, the cost of housing)

• Infrastructure (needed to sustain the community, particularly schools, health care and essential services)

• The social and cultural life of the community (expressed through the viability of cultural institutions, particularly those affecting younger people).

1.38. Population stability or moderate growth, combined with a high quality of life, a strong economy, high quality infrastructure and a vibrant social and cultural life are all central to community cohesion and sustainability. Where the Welsh language forms a part of the social fabric of a community, its fate and well-being is inexorably tied to the wider fortunes of that community. If a development is likely to be detrimental to any one of these aspects, it may also have an adverse impact on the Welsh language.

1.39. The questions included in this assessment are based on those included in appendix C of the document Planning and the Welsh Language: the way ahead (2005).
1.40. **POPULATION CHARACTERISTICS**

1. Are the Local Development Plan policies and allocations likely to lead to a population increase / decrease that might affect the balance of English / Welsh speaker (in a negative / positive way); or lead to an absolute or proportional decline in the number of Welsh speakers?

- The Local Development Plan housing requirements are not likely to lead to large population increases or decreases that might affect the balance of English / Welsh speakers.
- The Eryri Local Development Plan contains a policy stating the needs and interests of the Welsh Language will be taken into account in determining all planning applications.
- The Authority recognises that it is crucial to the future of the National Park that a balanced population is secured. The Plan places great emphasis on providing housing opportunities to meet the needs of the local community particularly those of young people and the elderly.
- The Plan also supports small scale employment and training development to meet local needs as well as appropriate agricultural diversification proposals to retain young people in the area.

2. Are the Local Development Plan policies and allocations likely to lead to increased in-migration?

- The policies and allocations in the Eryri local Development Plan are to meet local housing and economic needs and will not result in substantial levels of growth that may impact on social balance (in terms of age and income structure, and socio-cultural background).
- Some developments are likely to cause social reconfigurations. A residential development for retirement purposes in a community with a young age structure could cause permanent social change. However, the extra care housing allocated in Bala will also be affordable housing for local people and will benefit the local community by freeing up family size houses which have been under occupied in the past.

3. Are the Local Development Plan policies and allocations likely to lead to increased out-migration? Is the process of out-migration likely to result in a loss of Welsh speaking households?

- The Eryri Local Development Plan encourages new affordable housing in order to stem out-migration and retain young people in the area. Occupiers of affordable housing must satisfy the definition of a local person as defined in the Local Development Plan.
- Eryri Local Development Plan policies and allocations do not encourage un-neighbourly land-uses (e.g. large waste facilities or incinerators) near residential development that could lead to increased out-migration.
4. Are the Local Development Plan policies and allocations likely to lead to a changing age structure of the community?

- The Eryri Local Development Plan aims to encourage young people to return or remain in the area by encouraging affordable housing for local people and supporting small-scale employment and training development as well as appropriate agricultural diversification proposals.
### QUALITY OF LIFE

#### 5. Are the Local Development Plan policies and allocations likely to have an impact on the health of local people?

- The Eryri local development plan does not propose a development that is likely to have an impact on the health of local people or reduce the desirability to live in the community.
- The Local Development Plan supports the provision of new health, and sport facilities as well as supporting development which encourages the use of footpaths and cycle paths.
- The Local Development Plan promotes a healthy and safe living environment through good building design, the provision of good public recreational and open space and noise reduction measures.

#### 6. Are the Local Development Plan policies and allocations likely to have an impact on the amenity of the local area?

- Through the Local Development Plan the Authority aims to ensure that Snowdonia continues to be worthy of landscape protection. The Local Development Plan seeks to deliver development that is in keeping with the ‘Special Qualities’ of the National Park, which include not only the qualities relating to it as a place to live but also as a place that can be enjoyed by all visitors and residents alike.
- The Local Development Plan does not support developments that are likely to lead to deterioration in environmental quality, therefore reducing the desirability to live in the community.

#### 7. Are the Local Development Plan policies and allocations likely to lead to the threat of increased crime or violence in the community?

- The Local Development Plan does not support developments that are likely to increase the risk of crime or violence, influence long term social stability and cohesion and reduce the desirability to live in the community.
### ECONOMIC FACTORS

8. Are the Local Development Plan policies and allocations likely to have a detrimental impact on local businesses?

- The Local Development Plan promotes employment opportunities in settlements, as well as in rural locations, which should benefit residents across the National Park so that rural enterprise can develop and contribute to local economic development.
- The LDP also focuses on home-working opportunities and on agricultural diversification.

9. Are the Local Development Plan policies and allocations likely to have a detrimental impact on local jobs?

- The Eryri local development has allocated employment land in Dolgellau and Bala.
- The Eryri Local Development Plan also supports small scale employment and training development to meet local needs and ensure that local people have the right skills.
- The Local Development Plan promotes employment opportunities in settlements, as well as in rural locations, supports home working and agricultural diversification.

10. Are the Local Development Plan policies and allocations likely to lead to greater economic diversity? Potentially lead to a greater number of different jobs for the local – Welsh speaking – population due to economic diversification?

- The Eryri Local Development Plan policies aim to develop new local employment opportunities and developing a skills and knowledge based economy which optimises the value of the area’s natural resources, environment and cultural heritage. Ideally such employment initiatives should provide permanent careers that will attract and retain young people within the area, or encourage local entrepreneurship.
- The Eryri Local Development Plan support tourism and recreation activity which maximise local economic benefits minimise environmental impact and safeguard the ‘Special Qualities’ of the National Park. These new developments may create new employment opportunities, with specific skills required: e.g. leisure / tourism development based on cultural industries may require greater utilisation of the language as a labour market skill.
- The Eryri Local development plan also support the agricultural sector and opportunities for rural diversification

11. Are the Local Development Plan policies and allocations likely to have an impact on local wage / salary levels?

- The Local Development Plan policies and allocations are not likely to decrease local wage / salary levels due to business competition etc.
12. Are the Local Development Plan policies and allocations likely to have an impact on the average cost of housing?

- The Eryri Local Development Plan aims to restrict all new build and conversions within the housing development boundaries of Service Settlements, in Secondary Settlements and in Smaller Settlements to affordable housing to meet local needs only, while requiring at least 50% affordable housing units to meet local need in Bala and Dolgellau.
- The Eryri Local Development Plan also supports affordable housing for local need within the open countryside, through conversions and change of use of rural buildings.
- This LDP approach aims to attract and retain young people in the area and make more housing accessible and affordable to secure long term sustainability of our rural communities.
1.43 **INFRASTRUCTURE SUPPLY**

13. Are the Local Development Plan policies and allocations likely to have an impact on local schools?

- The Eryri Local Development Plan Spatial Development Strategy has taken into account the location of key community facilities. All the settlements have been categorised into a hierarchy that take into account primary school. Settlements with a primary schools have been categorised as a service settlement or a secondary settlements. None have been categorised as a smaller settlement.
- The Eryri Local Development Plan promotes employment and housing opportunities in settlements, as well as in rural locations, which should benefits residents across the National Park and the future viability of schools.

14. Are the Local Development Plan policies and allocations likely to have an impact on health care provision?

- A key determining factor for people deciding whether to remain in an area or move to an area for the first time is the availability of health facilities. Retention or establishment of health care facilities in a community could affect language viability, particularly where health centres have become social gathering places, supporting local Welsh-speaking networks. The lack of facilities may cause elderly people to move home, or lead to decisions where families take painful decisions to assist the move to elderly relations to other locations.
- The Eryri Local Development Plan supports the provision of new health and other community facilities where they are located within the main built up area of a local service centres, service settlements and secondary settlements.
- The Eryri Local Development Plan also supports developments in other locations where the development will provide an essential facility to support the local community.
- The Eryri Local Development Plan also states that the Authority will refuse the change of use from a community service or facility unless it can be shown that the potential for continued use of the facility is un-viable, or unsuitable.
15. Are the Local Development Plan policies and allocations likely to have an impact on the provision of local services, such as shops / post offices / banks / pubs?

| • Access to community services and facilities is an essential element of sustainable and inclusive communities. Community facilities such as schools, post offices, village halls and chapels often serve a network of small settlements and are essential to reduce the amount of travelling to reach alternative community facilities. The loss of local services and facilities will lower community sustainability. |
| • The Eryri local development Plan supports and encourages the retention and improvement of community facilities and services which provide an essential facility to support the sustainability of National Park communities. |
| • The Eryri Local Development Plan contains a policy that will refuse the change of use from a community service or facility unless it can be shown that the potential for continued use of the facility is un-viable, or unsuitable. |
| • The Local Development Plan doesn’t either allocate larger retail development that may impact on local services and impact upon social networks within the community that may presently act as meeting places, supporting community interaction. |
16. Will the Local Development Plan policies and allocations potentially lead to social tensions, conflict or serious divisions within the – Welsh speaking – community?

- The Eryri Local Development Plan does not allocate sites that will encourage developments that are obviously out of scale with communities, or uses that appear unsuited to the character / economy of a particular area.
- The Authority recognises that many settlements have strong social and family ties generating a strong commitment to continue living within the home community. The Authority recognises that if no new housing, particularly affordable housing is permitted in such settlements new households will be forced to move away. This could change the population structure of communities and lead to a fundamental weakening of family support network and support for existing facilities with potentially significant implications for future economic and community wellbeing.
- The Eryri Local Development Plan policies place great emphasis on providing housing opportunities to meet the needs of the local community particularly those of young people and the elderly to strengthen family support networks.

18. Are the Local Development Plan policies and allocations likely to have a potential impact on local voluntary / activity / youth groups?

- The Local Development Plan policies place great emphasis on providing housing opportunities to meet the needs of the local community particularly those of young people and the elderly so that community institutions continue in the area which can be central to the vitality of Welsh communities.
- The Plan also supports small scale employment and training development to meet local needs as well as appropriate agricultural diversification proposals to retain young people in the area that are active in local voluntary activity / groups.
**Welsh Planning Act and national policy since the adoption of the Eryri LDP**

**Technical Advice Note (TAN) 20: Planning and the Welsh Language (October 2013)**

Back in October 2013 the Welsh Government updated Technical Advice Note (TAN) 20: Planning and the Welsh Language. The TAN included:

- The role of Single Integrated Plans when considering the Welsh Language
- The Welsh language should be considered as part of the LDP Sustainability Appraisals
- The Role of the Welsh Language Commissioner
- That no assessment of the impact of planning applications on the language should be held because this would duplicate the processes of choosing LDP sites.
- That no further assessment of the impact of unallocated sites (windfalls) should be undertaken on the Welsh language because the LDP has set aside allowance for windfalls.
- Signs and adverts.

The Authority disagreed with the TAN in relation to the point that no further assessment of the impact of unallocated sites in the Plan (windfalls) on the language should be undertaken. The Authority's view is that windfall sites that have not been taken into account in preparing the development plan can be submitted and considered by the Authority and there should be an opportunity to examine the potential impact of the development on the Welsh language within that community.

**Welsh Planning Act 2015**

For the first time ever the Wales Planning Act introduced a legislative provision for the Welsh in the planning system. Section 11 and 31 of the Planning (Wales) Act deals with the Welsh language.

Under section 11 of the Planning Regulations (Wales) 2015, every local planning authority has to consider the impact that their local development plans will have on the Welsh language, and should do so by undertaking an appropriate assessment which forms part of the sustainability evaluation of the scheme. It also requires local planning authorities to routinely ensure that evidence relating to the use of Welsh in the area is updated regularly. Section 31 of the Planning (Wales) Act 2015 explains that impacts on the Welsh language should be a consideration in determining applications for planning permission, as long as they are relevant to the application. These changes have resulted in the need to update national planning guidance in Technical Advice Note 20: Planning and the Welsh language.

**Planning Policy Wales (PPC) (January 2016) Version 8**

The changes to PPC is an attempt to try to reflect the provision in the Planning Act (Wales) 2015 which deals with the Welsh language. See an extract from paragraph 4.13.5 below.

"The decision makers must have regard to considerations relating to the use of the Welsh language as long as those considerations are applicable to the applications for planning permission. If it is necessary to assess the impact on the language, the only time when such assessments will be undertaken is for proposals for major developments which were not foreseen or allocated in the development plan and in areas of sensitivity or specifically important to the language. Any such areas should be clearly defined in the development plan 20. In determining applications for planning permission, no elements of discrimination should be introduced and decisions shall not be made on the basis of a person or persons linguistic ability".
The Authority feels that part 31 of the Planning Act is not properly interpreted in PPW. In the Act it refers to any planning application where the Welsh language is relevant, but in the above paragraph it refers to major developments alone. It is felt that the local authority should have the right to determine the size and type of development that requires the need to assess the impact on the language. It is felt that the size and type of development should be determined in the preparation of the LDP and should be set out in a policy in the LDP.

**Technical Advice Note (TAN) 20 (draft): Planning and the Welsh Language (Jan. 2016)**

In January 2016 the Welsh Government announced changes to TAN 20 when the provisions of the Planning (Wales) 2015 Act came into force. The main changes proposed relate to the following issues:

- The link between planning for the Welsh language in land use planning and community planning
- Explain that the effects on the language can be considered where it is relevant to the application
- Enable local planning authorities to undertake a language impact assessment in certain circumstances

While we welcome the right to assess windfall planning applications, limiting planning applications to large residential planning applications seems to be contradictory to section 31 of the Wales Planning Act 2015 which refers to "any planning application". It is considered necessary to restrict the linguistic assessments to windfall sites to avoid duplicating LDP preparatory work, but that the local planning authority should be able to maintain the flexibility to determine the type and size of the application site on the windfall site which is subject to the assessment.

It seems, when reading the last sentence of paragraph 3.2.2 of the Draft TAN that there is some flexibility for the LPA to define major residential development but there is no reference to other significant developments which may be significantly contrary to the development plan, eg tourism developments or development which is likely to lead to the loss of community facilities. The authority believes that Development Policy 18 of the Local Development Plan: the Welsh language and the social and cultural fabric of communities coincides with the Welsh Planning Act and is also compatible with the draft TAN 20. The current development policy states that the LDP should consider the impact of planning applications on the Welsh Language on sites that have not been allocated in the development plan (windfall sites). As noted in TAN 20, the authority has set its own definition for this purpose based on the size and scale of developments and other local considerations.