

ITEM 5 APPENDIX 2

Meeting	Gwynedd and Anglesey Joint Planning Policy Committee
Date	16 November 2018
Subject	Gwynedd Council Scrutiny Enquiry Working Group Report - Planning and the Welsh Language

- It is noted that you have received a critical appraisal from linguistic planning specialists dealing with major developments.
- It is noted that you have not received guidance from experts in the fields of research and analysis or engagement and consultation.
- Members of the Working Group wish to draw your attention once again to the recommendations that were presented to you in March 2018. We still believe they are purposeful and need to be addressed by you.
- By now, you are probably in a better position to answer the questions raised by members of the public following your Engagement work in 2016.
- The Working Group presented a Summary to the Joint Planning Panel in March 2018 of the responses from the 2016 Engagement to assist you (copy enclosed - Appendix 1).
- Members of the Working Group strongly suggest that Members of the Joint Planning Policy Committee take account of the following main issues raised by Participants to the Engagement held in June 2016 and which you considered in March 2018 to reassure yourselves that you have fully addressed these issues before starting a further Consultation with the public.
- It is recommended that you answer the questions in columns C and CH concisely and clearly.

National Principles for Public Engagement in Wales

Principle 9 - People are informed of the impact of their contribution

Timely feedback is given to all the participants about their views and the discussions and actions that have been taken as a result, the method and form of feedback should take into account the preferences of the participants.

A	B	C	CH
	Issue that needs to be addressed	How is it addressed in the revised SPG or if it is not addressed, a brief explanation why?	Specific pages and points in the SPG (e.g. paragraph number)
	Does the current SPG address the priorities for the Welsh language in terms of the use of land or buildings? If not, what alternative issues do you suggest?		
1	Strengthening the Priorities in terms of protecting the Welsh language	The role of SPGs is to provide advice to expand on policies in the Local Development Plan, in order to assist in the Plan's implementation. Policy PS 5 (criterion 4) and Policy PS 1 set out the need for new development to contribute to safeguarding, supporting and promoting the use of Welsh.	The SPG as a whole, and in particular section 2
2	Please indicate if the SPG is a suitable tool to do this or not.	See response to 1 above	The SPG as a whole, and in particular section 2
3	How the SPG protects Welsh-speaking communities	See response to 1 above. The process of preparing the Plan and its policies has ensured that the effect on the Welsh language has been appropriately considered, and that the Plan, via a variety of policies (including Policy PS 5 and Policy PS 1) provide the framework to safeguard and promote the language.	The SPG as a whole, and in particular section 2
	Does the current SPG address issues that should not be included within the SPG? If so, please provide details of these issues.		
4	There is a need to distinguish between industrial and residential developments and small and large developments	The methodology for undertaking an assessment to be	Appendix 7 and Appendix 8

		submitted either as a Welsh Language Statement and a report about a Welsh Language Impact assessment identifies the factors linked to a variety of developments that reach the thresholds set in Policy PS 1, which will require consideration	
5	The current SPG is not effective in considering impact on the Welsh language	Disagree with this statement within the context of the revised SPG	The SPG as a whole, and in particular section 2
6	Is the current SPG clear enough about what type of development will need to have Welsh language information?		
7	The current guidance is vague	Disagree with this statement within the context of the revised SPG	The SPG as a whole, and in particular section 2
8	The thresholds are open-ended and need to identify types of developments that should be subject to assessment.	Criteria 1 and 2 of Policy PS 1, not the Guidance, provide the thresholds for identifying what type of development requires an assessment. The Guidance provides advice to expand on these thresholds.	Diagram 5
	The SPG contains a number of questions to assist applicants to present a Linguistic and Community Statement. Are the questions clear enough? Should additional questions be asked? If you think there is a need to change, please suggest how the questions can be changed and/or what type of questions need to be asked?		
9	Include an example of a positive and negative Language Assessment and Language Statement.	No it doesn't. The circumstances relating to individual developments will differ. The provision of examples would not	Appendix 7 and Appendix 8

		add value. The Guidance focuses on providing clear methodologies to undertake the assessments.	
10	Identify clearly the significance of a negative Assessment or Statement.	It does	Diagram 11 Criterion 3 in Policy PS 1
11	Include examples of how development can achieve the following for the Welsh language: Safeguarding, Promoting, Strengthening	No it doesn't. The Guidance focuses on providing clear methodologies to undertake the assessments, which identify the factors that will be important to consider in order to safeguard, promote or strengthen. The Guidance also identifies possible mitigation and enhancement measures.	Appendix 6, Appendix 7, Appendix 8
12	Please indicate where the revised SPG asks questions about definite relevant facts	It does	Appendix 5, Appendix 7, Appendix 8
13	That the Applicant be expected to submit an Assessment designed and evaluated by independent language planning specialists.	It does	Diagram 6, Diagram 7, Diagram 9, Appendix 7, Appendix 8
14	It is the Applicant's responsibility to fund this and it is the Council's responsibility to organise it.	It does	Diagram 11
15	Where has the revised SPG reduced and/or combined questions?	The Guidance provides new methodologies	Appendix 7, Appendix 8
16	Is the development likely to lead to an increase or decrease in the population that could affect the balance of Welsh / English speakers positively or negatively?	It will not be possible for assessments to give an absolute answer to the questions listed in	Appendix 7 and Appendix 8
17	Could the development lead to an absolute or proportional reduction in the number of Welsh speakers?		

18	How could the development affect the use of the Welsh language in the community?
19	Is the development likely to result in an increase in inward or outward migration?
20	How will this affect the number of Welsh speakers?
21	Would any change be permanent or temporary?
22	Is the Development likely to lead to a change in age structure in the community area?
23	Is Development likely to have an impact on the quality of life of local people?
24	Could the Development have an impact on the health and amenities of the community?
25	Could it increase the risk of crime or violence in the community?
26	Is the Development likely to have a detrimental impact on local businesses and local jobs?
27	Is there any potential that the development could lead to the closure of local Welsh speaking businesses
28	Could the development create or threaten local jobs?
29	Is the Development likely to lead to greater economic diversity in the community (or wider area)?
30	Is there potential for the development to increase the migration of non-Welsh speakers due to economic diversity?
31	Is the development likely to have an impact on wages/ pay levels and/or house prices?
32	Could the development increase / reduce salary levels due to increased competition?
33	Could the development force local Welsh speakers to leave the community because of housing prices, or prevent them from returning?
34	Is the Development likely to have an impact on local construction and service provision?

rows 16 – 46. It is important to remember that even with comprehensive information it would not be easy to measure the positive and negative impact because the planning system can not predict or manage personal qualities (such as the ability to speak Welsh in the future or the dynamics of the use thereof). The system also cannot discriminate on the basis of linguistic ability of applicants for planning permission or linguistic ability of individuals that will occupy or use properties. It is noted also that some of the questions derive from the methodology used in the current guidance. There is the preparation of the new Guidance does not propose to replicate them as our understanding of the field in a more mature and we have learnt from the experiences of checking past assessments. The revised Guidance focuses on identification methodology and scoring matrix to carry out assessments will identify the considerations which will help to identify who will be affected (positive and negative) by the

35	Could the Development threaten or safeguard local Welsh-medium schools and/or healthcare facilities?	development, what type of change is likely, how likely is the change, the degree of risk, what can be done to deal to change the likelihood and risk – by either embedding mitigation measures in the development or by managing the development via a planning condition or a Section 106 agreement, and by drawing attention to measure that the applicant can use voluntarily.	
36	Could the Development threaten or protect shops, post offices, banks, local pubs in Welsh-speaking communities?		
37	Is there a potential for the Development to lead to social tension, serious conflicts or divisions within the Welsh-speaking community?		
38	Could the Development have a significant disproportionate impact on different parts of the community?		
39	Could it undermine the traditional values of specific parts of the community?		
40	Is there any potential that the Development will lead to changes in Welsh traditions and culture?		
41	Could the development force local members of local voluntary groups/ activities/ youth out of the area due to unemployment / high house prices?		
42	Whether the Development is likely to have an impact on the use of the Welsh language in the community for the following reasons:		
43	Welsh speakers form a smaller proportion of the population?		
44	Language change in specific social networks?		
45	Lack of Welsh-medium services as a result of the development - Education, Childcare etc.,		
46	Is Development likely to increase the use of Welsh in the community?		
	Is the current SPG clear enough about obtaining input from local language initiatives and language planners to assist applicants to formulate the proposal that will be the subject of a planning application?		
47	Please explain clearly the input of Mentrau Iaith and Language Planning Specialists.	The Guidance states that the competent individual's role will be to apply the methodology and	Diagram 6 and Diagram 7, Appendix 7 and Appendix 8

		advise the applicant. When the competent person engages with the Menter Iaith it can provide information that the competent person requires to complete the assessment.	
48	It should not be a matter of supporting the applicant, but an issue of evaluating the situation.	The Guidance states that the competent person's role will be to apply the methodology and advise the applicant.	Diagram 6 and Diagram 7, Appendix 7 and Appendix 8
49	Will you explain clearly what is a 'local language initiative'?	The Guidance doesn't refer to local language enterprises	Not relevant
50	Does Hunaniaith have sufficient resources and expertise?	This isn't a matter for the Guidance	Not relevant
51	Developers need to be encouraged to hold discussions with local language organisations / initiatives.	It does	Appendix 7 and Appendix 8
52	Use measures and develop new ones to evaluate the position of Welsh as a living community language.	It does	Appendix 2, Appendix 7 and Appendix 8
53	Strong central guidance needs to be produced.	It does	The SPG as a whole, and in particular section 2
	Is the current SPG clear enough about what type of planning conditions or planning commitments can be made to ensure appropriate mitigation measures, compensation, and/or improvement measures related to development proposals to maintain or strengthen the Welsh language, and how the Councils can proceed to get planning conditions or commitments?		
54	The new SPG should provide examples of suitable mitigation and/or strengthening measures for different types of development.	It does	Appendix 6
55	The new SPG should include examples of standard conditions / planning implications.	It does	Appendix 6
56	There is a real need for stronger measures	It does	Appendix 6

57	Examples of various types of development should be included.	Not relevant	Not relevant
58	Planning conditions for residential development should include a condition for a gradual development over five years.	It does	Appendix 6
59	There should be strong central guidance.	It does	Appendix 6
	Do you have any other comments about the content of the current SPG?		
60	The scoring system needs to be improved.	It does	Appendix 7 and Appendix 8
61	The guidance should consider wider areas than just the village or town where the Development takes place, up to Arfon level, Meirion, Dwyfor.	It does	Appendix 7 and Appendix 8
62	This should be in the context of what has happened in that (wide) area within the last 5 years at least.	It does	Appendix 7 and Appendix 8
63	The conditions regarding use of the Welsh language on signs and so on should be strengthened; and also prevent the changing of old Welsh names into English.	Criterion 4 of Policy PS 1 sets out requirements for Bilingual Signage Scheme. Criterion 5 of Policy PS 1 encourages the use of Welsh names on properties and streets, although setting names for property and streets is not a land use planning issue. The role of the CCA is to provide guidance to expand on policies in the local development plan, to assist in the implementation of the Plan.	C.29 and C.30
64	Consideration should be given to who fills the gap (empty house) as Welsh-speaking local people buy new houses.	It does	Stage 8
65	The key importance of Gwynedd as the main Welsh language stronghold should be identified at the beginning of the new SPG and the need for specific policies to protect its unique features and to ensure a sustainable future for the language.	It does	Table 2 Section 2
66	The objectives of relevant strategies to strengthen the language should be noted in the new SPG, including:	It does	C.18 – C.24

67	Gwynedd Language Strategy 2014-2017 which aims to achieve a 5% increase in the percentage of population able to speak Welsh by 2021.		
68	The Gwynedd and Anglesey Joint Local Development Plan which aims to increase the number of communities with 70% of their population able to speak Welsh.		
69	The Welsh Government which aims to increase the number of Welsh speakers by a million by 2050		
70	Technical Advice Note 20 based on the language provisions of the Planning (Wales) Act 2015		
71	The need for each proposed development to be evaluated according to its compatibility with the above objectives. It should be ensured therefore that all the developments in question either contribute positively to the realisation of the objectives or, at least, that it would not in any way obstruct the efforts to achieve them.	As far as it is possible to do so within the remit of the planning system, applying the methodologies provided to undertake the assessments will provide a means to come to a conclusion about the effects of development that reach the thresholds set out in Policy PS 1 on the Welsh language in communities.	Appendix 7 and Appendix 8
72	In terms of the specific questions on the form, we cannot, in our opinion, respond meaningfully to them in the review of the current Supplementary Planning Guidance - Planning and the Welsh language, without knowing the extent to which the guidance has succeeded since it became operational in 2009.	This isn't a matter for the revised Guidance	Not relevant
73	Before proceeding, a linguistic assessment of the developments from 2009 to date should be carried out, to determine if the current version of the guidance has contributed to safeguarding, promoting and reinforcing the Welsh language.	This isn't a matter for the revised Guidance	Not relevant
74	Stop using Community and Linguistic Statement, and require developers to provide a Linguistic Impact Assessment in the cases where a Statement is required at present.	An SPG's role is to provide guidance to expand on policies in the Local Development Plan, in	Not relevant

		order to assist in its implementation. Policy PS 1 sets out the need to undertake assessments and to submit them either as a Welsh Language Statement or a report about the Welsh Language Impact Assessment.	
75	Make it a requirement for a Linguistic Impact Assessment to be produced by those with knowledge and understanding of the field.	It does	Diagram 6, Diagram 7, Diagram 9, Appendix 7 and Appendix 8
76	Make it a requirement for the Planning Authority to ensure that the Linguistic Impact Assessment is evaluated by those with knowledge and understanding of the field.	It does	Diagram 11
77	That consultation with community councils, language initiatives and language organizations is a key part of a Linguistic Impact Assessment.	It does	Diagram 4, appendix 7 and Appendix 8