

## STATEMENT

We are four organisations that campaign to support and strengthen the Welsh Language. We came together due to concerns regarding the effect of the Gwynedd and Anglesey Joint Local Development Plan on the Welsh language.

This Statement contains a summary of the conclusions of an independent linguistic impact assessment of the LDP. To complement the Statement, we submit as an appendix the full independent linguistic impact assessment (together with county linguistic profiles) which provides the evidence which forms the basis of the conclusions and the recommendations. They all respond to the questions contained in clause 8.4 of the Guidance Notes for Respondents.

This independent assessment confirms our misgivings that the LDP provides for an excess of housing, particularly in some specific areas, without offering adequate evidence that such developments will not be detrimental to the Welsh language. Without such evidence, our argument is that the LDP is unsound.

We have concerns regarding the quality of the linguistic impact assessment prepared by the Joint Planning Policy Unit. It does not show an adequate understanding of the subject and its statements about the situation of the Welsh language are simplistic and superficial. Also, an assessment of its own work by the Joint Planning Policy Unit is unacceptable as an objective view is needed.

At a meeting of the Joint Planning Policy Committee on 29 January this year, Cllr Ann Griffith, a member of the Isle of Anglesey County Council, asked if it would be possible for the language organisations to commission an independent linguistic impact assessment. During the period when we were collecting evidence for our observations on the LDP, our attention was drawn to the fact that Huw Prys Jones from Hanfod language consultancy had already carried out detailed research on the results of censuses on the Welsh language for the Welsh for Adults Department at Bangor University; he has also published articles on such matters.

He agreed to carry out further research for us to build on the information he already had and he was invited to offer observations. He explained to us that his assessment would be objective and balanced and that he would not use statistics selectively in order to promote any arguments from either side.

Contrary to the assessment of the Joint Planning Policy Unit, the Hanfod assessment does not make sweeping statements based on superficial evidence, but rather looks at linguistic trends in different areas and weighs up the likely effect of growth on housing numbers. It also underlines the quite crucial importance of Gwynedd and Anglesey to the future of the Welsh language as a living language; a significance which requires a much more thorough assessment of the linguistic effect than carried out by the Joint Planning Policy Unit.

Yours sincerely,  
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Translation

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## Summary and conclusions of the Assessment of Linguistic Impact of the Gwynedd and Anglesey Local Development Plan

Gwynedd and Anglesey is the only Local Development Plan area in Wales where the majority of the population are able to speak Welsh. Therefore, the Welsh language is a wholly vital part of the area's unique character and heritage. The vast majority of communities where over 70% of their population can speak the Welsh language are also within Gwynedd and Anglesey. Therefore, the area has a crucial key significance to the future of the language.

The Joint Local Development Plan recognises the importance of the Welsh language, and one of its Strategic Objectives is to "contribute to creating more communities with a higher proportion than 70% of Welsh-speakers"<sup>1</sup>.

The degree in which the Welsh character of these communities is successfully maintained, strengthened and developed, will be an important criterion when measuring the success of the Local Development Plan's Strategic Objective. A Strategic Objective is not something to be disregarded as empty words full of good intentions and nothing else - it is in fact a measurable aim.

Unfortunately, research undertaken for this assessment suggests that several aspects of the Local Development Plan are at risk of hindering Strategic Objective 4 rather than promoting it.

As it will not be possible to prove for certain what the Local Development Plan's outcomes will be prior to the publication of the 2021 Census (and language figures are usually not published until about two years later), further research work is required to try to predict in more detail how Strategic Objective 4 can be achieved.

**Recommendation 1.** Prepare a detailed action plan to achieve Strategic Objective 4, namely "contributing to creating more communities with a higher proportion than 70% of Welsh-speakers", and amending the Local Development Plan as required accordingly.

The need to increase the overall percentages of people who are able to speak Welsh in both counties is as important as in individual communities, especially in parts that form the main core area of the Welsh language that extends from the centre of Anglesey to north Meirionnydd.

Everyone realises that achieving such an aim is not something that any planning system can do alone. At the same time, the planning system has an important function in terms of

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preventing developments that would have a negative impact on efforts to maintain and strengthen the Welsh character of our main strongholds.

There could be an argument for some sort of national recognition, from the Welsh Government's Welsh Language Unit or the Welsh Language Commissioner's Office, of the key importance of these areas. They could offer assistance and specialist guidelines, for example, on developing the planning system in the most favourable manner to maintaining their Welsh identity. At the same time, it would also be good to see more resourcefulness and imagination on a local level, breaking new ground in a different way to the rest of Wales and more emphasis on what makes Gwynedd and Anglesey different.

Unfortunately, it appears that the way the plan was prepared was no different to any other development area in Wales or the rest of Britain.

**Recommendation 2.** Seek special national recognition in the field of planning for Gwynedd and Anglesey based on their importance to the future of the Welsh language.

Two main concerns come to light when the likely impact of this Local Development Plan on the Welsh language is assessed:

- the excessive increase in population that is provided for
- some of the areas where this population growth is distributed.

It must be emphasised that population growth should not be regarded as a threat to withstand. Indeed, seeing some of the strongholds of the Welsh language increasing in population would be a development to be welcomed in an ideal world. Unfortunately, however, it is easy for population increase to lead to the weakening of the Welsh character of these strongholds.

Of course, inward migration of Welsh-speakers, whether they hail from other parts of Wales, or are returning from other places, would be a positive development for the language. Inward migration of non-Welsh-speakers, provided that it occurs on a small scale, could also be a constructive development if a substantial proportion of these people learn Welsh. On the other hand, inward migration of non-Welsh-speakers on an excessive scale could change the linguistic nature of these areas, and thus contribute towards the weakening of the motivation to learn the Welsh language. Also in several areas, a slightly small increase could make a substantial difference as so much inward migration of this type has taken place in recent years.

For the reasons noted in the first part of this assessment, the type of population increase that is provided for represents a development that is unlikely to benefit the Welsh language.

- it appears that the proposed population growth is more or less completely dependent on inward migration from outside both counties

- as the only two counties where the majority of the population can speak Welsh, the probability that people from outside the counties could speak the language is fairly low
- although reference is made to the desire for local people to remain in the county rather than leave, no evidence is offered that constructing new houses would achieve this result
- whilst accepting the possibility that most of the new houses in a specific area could be bought by local people, as a result other houses are then likely to become vacant and they are then sold to non-Welsh-speaking migrants
- the pattern of population and language changes over the past decades suggests a trend of indigenous population leaving and people from outside, the majority of them from outside Wales, moving in; the plan does not offer evidence as to why providing more houses should change this trend.

Taking everything into consideration, it is estimated that population increase in itself could lead to reductions of approximately 2-2.25% in the percentage of people who speak Welsh in Gwynedd and approximately 2.5-3.5% in Anglesey. This is in addition to any reduction that could take place as a result of other factors; or it could counteract any increase that could occur.

In addition to this, it appears that the Welsh Government's projections are not reliable as far as Gwynedd is concerned. These are based on past trends, and it is quite clear that a vast proportion of the population increase in Gwynedd can be attributed to the increase in students in Bangor. Therefore, it is entirely inappropriate to use such figures to increase population in other parts of the county.

In Anglesey, it appears that the possibility of a new power station in Wylfa has strongly influenced the decision to provide for so many houses. However, it is not entirely clear to what extent the proposed increase in the island's economy will depend on the existence of the power station or not. This is certainly a matter that requires further discussion.

There is a need to realise that there are various extensive risks when setting excessive allocations for new houses. Although planning permission will be required for any individual developments, the planning authority is open to a legal challenge from developers if they are refused. Ensuring the suitability of a local development plan can save significant money for taxpayers in subsequent years.

**Recommendation 3.** Consider seriously the suitability of the total number of new houses for the area's requirements. When considering population and language trends over the years, it becomes apparent that the number is too high. Rather than determining a specific total for both counties, the number of houses should be based on the genuine requirements of individual areas.

The Language Impact Assessments prepared by the Joint Planning Policy Unit intensifies doubts that insufficient attention was given to the Welsh language as the Local Development Plan was formulated in the first instance. They are extremely superficial, full of statements that are nothing but an expression of wishes, and show a lack of pure basic

understanding of linguistic and social matters. They do not include any evidence either as to how proposals within the Local Development Plan could benefit the Welsh language within its areas. Having considered everything, the Joint Planning Policy Unit's Language Impact Assessments cannot be considered as robust evidence for their intended purpose.

As noted many times in this assessment, the general increase in population will certainly have direct and indirect impacts on different areas wherever it happens.

This is why it is essentially important to continuously monitor the broader picture. While examining individual developments, or the allocations for individual areas, it would be easy to argue that the majority of the houses could be bought by local people. However, if there is a general over-provision throughout both counties, it is therefore logical that this cannot be true in every area, due to the limited number of local buyers in the long run. Therefore, directly or indirectly, the housing supply will encourage more inward migration.

In addition, some specific developments in individual areas cause particular concern due to the linguistic significance and sensitivity of those areas. The proposals that cause the greatest concern are those for the catchment areas of Wales' most Welsh towns, namely Blaenau Ffestiniog, Pwllheli and Llangefni, three towns which are essential to the Welsh character of the main core area of the Welsh language in north Meirionnydd, Llŷn and Eifionydd and the centre of Anglesey.

- 300 houses are designated in Blaenau Ffestiniog, a town that has seen a small reduction in the numbers of Welsh-speakers, and a town where the numbers of empty houses are already among the highest in Gwynedd. Without evidence of local demand, an increase to the recommended scale could lead to inward migration that would cause an unsustainable reduction in the percentage of the Welsh-speaking population in the town.
- The designation for over 300 houses is excessive for Pwllheli. As noted in the Local Development Plan, the town is an international sailing centre and will certainly be a location that attracts wealthy buyers from near and far. Even if the impact on the town is not as severe as expected, it would certainly affect some of the nearby villages, and a relatively small migration could be enough to lower the percentage of those who speak Welsh in the Dwyfor area to below 70%. For a Plan that has the aim of increasing communities where more than 70% of people speak Welsh, seeing an entire region such as Dwyfor falling below this level would be a sign of total failure.
- Likewise, the intention to construct 673 houses in Llangefni could be a serious blow for Anglesey's most Welsh area. It would result in an enormous increase in population after the substantial growth that has already occurred over the past 10 years. It is very difficult to foresee how such an increase would not weaken the Welsh identity of the town and surrounding areas.

**Recommendation 4.** Give particular and specific attention to the housing allocation for Blaenau Ffestiniog, Pwllheli and Llangefni. This degree of development in the areas cannot be justified unless robust and reliable evidence can be shown that it would be beneficial to the Welsh language.

In addition to the direct impacts on the sensitive areas referred to above, there is also a need to examine potential side effects on other areas.

- Difficult to see any rationale for the proposed growth of nearly 1,000 houses in Bangor. As noted in this assessment, it is the increase in the number of students between 2001 and 2011 that is more or less responsible for the increase in the city's population over the same period. There is no evidence that such an increase would be likely to continue. Bangor is within convenient travelling distance to towns further to the east and even as far as the Chester area, and many of these new houses could lead to further Anglicization. In addition to this, the value of the idea of centralising too many developments in Bangor must be questioned as it could be at the expense of other areas in the county. In other words, it is difficult to see what good could come from this over-provision. If it attracts too high a proportion from outside the county, it is likely to contribute towards the further Anglicization of the city, and if it attracts more than anticipated from within Gwynedd and Anglesey it will contribute towards further impoverishing other more rural and Welsh locations.
- Much of the same is true for Holyhead, where adding 833 houses to the town would have an impact on the entire island. The Welsh language is already at a low ebb in the town, and more people from outside could further Anglicize it, and a general increase in the town could have more of an impact on the surrounding area. It could also contribute towards the loss of the Welsh indigenous population from the island's more rural areas.
- Although the number of houses earmarked for Caernarfon and the vicinity is not as large in comparison with the population nor likely to have an impact on the language of the town and nearby villages to the same degree, the risks of indirect impacts cannot be ignored by confirming the existing trends of population increase in the area at the expense of the county's more rural areas. Everything contributes towards a general provision of houses that is excessive for the current situation in Gwynedd and Anglesey.

**Recommendation 5.** Consider the indirect impacts, as well as direct impacts, of any developments on the Welsh language, especially in the context of excessive growth in some of the largest towns noted above.

Turning one's attention to affordable homes, lack of house affordability is a problem in several areas of the county, as noted in the Plan. However, providing more open market housing will not help to resolve this. Therefore, stricter conditions should be imposed to ensure a higher proportion of affordable homes in different developments, and extending the local housing market to more areas. There is also a need to seriously consider the eligibility criteria for affordable homes or social housing to see whether or not local people are given their due priority.

**Recommendation 6.** Extend areas where houses are being limited to the local market, increase the proportion of houses in developments that must be affordable homes, and assess the suitability of criteria for the tenancy or purchase of such houses.

To conclude, the need for more information and research on matters regarding planning and housing and the Welsh language must be emphasised. In terms of the Local Development Plan specifically, there is a need to take a step back and try to assess its impacts thus far.

With over five years of the plan's period having already elapsed, there is an opportunity to seriously examine the housing developments that have been approved thus far, namely from 2011 to 2017, and assess the impact of those when re-considering the suitability of allocations for the remainder of the plan's period.

If fewer developments than anticipated have taken place thus far in some specific areas, there is a disproportionate proportion of the housing allocation left for what remains of the plan's period. This results in developing a far higher number of houses per year on average than is suggested in Council documents, and which could lead to intensifying the impacts of migration.

It is understood that Gwynedd Council is already taking action on such research in line with a decision that was made at a Special Meeting of the Council as referred to above. If this is the case, it would be possible to ensure that a review is ready for the Plan before it is finally adopted by both Councils.

On a wider level, there is a need for much more thorough research at grass roots level to discover the requirements of local housing, using organisations such as community councils, schools and local language enterprises. This would set a more robust knowledge base when determining developments. The information would also be valuable to assess the suitability of criteria for social housing and affordable homes.

Finally, there is a need to arrange a network of information at grass roots level on the linguistic nature of the communities of both counties. 10 years is too long between Censuses and a way of identifying any trends far sooner is required so that a robust knowledge base is available for all types of linguistic planning. A consultation should be held with suitable organisations and establishments on methods of doing this.

**Recommendation 7.** Ensure more information and research, including assessing the impacts of housing developments that have been approved since the start of the Local Development Plan's period in 2011.