

**OUTLINE PLANNING APPLICATION
LAND SOUTH OF CWMGARW ROAD, BRYNAMAN,
AMMANFORD, SA18 1BY**

**OUTLINE APPLICATION WITH ALL MATTERS RESERVED
FOR RESIDENTIAL DEVELOPMENT COMPRISING UP TO
60 DWELLINGS**

**WELSH LANGUAGE IMPACT ASSESSMENT & LANGUAGE
ACTION PLAN**

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1. INTRODUCTION

Background

- 1.1 This Welsh Language Impact Assessment & Language Action Plan (WLIALAP) has been prepared in support of an application, submitted on behalf of Mses Wight, Searles, & Dudleyke, in relation to the following development proposal at the land south of Cwmgarw Road, Brynamman:

"Outline application with all matters reserved for residential development comprising up to 60 dwellings".

Purpose and Structure of this Document

- 1.2 The purpose of this Document is to:
- a) provide a clear understanding of the relevant legislation and policy in relation to the Welsh language;
 - b) consider how the development proposals may impact on the Welsh language; and
 - c) outlines how the proposal intends to achieve the objectives of protecting, strengthening and promoting the Welsh language.
- 1.3 The Document is structured as follows:
- **Section 2** describes the development proposals;
 - **Section 3** provides an overview of the legislation and national and local planning policy;
 - **Section 4** considers how the development proposals may impact on the Welsh language;
 - **Section 5** outlines how the proposal intends to achieve the objectives of protecting, strengthening and promoting the Welsh language; and
 - **Section 6** sets out the summary and conclusions.

2. DEVELOPMENT PROPOSALS

2.1 The application seeks outline permission for a housing-led development of strategic scale, which will deliver:

- Approximately 60 new homes;
- A significant network of informal and formal open space, including retained and protected areas, new planting, and SuDS features; and
- A permeable active travel route of footpaths/cycleways.

Development Vision and Key Principles

2.2 The proposed development responds to the scale of growth proposed in the adopted Local Development Plan (LDP), with a housing requirement of 15,197 dwellings needed over the plan period.

2.3 The development vision, key principles and parameter plans have been developed in collaboration with the Local Planning Authority to ensure they are consistent with the Authority's aspirations for the area, and are reflective of:

- The site's position, location, and ability to strengthen connections with established communities – both to the north and south - by sensitively integrating the planned development with the existing urban form;
- The potential for the site to facilitate enhanced community infrastructure, including improved recreation and education infrastructure – which are proposed to be positioned centrally allowing easy access between, and to, both the existing and proposed future housing;
- A clear understanding of the environmental condition of the site – accrued through comprehensive and detailed technical assessment work;
- An assessment of the key features of the site and surrounds and how these can form part of the scheme; and
- A mix, form and quality of development that is inherently deliverable, and will create a great place to live, play, and travel to and through.

3. POLICY CONTEXT

Introduction

- 3.1 This section of the Document provides a summary of the relevant legislation and the planning policies in relation to the Welsh language at both a national and local level. The key policies relating to Welsh language impacts of relevance to the determination of the application are outlined below. A review of these in the context of the proposals is provided in Section 4 of the Statement (Assessment of Impact).

Legislation

Planning (Wales) Act 2015

- 3.2 Section 31 of Planning (Wales) Act 2015 confirmed that local planning authorities may treat the use of the Welsh language as a material consideration in planning assessments.

<i>Determination of applications for planning permission</i>	
31	Welsh language
(1)	Section 70 of TCPA 1990 (determination of applications: general considerations) is amended as follows.
(2)	In subsection (2), after paragraph (a) insert – “(aa) any considerations relating to the use of the Welsh language, so far as material to the application;”.
(3)	After subsection (2) insert – “(2ZA) Subsection (2)(aa) applies only in relation to Wales.”
(4)	The amendments made by this section do not alter – (a) whether regard is to be had to any particular consideration under subsection (2) of section 70 of TCPA 1990, or (b) the weight to be given to any consideration to which regard is had under that subsection.

Well-being of Future Generations (Wales) Act 2015

- 3.3 In addition to the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act received Royal Assent on 29th April 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. One of the ‘well-being’ goals identified in the document is that Wales should be a *‘society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation’*.

National policy

Planning Policy Wales (Edition 11, February 2021)

- 3.4 The latest edition of Planning Policy Wales (PPW), updated following the introduction of the Planning (Wales) Act 2015, suggests how an LPA might consider the use of the Welsh language in a planning assessment. The following passages are especially relevant to this proposal:

Paragraph 3.25: *The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. 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.*

Paragraph 3.26: *Planning authorities must consider the likely effects of their development plans on the use of the Welsh language as part of the Sustainability Appraisal. Planning authorities should seek to ensure a broad distribution and phasing of development that takes into account the ability of the area or community to accommodate development without adversely impacting use of the Welsh language.*

Paragraph 3.27: *Development plans should include a statement on how planning authorities have taken the needs and interests of the Welsh language into account in plan preparation and how any policies relating to the Welsh language interact with other plan policies.*

Paragraph 3.28: *Considerations relating to the use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission. Policies and decisions must not introduce any element of discrimination between individuals on the basis of their linguistic ability and should not seek to control housing occupancy on linguistic grounds.*

Paragraph 3.29: *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: Planning and the Welsh Language (2017)

3.5 Technical Advice Notes (TANs) provide detailed planning advice on various subjects. Each TAN may relate to one of various material considerations in a planning assessment.

3.6 The following paragraphs of TAN 20 (Published in 2017) are especially relevant to this proposal:

Paragraph 1.7.3: *The future of the language across Wales will depend on a wide range of factors beyond the town and country planning system, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The planning system can contribute to the future well-being of the Welsh language, by establishing the conditions to allow sustainable communities to thrive. For example, creating conditions for well-paid employment opportunities and a range of quality housing options are integral to planning for sustainable communities.*

Paragraph 3.1.2: *In determining individual planning applications and appeals, considerations relating to the use of the Welsh language may be taken into account so far as they are material. Section 70(2) TCPA does not give any additional weight to the Welsh language above any other material consideration and decisions on all applications for planning permission must be based on planning grounds only and be reasonable.*

3.7 With the TAN 20, the Welsh Government seeks to undertake the following:

- i. Clarify the link between planning for the Welsh language through land-use planning and community planning;
- ii. Make it clear that decision-makers may take the Welsh language into account where it is material to the application; and
- iii. Allow language impact assessments in specified circumstances.

3.8 In addition to TAN 20, the Welsh Government has produced their Cymraeg 2050 vision which aims for there to be 1 million Welsh speakers by 2050. The three key themes of this are:

Theme 1: Increasing the number of Welsh speakers

- This includes transmitting the Welsh language between generations and;
- Developing and sustaining skills through education and training from early years to Welsh-language provision for adults.

Theme 2: Increasing the use of Welsh

- This includes increasing the use of Welsh within the workplace across all sectors;
- Increasing the range of services offered to Welsh speakers, and an increase in use of Welsh-language services and;
- Embedding positive language use practices supported by formal and informal opportunities to use Welsh socially.

Theme 3: Creating favourable conditions – infrastructure and context

- This includes supporting the socioeconomic infrastructure of Welsh-speaking communities;
- Safeguarding the Welsh language as part of our contemporary culture and;
- Enhancing linguistic infrastructure to ensure the continued development of Welsh language infrastructure via dictionaries, terminology, and translation.

Development Plan Context

3.9 The Carmarthenshire County Local Development Plan is the adopted development plan for the local planning authority.

Current Local policy

Carmarthenshire County Local Development Plan (Adopted 10th December 2014)

Policy SP18 from the Carmarthenshire LDP aims to '*Delineate those areas identified within SP18 as being of high linguistic sensitivity on the proposals map. The following Town & Community Wards will constitute such areas: Gorslas, Llannon, Pencarreg, Pontyberem and Quarter Bach.*'

This is to '*provide additional clarity in the interpretation and implementation of the policies and provisions of the Plan.*'

3.10 The below diagram reflects the percentage of Welsh speakers within the county of Carmarthenshire based on 2011 census data.

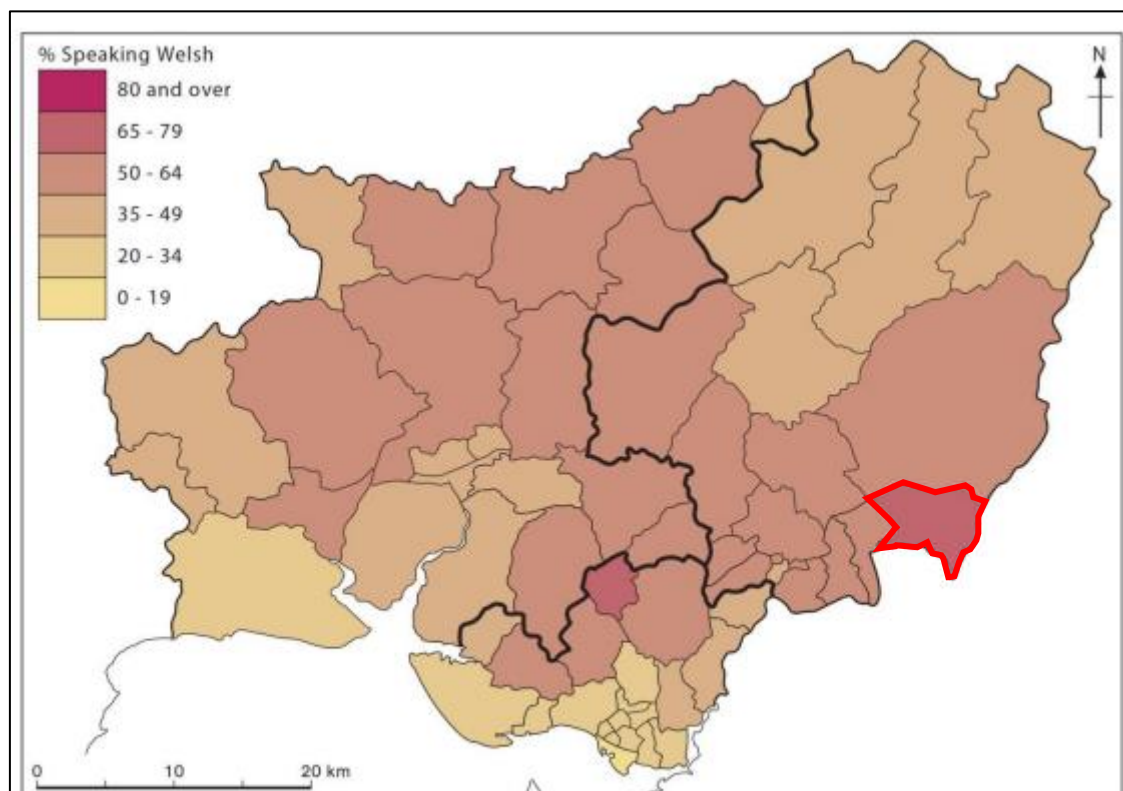


Table 4: Percentage of Welsh speakers by ward (2011 Census)
2011 Census: The Welsh Language in Carmarthenshire by Dr Dylan Phillips

Welsh speakers by ward diagram with site ward outlined in red

- 3.11 The Carmarthenshire SPG states the following relating to Policy SP18: *'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.'*
- 3.12 The Carmarthenshire SPG also provides additional guidance in respect of the requirements of Policy SP18. This is said to be *'especially pertinent to supplement the Policy's requirement to phase residential development in areas where 60% or more of the population speaks Welsh. These communities are identified in the Census data, and as such the Local Planning Authority will update the LDP policy and this SPG as necessary to reflect the updated Census data.'*

The current statistics indicate that 60% or more of the population speak Welsh in the following Town and Community Wards:

- Gorslas;
- Llannon;
- Pencarreg;
- Pontyberem; and
- Quarter Bach

4. ASSESSMENT OF IMPACT

Introduction

- 4.1 This Section assesses the impact of the proposals in relation to the Welsh language having regard to the consideration of relevant legislation, national and local planning policy and guidance, as outlined in the previous Section of this Document.
- 4.2 This Section addresses the potential impact of the proposal in relation to:
- A summary of the demographic impact of the proposals;
 - The extent to which Welsh is a feature of the community;
 - The impacts on Welsh language schools and the likelihood of them being able to accommodate such impacts satisfactorily.

Summary of the Demographic Impact of the Proposals

- 4.3 Whilst the application is in outline only and the exact unit mix and associated level of occupancy is not currently known, the following table outlines an indicative projected population of the application based on the proposed mix at this stage:

Household Type	Average Occupancy	No. of Units	Total Occupancy
3 bed house	3 persons	21	63
4+ bed house	4 persons	39	156
TOTAL			219

- 4.4 The projected population of the proposal is 219, which comprises 7.77% of the overall population of Quarter Bach (as identified within the 2019 electoral division profile).

The Extent to which Welsh is a Feature of the Community

- 4.5 The extent to which Welsh is a feature of the community is principally considered in the context of the ward of Quarter Bach, within which the site is located, and also in relation to the surrounding wards of Garnant and Llangadog.
- 4.6 The Carmarthenshire Census data shows that the number of and percentage of Welsh speakers is high within the district of Ammanford and neighbouring districts of Garnant and Llangadog. These indicators are documented and assessed below:

Electoral Division	2011 Able to Speak Welsh (%)	2011 Welsh Language Skills (%)
Quarter Bach	68.7	77.7
Garnant	58.5	70.8
Llangadog	55.6	56

- 4.7 The Census information indicates that around half of the population are Welsh speakers. It is also worth highlighting that a significant percentage of the population have at least some Welsh language skills even if they are not able to speak the language fluently.

The Impacts on Welsh Language Schools

- 4.8 The schools within the catchment area of the site are as follows:
- Brynaman Primary (Welsh-medium primary);

- Ysgol Y Bedol (Welsh-medium primary);
- Ysgol Dyffryn Amman (Welsh & English-medium secondary);
- Ysgol Maes Y Gwendraeth (Welsh & English-medium secondary).

4.9 In terms of the Welsh-medium schools, Carmarthenshire Council education Officers have identified that there is no surplus capacity in local schools. As such an Education S106 contribution is required.

4.10 Carmarthenshire Council Education Officers have calculated the pupil generation of the development to be as follows:

- Early years pupils 2.4;
- Primary pupils: 24; and
- Secondary pupils: 12 pupils.

4.11 Having regard to the pupil generation the S106 contribution requirements proposed by Carmarthenshire Council are as follows;

- Early Years – $2 \times £3,000 = £6,000$ (Brynaman)
- Primary – $24 \times £3,500 = £84,000$ (Brynaman)
- Secondary – $12 \times £3,000 = £36,000$ (Dyffryn Aman/Maes Y Gwendraeth)

5. LANGUAGE ACTION PLAN

Introduction

- 5.1 Whilst there are a number of wider national and regional strategies in place to promote the use of the Welsh language, the applicants have prepared a Language Action Plan outlining the measures to assist in the proposed development's contribution to the Welsh language and culture.
- 5.2 It should be stressed that the following measures supplement and are in addition to the proposal's contribution in providing a wide variety and choice of housing types, which is promoted in Planning Policy Wales (Paragraph 9.1.1) as having a positive community contribution.
- 5.3 Whilst the application is in outline form, this Plan incorporates the following measures in accordance with the Welsh Language SPG 2014:
- a) Marketing;
 - b) Phasing;
 - c) Provision of affordable housing;
 - d) Provision of community facilities;
 - e) Provision of school;
 - f) Unit mix; and
 - g) Street names and signage.

- 5.4 It is considered that, where appropriate, these measures can be further detailed at Reserved Matters stage.

a) Marketing

- 5.5 Local marketing of the proposed residential development in the Welsh medium should ensure maximum exposure to a high proportion of Welsh linguists.

b) Phasing

- 5.6 The sensitive phasing of the development takes into account the ability of the area to accommodate the development without eroding the position of the Welsh language.

c) Affordability

- 5.7 Increasing the existing provision of housing stock within the Ammanford area is likely to mitigate (to a certain extent) any existing issues of affordability. Moreover, the provision of an appropriate level of affordable housing will allow local people who require housing to remain in Ammanford and will therefore assist with maintaining the level of Welsh speakers in the local area.

d) Provision of Community Parkland and Open Space

- 5.8 As illustrated within the illustrative masterplan submitted with this application, the proposal incorporates a substantial proportion of open space, comprised of retained high quality trees, a village green, areas for play, attenuation areas and amenity grassland. The community use of these open spaces by both existing and proposed residents will bolster social networks.

e) Provision of School

- 5.9 The applicants are making S106 contributions to local schools to assist with funding and teaching provisions. On the basis of pupil generation projections outlined by Carmarthenshire council, and current trends in the district, it is anticipated that circa 20 pupils will attend Welsh medium education. This will serve to promote the Welsh language amongst children and by indirect extension, encourage the non Welsh speaking adult population to learn Welsh also.

f) Balanced Unit Mix

- 5.10 The provision of a mix of unit types to ensure a balanced age demographic is maintained.

g) Street Names and Signage

- 5.11 As per Paragraph 4.1.1 of TAN 20, it is stated that:

'Signs can have a strong visible impact on the character of an area, including its linguistic character. They are also one method of promoting the distinctive culture of Wales, which is of significance to the identity of individual communities as well as the tourism industry. Policies in LDPs relating to signage and advertising subject to planning control may promote the provision of bilingual signs.'

- 5.12 It is accordingly considered that this will encourage the use of the Welsh language and will adhere to the current signage in and around Kingsbridge to keep this consistent with the existing use of the language.

Interim Summary

- 5.13 Having regard to the measures proposed, the proposed residential development of the site is considered acceptable in principle in terms of impacts on the Welsh language.

6. SUMMARY AND CONCLUSIONS

Introduction

- 6.1 In summary, this Document has sought to address the following objectives in relation to the proposed housing-led development of strategic scale at Land South of Cwmgarw Road, Brynamman:
- a) provide a clear understanding of the relevant legislation and policy in relation to the Welsh language;
 - b) consider how the development proposals may impact on the Welsh language; and
 - c) outlines how the proposal intends to achieve the objectives of protecting, strengthening and promoting the Welsh language.
- 6.2 Whilst pre-application dialogue with the LPA has identified that a Welsh Language Impact Assessment is not strictly required, the Applicant has provided one voluntarily having regard to the context of the site and surrounds.

Planning Policy Context

- 6.3 In terms of planning policy context, and in particular the adopted Local Development Plan, identifies the Quarter Bach community as one of the 5 areas with over 60% of Welsh speakers, which should be maintained as much as possible. This suggests that the position of the Welsh language is strong and the overall number and proportion of those who speak Welsh is similar to those in the surrounding wards.

Assessment of Impact

- 6.4 The projected population of the proposal is 219 which comprises 7.7% of the overall population of Quarter Bach (as identified within the 2019 electoral division profile).
- 6.5 Moreover, it's worth highlighting that the percentage of those who are considered to possess Welsh language skills is also high in the Brynamman area. It is therefore considered that the potential impact of the proposals should be considered in this context.
- 6.6 Information presented suggests that the Welsh-medium pupil generation associated with the proposals is likely to exceed current surplus capacity. Notwithstanding this, the Applicant is working with Carmarthenshire council to provide s106 contributions to local schools, to help provide funding which may go towards new facilities and improving teaching capacity.

Notwithstanding this, on the basis of pupil generation projections outlined by Carmarthenshire Council, it is anticipated that circa 20 pupils will attend Welsh medium education. This will serve to promote the Welsh language amongst children and by indirect extension, also encourage the non-Welsh speaking adult population to learn Welsh.

Language Action Plan

- 6.7 Whilst there are a number of wider national and regional strategies in place to promote the use of the Welsh language, the applicants have prepared a Language Action Plan, which outlined the following measures to assist in the proposed development's contribution to the Welsh language and culture:
- a) Local marketing of the proposed development in the Welsh language to maximise exposure to a high proportion of Welsh linguists;
 - b) Phasing of the development taking into account the ability of the area to accommodate the development without eroding the position of the Welsh language;
 - c) The provision of an appropriate level of affordable housing, which allow local people who require housing to remain in Brynamman, and therefore assist with maintaining the level of Welsh speakers in the local area;
 - d) The provision of a variety of open spaces for community use spaces by both existing and proposed residents facilitating social networks;
 - e) The provision of a mix of unit types to ensure a balanced age demographic is maintained; and
 - f) Street names and signage reflecting the linguistic character of the area serving to promote the distinctive culture of Wales.

Conclusion

- 6.8 Having regard to the linguistic character of the site and surrounds, the site and proposal's planning policy context, and the Language Action Plan proposed it is considered that the application is acceptable in relation to Welsh language and community impacts.