

DYFODOL I'R IAITH

Comments on a Consultation

**A consultation on the 2018 – 2033 Carmarthenshire Council Revised
Local Development Plan second deposit document**

April 2023

Contact:

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Carmarthenshire County Council Forward Planning Department:

The response of Dyfodol i'r Iaith members in Carmarthenshire to the second deposit version of the 2018 – 2033 Carmarthenshire Revised Local Plan

Planning and "Developers"

Population Exchange

Language, as we know, is a strange thing. Who in their right mind opposes development? But if we were to ask a number of people who have been involved with the planning system recently, it is likely that we would encounter a number of people who have lost their sanity.

The Carillion Company failed in 2018 due to the protection of bonus payments for the Directors, inappropriate accounting methods and paying entirely inadequate attention to the pension scheme. A significant number of buildings, including hospitals, were left unfinished. The cost of completing the building of the Royal Liverpool Hospital fell on the shoulders of the taxpayers.

Numerous houses were built on wetlands and on top of coal shafts by "developers" in Wales and beyond.

The Persimmon Company has built a significant number of houses in the county. The former Chief Executive of the company, Jeff Fairburn, was paid £7,000,000 in bonus over the years. This is the total amount the same company is prepared to pay to rectify the dangers on nine sites where they built unsafe housing.

Cladding is not the only dangerous element in homes in the UK. It is estimated that around 700,000 people still live in unsafe flats and up to another 3 million in homes that cannot be mortgaged because they are unsafe. The "developers" and Government rules are responsible for this unacceptable situation.

The Westminster Government presented a package of money to help around 200,000 flats in the highest towers. They did this under public pressure. The "developers" were very reluctant to accept responsibility and offer compensation to the tenants. The construction industry was given a decade to pay the £2billion cladding tax. Only recently, due to threats from the Minister in Westminster to remove them from the list of approved companies, have the companies made the effort in earnest to solve the problems that were created by them. But since the Grenfell disaster, when 72 people were burned to death, in June 2017, the five largest construction companies made £10 billion in profit. Somewhere in the Kensington and Chelsea council offices there is an application to "develop" Grenfell Towers.

It is high time we were more suspicious of "developers" and their empty claims and trusted local companies to meet local requirements.

Is there a need for so many houses?

No.

Research by Ian Mulheirn shows that the housing supply as a whole is sufficient. Mulheirn is a former economist at the Treasury, and Director of Consultancy with Oxford Economics. He is now Executive Director and Chief Economist with "Renewing the Centre", an Organization created by the former Prime Minister, Tony Blair.

In 2019 he published “Tackling the UK Housing Crisis – is supply the answer?” It focuses on England but it refers to Wales. To avoid incorrect translation, here is the crux of his argument:

“It is commonly claimed that we have failed to build enough houses to meet the demand for places to live. But official data suggests this is not the case since the 1996 nadir of house prices, the English housing stock has grown by 168,000 units per year on average, while the growth in the number of households has averaged 147,000 per year. As a result, while there were 660,000 more dwellings than households in England in 1996, the surplus has since grown to over 1.1million in 2018.

Similar trends are apparent in Scotland where a surplus of 74,000 in 1996 had more than doubled to 169,000 by 2017.

And in Wales the surplus increased from 56,000 to 92,000.”

The “*Dwelling Stock Estimates, Welsh Government*” document November 2019 supports Mulheirn’s analysis:

“The figures seem to suggest that in 2019 there may have been a sufficient number of dwellings for the overall number of households in Wales” [page 4]

The Forward Planning Department claims that it scrutinises carefully the Government’s projections relating to population. It does not appear that sufficient attention was paid to this particular analysis.

Mulheirn attributes this completely misleading situation to erroneous projections from the Office of National Statistics and the Government, which are the agencies on which the Forward Planning departments base figures. For decades, the growth in household numbers has been overestimated. The result of this was an overestimation of the total number of houses needed. Although the Office for National Statistics has recently recognized the weakness and adjusted the figures, Mulheirn is of the opinion that the estimate remains around 15,000 in excess per year.

He does not deny that there are specific problems such as homelessness, the need for social housing and affordable housing but in general there is no need to build thousands of houses in the UK and certainly not in this county. In the meeting at the end of 2020, the Council's Housing Department answered the questions about providing housing that meets the county's specific requirements.

Is it time to consider combining the Housing Department and the Forward Planning Department, on the understanding that it is the needs of the people of the county and not those of "developers" which should now claim priority?

The Situation in Carmarthenshire:

If the population of the county were to increase due to the natural growth of the native population and there were numerous jobs to support the people of the county, more houses would be needed, and with time and effort it would be possible to turn the linguistic ebb into a tide, and see an increase in the number of Welsh speakers. But that is not how it is.

Since 2001 the county's death rate has been higher than the birth rate. The same point is made in the Language Assessment, at the end of 2019, a document that the Forward Planning Department claims to have paid attention to its content. Here is an extract from the Language Assessment: ***“The 2017/18 period recorded the highest number of deaths was registered since 2001”*** [Appendix 2.4, point 9].

If the death rate is consistently higher than the birth rate, and bearing in mind the significant emigration, the county's population would be expected to fall. That is not what happened. The first draft document of the LDP explains:

"The main factor influencing population change in Carmarthenshire since 2001/2 has been through inward migration, where more people have come into the County than have left"

The Language Assessment report confirms the pattern:

"Net internal migration continues to be the dominant driver of population change, with a sharp increase in the level of net inflow, reaching approximately +1600 in 2017/18 and showing a significant increase of over 700 compared to the previous year"

The County Council's latest LDP draft document underlines the continuation of the pattern

"Since 2011, the County has seen its population grow by 4,100 people, a 2.2% increase in 10 years. The main factor influencing population change in Carmarthenshire since 2001/2002 has been through inward migration....Carmarthenshire has an ageing population, with the number of deaths exceeding births each year since 2001/2."

There is an increase of people moving into the County within the 30-44 young family age group and the 0-14 year age group. There is also an increase in the over 65 age group which has contributed to Carmarthenshire's ageing population profile"

Further evidence of an ageing population are the figures of children attending the county's primary schools which have fallen over the years:

2016 = 2120; 2017 = 2065; 2018 = 1995; 2019 = 1950; 2020 = 1965 a 2021 = 1915

*****This evidence, commissioned by the County Council, shows the danger to the Welsh language from over construction. The draft Development Plan is not credible, in the face of the evidence of the Language Assessment or the evidence of the County Council.*****

The Census took place in February 2021 at the time of the pandemic. Although we do not have official figures it is clear that an additional number of immigrants have come to the county, like other counties in the west, looking for homes in a less populated area and dwellings with a garden or land.

Besides the Language Assessment, the Forward Planning Department claims to pay attention to the views and guidelines of the Welsh Government. When looking at the Preferred Strategy of the Forward Planning Department [alternative strategies were considered and rejected ... see below] the Planning Directorate of the Welsh Government made comments for consideration.

"The consequence of the level/distribution of housing growth proposed on the Welsh language needs to be clearly articulated especially as past high levels of in migration and international migration are being used to justify the housing requirement." [Impact on the Welsh language Assessment Methodology - paragraphs 23/4]

That is the truth. Building houses mainly for immigrants is what has happened in the county, and that when there was an adequate general supply of housing in Carmarthenshire. The latest figures from the County Council indicate that there are just under 2,000 empty houses in Carmarthenshire. The Housing Department is making progress in letting a number of the empty houses to county residents. But considering the houses for sale as well, which are available for any economic growth, however likely or unlikely that may be, there is a significant housing stock in the county for people who work here.

One would expect a County Council Forward Planning Department to consider carefully and to support to some extent, comments from the Planning Directorate of the Central Government. The intention to build 8,822 houses between 2018-2033 does not do that. The result of building this unreasonably high number will be to continue to promote the immigration of non-Welsh speaking people. Time is needed to implement the county's progressive policies in terms of making schools, workforces, apprenticeships and a number of other areas more Welsh.

The work of the Mentrau is challenging enough as it is, without continuing to promote the population exchange which is so harmful to our native language. The worry about the Forward Planning Department's lack of understanding of the County Council's linguistic priorities intensifies when looking at clause 11.173 of the Strategic Policy SP8 which claims:

“Through aiming for sustainable growth, the Plan will also maximise opportunities for non-Welsh speakers who move to the County to be integrated into community life at a scale and pace that will not undermine the vitality and viability of the Welsh language and culture” There is no explanation how this is meant to happen.

The results of the 2021 Census show that 26.4% of the county's population were born "outside Wales". This is an increase of 2.4% since 2011 and more than half the decrease of 4.1% in the percentage of Welsh speakers in the county since 2011. The integration policy does not appear to be very successful. There is no evidence concerning how many of the 26.4% of the county's population born "outside Wales" are fluent in Welsh.

The Forward Planning Department's approach to answering such questions is to transfer responsibility to other County Council departments, such as the Education Department. Reference was made above to the high level of immigration to the county in 2017/18. That cohort was analysed by the company that produced the Language Assessment. 30% of the people who came to the county in 2017/18 were aged 45 or over. [Appendix 2.4, pages 96 and 99/100]. Does the Forward Planning Department expect this cohort to attend a Welsh language school?

*****A lack of solid evidence to justify policies is a feature of the LDP as it stands*****

The immigration is not surprising from an economic point of view or the standard of living. The county is a pleasant place to live especially if your economic situation is comfortable. With the interest rate so low, selling a house and buying a similar one at a lower price is an effective way to accumulate a significant amount of money. By February 2021, according to Zoopla, the average value of a house in England was £320,757 while in Wales the average value was £199,113. The gap has closed somewhat since 2021 but a significant gap remains between the average house prices in the two countries.

When comparing house prices, again using Zoopla, we saw this comparison between Carmarthenshire and areas of England.

	<i>Birmingham</i>	<i>Coventry</i>	<i>Guildford</i>	<i>Brighton</i>	<i>Carmarthen</i>	<i>Carmarthenshire</i>
Semi-det	£268k	£273k	£552k	£578K	£188k	£178k
Detached	£463k	£427K	£1,047k	£786k	£321k	£334K

The Research was conducted in March 2023.

There are houses for sale in the county for £400,000, £500,000 and more. It is not likely that local people will be able to purchase these.

The county's Mentrau laith endeavoured to find out from house auctioneers, who has been buying houses in the area during the period of the pandemic. It is probable that some have moved from east Wales and some have returned to the county. But the house price comparison offers sufficient

evidence of the financial benefits of moving from England to Carmarthenshire. For the County Council, this is advantageous and it is likely that there are advantages for landowners, some businesses and more Council Tax as well.

But what immigration does is place significant additional pressure on our unique heritage. While acknowledging that some will certainly benefit from the construction of 8,822 houses between 2018 and 2033, as a pressure group, Dyfodol i'r laith believes that it is gradual and careful growth that is needed, while the policy to make the county more Welsh bears fruit.

Strategic Growth and Spatial Options Things to Consider and the Best Choice?

The title explains the department's priorities - the use of space or "land use", which is the basis of the planning system. Not the effect of land use on people but rather the use of land space for construction, arguing that this leads to economic improvements. It is claimed that the Department of Forward Planning is "**considering employment-led options**." This is commendable if it is realized and the department does not fall into the trap of thinking that construction on its own leads to economic prosperity.

The Forward Planning Department also considers the "**vacancy rate**". Reference has already been made to this. There are just under 2,000 empty houses in the county. Therefore, should there be an improvement in employment in the county and if that were to reduce emigration by the county's young people, there are empty houses here already for those workers. There are also a significant number of empty buildings in the towns and the countryside that can be converted into purpose-built homes.

A further argument from the Forward Planning Department is that it is necessary to "**link population growth and estimated employment growth**". The intention is supported by adding "**The options identified assume that housing development without employment opportunities in the same broad location, and vice versa, is less sustainable and is to be avoided**". The argument is correct, housing is needed for employees. Therefore the economic and employment prospects need to be considered carefully [see below].

The employment prospects were quite fragile when the Forward Planning Department considered the choices for the 2018 – 2033 Local Development Plan. Consideration was given to 6 options. The one with the smallest projection in terms of population growth and population change was the Welsh Government Projection based on 2018. According to this analysis, 4,359 houses would be needed over the period of the LDP to meet the requirement of 6,197 in population growth. This option and others were rejected, even the one which estimated that 5,670 houses were needed to meet the projected growth demand of 9,460 people over the period of the LDP. This was the Welsh Government's "High Population" variable based on 2018.

****The County Council's LDP does not pay sufficient attention to the Welsh Government's projections****

All the options claim to be able to link the construction with "job creation". Evidently there will be jobs in the construction field and this will offer economic benefit in some other areas. But it has already been explained that there are a number of people in the county looking for work and they live in the county. Also, what evidence does the Forward Planning Department have that the jobs created by large "developers" such as Persimmon will be local jobs? It is quite likely that a number of the workers would come from outside the county, in order to meet the demand of the "developers" for workers.

There is no purpose in building houses unless there is appropriate work for the people who will live in them, as the department's citations acknowledge. Otherwise, the people who come into the houses will be retired people from outside the county, placing additional pressure on local public services.

On what basis were these options rejected?

This is the Forward Planning Department's explanation for rejecting the other options:

“Given the potential negative impacts highlighted above, it is not considered prudent to utilise the principal WG 2018-based projection for the Revised LDP. It would not have delivered the Plan’s Vision and Strategic Objectives.”

As the County Council is not willing to accept the Welsh Government's analyses, it is necessary to consider who is being most realistic [below].

We find again in the department's comments the completely unclear connection between building and keeping young people in the county. Cymdeithas yr Iaith's response to the vague allegations is absolutely right:

“Hope and ambition are not the same as evidence”. Exactly.

More than once, the Forward Planning Department notes that attention has been paid to the Impact Assessment on the Welsh language carried out by the County Council in 2019. This was to be welcomed. The councils that give such consideration to the impact of planning on our national language are few. But it is necessary to consider and remember that the Assessment was discussing the previous Preferred Strategy, which was to build 8,835 houses. The new Preferred Option is just as likely to cause great harm to the Welsh language and make the work of the agencies on the Language Forum, and other organizations even more challenging. The options that offered gradual growth, that would offer an opportunity for all the work to restore the Welsh language to bear fruit over the period of the Development Plan, were ignored.

The Economic Outlook:

Above, we saw a suggestion that the Forward Planning Department couples the building of houses with the county's employment needs. So, what are the economic prospects now?

The latest LDP places strong emphasis on the Swansea Bay City Deal to create jobs and prosperity. The two most important projects within the county are Egin where the S4C centre is located and Pentre'r Awel near Llanelli. In the last LDP, an attempt was made to persuade us that Canolfan yr Egin would protect and, possibly, promote the Welsh language in the area. There are around 50 jobs there directly linked to S4C. Nearby it was planned to build 1,200 houses. For whom were these intended?

Another pillar in the county's planned economic growth is Pentre Awel on the outskirts of Llanelli. The target over the next 15 years is to "create up to 2,000 jobs" and give "a £467 million boost to the economy". In that very area, more than 200 jobs were lost at the Schaeffler factory and another 90 from the Calsonic factory relatively recently. During the Covid period the AIM Altitude factory in Dafen closed with the loss of an additional 100 good jobs. This is approximately 400 local workers who would be available, with the appropriate training, to work in Pentre Awel, and who already live in houses in the area. Llanelli is in the south east of the county and convenient for Swansea. Neath Port Talbot, just to the east, can meet the needs of Pentre Awel, without building thousands more houses in the area.

The pandemic accelerated the tendency that already existed to shop online. Unfortunately, many more workers will lose their jobs because of this. Debenhams has closed in Carmarthen and other shops had already disappeared from the town centre. The same pattern will take place in towns such as Llanelli and Ammanford. Llanelli town centre is quite sad at the moment and it is comforting to know that discussions have taken place to change the character and regenerate the area. It is good to see a number of smaller shops opening, but they can hardly offer the number of jobs that existed in the big chain shops. In the countryside, we have seen the closure of many branches of the big banks and the loss of jobs as a result. Here are more workers who already live in houses in the county and are ready to work.

Planning the recovery of the county's town centres should be a priority for the Forward Planning Department. Already, a number of councils are preparing to adapt the nature of town centres, including leisure resources and turning empty shops into purpose-built dwellings for local residents. The priority is not to build thousands of houses, but to secure work that suits the county for people who, on the whole, already live here.

The document "*Plans for Carmarthenshire's economic recovery and growth*" makes the point, "*It sets out the authority's aims to help businesses replace more than 3,000 jobs that have already been lost during the pandemic and safeguarding and replacing up to 10,000 jobs that may have been, or are at high risk of being lost when furlough ends*". Protecting jobs and creating jobs to meet the demands of the county's current population is enough of a challenge. There is hardly a need for 8,800 additional houses that could attract people who would gain a head start on the local residents in terms of getting the lost jobs.

"The **county's economic ambitions**" is a laudable enough ideal but it seems as far from reality as a rhinoceros ballet-dancing! Gradual growth and improving the infrastructure is the realistic ambition and the department on rural development offers intelligent guidance in this direction. An example of what can realistically be done is the use of the £36.8 million from the UK Wealth Sharing Fund for community associations and businesses and the Tywi Valley Walking and Cycling Paths project.

Population and Housing Documents:

Forward Planning departments study documents that try to predict population and dwelling trends. These are not concrete forecasts of what will happen but projections based on trends. Many of them confirm what is increasingly obvious to us.

Summary statistics for the South West Wales region: 2020 [Welsh Government, May 20 2020]
"Looking at local authorities, Carmarthenshire saw the largest net change in population due to migration and other changes during the 2017-18 period. All 4 local authorities experienced negative natural change during this period, meaning the number of deaths was higher than the number of births. The highest level of negative natural change was in Carmarthenshire".

In other words, more have died than been born in the county and that at a higher rate than the other three counties. But because of migration, "**population change due to net migration and other changes was positive**". "Positive" means progress for the statistician, but for those who love the Welsh language, it means an additional challenge of trying to assimilate even more non-Welsh speaking people.

Stats Cymru offers totals for 2016/7.

2016/7 - Inward inflow [within the UK] 6,702 Inward outflow 6,080

In 2018/19 - Inward Inflow [within the UK] 6,900 Inward outflow 5,900
[Local authority population projections for 2018/19]

What kind of people migrate? We know that a significant number of young people leave the county annually. Who is taking their place? Is it young people returning to the county or immigration of working age people as the Forward Planning Department predicts when building so many houses?

Local authority population Projections based on 2018, Wales [revised], that was published in August 2020, attempts to foresee what is likely to happen. It predicts a 2.4% increase in the county's population by 2028, which would bring the total population of Carmarthenshire to 192,100. This is 1.7% higher than the projection based on 2014 figures. What will drive the increase in population?

“Migration is projected to add to the population of all local authorities in Wales...in the period 2018 to 2028. However, for most local authorities, net positive migration will more than offset the negative natural change resulting in overall population increases”

[Remember the meaning of "positive" and "negative" for the statisticians]

The theory was realized in the 2021 census. The percentage born "outside Wales" increased from 24% to 26.4%.

Carmarthenshire - 2021 Births 1,540	Deaths 2,592	2020 Births 1,660	Deaths 2,404
2019 Births 1,744	Deaths 2,202	2017 Births 1,817	Deaths 2,230
2016 Births 1,878	Deaths 2,266 the same pattern since 2001/2	

In 17 of the local authorities, including Carmarthenshire, a reduction will be seen in the number of people aged 16-64. These are the people that the Forward Planning Department claims will come to live in the houses that are to be built. Indeed, the graph on page 5 of the Language Assessment shows that the increase between 2018 and 2028 is likely to be in the age of 65+ to 75+. As well as creating challenges for social services, people in this age range are not likely to learn Welsh. Therefore what the analysis does is predict the pattern of immigration which will include a significant percentage of older adults, and emigration of a significant number of young people who have been educated in the county. It also predicts that the pattern of the death rate being higher than the birth rate will continue until 2028.

Official documents show a gradual but clear shift towards renting at the expense of ownership. The **Dwelling Stock Estimates** document, published in March 2019, states that 9,200 dwellings in the county are rented from the local Council and 3,200 from social landlords. It is certain that people in need must be housed and offered suitable dwellings. But there is some concern that many of the social homes in the county are being let to people from England and if this is happening it will surely further dilute the language.

Another trend that has already started and is likely to accelerate is homes suitable for one person. It is expected that the demand for this type of dwelling will increase by 27% by 2039. Forward Planning departments need to be aware of these trends and adjust the projections in the light of the developments and the evidence.

The Forward Planning Department, Welsh Government and the Welsh Language:

The Welsh Government aims to secure one million Welsh speakers by 2050 and there is a reference to the place of the Welsh language in a number of Government documents. The LDP refers to the Well-being of Future Generations Act which includes the objective to create

"A Wales of vibrant culture and thriving Welsh language"

**** Building houses that will attract more non-Welsh speaking immigrants is not consistent with this objective**.**

Unlike the previous draft LDP, there is just one reference this time to the Welsh Government's document "**a Million Welsh Speakers by 2050**". Then we have " *To deliver on this aim, the Council will support, promote, and enhance the Welsh language as a viable community language by ensuring that there are sufficient and proportionate employment and housing opportunities to sustain both the rural and urban communities the county and by implementing an effective monitoring framework*"

We can welcome the intention to offer worthy and adequate employment to the people of the county. In our view, 8,822 houses are not required to realize this intention. The monitoring regime requires clarification because Census 2021 figures show that this has not been effective, if it exists at all. The percentage of the county's Welsh speakers fell from 44.0% to 39.9%. Remarkably, the document refers to the 2011 census and not that of 2021!

**** This is another example of paying insufficient attention to the Welsh Government's recognized policy and that in a county with a significant number of speakers of the language, despite the worrying decline ****

The government's "a Million Welsh Speakers" document recognizes the emigration of a significant number of Welsh speakers from their areas and the influx of older people. The document then makes a point that it would be beneficial for the County Council to consider and act upon, if it is serious about wishing to maintain and promote the Welsh language:

This calls for the relationship between language planning and land use planning to be strengthened

There is no evidence whatsoever in the preferred strategy that the county is aware of its responsibility in the process of language planning.

****The Local Development Plan in its current form has not understood the implications of the Welsh Government's requirement****

The Forward Planning Department and therefore the County Council probably understand that there is a hierarchical regime in the planning system in Wales. Below Wales' planning system comes Future Wales. It is a vitally important policy in the planning system:

"Future Wales is the top tier of a development plan and it focuses on issues and challenges at the national level" and

"Strategic and Local Development Plans are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively" [Page 6]

So, how close is the relationship between the preferred strategy of the Forward Planning Department and the Future Wales Guidelines, specifically in terms of the total housing needed? The South West region was adapted for the final version of Future Wales. The region now includes the counties of Pembrokeshire, Carmarthen, Swansea, Neath Port Talbot and the Pembrokeshire Coast National Park.

The central estimate of the final version of **Future Wales** is that **25,600 additional houses will be needed between 2018/19 and 2038/9**. This extends five years beyond the end of the county's Local Development Plan period.

As there is a period of 20 years for the central estimate of the South West Future Wales region, we can divide the 25,600 by 20 and get **1,280**. This is the number of additional houses needed **annually, across the 5 authorities** to reach the target. By dividing the 1,280 among the 5 authorities, we find that each authority needs to build only 256 additional houses annually to reach 25,600. Finally, in order to see how many houses Carmarthenshire needs to build over the 15 years of the LDP it is necessary to **multiply 256 by 15 = 3,940 additional houses**.

Even if we divide the 25,600 between the five authorities we get a total of 5,120 for each county but that is over a period of twenty and not fifteen years.

Some would argue that the Pembrokeshire Coast National Park is so small, that it could almost be ignored when trying to predict housing totals in the counties. If we were to do that and divide 25,600 between 4 authorities we get a total of 6,400, but again over twenty and not the fifteen years of the LDP.

Whichever analysis is preferred, it is significantly less than the 8,822 in the Preferred Strategy by the County Council. These are much more reasonable targets bearing in mind that there are around 2,000 empty houses in the county in 2022 not to mention other empty buildings and the houses for sale.

** This is another example of the Forward Planning Department/County Council paying insufficient attention to the Welsh Government's clear guidelines in the key "Future Wales" planning document.

The document's guidelines are vague on how to ensure a situation "***that create(s) the conditions for Welsh to thrive and remain as the community language in the many places where everyday life takes place in Welsh***". There are references to "***the correlation between strategic housing, transport and economic growth and the Welsh language***" before asking the LDPs to include "***settlement hierarchies and growth distribution policies***" for creating the appropriate conditions to ensure the prosperity of the Welsh language. These concepts are open-ended and vague, but by adhering to the central target it should be possible to develop appropriate assimilation strategies over the 15-year period of the LDP.

Nevertheless there are specific challenges facing the county's Mentrau Iaith. "***The Future Wales spatial strategy states that the focus of growth in the South West region should be in the Swansea Bay and Llanelli area***".

Within the county, the area includes the Anglicised town of Llanelli, where the lowest percentages of Welsh speakers are according to the 2011 and 2021 Censuses, but next door the areas with the highest percentages, namely Cwm Gwendraeth and Dyffryn Aman. "Development" meaning further significant construction in the town, and particularly in the Amman and Gwendraeth valleys, will place enormous pressure on the Welsh language. There will also be an additional challenge in the Carmarthen area which has been designated as a "***regional growth area***". It is possible that "developers" and the Forward Planning Department will argue that we need quite a bit more than the 3,900 or 5,120 or even the 6,400 houses if there is development/construction, in the Llanelli and Carmarthen area. On the other hand, there are a significant number of empty houses in the county and also a number of people already looking for work. The total number of empty houses does not include the Houses for Sale. This is an additional pool of dwellings to meet the needs of workers in the county. Therefore, it is not possible to see a need for many more than 5,000 houses at the most, considering the uncertain economic outlook. This is especially true bearing in mind that the County Council does not know how many houses are for sale in the county. These houses are available for any employment development.

The emphasis on affordable and social housing meets the county's needs and we received acceptable answers from the Housing Department concerning re-letting empty houses as dwellings. Building social and affordable housing, with affordable corresponding to local wages, is what is required, with the necessary minimum of houses on the open market that can ensure profit for local companies. This is not the intention of the Preferred Strategy. Unlike the Welsh Labour

Government's guidelines, it opens the door to further immigration and makes the challenging work of the Forum agencies and other Welsh organizations even more difficult.

Ms Meinir Jones, on behalf of the Welsh Language Commissioner, makes the exact point when responding to the previous LDP. It is difficult to believe that she would change her opinion, bearing in mind that a reduction of 13 was seen in the total number of houses now planned to be built in the new LDP, **"The new housing target of 8,835 is significantly higher than the need for new housing based on Welsh Government projections"** [page 184 County Council minutes, January 2021]]

Welsh Government Response to the Local Development Plan:

On behalf of the Welsh Government, Mark Newey raises relevant questions about the first LDP. He highlights the negative natural growth in the county's population, before making the point:

"The authority must fully evidence and explain how the scale of growth relates to the latest projections, taking account of housing need and impacts on the Welsh language. The evidence needs to demonstrate where the in-migration will be derived from i.e. neighbouring counties, elsewhere in Wales, the UK or international migration" [page 182 County Council minutes]

This is the type of information that Mentrau Iaith have tried to find out from the local Estate Agents. Dylan Phillips' evidence on the 2011 Census strongly suggests that many came from England to the county's countryside. The draft version of the LDP recognizes that immigration is responsible for the growth in the population [page 2] and the Welsh Government's Planning Directorate comes to the same conclusion [page 2]. But whether the immigration comes from England or an Anglicised part of Wales, it is bound to lead to a weakening of the Welsh language in the county.

Mark Newey is also critical of the spatial distribution of the LDP, raising doubts about its impact on the Welsh language. He even raises doubts about the effect of the LDP on the rural areas of the county, although that part of the plan shows an awareness of careful development and the importance of the Welsh language and our native culture.

"The Council's Rural Needs Study" 2019 states that in rural settlements there is a predominant need for affordable homes. ..It is likely that the majority of housing delivered in these settlements will be for market housing. The study also highlights that half of the properties sold in these areas are likely to be to people outside the County Borough. The policy appears at odds with the evidence base. It is unclear how this approach aligns with findings in the SA/SEA, which identify that growth and inward migration has the potential to dilute the Welsh language" [page 814 County Council minutes]

As things stand at the present time, the Welsh Government demonstrates a greater awareness of the effect of the LDP on the Welsh Language than the County Council does. It has a better understanding that we are talking about exchanging a Welsh population for one that is English speaking. The Future Wales housing target also offers far better opportunities to the Welsh language than the false projection of the Forward Planning Department.

The County Council:

The County Council's answer to the critical comments was that more research would be carried out before reaching a final decision. Little seems to have changed in terms of the Growth Strategy and the total number of houses.

But the County Council carried out a Language Assessment of the impact of the LDP on the Welsh language. Few authorities have undertaken such research and Carmarthenshire is to be commended for doing so. As already stated the basic weakness of the Assessment was that it assessed the impact

of the Preferred Strategy, which recommended the construction of 8,835 houses. The more realistic options of the total number of houses required were not considered. Nevertheless, the Assessment reaches a similar conclusion to Dylan Phillips and the Welsh Government:

“All scenarios assume that net internal migration will continue to be the main driver of population change. Although it is not made explicit, it is assumed that natural change will continue to be negative thus reducing the pool or stock of existing Welsh speakers over time” [appendix 2.5 point 17, page 108]

The comments are scathing on how reliable the County Council's projections are. This is a quote from "***Methodology for Assessing the Impact on the Welsh Language***" - para 55 "***In terms of realising population and household projections and economic growth, the consistency of realising projections is not particularly good***". Exactly.

It is to be hoped that the decision of the County Council passed in July 2019 will be implemented consistently. The whole county was designated as one of "linguistic sensitivity" and further that the language "is a Material Planning consideration"

- In all applications to build 5 or more houses in the rural areas and
- In all applications to build 10 or more houses in the urban areas.

This can be a strong tool to prevent unnecessary construction in the county and it is a credit that the whole county has been defined as one of linguistic sensitivity. Of course, it depends on who undertakes the Impact Assessment on the Welsh language. In the past, the “developers” were left to get on with it! As the Council sees the whole county as one of linguistic sensitivity, it is difficult to understand why the same Council sees the need to build 8,822 houses over the period of the LDP, which according to a number of agencies is likely to dilute the Welsh language.

In the past the chairman of the Planning Committee was closer to it:

“Approximately 6,000 houses probably will be the target for the period 2021- 2033” were the Chairman's words in articles in the local paper in 2018. One must hope that he and the County Council will come to realize that this, although it is an excessive target, is nearer the mark and we shall have a significant change in the total number of houses from 8,822 over the period of the LDP, which is likely to be a further heavy blow to the Welsh language in the county over the next decade.

As things stand, Dyfodol i’r Iaith is unable to support the Local Development Plan.

It is not appropriate for Carmarthenshire, in the light of the evidence in the Language Assessment or Welsh Government policies. It pays insufficient attention to national policies such as the Well-being of Future Generations Act and a Million Welsh Speakers, not to mention Future Wales which is an important statutory guideline in the Planning system. We are of the opinion that the Local Development Plan is unstable and that the total number of houses intended to be built needs to be significantly reduced.

Dyfodol i’r Iaith Carmarthenshire

March 2023