**Cymdeithas yr Iaith - Carmarthen Region's response to consultation on Carmarthenshire’s Deposit Revised Local Development Plan 2018 - 2033**

**Initial comments**

We recognise that the objectives of the Revised Local Development Plan (LDP) are ambitious and that the County Council's aspiration to facilitate high quality job creation is commendable.

Having said that and having analysed the relevant documents, we must raise serious concerns about the impact of the scheme on the Welsh language and some of Carmarthenshire’s communities and areas where the Welsh language is at its strongest.

We believe that key elements of the revised plan are not based on hard evidence, and that there is a long way to go to ensure a viable future for the Welsh language before the Council submits the Deposit Scheme to the Government. There is no analysis of how creating a significant number of jobs in one corner of the county can achieve the goal of preventing the severe exodus of young people from our communities across the county. A fundamental mistake is that the Plan treats economic regeneration and language and community regeneration as two separate things instead of giving detailed consideration into what kind of economic development will best benefit the language and our communities.

Although "protecting, enhancing and promoting the Welsh language and cultural identity" is one of the Strategic Objectives of the Plan, the content of the Plan itself does not reflect that.

Furthermore, the Council's Welsh Language Promotion Strategy includes the aim of making Welsh the main language of the county. The LDP does not refer to that at all and works against it.

**Housing needs and population projections**

As with the second original Plan, it is difficult not to conclude that the County Council asked how much housing would be needed to achieve the objectives of its regeneration strategy, as the number of houses is based on Turley's Housing and Economic Growth (Population Growth) Report.

The plan recognises that there has been a significant decline in the number of Welsh speakers in recent decades, therefore one must ask why the second LDP is based on a ten-year projection in Turley's Housing and Economic Growth (Population Growth) Report.

The first LDP was also based on a population projection, and it planned for growth.

The Deposit Plan expects a growth of 14,468 in the County's population and that 8,822 houses are needed to achieve an objective of creating 4,140 jobs.

We disagree with the Preferred Option, which is a Balanced Community and Sustainable Growth Strategy.

Focusing growth in two areas in the east of the county, the Llanelli Coastal Belt and the Ammanford / Cross Hands area, will encourage an influx through the creation of commuter villages.

The Report on [the Initial Consultation](https://www.carmarthenshire.gov.wales/media/1230998/isa-report-2nd-deposit-rldp.pdf?v=202302131122270000) states, in response to Cymdeithas yr Iaith's comments regarding concerns about basing a Local Development Plan on an economic plan:

*"Further evidence will be produced to inform the economic needs of the County and its impacts upon the County's housing needs."*

The Welsh Government's comments regarding the original consultation also state:

*"Further evidence and explanation is required to explain how and where the level of job growth will be delivered, including both strategic and non strategic allocations. It is unclear what the level of employment provision is and for what sector and how this*

*translates into a land requirement for employment uses. The current employment evidence base is inconsistent and unclear.*

*"The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable."*

There is no reference in the latest documents to further evidence of impact nor to needs arising from economic developments.

The council should co-produce a regular Community Assessment in all areas of the county with communities as equal partners.

**The Welsh Language**

Although a "Welsh Language Impact Assessment, December 2019" has now been published it appears that Carmarthenshire's Draft Deposit Revised LDP - Welsh Language Impact Assessment, 2023, is not available.

This would be the most relevant evidence regarding the Welsh language.

**Policy, Welsh Language and Culture**

The wording of policy SP8 is a cause for concern:

*"Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated."*

By requiring mitigation measures it is recognised that there is a negative impact on the Welsh language, and according to their definition, any mitigation measures will not prevent a negative impact but rather minimise that impact.

Cymdeithas yr Iaith welcomes the County Council's decision to designate the whole county as a linguistically sensitive area again but the Plan needs to reflect the vulnerability of those communities, by basing the Plan on housing need.

Whilst agreeing with the objective of clause 11.174 to create jobs and opportunities to enable people to stay in the county, we disagree that the growth being planned is "sustainable" and that the Plan will *"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."*

We are concerned that clause 11.176 states that:

*"…will seek to ensure that development occurs at a rate which can be absorbed and assimilated without damaging the character of the community."*

"Seeking to ensure" is contrary to the principle in clause 11.174 that integration will be on a sustainable scale.

**WL1: Welsh Language and New Developments**

It is encouraging that the policy itself is clear that the intention of the Welsh Language Action Plan would be to set out measures "to safeguard, promote and enhance the Welsh language", but clause 11.179 refers to the Action Plan’s "mitigation measures", which suggests that it is mitigation measures that are actually in mind.

In addition, we again note that the council's Welsh Language Promotion Strategy sets a goal of making Welsh the primary language of the county, which does not accord with policy WL1.

It is also encouraging that the policy sets expectations for the Welsh Language Action Plan to show that the development contributes positively to Welsh language groups in the area.

It is unclear what would be considered a "large-scale" development and whether it would qualify to prepare a Welsh Language Impact Assessment.

We believe that specific figures are needed in this case, and that an additional percentage of housing is identified in the case of a housing development or a percentage of employees and population in the case of employment developments.

There is absolutely no mention of Welsh in the Tests of Soundness. If the aim of the Plan is to "promote the Welsh language and its culture" shouldn't that be part of Tests of Soundness?

**Summary**

Cymdeithas yr Iaith shares the common view that the current LDP has been a failure, and we hoped that the Council would take this further opportunity to produce a revised plan that would change direction by prioritising the wellbeing of communities across the County and placing the Welsh language at its heart.

It is therefore disappointing to see a corporate strategy that focuses on delivering a few developments in the south and east of the County rather than an innovative programme of promoting smaller-scale employment developments and opportunities across Carmarthenshire.

We strongly feel that there is a lack of evidence on housing allocations and employment sites.

Hope and ambition are not the same thing as evidence.

We welcome some of the steps the Council wants to take to mitigate and assess the impact of developments on the language but there is still a long way to go, and we are concerned that the interests of Welsh-speaking communities will be placed second to the objectives of the County Council's regeneration strategy, a strategy that essentially looks outdated now.

Cymdeithas yr Iaith, Carmarthen Region

April 2023