



National Development Framework Team
Planning Policy Branch
Welsh Government
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15/11/2019

Dear Colleague,

Consultation on the draft National Development Framework

Thank you for the opportunity to respond to the consultation on the draft *National Development Framework*. My comments focus on matters relating to the Welsh language. I support many aspects of this document and I would also like to highlight some elements which could be refined.

The positive aspects include the following intentions noted in the Framework:

- ensuring the prosperity of the Welsh language and supporting an increase in the number of speakers
- managing development in order to protect Welsh as a community language
- linking sustainable development with the Welsh language, communities and the economy

The following are among the matters requiring further attention:

- how development should be managed in order to protect the Welsh language and enhance opportunities to use the language locally and nationally
- the link between education and development, including local authorities' Welsh in Education Strategic Plans

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- the importance of some counties and regions to the prosperity of the Welsh language and the potential for collaboration between them as strongholds of the Welsh language
- the significance, for the entire Framework, of the statement that Welsh is a living language which is spoken in all parts of Wales
- the link between development and the policy making standards and promotion standards imposed on local authorities through the Welsh Language (Wales) Measure 2011

Places with a thriving Welsh Language

I welcome the fact that the Framework's Outcomes include an objective to develop "A Wales where people live in places with a thriving Welsh Language" (Outcome 4). This Outcome supports the Welsh Government's aim of ensuring a million Welsh speakers in Wales by 2050. It is stated that the Framework also supports the target of increasing the percentage of people who speak Welsh daily by 10% by 2050. These are targets from the Government's *Cymraeg 2050* strategy and I encourage you to refer directly to this strategy and to incorporate its themes and objectives in the Framework.

Outcome 4 states the following: "Where Welsh is the everyday language of the community, development will be managed to ensure there are jobs and homes to enable the language to remain central to those communities' identities. Elsewhere, education authorities will lead in developing infrastructure to enable the language to develop as a natural, thriving part of communities." I support the first of these objectives but I am concerned that it suggests that development will only be managed in a way which supports the Welsh language in those areas in which Welsh is an everyday language. The Framework should elaborate not only on how development should be managed in order to protect the Welsh language and enhance opportunities to speak the language, but how this should be done in all parts of the country. With regard to the second objective, I believe that what is expected from education authorities needs to be specified.

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The Framework should highlight the link between the duties of local authorities in terms of development and their Welsh in Education Strategic Plans. In August this year I responded to the Government's consultation on the Draft Development Plans Manual (Edition 3). In that response, I noted that the Government, in its Draft Regulations for Welsh in Education Strategic Plans published on 30 May 2019, expressed a wish for local authorities to demonstrate a commitment to the targets in *Cymraeg 2050*. I recommended that local authorities should take this into account when drawing up long-term plans for the development of their local areas. The Framework should refer to the link between education and development, in the context of community and economy, considering their importance to the themes of *Cymraeg 2050*.

The NDF Spatial Strategy

I welcome the support in the Framework's spatial strategy for sustainable development and the link made to the Welsh language, communities and the economy. I note that this reflects a recommendation in *Cymraeg 2050*, namely: "The land use planning system should contribute to the vitality of the Welsh language by creating suitable conditions for thriving, sustainable communities." I referred to this principle in my response to the consultation on the Draft Development Plans Manual (Edition 3) and it remains valid in terms of this Framework. In relation to this, I emphasised the importance of linguistic planning to ensure the sustainability of rural Welsh-speaking communities in my response in October 2019 to the Government's consultation on *Sustainable Farming and our Land*¹ by saying:

"Language planning for the sustainability of rural Welsh-speaking communities should therefore be an integral part of the Welsh Government's plans and policies for the future of farming in Wales."

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<http://www.comisiynyddygybraeg.cymru/English/Publications%20List/20190712%20LL%20S%20Ffermio%20cynhaliadwy%20an%20Tir.pdf>

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I should emphasise that those comments are wholly relevant to this consultation as well.

Regional centres

The Framework lists a number of regional centres which are considered important. It is noted that specific policies in Strategic and Local Development Plans should be used to retain and enhance the commercial and public service base that makes them focal points in their areas. The list includes Carmarthen, Aberystwyth and Caernarfon. These towns are focal points in the counties of Carmarthenshire, Ceredigion and Gwynedd, three of the counties which have the highest percentages of Welsh speakers in Wales (43.9% – 65.4%), according to figures from the 2011 Census. The Framework should highlight this fact, in the context of its commitments to the Welsh language. It should also be ensured that the Framework, by emphasising these centres, does not undermine other centres in the same regions or smaller more rural communities in these areas. Considering the pressures on services in rural areas, including education and public transport, care must be taken to avoid centralising resources in centres that are not within easy reach for all and in so doing undermine the viability of smaller communities.

Anglesey is the only other county where the percentage of Welsh speakers is within the same range as the three counties noted above. Anglesey is referred to in the context of developing the port of Holyhead and new energy, to ensure growth and support local and regional communities. Once again, in the context of the Framework's commitments to the Welsh language it should be highlighted that this county has one of the highest percentages of Welsh speakers in Wales. It should also be noted that inter-regional collaboration is important in terms of the Welsh language. Collaboration between local authorities for the benefit of the Welsh language should not be limited, especially between authorities where there is a significant number of Welsh speakers. One example of such cooperation is, of course, the Arfor initiative.

It should also be emphasised that the aim of ensuring a million Welsh speakers is relevant to Wales in its entirety. I welcome the fact that a statement is made, in the case of each

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region, that development plans should consider the relationship between housing, transport, economic growth and the Welsh language. Education should be added to this list, for the reasons I outlined above. In the case of the Mid and South West Wales region, specific reference is made to Strategic and Local Development Plans. I encourage you to refer to both types of plan in the case of the other regions too, to ensure consistency. For the same reason, the infographic at the beginning of each section about an individual region in the Framework should refer to the Welsh language. Although the numbers for each region are included in Chapter 2, in the case of the infographics the North Wales region's is the only one which refers to the number of Welsh speakers. The Framework in its entirety should reflect the statement in Chapter 2 that Welsh is a living language, with speakers across all parts of the nation. I welcome the reference to the increase in the number of Welsh speakers in the South East region and I believe it is important to highlight such growth to local authorities.

Welsh Language Standards

I suggest that the Framework refers to the Welsh Language (Wales) Measure 2011 and the standards which derive from it, which place duties on local authorities in respect of the Welsh language. It should be noted that local authorities are required to prepare development plans and policies in the context of the standards. I refer specifically to the policy making standards and promotion standards. The policy making standards relate to the consideration of the effects of policy decisions made by organisations on the Welsh language. They note, for example, that when formulating a new policy or reviewing an existing policy, organisations must consider what effects the policy decision would have on people's opportunities to use the Welsh language and treat the Welsh language no less favourably than the English language. They place a duty on organisations to consider how to formulate a policy or change a policy so that it has a positive impact on the Welsh language and so that it does not have adverse effects on the language.

The promotion standards place a duty on organisations to produce and publish a 5-year strategy for promoting the Welsh language and facilitating use of the language, including a

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target for increasing or maintaining the number of Welsh speakers in the area. My office has issued guidance on this matter, *Standards relating to promoting the Welsh language: 5-year strategies: a best practice guide for county and county borough councils and National Park authorities.*² The guidance refers to the themes underpinning strong strategies, including some of the obvious aspects of planning, namely communities and the economy. I referred to these standards in my response to the consultation on the Draft Development Plans Manual (Edition 3). The Framework should refer to these strategies in the context of its support for the objectives of *Cymraeg 2050* and in the context of Welsh in Education Strategic Plans which are discussed above. I should also note that there is some uncertainty about the exact democratic accountability and governance of many regional structures. This is a matter of concern considering the duties placed on the majority of Welsh public sector organisations in accordance with the Welsh language standards. I would not wish the emphasis placed on regional working to undermine these duties.

Finally, I would like to request clarity regarding the way in which the Framework will be monitored and how success will be measured when aiming for the desired Outcomes. I trust my comments will be useful to you as you produce the final Framework.

Yours faithfully,

Aled Roberts

Welsh Language Commissioner

Copy to: Welsh Language Division, Welsh Government

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[http://www.comisiynyddygyymraeg.cymru/English/Publications%20List/20181031%20GC%20Standards%20relating%20to%20promoting%20the%20Welsh%20language%20\(S\)%20-%20Final.pdf](http://www.comisiynyddygyymraeg.cymru/English/Publications%20List/20181031%20GC%20Standards%20relating%20to%20promoting%20the%20Welsh%20language%20(S)%20-%20Final.pdf)

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