

Julie James MS

Minister for Housing and Local Government

18 November 2020

Dear Minister,

The National Development Framework and the Welsh language

The Culture, Welsh Language and Communications Committee discussed the latest iteration of the National Development Framework ('the Framework') at its meeting on 5 November.

The Committee heard from Dyfan Sion, from the Welsh Language Commissioner's Office, Wyn Thomas, Dyfodol i'r Iaith, Robat Idris, Cymdeithas yr Iaith and Dylan Foster Evans from the Welsh Place-Name Society.

I note the requirements in section 60B(4)(b) of the Planning and Compulsory Purchase Act 2004 (as inserted by section 3 of the Planning (Wales) Act 2015) for the Welsh Ministers to have regard to any recommendation made by a Senedd committee. As such, I would be grateful if you could consider our recommendations as contained in this letter, which seek to address issues which were raised during our discussions and consideration of the Framework.

Additionally, I note the requirement in section 60B(6) for the Welsh Ministers to lay before the Senedd a statement explaining how they have had regard to any such Committee recommendations. I look forward to reading this statement to see how the Committee's recommendations have been considered.

Mainstreaming of the Welsh Language

Concerns were raised in the evidence received, about the way in which the Framework deals with the Welsh language. The Committee heard of the need to mainstream the Welsh language throughout the Framework and ensure there are stronger links to other relevant strategies.

Those who spoke to the Committee commented that at the national strategic level the Framework does make a number of references to the Welsh language, but at the regional spatial level the references tend to be more general in nature.



Senedd Cymru
Bae Caerdydd, Caerdydd, CF99 1SN

✉ SeneddDGCh@senedd.cymru

☎ 0300 200 6565

Welsh Parliament
Cardiff Bay, Cardiff, CF99 1SN

✉ SeneddCWLC@senedd.wales

☎ 0300 200 6565

Witnesses were concerned that there was insufficient accountability for delivering the outcomes for the Welsh language at a regional level. For instance, Dyfan Sion from the Welsh Language Commissioner's Office, said:

'You have the national framework at the top, yes, but feeding into that you have the local development plans and... there is an expectation on each of those LDPs to include a spatial strategy for the Welsh language. So, that connection is there at a national level, but as you go down to the regional level, then there is scope to strengthen that, I think.'¹

Witnesses spoke of the need for the contribution of the Framework to the Cymraeg 2050 strategy to be measured and monitored. Dyfan Sion said:

'one of the most important things for us is the reporting and monitoring elements and ensuring that the framework does lead to progress and contributes towards the Cymraeg 2050 strategy. So, as I said, I think there are elements of mainstreaming within the framework, but there are further questions to be asked as to how it will be implemented and monitored.'²

In terms of monitoring the contribution of the framework to the Cymraeg 2050 strategy, Dyfan Sion said, 'there's also a contribution for local authorities to make in that regard.'³

He noted the need for the Framework to link to the Welsh in Education Plans.⁴ Dyfan Sion stressed the need for the Framework to be flexible enough to allow opportunities for partnerships outside of the proposed regional structures to form. He gave the example of the Arfor scheme for the Welsh language which is a partnership between four west Wales counties.⁵

The Committee recommends that the regional level of spatial planning in the Framework should be flexible enough to allow for the growth of partnerships that address specific issues, such as the support and promotion of the Welsh language.

The Framework should specify how the contribution to the outcomes of Cymraeg 2050 will be measured and monitored.

Accountability at a regional level

There were concerns regarding the accountability of the regional structures proposed in the Framework. For instance, Dyfan Sion said:

'There is a lack of accountability in terms of regional structures more generally speaking. As a regulatory body with oversight of statutory duties, that creates a

¹ CWLC Committee 5 November 2020 p37

² CWLC Committee 5 November 2020 p15

³ CWLC Committee 5 November 2020 p37

⁴ CWLC Committee 5 November 2020 p36

⁵ CWLC Committee 5 November 2020 p116



problem, because those statutory duties that we have in terms of Welsh language standards and a number of other statutory duties are placed on individual bodies, legal entities. So, when there are so many decisions then happening through the regional partnerships, there is an accountability deficit, perhaps'.⁶

Wyn Thomas, from Dyfodol i'r Iaith, wrote:

'There are concerns that power is being transferred to unelected bodies. People understand the role of county councils in producing Local Development Plans, and people have become familiar with the influence of the Welsh Government. There is more concern regarding the Strategic Development Plans. It is not clear what powers these bodies have or how accountable they are.'⁷

The governance of the regional boards was also of concern to Robat Idris, Cymdeithas yr Iaith, who said 'there will be unelected members of those boards, which I don't think is healthy. You would usually ask why they are there.'⁸

He also commented that the regional approach and the emphasis on creating stronger links with urban areas in England would be damaging to the Welsh language because 'it moves the economic focus even more towards the east when we in western areas are having huge problems as it is'.⁹ He said:

'what we see is rather than looking at Wales as a single entity, we see three regions that are linked economically, and that aspiration being repeated time and time again, with the north of England, the midlands and the southwest of England. Now, as Cymdeithas yr Iaith, we understand that you can argue that there are economic benefits to that, but the trend will be, I would say, to weaken the Welsh language in the community through that'.¹⁰

The Committee notes the concerns regarding the governance and accountability of regional structures and recommends that the Welsh Government outline how it intends to ensure greater transparency of the work of the regional boards.

The need to balance the focus between rural and urban centres

There was concern that the NDF places too much focus on growth in urban centres at the expense of communities in rural areas. The Committee was told that there should be far more emphasis and focus on local communities within the framework, particularly as the social and economic context has changed so dramatically as a result of the pandemic.

For instance, Robat Idris argued that the Framework appeared to be based on economic drivers and large scale infrastructure projects like Wylfa. Such projects, he stated, have

⁶ CWLC Committee 5 November 2020 p115

⁷ Dyfodol i'r Iaith written evidence

⁸ CWLC Committee 5 November 2020 p119

⁹ CWLC Committee 5 November 2020 p119

¹⁰ CLWC Committee 5 November 2020 p25



failed to materialise in the past, but these large infrastructure projects 'drove local development plans', which in turn:

'was steering the demand for housing and where housing should be built. I think we need to build our communities from the bottom up, not the top down.'¹¹

He continued by asking how much discussion has been had in developing a framework that is 'relevant to local communities', stating that:

'it does appear, to some extent, that rural areas are almost seen as the lungs of our urban areas; they're areas to be enjoyed by the urban population and the population that lives there is there to serve.'¹²

Dyfan Sion also believed that there needs to be more of a balance between rural and urban centre growth. He told the Committee:

'the main thing I would say is that the framework needs to respond better to the social changes that have happened as a result of COVID. I think the framework, if it were drafted today, perhaps there would be less focus on urban centres of growth in the framework. What we've all learned, I think, from the COVID crisis, is that it's possible for us to live and work in any area of Wales; it's possible for us to work remotely and to work flexibly. And I think the Government itself, through remote working policies, is more focused on local centres now, rather than urban centres. So, that is something within the framework that we would want the Government to reconsider'.¹³

The Committee also heard that in order for rural and local communities to capitalise on work opportunities, suitable transport infrastructure, such as public transport, and fast broadband connections are needed.

The Committee would like to see more information on the Welsh Government's thinking on 'local hubs'. The Committee recommends that the Framework is updated to take account of:

- a more balanced approach to developing urban and rural centres to prosper rather than one which focusses on urban centres surrounded by a rural 'hinterland'.
- new working patterns, arising from the COVID-19 pandemic most recently, which have seen a greater need for fast, reliable and accessible broadband in all parts of Wales;

Affordable housing

There was a call for the Framework to address the issue of affordable housing more robustly. The ability for people from Welsh-speaking areas of Wales to live and work in

¹¹ CWLC Committee 5 November 2020, p27

¹² CWLC Committee 5 November 2020, p26

¹³ CWLC Committee 5 November 2020, p58



their communities is linked to the price of housing in these areas. Robat Idris told the Committee:

‘because so much property is out of the reach of local people, that weakens the indigenous community. So, I do think that there is a strong role for the planning system to look at the whole question of housing’¹⁴

In response to a question about whether the Framework should focus more on ‘social housing’ rather than ‘affordable housing’ as this would place greater responsibility on local authorities to meet local housing needs, Dyfan Sion said:

‘because of high house prices and a high percentage of second homes in some communities, it can be very difficult for some people to remain within their own communities if they wish to do so. And clearly, that is an issue of social justice. So, from the point of view of affordable housing and social housing, the risk is that affordable housing is more open to market conditions and there is less control and less ability to provide according to need. So, if focusing more on social housing would improve the problems facing Welsh-speaking communities, and that could happen more swiftly, then I would agree with the comment made in the question.’¹⁵

There was also a call for the Framework to address the pressures placed on Welsh-speaking areas from second homes and the fact that they price local people out of the market. The pressures were said to have increased as a result of the COVID-19 pandemic and concerns within local communities about second-home owners travelling during lockdown restrictions.

Robat Idris told the Committee that 40% of homes in Gwynedd were sold as second homes recently.¹⁶ He suggested there should be a maximum number of homes available in tourist areas. He said:

‘we do need to look at legislation as to whether it’s ethical that people should be able to own a second home, or a second house, where others can’t afford a first home. We need to look at particular areas where there is too much emphasis on tourism where there should be, perhaps, a maximum limit on the housing market that serves tourism, including Airbnb, or the second home market. There are examples in other places of where that’s done.’¹⁷

Wyn Thomas, wrote:

‘Following the route of Jersey and Guernsey would be a significant step towards safeguarding the Welsh-speaking communities. In those places, a significant percentage of housing is earmarked for residents who have lived on the islands

¹⁴ CWLC Committee 5 November 2020 p 27

¹⁵ CWLC Committee 5 November 2020 p81

¹⁶ CWLC Committee 5 November 2020 p83

¹⁷ CWLC Committee 5 November 2020 p84



their entire lives or who have a long and obvious connection with the area. The rest of the housing stock would be for sale on the open market.¹⁸

The Committee heard that the balance between ownership of second homes, holiday lets and affordable home ownership has an impact on the ability of people from Welsh-speaking areas to live and work in their communities. The impact of house prices, second home ownership and holiday lets on the Welsh language is an important aspect which needs to be explored in a planning strategy that aims to ensure:

‘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’.¹⁹

The Committee recommends that the link between social housing and affordable housing in Welsh-speaking areas and the impact on the Welsh language should be explored more thoroughly in the Framework.

I have copied this letter to the Chair of the Climate Change, Environment and Rural Affairs Committee as part of their consideration of the Framework.

Yours sincerely,



Helen Mary Jones

Chair of the Culture, Welsh Language and Communications Committee

¹⁸ Dyfodol i'r Iaith

¹⁹ National Development Framework, pp54

