Welsh Language Commissioner's response to the Welsh Government's consultation on the National Development Framework

Part A

Statement of Public Participation

Question 4: Are there communities or groups whose views are under-represented in planning processes, and who should receive special attention during the National Development Framework reform?

We believe that particular attention should be paid to the experiences and perspectives of Welsh-speaking communities as the Framework is reformed. As the first report of the Commission for Welsh-speaking Communities states, communities with a higher density of Welsh speakers must be protected if the language is to be transmitted from one generation to the next and used in all aspects of life. For the Welsh language to flourish nationally, further decline must be prevented in the areas where it is currently strongest. The National Framework has an important role in implementing several of the Commission's policy recommendations and, consequently, in strengthening the position of the Welsh language in areas with a high density of speakers.

The Framework must therefore recognise that linguistic circumstances vary across Wales. The needs of areas with a high density of Welsh speakers differ from those where the density is lower. In higher-density areas, factors such as the housing market, the out-migration of young people, demographic change, the nature of the labour market and access to services can affect the sustainability of Welsh as a community language. Elsewhere, a key challenge is to create and maintain sufficient opportunities for people to use Welsh naturally in their daily lives.

We therefore believe that the process of reforming the Framework should include specific engagement with communities in areas of higher density linguistic significance, but also with Welsh speakers in other parts of Wales. Particular efforts should also be made to hear from young people and young families, including people who have left their communities due to a lack of housing, work or educational opportunities.

It would also be beneficial to engage directly with organisations involved in community language planning and with those that have expertise in the relationship between the Welsh language and policies on housing, education, economic development and the rural economy. This would help ensure that the links between these areas and the sustainability of the Welsh language are fully understood.

Engagement Plan for the National Conversation

Question 7: Do the proposed themes (see 4.1 of the Engagement Plan for the National Conversation) cover the most important issues for the future of Wales.

Yes. We welcome the inclusion of culture and the Welsh language as a specific theme. However, it is important that the Welsh language is also treated as a cross-cutting consideration across all themes.

The future of the Welsh language is closely linked to decisions about the economy, housing, transport, education, land use, energy and infrastructure. In communities with a high density of Welsh speakers, decisions in these areas can directly affect people's ability to continue living and working in their communities and, consequently, the sustainability of Welsh as a community language. As our five-year report on the position of the Welsh language indicates, planning, housing, education and economic policy must be coordinated to strengthen community language planning.

We therefore suggest that the linguistic sustainability of communities be recognised as a cross-cutting consideration in the National Conversation, and not as an issue that is only relevant to the theme of the Welsh language. This should ensure that the relationship between spatial development and linguistic sustainability is considered from the outset of the process.

Question 8: Are there any places, communities or issues that should be given special attention during the national conversation?

Particular attention should be paid to areas of higher linguistic density. The Commission for Welsh-speaking Communities has recommended designating such areas so that public policies can be tailored to local linguistic circumstances and strengthen Welsh as a community language. On the basis of the available evidence, the Commission has suggested a presumption in favour of designating areas in which 40% or more of the population can speak Welsh as areas of higher linguistic density. In these areas, town and country planning, housing and the economy are central to the vitality of Welsh as a community language.

The National Conversation should also address the different challenges faced by communities where the density of Welsh speakers is lower. In those areas, the need to maintain and create spaces for the use of Welsh can be just as important. Issues such as planning education provision as part of housing developments, transport infrastructure and transport to schools, and creating leisure, sport and cultural spaces, are issues that can significantly influence people's opportunities to learn and use Welsh.

Part B

Themes of the National Conversation

Wales in 2050

Question 12: What would you like Wales to be known for in 2050? How can planning, development and infrastructure help make this happen?

Our vision is a Wales where the Welsh language can thrive as a living language used naturally in all areas of life, and in sustainable communities where people can live, work, learn, use services and raise families through the medium of Welsh.

The Framework should contribute to creating the economic, social and demographic conditions needed to realise this vision. Our responses to the other questions of the consultation detail how this could be done.

Question 13: What should we pass on to future generations in terms of communities, our environment (land and sea) and our infrastructure?

The Welsh language and its culture should be passed on to future generations. This includes Wales's unique and valuable body of historic Welsh place names, which records the relationship between the people of Wales and their environment. Welsh-speaking communities should also be protected for future generations.

Question 14: Looking towards 2050, what are the biggest challenges and opportunities facing Wales, and how should they influence future development?

From the perspective of the Welsh language, one of the greatest challenges is the decline in linguistic sustainability in some communities where Welsh has traditionally been the natural language of everyday life. We recently published our five-year report on the position of the Welsh language. One of its main conclusions is that there is clear evidence of further decline in areas with a high density of Welsh speakers. The position of Welsh as a widely used, living community language, transmitted from one generation to the next, is undoubtedly weakening.

The report highlights how economic and structural challenges including youth emigration, weak transport infrastructure, housing market pressures, and a lack of economic opportunities are weakening the sustainability of these communities.

We believe that the Framework offers an important opportunity to ensure that spatial planning contributes to strengthening the community and linguistic sustainability of these areas. It can do this by ensuring that housing, jobs, transport, education and services are designed to create the social and economic conditions that enable the Welsh language to flourish.

Beyond areas with a higher density of speakers our report also highlights the challenge of ensuring that more children and young people learn Welsh through the education system, and that they have diverse opportunities to use Welsh in their everyday lives. We believe that the Framework can support the expansion of opportunities for young people to access Welsh-medium education, and also in terms of planning spaces for the use of Welsh.

Economy and Jobs

Question 15: Which parts of Wales should be prioritised for jobs, investment, and economic growth and why?

We believe that economic investment should be driven by the need to create sustainable local economies across Wales, rather than concentrating growth in a more limited number of centres.

From the perspective of the Welsh language, there is a particular case for addressing economic and employment needs in areas with a high density of Welsh speakers.

Strengthening the socio-economic infrastructure of Welsh-speaking communities is central to increasing both the number of Welsh speakers and the social use of the language. The challenge is to ensure that people have access to high-quality jobs, attractive career opportunities and suitable homes, enabling them to remain in, or return to, those communities. These are among the main factors influencing intergenerational language transmission and the social use of Welsh in Welsh-speaking communities.

The Commission for Welsh-speaking Communities has argued that one of the reasons that communities with a high density of Welsh speakers are seeing a steady decline in the number and percentage of speakers is that they face significant structural challenges, including an ageing population, and a steady emigration of young people. The Commission notes that some of the main challenges include:

- Weak transport infrastructure
- A labour market that does not always meet the needs of industry
- Productivity levels lower than most of the rest of the UK
- Underemployment and low wages

These challenges mean that there are fewer economic opportunities to attract young people to stay or return to these communities, which in turn, further intensifies the challenges to creating an attractive and prosperous economy.

Priority should therefore be given to supporting the economy of these areas in a way that creates quality sustainable jobs that will enable people to live and work in their communities, support local businesses and enterprises, and create workplaces where the Welsh language is used.

In recent years, the Government has supported the socio-economic infrastructure of Welsh-speaking communities through the ARFOR programme. Although the programme has been successful, the £11 million invested in ARFOR is modest in comparison with the Welsh Government's wider economic development budget. The City and Growth Deals, for example, represent investment worth billions of pounds. Greater attention should therefore be given to how Corporate Joint Committees give due consideration to the Welsh language when making strategic and budgetary decisions, particularly in relation to the needs of communities with a high density of Welsh speakers.

Energy

Question 18: How can renewable and low-carbon energy projects bring the greatest benefits to local communities and the Welsh economy?

In connection with our response to question 15 above, consideration should be given to how renewable and low-carbon energy projects can create significant economic opportunities for parts of Wales, including rural communities and communities with a high density of Welsh speakers.

Such projects could contribute to the creation of long-term local jobs, local supply chains, training and apprenticeship opportunities, and investment in community infrastructure. We believe that such projects have the potential to create job opportunities that enable young people to stay or return to Welsh-speaking communities.

As part of this, the impact of major projects on housing, migration, local services and infrastructure and on the Welsh language should also be assessed.

Net Zero and the Circular Economy

Question 22: How can these changes support a fair transition that tackles inequality, creates opportunities and is fair to people and communities across Wales?

We welcome the emphasis on the transition to net zero and the circular economy. This agenda has significant economic, social and linguistic implications, and therefore the Framework should recognise the relationship between this transformation and the

viability of the Welsh language, particularly in communities where Welsh is a strong community language.

The net zero sector has real potential to contribute to the economic prosperity of areas with a high density of Welsh speakers, and therefore to maintaining and strengthening the Welsh language as a community language. Sectors such as agriculture, forestry, land use and energy production are particularly relevant as many of the economic opportunities with green energy potential are located in areas where the Welsh language is strong. This is particularly true from the point of view of rural communities that have many natural resources, and could be enabled to benefit from energy projects. This should also be considered in the context of the Government's commitment in its programme of government to ensure that the people and communities of Wales own more renewable energy initiatives.

We therefore recommend that the Framework integrates linguistic considerations in planning the transition to net zero and the circular economy.

Nature and land

Question 25: How should land use planning protect and enhance nature while also supporting housing, renewable energy, food production, timber, economic development, circular economy opportunities, flood resilience and community well-being?

It is important to recognise that land-use planning supports communities, local economies and culture. This is particularly important in rural and agricultural areas, where Welsh often remains a strong community language. Agriculture is the employment sector with the highest proportion of Welsh speakers in Wales, and agricultural businesses sustain many rural communities in which Welsh is used naturally every day.

It should therefore be ensured that decisions about planning and land use change support the growth of the rural economy and contribute to the sustainability of agricultural communities. This could be done by considering how new planning and economic decisions are:

- Maintain high-quality jobs in rural communities
- Offer opportunities for young people to remain in, or return to, these communities
- Strengthening local supply chains
- Supporting agriculture and food production

Homes and Housing

Question 34: What types of homes will Wales need over the next 25 years, and where should they be built?

From the perspective of the Welsh language and the viability of Welsh-speaking communities, it is vital that the right homes are built in the right places, at an appropriate scale and on the basis of robust evidence of local need.

In communities with a high density of Welsh speakers, the aim is not to prevent development, but rather to ensure that the size, type, location and nature of housing developments respond to local needs and contribute to the long-term sustainability of Welsh-speaking communities. In some circumstances a shortage of affordable housing can mean that people cannot stay in their communities, and that can undermine community and linguistic sustainability. In other circumstances, development that does not correspond to local needs or that is on a disproportionate scale can change the demographic and linguistic character of a community.

There is therefore a need for a balanced approach that ensures that the size, nature and pace of development respond to local needs and evidence. In areas with a high density of Welsh speakers housing development decisions should take into account issues such as:

- Linguistic composition of communities
- Availability of housing for local families and young people
- Local demand for social housing
- Demand for affordable housing locally
- Migration and emigration patterns
- The impact of second homes and holiday accommodation
- Links between housing and employment opportunities
- School capacity and Welsh-medium education provision

In areas with a lower density of Welsh speakers, the main consideration is the need to plan school places and Welsh-medium education provision as an integral part of new housing developments. The language medium of any new provision should be determined from the outset, ensuring that the decision supports the objectives of Welsh in Education Strategic Plans and the national objective of widening access to Welsh-medium education.

Transport and logistics

Question 36: How should people and goods travel around Wales in 2050, and what transport and infrastructure will be needed?

Transport should support people's ability to access work, education, services and community activities, including through the medium of Welsh. Very often Welsh-speaking communities are also more rural areas where transport and logistics can be difficult. Ensuring effective transport infrastructure in these communities is therefore key to making it attractive for people to continue to live and raise families in these areas.

Particular attention should be paid to how transport infrastructure enables access to education through the medium of Welsh. Distance or lack of suitable transport should not be a practical barrier to accessing Welsh education. The Framework should therefore encourage close coordination between transport planning, housing growth planning and education planning.

A vibrant culture where the Welsh language thrives

Question 37: How can new development and planning help to support and strengthen the Welsh language?

The Commission for Welsh-speaking Communities' report on town and country planning recommends that the National Framework and the Integrated Sustainability Appraisal need to be reviewed in order to give fuller consideration to the spatial distribution of Welsh speakers and the implications of that for the Welsh planning system. We agree with this recommendation, and our response to the remaining questions in this consultation details how this could be done.

As the highest tier of the planning system in Wales, the Framework will influence how places, communities, infrastructure and natural resources are planned and managed over the coming decades. It must provide much clearer guidance to Corporate Joint Committees as they prepare Strategic Development Plans, and to planning authorities as they prepare Local Development Plans. The Framework should:

- Establish clear and consistent national expectations regarding the Welsh language
- To enable the variation of policies according to the linguistic circumstances of different areas, paying particular attention to the needs of areas with a high density of speakers.
- Ensure that developments contribute positively to the sustainability of the Welsh language rather than just focusing on mitigating negative impacts

- Link land use planning to housing, economy, education and community language planning policies by:
  - Planning and delivering housing that responds to local needs
  - Supporting local economies and sustainable jobs
  - Linking housing development to Welsh language education capacity and development, including local transport infrastructure
  - Supporting community services and infrastructure
  - Creating places and facilities that facilitate the social use of the Welsh language
- Draw on a robust linguistic, social, economic and demographic evidence base
- Include clear arrangements for the implementation, monitoring and review of the Framework's effects on the Welsh language

Our central message is that the revised Framework should mainstream the Welsh language as a key consideration in decisions about what development takes place, and where. Sustainable growth in the number of Welsh speakers, or wider use of the language, cannot be achieved through language and education policies alone. The position of the Welsh language also depends on the nature and viability of the communities in which people live, work, access services and raise families. The Welsh language and the viability of Welsh-speaking communities should therefore be central strategic considerations in shaping the pattern of development across Wales.

Alongside amending the National Framework, it is also essential to review Planning Policy Wales and national planning guidance, particularly Technical Advice Note 20 (TAN 20). The principles set out in our response therefore apply to every tier of the planning system in Wales.

Question 38: How should local history, culture and identity be reflected in decisions about new development?

The language used in a community, its social networks, institutions, schools, businesses, meeting places and cultural activities are all integral to its character. Decisions on new development should therefore consider how development can maintain and strengthen those characteristics, drawing on local evidence and involving the community in the process. For example, new developments should use bilingual names and signage, with this requirement secured through planning conditions where appropriate.

The name of a development can provide a natural starting point for establishing a positive relationship with local history, culture and identity. Welsh place names are

often central to that identity. They record the history, language, landscape and heritage of communities, and often preserve information about local features over generations.

When considering new development, it should therefore:

- **protect and use existing Welsh names** associated with the site or area, rather than introducing new names that do not have a local connection;
- **research the historical names of fields, farms, landscape features and settlements before naming new streets, estates or developments;**
- **give priority to authentic Welsh forms**, ensuring appropriate spelling and standard form;
- **avoid generic or commercial names that can dilute the linguistic and cultural character of an area;**
- **involve the local community and place-name experts in selecting new names; and**
- **ensure that Welsh names are visible** on signs, maps, addresses and materials relating to the development.

Planning decisions can either reinforce or erode local identity. New development should therefore respond to the character of the place that is already there, treating Welsh place names as part of the living heritage and as a resource to be passed on to future generations.

Under the Historic Environment (Wales) Act 2023, Welsh Ministers have a duty to maintain and publish a List of Welsh Historic Place Names. There are already statutory duties on local authorities, National Park authorities and Natural Resources Wales to use this List of Historic Place Names where their functions relate to the naming or renaming of places. This includes specific instructions to local authorities in carrying out their statutory functions on street naming and numbering. There is potential to further strengthen these duties by extending the statutory duties to other bodies and by making specific provisions to give priority to Welsh names. The Commissioner has particular expertise in this area on account of his unique responsibility to standardise Welsh place names. The Commissioner would be keen to discuss how his advisory service could be extended to organisations of all kinds wishing to create appropriate Welsh names on new developments.

Question 48: What information and evidence should be used to help shape the Revised National Development Framework

A range of data about the Welsh language should be used, at a national and local level. Our five-year report on the state of the Welsh language, together with reports from the Commission for Welsh-speaking Communities and the Bro Project Commendium provides a detailed overview of the type of data that should be considered. It includes:

- Number and percentage of Welsh speakers
- Speaker density
- Ability by age
- Ability by age
- Data on Welsh language usage
- Education data including the capacity and location of Welsh-medium education, Welsh in Education Strategic Plan targets, transport and the accessibility of Welsh-medium provision
- Demographic data including migration and emigration, household composition, population projections, change over time
- Housing data, including demand for social and affordable housing, house prices and local income, second homes and holiday accommodation, location, type and size of housing developments
- Economic data, including job types, employment sectors and wages
- More generally, a wider range of current, local data is needed on the Welsh language and on the impact of planning decisions on the language and its speakers. Census data collected every ten years cannot, on its own, provide an adequate basis for planning and impact assessment. The Framework should therefore encourage Corporate Joint Committees and local authorities to collect and use detailed, up-to-date data when preparing Strategic Development Plans and Local Development Plans and when making planning decisions.

In the above context we believe that consideration also needs to be given to the duty of local authorities and national parks to formulate 5-year strategies for promoting and facilitating the use of the Welsh language. An advice document we have recently presented to Welsh Ministers outlines the relevance of promotion strategies as a vehicle for planning, monitoring and reporting on the impact of policies in key areas such as town and country planning.

Part D

Call for Evidence

Please note the evidence you have to support the reform of the National Development Framework

We recommend that you pay particular attention to the following evidence:

- Welsh Language Commissioner's 5-year report
- Welsh Language Commissioner's advice document on community language planning
- Reports of the Welsh Communities Commission, including in particular its work on town and country planning
- Census data and other relevant administrative data. See for example the Welsh Language Commissioner's data dashboard.