



Dear Sir/Madam

Cardiff's Replacement Local Development Plan - Deposit Plan - January 2025

Thank you for the opportunity to take part in this consultation as the Council prepares its new Local Development Plan (LDP). When responding to LDP consultations we usually focus on the process used in setting the plan, considering whether the planning authority has considered policies and laws relating to the Welsh language in planning. We are pleased to see the significant efforts made to lay the basis of relevant and sound evidence regarding the situation of the Welsh language in Cardiff in the supporting documents. We agree with your assessment in the Background Technical Paper No. 9 which states that a local development plan should not be a barrier to the growth of the Welsh language, but rather that it should be part of the solutions to see it flourish. By mainstreaming Cardiff Council's Welsh language strategies within the new scheme, we think you are taking significant steps towards making that a reality.

Planning for schools

The Background Technical Paper No. 9 recognises that the education and training system is the primary means of creating Welsh speakers, and you make the link between that and Cardiff Council's targets to increase the number of Welsh-speaking population, in line with the *Cymraeg 2050 roadmap*. We note that you are committed to ensuring that 50% of new schools will be Welsh-medium schools, in line with the Welsh in Education Strategic Plan (WESP). In addition, you establish the principle that '15-minute neighbourhoods' are applied to ensure that all learners can access Welsh language education within a reasonable distance of their homes. Apart from transferring within the home, we agree that the education system is the most effective way to create new speakers, and we are supportive of your vision.

We are keen to better understand how Cardiff Council will pursue its ambition of developing new Welsh-medium schools, and where they will be located. Your evidence base enables analysis at the micro level by communities, and we think it would be useful if

Comisiynydd y Gymraeg
Siambrau'r Farchnad
5-7 Heol Eglwys Fair
Caerdydd CF10 1AT

0345 6033 221
post@comisiynyddygymraeg.cymru
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

comisiynyddygymraeg.cymru

Welsh Language Commissioner
Market Chambers
5-7 St Mary Street
Cardiff CF10 1AT

0345 6033 221
post@welshlanguagecommissioner.wales
Correspondence welcomed in Welsh and English

welshlanguagecommissioner.wales



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the LDP analysed by ward where is the greatest need for Welsh language education within the county, then compare that against where the development of new schools is envisaged during the lifetime of the new LDP. This detail may be to follow when you develop your Supplementary Planning Guide (SPG).

Place names

We welcome that the new LDP makes Welsh names the default option on development proposals and sets an expectation for signs to be bilingual. Increasing the visibility of the Welsh language contributes to its normalisation, as well as increasing its use. We are pleased to see that you have referred to the Commissioner's Promotion Team's guidance on increasing the use of the Welsh language. In that context, a reference to our [list of standard place names](#) could be of use to those following the LDP.

Major developments

We welcome the requirement on developers of major developments to identify positive measures that improve the interests of the Welsh language, increase the opportunities to speak the language and to introduce mitigation measures in a case where there are significant adverse effects on the Welsh language. We can see that this requirement is in line with the strategic goals of *Bilingual Cardiff*. It also aligns with one of the objectives of the Commissioner's new strategic plan, which is to increase wider opportunities to use the Welsh language, creating environments where people can use the language easily and consistently, including in workplaces. Our [Hybu Team will](#) work with businesses and charities to see an increase in the use of the Welsh language in workplaces across Wales, and could be of help to businesses building major developments in Cardiff to realise the requirements of the LDP. For example the team has [a guide for producing bilingual signs](#) that could be shared with developers.

Reference to the Welsh Language (Wales) Measure 2011 and the standards

The new LDP says:

"Where appropriate, development proposals will be required to recognise the official status of Welsh in the city and to commit to facilitating opportunities to increase the use of Welsh on a daily basis and not to treat the Welsh language less favourably than English in accordance with the requirements of the Welsh Language Standards and Measure".



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We are pleased that the LDP refers to the official status of the Welsh language. However, we think that the reference to ensuring the Welsh language is not treated less favourably than the English language is too vague, and that the LDP should be more prescriptive in explaining its significance. Many of the Welsh language standards include the requirement to ensure the Welsh language is not treated less favourably than the English language, and in different contexts. The new LDP should describe in which situations the principle should apply, e.g. in the provision of education, or on the visibility of the Welsh language on signs. [The Commissioner's codes of practice](#), which offer definitions of what is meant by the requirement, by standard, might be of help to you.

Conclusion

The new LDP is a good example of how a planning authority should consider its planning policy in the context of the strategic direction of the Welsh language within its boundaries. We are interested in understanding the process used to ensure that the Welsh language is a central consideration for the LDP, as well as any challenges experienced along the journey. Furthermore, we are interested in understanding more about the scope of the CCA and the relevance of the work to the Welsh language. I wonder if my officials would be able to meet with you to discuss this further? We hope that these comments will be of use to you. Please feel free to contact us if you would like to discuss the above issues further.

Yours sincerely,

Efa Gruffudd Jones
Welsh Language Commissioner