



Comisiynydd y  
Gymraeg  
Welsh Language  
Commissioner

Boundary Commission for Wales

By email to:

[bcw@boundaries.wales](mailto:bcw@boundaries.wales)

14/11/2022

Dear Commissioners,

## **Response to the consultation on the revised proposals for the 2023 Parliamentary Review**

Thank you for the opportunity to respond to the consultation on the revised proposals for the 2023 Parliamentary Review. The Welsh Language Commissioner responded to the consultation on the initial proposals in 2021 outlining our involvement with the Local Democracy and Boundary Commission for Wales in the process of determining ward names and expressing our dissatisfaction with some of the final decisions regarding those names. Our previous response also drew attention to inconsistencies in the consultation document, to the problematic term 'alternative names' used when discussing the Welsh names of the constituencies, and to how the Commissioner's recommendations were incorrectly represented and communicated in the Boundary Commission's final reports to Welsh Government. I do not intend to repeat those comments here. However, further inconsistencies can be found in the revised proposals, and I would like to address those in this response.

### ***Aberhonddu, Maesyfed a Chwm-tawe / Brecon, Radnor and Cwm-tawe***

We recommend writing *Cwm Tawe* as two separate words in both Welsh and English names as it is the name of a topographical feature rather than a settlement name. Settlement names (cities, towns, villages etc) are usually written as one word while topographical names (valleys, rivers, mountains etc) are written as separate words. Please note that *Cwm Tawe* is the form in BydTermCymru and that is the form used by the Welsh [Wikipedia](#). When referring to the Swansea Valley area in your Welsh consultation document, [Cynigion Diwygiedig](#), the form *Cwm Tawe* is always used; *Cwm-tawe* is only used when referring to the name of the constituency. In the [English version](#) of the document, *Cwm-tawe* is used three times to refer to the area but *Swansea Valley* is mostly used.

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### ***Gŵyr a Gorllewin Abertawe / Gower and Swansea West***

It needs to be ensured that the circumflex is always used in the name *Gŵyr*. It is always correct in the consultation document, but incorrect (without the circumflex) in the Welsh Excel document, *Cynigion Diwygiedig data etholwyr gan Awdurdod Lleol*. It is necessary to ensure that the forms are consistent in all the Commission's documents to avoid confusion and mistakes.

### ***Canol a De Sir Benfro / Mid and South Pembrokeshire***

This is the Welsh form used everywhere except for on page 30 of the Welsh consultation document, where *De a Canol Sir Benfro* is used. Note that if the Commission wished to use *De a Chanol Sir Benfro*, the 'canol' element needs to be mutated as shown.

### ***Maldwyn a Glyndŵr / Montgomeryshire and Glyndŵr***

It needs to be ensured that the circumflex is always used in the name *Glyndŵr* in both Welsh and English names. It is incorrect in the English name on the 'Contents' page of the Welsh version of the consultation document, and incorrect several times in the English version of the document. It is also incorrect (without the circumflex) in the Welsh and English versions of the Excel document, *Revised Proposals Electoral Data by Local Authority*. It is necessary to ensure that the forms are consistent in all the Commission's documents to avoid confusion and mistakes.

### **Bilingual names**

The English and Welsh names of the constituencies are set out next to each other in the table of contents in the consultation document and in the headings of the individual sections, but it would be beneficial to include both names when there is a map as on page 30, and in the Excel document, *Revised Proposals Electoral Data by Local Authority*. It is important to ensure that it is clear that the constituencies have an official bilingual name to prevent any translators from translating the names themselves and using a different form from the official name. We would also argue that placing the Welsh name in brackets after the English name in the consultation document implies that the Welsh name has a lesser status than the English name.

The blemishes and inconsistencies that continue to appear in constituency names are a cause for concern and indicate a wider problem with the Commission's naming processes. Although we provided recommendations and detailed notes regarding ward names during that consultation process, the standard forms have not always been adopted. In fact, some non-standard and orthographically incorrect names have been adopted at times, as in the case of *Bryn-côch North* and *Bryn-côch South*, for example. Any Welsh dictionary consulted would confirm that the circumflex is never used in the word *coch* (red). It is also frustrating that there is no commitment from the Commission to use the forms we recommend, even when we have agreed the standard forms of those names with local authorities. This has led to the use and introduction of new non-standard forms which adds to an existing problem in Wales where various different forms exist for one place-name in some cases.

You will be aware, of course, that the Welsh Government has launched a consultation on the electoral administration and reform White Paper. That consultation paper highlights the keen public interest in electoral ward names and recognises that, based on this, naming should be given a more central place in the review process. This exercise certainly underlines the need for naming to have a clearer and more robust role in our democratic processes. It must be ensured that Welsh is not treated less favourably than English in determining those names that will be at the heart of democracy in Wales.

Should you wish to discuss the above comments in more detail, my officials would be more than happy to discuss.

Yours sincerely,



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