



Replacement Local Development Plan 2018-2033

Background Paper

July 2019

BP 42: Welsh Language Impact Assessment of the Preferred Strategy

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1. Introduction

1.1 Overview

- 1.1.1 This is one of a number of background papers accompanying Conwy Borough Council's Preferred Strategy, 2019. When the Council publishes its Preferred Strategy, it must include a Welsh language impact assessment. This document provides a high-level Welsh language impact assessment to accompany the publication of the Preferred Strategy.
- 1.1.2 This document should also be read alongside the Technical Advice Note (TAN) 20 'Welsh Language' which contains statutory guidance as well as the Council's Welsh language planning policy.

1.2 Background

- 1.2.1 Conwy County Borough Council commissioned RHD Consultancy Ltd to undertake a high-level Welsh language impact assessment of its Preferred Strategy prior to its publication in July 2019.
- 1.2.2. The work was made up of two phases: the first of which was to review the legislative and policy context and provide a report to Conwy Borough Council on these changes. Since the last LDP was published, there have been several important legislative, policy and national guidance developments. The Welsh Language (Wales) Measure 2011 has come into force together with the requirement for Conwy County Borough Council to comply with the new Welsh Language Standards. Furthermore, the Future Well-being of Future Generations Act 2015 has been introduced and includes implications for planning, ways of working and ensuring the health and well-being of the Welsh language and culture. In addition, Planning Policy Wales (2018) has been published and new national planning guidance on the Welsh language, Technical Advice Note 20.
- 1.2.3 This first phase of work has been completed and included presenting recommendations for Conwy County Borough Council to consider regarding a revised Welsh language planning policy.
- 1.2.4 The second phase was to undertake a high-level Welsh language impact assessment of the proposals in the Preferred Strategy and the purpose of this report is to outline the outcomes of this particular workstream.

- 1.2.5 Conducted between May and July 2019, this Welsh language impact assessment has drawn on multiple sources of evidence, including Census data, statistical bulletins and research reports, together with a plethora of papers and reports that supported the development of the Preferred Strategy, as well as a wider literature review. A full list of sources used as well as useful links and the bibliography is in the annex to this report.
- 1.2.6 Multiple methods of data collection and analysis were utilised in order to inform the impact assessment. The three main components of the work are outlined below:

Desk research and analysis:

- i. Review of legislation and national policies – both planning and Welsh language – Planning Policy Wales, TAN 20, TAN 6, Welsh Language (Wales) Measure 2011, Well-being of future generations Act 2005, Cymraeg 2050, Welsh Language Standards (for Conwy County Borough).
- ii. Documentary analysis – Preferred Strategy (draft for publication July 2019), Planning and the Welsh language: the way ahead (2005), BP07 Housing Land Supply Paper, Conwy Welsh language promotion strategy, Conwy Research Unit analysis, Welsh in Education Strategy, Well-being plan.
- iii. Statistical analysis – Census 2011, Research Unit Welsh language report, Language Commissioner's Language Use Survey, ONS Statistical Bulletins, Stats Wales bulletins on the Welsh language, housing reports, employment data report, Wales deprivation areas, travel to work reports, demand for Welsh medium school data.
- iv. Literature review – wider reading on Welsh language and identify, sense of place and placemaking, Welsh language heartlands, and Welsh language communities and organisations.

Reviewing and mapping existing Welsh language planning policy with desk research findings:

- v. Mapping of existing Welsh language planning policy with findings of above analysis.
- vi. Annotating existing policy with recommendations for early consideration.

Impact assessing the Preferred Strategy

- vii. Identifying the five allocated sites and assessing the impact based on statistical analysis
- viii. Completing a high-level assessment of the Strategic Policy Statements against best practice and legal requirements
- ix. Completing the 18-point impact assessment checklist and toolkits
- x. Formulating a high-level Welsh language impact assessment report
- xi. Testing and applying recommendations against Preferred Strategy:

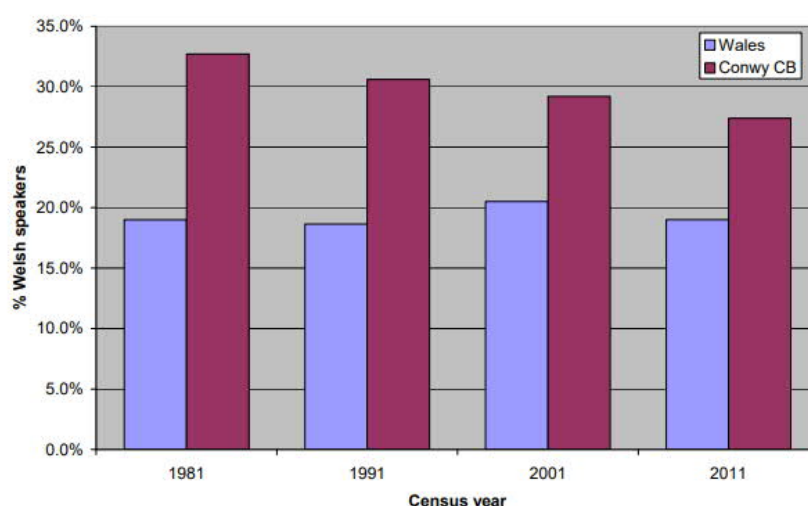
- 1.2.7 A revised Welsh language planning policy is also being undertaken to feed into the LDP process.
- 1.2.8 Following this high-level impact assessment carried out on the Preferred Strategy at this stage, further work on impacts and mitigation measures will be undertaken later for those allocated sites that have been identified through this assessment.
- 1.2.9 Furthermore, whilst TAN 20 guidance requires the local planning authority to undertake a plan led approach and undertake an impact assessment at this stage, it also says that the plan cannot foresee all developments and that large-scale windfall sites will therefore need to be impact assessed at the appropriate time.

2. The Welsh Language in Conwy

- 2.1 The Welsh language is part of the social fabric and culture of Conwy and Wales. The 2011 Census estimated that in Conwy County Borough there were 30,600 people aged 3 or over able to speak Welsh. This amounts to 27.4% of the population of the county borough.
- 2.2 This compares with the percentage for the population of Wales as a whole of 19% able to speak Welsh. Conwy County Borough has the fifth highest proportion of Welsh speakers of all the unitary authorities of Wales, behind Gwynedd, Isle of Anglesey, Ceredigion and Carmarthen. Numerically, the County Borough ranks sixth and accounts for 5.4% of the Welsh speaking population of Wales.
- 2.3 Whereas 19% said they were able to speak Welsh in the 2011 Census, nearly half were able to do so in 1901. Over the last century, there has been a decline in the

percentage of Welsh speakers. In common with much of Wales, the proportion of Welsh speakers in Conwy has declined between each Census period. In 1981, 33% of the population spoke Welsh, compared to 29.2% in 2001 and 27.4% in 2011.

Chart 1.2: change in the proportion of Welsh speakers over time
Source: Census of Population, ONS



- 2.4 Between 2001 and 2011 the number of Welsh speakers in the County Borough fell from 31,050 to 30,600 – a decrease of 450 or -6.2%. As a proportion this was a fall from 29.2% of the population aged 3+ in 2001 to 27.4% in 2011. This decline has been continuous over the past four Censuses.

Table 1: Welsh speakers 1981 to 2011 Source: 2001 and 2011 Censuses, ONS

	Conwy County Borough		Wales	
	Number	%	Number	%
2011 Census	30,600	27.4%	562,016	19.0%
2001 Census	31,042	29.2%	575,640	20.5%
1991 Census	31,431	30.6%	508,098	18.7%
1981 Census	30,276	32.7%	508,207	19.0%

Source: 2001 and 2011 Censuses, ONS

- 2.5 However, the number of Welsh speakers is declining as well as the percentage. Between 2001 and 2011 the number of Welsh speakers fell from 31,298 to 30,600. This is particularly important against the backdrop of an overall increase in the

population of Conwy over the same 10-year period – from 106,316 to 111,724. Therefore, the number of Welsh speakers is declining, whereas the number of non-Welsh speakers is increasing. There is a net loss of Welsh speakers in Conwy as demonstrated in the table below.

Table 2: Change in numbers and percentages able to speak Welsh between 2001 and 2011 in Conwy county borough

2001				2011			
Able to speak Welsh	Not able to speak Welsh	Total	%	Able to speak Welsh	Not able to speak Welsh	Total	%
31,298	75,018	106,316	29.4%	30,600	81,124	111,724	27.39%

Source: 2001 and 2011 Censuses, ONS

- 2.6 However, not all areas in Conwy have seen a decline in Welsh speaking abilities. Between 2001 and 2011, four electoral wards saw an overall increase in Welsh speakers within their population in terms of both numbers and proportion – Penrhyn (Llandudno), Kinmel Bay, Llandrillo yn Rhos and Eglwysbach. – a further 11 electoral divisions saw a numeric increase in the number of Welsh speakers, even though there was a proportionate decline¹.

Table 3: electoral wards where Welsh speaking has increased between 2001 and 2011

Electoral division of Conwy	Numerical change	Percentage change
Llandrillo yn Rhos	114	0.4%
Kinmel Bay	72	0.4%
Penrhyn	70	0.9%
Rhiw	70	-1.2%
Betws yn Rhos	65	-1.0%
Pant-yr-afon/Penmaenan	63	-4.1%

¹ Conwy County Borough Council Research Unit (August 2013), The Welsh language in Conwy – ad hoc research bulletin

Crwst	49	-3.7%
Eglwysbach	32	0.1%
Deganwy	31	-0.7%
Gele	19	-0.6%
Llangernyw	18	-3.5%
Marl	16	-0.6%
Llansannan	15	-2.6%
Gower	13	-2.9%
Towyn	11	-0.2%
Llansanffraid	-26	0.2%

Source: 2001 and 2011 Censuses, ONS

- 2.7 The ability to speak Welsh differs between age groups. The ability to speak Welsh is most prevalent amongst those of school age – overall, 49.2% of 5-15 year olds can speak Welsh. Those aged 50-69 have the lowest proportion of Welsh speakers (only 20.4%), though even in this age group, Conwy is well above the Wales average.
- 2.8 Of all the pupils in schools in Conwy, 16.4% of pupils are in Welsh medium schools and a further 21.7% of pupils are educated in schools that provide a significant proportion of the provision through the medium of Welsh. Furthermore, most children and young people learn Welsh up to the age of 14 years as part of the national curriculum (in English mediums schools).

Table 4: pupils by school type in Conwy County Borough, 2013 Source: Pupil Level Annual School Census²

All pupils	15,903	-
Pupils in Welsh medium schools	2,602	16.4%
Pupils in bilingual schools	692	4.4%
Pupils in dual stream schools	412	2.6%
Pupils in English schools (with significant Welsh)	2,343	14.7%
Pupils in English medium schools	9,854	62.0%

² Conwy County Borough Council Research Unit (August 2013), The Welsh language in Conwy – ad hoc research bulletin

- 2.9 There are Welsh speakers living, working and using Welsh across all parts of Conwy Borough. This section demonstrates that there are as many as 70% able to speak Welsh in some electoral wards and that there are Welsh speakers in every ward.

Table 5: Percentage of population able to speak Welsh by electoral ward, Conwy

Conwy electoral Ward	% able to speak Welsh
W05000149: Uwchaled	70.8
W05000132: Llangernyw	65.8
W05000128: Gower	63.5
W05000134: Llansannan	63.0
W05000148: Uwch Conwy	60.7
W05000121: Crwst	59.6
W05000123: Eglwysbach	54.3
W05000113: Betws-y-Coed	50.3
W05000139: Pandy	48.4
W05000146: Trefriw	45.6
W05000114: Betws yn Rhos	45.4
W05000115: Bryn	45.0
W05000116: Caerhun	41.9
W05000133: Llansanffraid	35.8
W05000140: Pant-yr-afon/Penmaenan	34.1
W05000117: Capelulo	33.3
W05000915: Marl	29.8
W05000119: Conwy	28.7
W05000917: Pensarn	28.4
W05000124: Eirias	23.5
W05000918: Tudno	23.4
W05000916: Penrhyn	22.9
W05000914: Deganwy	22.8
W05000125: Gele	22.7
W05000137: Mochdre	22.5
W05000135: Llysfaen	21.1
W05000143: Pentre Mawr	21.1

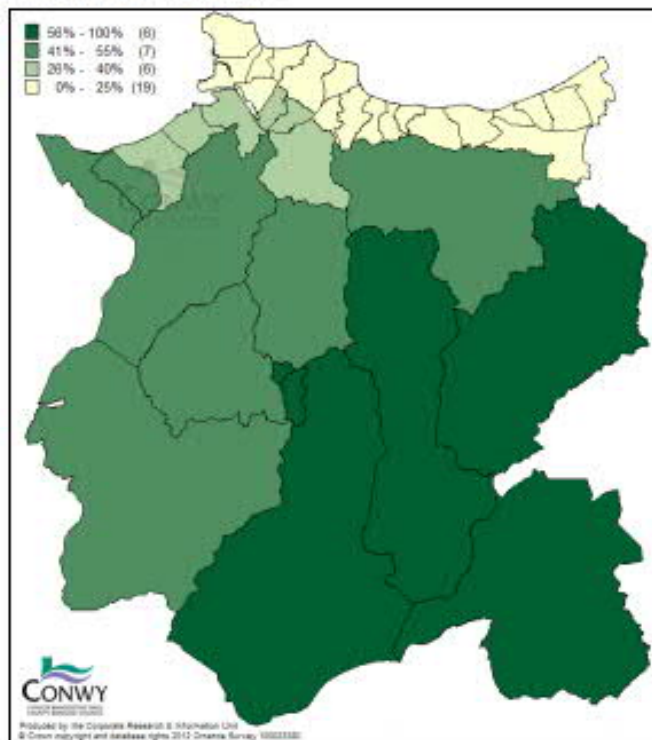
W05000118: Colwyn	20.7
W05000130: Llanddulas	20.5
W05000126: Glyn	19.7
W05000913: Craig-y-Don	18.7
W05000131: Llandrillo yn Rhos	18.4
W05000138: Mostyn	18.4
W05000144: Rhiw	16.7
W05000127: Gogarth	16.0
W05000112: Abergele Pensarn	11.6
W05000129: Kinmel Bay	11.5
W05000145: Towyn	10.8

Source: StatsWales Census 2011 Bulletin, Welsh language, Welsh Government

- 2.10 In general, the incidence of Welsh speakers increases towards the west, and as one travels inland from the more highly populated coastal strip. The Welsh language speakers are at a peak in the rural southern electoral wards, such as of Uwchaled (71% Welsh speaking) and at its lowest in the eastern coastal community of Towyn & Kinmel Bay (less than 12% Welsh speaking).
- 2.11 Whilst the percentages are highest in rural and south western areas, numerically there are many more Welsh speakers in more highly populated areas including urban areas. Llandudno has 4,079 people able to speak Welsh, followed by Conwy where 3,908 can speak Welsh. In Colwyn Bay, 1,897 can speak Welsh, whilst this amounts to 17.9% of the population (based on the 2011 Census data). And Rhos-on-Sea has 1,366 Welsh speakers, which is 18.4%. The Map below highlights the highest population density in the darkest green colour.

Map 1.1: proportion of Welsh speakers in Conwy County Borough, by electoral division (ward)

Source: 2011 Census table KS20FWA, ONS



However, though the proportions of Welsh speakers are highest in the rural electoral divisions, numerically there are many more Welsh speakers in the urban areas than in the more sparsely populated rural areas. Rhos-on-Sea has over 1,350 Welsh speakers though that makes up only 18.4% of the population. Uwchale, which is proportionately the most Welsh speaking electoral division has about 400 fewer.

2.12 This next section presents the Welsh language skills in Conwy by community council area.

Table 6: Welsh language skills by community council area, 2011 ³

	All people aged 3 and over	No skills in Welsh	Understands spoken Welsh only*	Can speak Welsh	Can speak, read & write Welsh	Other skill combination
Wales	2,955,841	73.3%	5.3%	19.0%	14.6%	6.7%
Conwy County Borough	111,724	60.6%	9.5%	27.4%	20.6%	9.2%
Abergele	10,279	80.4%	6.8%	11.6%	7.7%	5.1%
Betws-y-Coed	542	36.7%	11.2%	50.3%	42.7%	9.4%
Betws yn Rhos	1,020	43.7%	9.0%	45.4%	36.3%	11.0%
Bro Garmon	635	39.2%	13.5%	45.0%	32.4%	14.9%
Bro Machno	596	44.6%	11.2%	41.9%	33.4%	10.8%
Caerhun	1,263	49.1%	14.6%	33.3%	23.4%	13.0%
Capel Curig	198	66.1%	9.9%	20.7%	15.2%	8.8%
Cerrigydrudion	711	54.0%	14.5%	28.7%	20.4%	11.2%
Colwyn Bay	10,605	70.0%	8.9%	18.7%	13.7%	7.4%
Conwy	14,274	26.1%	12.0%	59.6%	46.2%	15.7%
Dolgarrog	427	65.4%	9.5%	22.8%	16.6%	8.4%
Dolwyddelan	459	37.0%	7.4%	54.3%	44.9%	10.6%
Eglwysbach	914	62.5%	11.1%	23.5%	17.3%	9.1%
Henryd	704	67.7%	7.3%	22.7%	17.3%	7.7%
Llanddoged and Maenan	595	68.6%	9.1%	19.7%	14.1%	8.2%
Llanddulas & Rhyd-y-Foel	1,504	72.9%	9.0%	16.0%	11.8%	6.3%
Llandudno	20,111	20.9%	13.2%	63.5%	51.1%	14.8%
Llanfairfechan	3,523	81.7%	5.0%	11.5%	7.4%	5.9%
Llanfairtalhaearn	1,044	67.2%	9.7%	20.5%	14.1%	9.0%
Llanfihangel Glyn Myfyr	184	71.3%	8.0%	18.4%	13.0%	7.7%
Llangernyw	1,043	28.0%	5.5%	65.8%	57.3%	9.1%
Llangwm	462	49.9%	11.8%	35.8%	26.5%	11.8%
Llanefydd	571	29.6%	6.5%	63.0%	56.5%	7.4%
Llanrwst	3,187	66.2%	9.7%	21.1%	14.6%	9.6%
Llansanffraid Glan Conwy	2,139	56.1%	10.8%	29.8%	21.8%	11.3%
Llansannan	1,299	65.3%	9.6%	22.5%	15.9%	9.3%
Llysfaen	2,621	68.1%	10.8%	18.4%	12.6%	8.5%
Mochdre	1,847	37.5%	11.9%	48.4%	34.3%	16.3%
Old Colwyn	7,844	49.2%	13.6%	34.1%	24.6%	12.6%
Penmaenmawr	4,210	64.5%	9.8%	22.9%	16.9%	8.7%
Pentrefoelas	345	53.6%	14.3%	28.4%	20.0%	12.1%
Rhos-on-Sea	7,422	68.1%	8.1%	21.1%	15.6%	8.2%
Towyn and Kinnel Bay	8,194	72.2%	8.2%	16.7%	11.9%	7.6%
Trefriw	761	82.8%	5.0%	10.8%	6.9%	5.3%
Ysbyty Ifan	191	38.6%	13.0%	45.6%	33.1%	15.4%

* 'Understands spoken Welsh only' means that the person understands spoken Welsh but has no other skills in the language.

³ Source: 2011 Census table KS207WA, ONS

2.1.13 Where 60% or more are able to speak Welsh, these areas were described as Welsh language heartlands (Aitchison, J. and Carter, H. (1998). These are important areas where the Welsh language is used in everyday life and is an important part of the fabric of the community. In most recent studies and reports, areas where over 50% speak Welsh are now often described as heartlands where the Welsh language is part of the social fabric and is used frequently in everyday life. These areas contribute to both Conwy's language strategy as well as to the national policy of Cymraeg 2050. Conwy has many such areas and Table 7 lists each in turn.

Table 7: Community Councils with above 60% able to speak Welsh

Community Council	Number able to speak Welsh	Percentage able to speak Welsh
Ysbyty Ifan	151	79.1%
Cerrigydrudion	549	77.2%
Pentrefoelas	241	69.9%
Llanfihangel Glyn Myfyr	128	69.6%
Llangernyw	672	64.4%
Llansannan	831	64.0%
Llanddoged and Maenan	371	62.4%
Llangwm	284	61.5%
Llanrwst	1,943	61.0%
Llanefydd	348	60.9%

3. Welsh language national policy and legislation

3.1 The Welsh Government's national strategy for the promotion and facilitation of the use of the Welsh language, *A Living Language: a Language for Living 2012 – 2017* lists six strategic areas. Of particular relevance to the land use planning system is the strategic area of community, where the strategic aim is to strengthen the position of the Welsh language in the community and its use therein.

- 3.2 The strategy acknowledges the importance of Local Development Plans (LDPs) as a tool to manage the use of land and sustainable development. The strategy proposes to review with stakeholders how Welsh-speaking communities have engaged in the LDP process and whether that engagement could be better facilitated in future, identifying how Welsh language issues have been addressed and considering the need to provide additional guidance with regard to taking Welsh language issues into account as LDPs are prepared.
- 3.3 The strategy also aims to identify parts of Wales with high percentages of Welsh speakers but where the language is now under threat. In Conwy, there are wards to the south of the Plan where over 50% are able to speak Welsh, but the numbers have declined in recent years. These are areas of importance for the national Welsh language strategy.
- 3.4 Welsh Government published Cymraeg 2050⁴ – the national strategy for the promotion and facilitation of the use of the Welsh language. It included a national target to increase the number of Welsh speakers to 1 million by 2050 and Conwy County Borough Council has a role to play to contribute to this strategy. Moreover, the local authority has prepared a Welsh language strategy which includes a target to increase by 2% the amount of people able to speak Welsh in the area over the next five years.
- 3.5 The proportional decline in Conwy and elsewhere across Wales can be due to demographic changes, migration patterns and educational factors. These broad factors include issues such as out-migration of Welsh speakers, in-migration by non-Welsh speakers and when the Welsh language is not being passed on from one generation to the next. A further factor which has been suggested is the land use planning system, although the degree to which this is a factor is debatable.
- 3.6 New development can have both beneficial and adverse effects on the Welsh language. Beneficial effects can occur when development encourages Welsh speakers to remain in their communities, for example affordable housing for local need in a primarily Welsh speaking area, or when it supports the viability of village facilities, such as the school. Harmful effects can occur when a disproportionate number of non-Welsh speakers move into a community. This can often have cumulative effects, for example, by reducing the use of the Welsh language among Welsh speakers.

⁴ Welsh Government (2017) - Cymraeg 2050 - <https://gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf>

- 3.7 As is shown in the next section, the planning system has an important role to play to contribute to the national target of creating a million Welsh speakers by 2050. The Welsh language and culture is a material consideration in planning decisions.

4. Planning and the Welsh Language

4.1 National Planning Policy and Guidance

- 4.1.1 Section 70(2) of the Town and Country Planning Act 1990 (TCPA) clarifies that considerations relating to the use of the Welsh language may be taken into account when determining applications for planning permission, so far as they are material to the application. This may apply to any application in any part of Wales. This provision means that the Welsh language is a material consideration but does not give any additional weight to the Welsh language above any other material consideration.
- 4.1.2 The planning system operates within the provisions of town and country planning legislation and other domestic and European legislation. In relation to the Welsh language and planning, the Equality Act 2010 and the Human Rights Act 1998 are relevant and decision-makers should be mindful of the wider legal requirements.
- 4.1.3 The Wales Spatial Plan (2004; updated 2008) provides a mechanism for joining up the Welsh Government's activities; in planning terms, it is one of the ten tests of soundness that an LDP should have regard to. Conwy predominantly falls within the Plan's North East Wales Spatial Plan Area, where the Plan recognises the prominent use of the Welsh language. It states that with a new generation of Welsh learners and speakers being fostered, this provides a good opportunity for the area to capitalise on this element of its cultural heritage.

Planning Policy Wales 2018

- 4.1.4 Planning Policy Wales (Edition 10) 2018 (PPW) is the Welsh Government's land use planning policy for Wales and should be taken into account when preparing development plans. The document, along with supporting guidance contained in Technical Advice Note (TAN) 20 on the Welsh Language (2000), states that the future well-being of the language will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The land use planning system should also

take account of the needs and interests of the Welsh language and in doing so contribute to its well-being.

- 4.1.5 Updated in 2018, Planning Policy Wales (PPW)⁵ aims to deliver the vision of the Wales as set out in the Well-being of Future Generations Act: a more prosperous Wales; a resilient Wales, which supports healthy, functioning ecosystems and recognises the limits of the global environment; a healthier Wales; a more equal Wales; a Wales of more cohesive communities; and a Wales of vibrant culture and thriving Welsh language and a globally responsible Wales.
- 4.1.6 The PPW embeds the spirit of the Well-being of Future Generations Act, through moving us towards a low carbon, resilient society, of providing secure and well-paid jobs, and of building well-connected environments for everyone in Wales.
- 4.1.7 PPW supports the Welsh language, including access to services and encourages a sense of place and belonging. It also sends a clear message that we are planning for future resilient communities (both urban and rural).
- 4.1.8 PPW states that all development decisions, either through development plans' policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being. One of the Placemaking Outcomes is - Creating and Sustaining Communities: Enables the Welsh language to thrive.

Technical Advice Note 20 – the Welsh language

- 4.1.9 Technical Advice Note (TAN) 20 provides supplementary guidance to Part 4 of Planning Policy Wales. TANs and Circulars should be taken into account by planning authorities in the preparation of development plans and in determining planning applications.
- 4.1.10 Updated in October 2017, TAN 20 says that the Welsh language is a material consideration in planning. There may be occasions when one benefit of a development proposal or site allocation outweighs another, and in such cases, robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.

⁵ Planning Policy Wales, 2018 <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf>

- 4.1.11 The guidance says that the assessing the impact on the Welsh language must form part of the Preferred Strategy's Sustainability Appraisal (SA).
- 4.1.12 Impact assessments per se are not routinely required for all sites. Impact assessments are required for the following:
- Significant policy decisions (as set out in the Welsh language standards);
 - Large scale development - normally defined as 10 or more residential dwellings or developments over 1,000 square metres or 1 hectare, but LPAs may set locally-appropriate thresholds in the LDP, based on evidence (TAN 20, Oct 2017);
 - Linguistic sensitive areas (which must be identified by the local planning authority); and
 - Defined areas
- 4.1.13 Therefore, the authority is required to take a plan-led approach and undertake a high-level Welsh language impact assessment of the Preferred Strategy as part of the Strategic Appraisal in accordance with TAN 20.
- 4.1.14 The Preferred Strategy being consulted on from July 2019 contains allocated sites being proposed for development. This report provides an overview of the impact assessment completed on these.
- 4.1.15 However, not all sites for development can be foreseen at this stage and TAN 20 says that local authorities can consider the scale of their contribution and whether the level of anticipated windfall developments may impact on the use of the Welsh language. Therefore, a high-level impact assessment can broadly take these into account at this juncture.

4.2 Defined areas

- 4.2.1 TAN 20 requires planning authorities to identify linguistically sensitive areas. These defined areas are where the Welsh language is considered to be of particular sensitivity and / or significance. Any such areas must be made clear on the LDP Proposals Map and their rationale and boundaries must be supported by evidence.
- 4.2.2 Defining such areas will enable the local planning authority to make it clear to communities and developers where the use of the Welsh language needs to be considered. It will also signal the areas where measures to mitigate the impacts of development on the Welsh language may be necessary.

- 4.2.3 There are some wards and community council areas in the County Borough of Conwy that do not form part of the Council's LDP. This is because these communities are in Snowdonia National Park and are therefore out of scope. Whilst all wards and county boroughs are relevant for data comparison purposes, and demonstrate the rich Welsh language fabric of the county, communities in the National Park are outside the scope of this Welsh language impact assessment. Those Community Councils with a high number and/or percentages of Welsh speakers and are located fully in Snowdonia National Park area and not within the Plan Area include Betws y Coed, Capel Curig, Dolwyddelan, Bro Machno and Ysbyty Ifan.

4.3 Mitigation measures in national guidance

- 4.3.1 Measures to mitigate adverse impacts and actions to promote positive impacts, should be identified at the development plan-making stage. By doing this at this stage, the developer will be informed of the implications of those measures when it comes to preparing a planning application. This should also aid community engagement – because more robust and constructive proposals at the plan-making stage, will reduce potential conflict at the planning application stage.
- 4.3.2 To ensure mitigation measures are applied, the Community Infrastructure Levy (CIL) or section 106 agreements may need to be used. The provision of infrastructure supporting the use of the Welsh language may be included on a CIL charging schedule in accordance with all applicable law, including the provisions of the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010.

4.4 Signage

- 4.4.1 TAN 20 says that “Signs can have a strong visible impact on the character of an area, including its linguistic character. They are also one method of promoting the distinctive culture of Wales, which is of significance to the identity of individual communities as well as the tourism industry. Policies in LDPs relating to signage and advertising subject to planning control may promote the provision of bilingual signs.”

4.5 Planning and the Welsh Language: the Way Ahead

- 4.5.1 This report was produced through collaboration between local planning authorities, the Welsh Language Board (now the Welsh Language Commission), the Home Builders Federation and the Welsh Government.
- 4.5.2 One of the recommendations of this report was that local planning authorities should start to define Language Sensitive Areas (LSAs) within their areas based on a threshold of whether 25% or more of their Community Council area speak Welsh;

5. The Conwy Preferred Strategy, 2019-33

5.1 Introduction

- 5.1.1 Conwy adopted its Local Development Plan (LDP) in 2013 which is due to expire in 2021. Therefore, Conwy are now preparing a Replacement Local Development Plan (RLDP) to cover the period 2018 - 2033. The authority says that 'together, we want to contribute positively to sustainable development by improving the economic, social, environmental and cultural well-being of Conwy by 2033 and ultimately 'Creating Greater Opportunities to Live, Work and Visit' the county borough.
- 5.1.2 This will be achieved by preparing a focussed, succinct and relevant Replacement Local Development Plan (RLDP) which embraces the sustainable development principles and the concept of placemaking. By taking such action it will ensure that the RLDP embeds the spirit of the Well-being of Future Generations Act and seeks to take positive steps to create sustainable places, social inclusion and improved Well-being for all in Conwy.
- 5.1.3. Informed by the Key Planning Principles and the National Sustainable Placemaking Outcomes in Wales, the concept of placemaking will be a key element of the Conwy Preferred Strategy in delivering the goals of Well-being of Future Generations Act and in driving Conwy's plan-making and development management decisions to create sustainable places. Placemaking in Conwy will ensure a holistic approach to planning. It will draw on Conwy's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well-being.'
- 5.1.4 The Preferred Strategy is the first statutory stage in preparing the RLDP. It sets out the broad approach that the RLDP intends to take in order to ensure that development in Conwy is sustainable.

5.1.5 The authority's Vision is set out clearly in the Preferred Strategy as follows:

By 2033, Conwy will offer greater opportunities to live, work and visit. A good quality of life will be offered to all, supporting the diversity of Conwy's people and places. The importance of the Welsh language in many communities is recognised and will be enhanced. Older people of Conwy will be encouraged to lead active, healthy and fulfilling lives into old age. Improved education, employment and social opportunities will be made available to encourage young people to stay and return to Conwy and support growth. An increased range of well-designed accommodation will be provided across Conwy, based on the local need for affordable and open market housing. A renewed focus on placemaking and regeneration led initiatives will ensure that high quality and well-designed development supports the creation of healthier and more vibrant places and reflects Conwy's position within the regional North Wales Growth Deal. The economic strength of Conwy's employment hubs, built around the strategic transport links throughout the county will be enhanced. Conwy will have a prosperous network of towns and villages, and a viable rural economy which protects and enhances the natural environment. Further inward investment, infrastructure, and active travel provision will be encouraged to support sustainable development where compatible with the need to mitigate against the causes and effects of climate change. Conwy's rich natural and cultural heritage will be protected and promoted; recognising their importance to the well-being of people and wildlife, and to the tourism economy.

5.1.6 The vision clearly includes a firm commitment to the Welsh language. The above statements include both a vision to recognise the importance of the Welsh language in Conwy and also a strong commitment to enhance the language through the planning process.

5.1.7 The Preferred Strategy is supported by four supporting sections designed to contribute individually to placemaking and sustainable development in Conwy: The Preferred Strategy sets out four strategy subject areas, which are:

- **Sustainable Placemaking** – This section promotes integrated policies that should not be considered in isolation during the development process. This includes considering the design of a development and its impacts upon

everyday lives as well as thinking holistically about where people might live and work and which areas should be protected.

- **Prosperous places in Conwy** - The Preferred Strategy promotes a prosperous economy in Conwy by providing well connected employment and economic development in sustainable and accessible locations. This section sets the strategic direction for Economic Development, Tourism, The Rural Economy, Transportation Infrastructure, Telecommunications, Energy and Minerals & Waste.
- **Healthy and social places in Conwy** – this section sets out how the authority will support people to adopt healthy lifestyles, secure socially inclusive development and more cohesive communities. This section sets the strategic direction for Transport, Housing, Retail & Commercial Centres, Community Facilities and Recreational Spaces.
- **Natural and cultural places in Conwy** - Natural and Cultural Places in Conwy are those which value the quality of Conwy's landscapes and historic environment, future proof economic assets both in response to the challenges presented by climate change and in promoting low carbon solutions, protecting landscapes and habitats, enabling opportunities for connecting with the natural environment and encouraging healthier lifestyles with the benefit of improving physical and mental well-being.

5.1.8 The Preferred Strategy sets out the case for growth in the county borough for the period 2018 – 2033. The Council says that due to population growth and estimates for more households, new development is needed to support that growth. The Conwy Preferred Strategy proposes to accommodate up to 1,800 new jobs and 5,150 homes by 2033.

5,150 homes (350 homes per year from 2018 to 2033)
1,800 jobs
1,800 affordable homes (120 per year from 2018 to 2033)

5.2 The allocated sites in the Preferred Strategy

5.2.1 Having identified and understood the needs of existing urban and rural areas and their key attributes, the Preferred Strategy proposes to focus growth within two strategic areas: the Coastal Development Strategy Area (CDSA); and the Rural Development Strategy Area (RDSA).

5.2.2 Coastal Development Strategy Area (CDSA):

Conwy's population primarily falls within the urban coastal corridor along the strategic transport routes of the A55 dual carriageway and railway line. These urban locations offer the best opportunity to locate growth, meet community's needs, promote active travel, healthier communities, combat climate change and ultimately conform to the Key Planning Principles and the National Sustainable Placemaking Outcomes in Wales. However, these areas also experience community and infrastructure capacity issues (e.g. schools, doctor's surgeries and utilities supply), which are planned for in this Preferred Strategy to ensure sustainable communities are created.

5.2.3 Some urban areas, such as Abergele, Pensarn, Towyn and Kinmel Bay also suffer from major constraints, such as flood risk and highways infrastructure, which impacts on their ability to accommodate growth and regenerate. The Preferred Strategy promotes an Eastern Regeneration and Investment Area (ERIA) as part of the Preferred Strategy to avoid further decline in these vulnerable areas and ensure that the plan contributes to the creation of resilient communities. The majority of growth is focused in the more sustainable accessible urban towns within the Central, Creuddyn and Western areas of the CDSA.

5.2.4 Rural Development Strategy Area (RDSA):

Conwy's countryside is a dynamic and multi-purpose resource, as outlined in the Preferred Strategy, must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes will be balanced against the economic, social and recreational needs of local communities and visitors.

5.2.5 The Preferred Strategy focuses limited growth to those rural settlements which have relatively good accessibility by non-car modes when compared to the rural area as a

whole. As such the majority of rural growth is focused in the Key Service Centre of Llanrwst, which is a settlement that supports the wider rural communities in terms of employment, retailing and education. To ensure that the wider rural communities have the opportunities to sustain themselves, a more flexible approach to development is promoted where it safeguards community identity and meets local needs.

5.2.6 The Preferred Strategy identifies the sites that are key to delivering the overall strategy. A Strategic Site is classed as being 6 hectares (60,000 sqm) or more, which could include a specific use or a mix of uses. Five Strategic Sites have been identified as making an important contribution to the overall provision for growth during the Plan period.

Strategic Policy 11 (SP/11): Strategic Sites

To partly meet the future growth requirements, reflect highly constrained land to the east of the County Borough and contribute positively to the North Wales Growth Deal, five Key Strategic Sites* are proposed in sustainable and accessible locations, supported by the required infrastructure and proposed phasing over the Plan Period:

Coastal Development Strategy Area (CDSA):

1. Llanfairfechan – Mixed Use Housing (400 Homes), Affordable Housing, Primary School, Allotments and Recreational Space. The site is phased between 2021 and 2029
2. Llanrhos – Mixed Use Housing (250 Homes), Affordable Housing, Primary School, 1 Hectare of B1 Employment Land, Allotments and Recreational Space. The site is phased between 2024 and 2031.
3. Old Colwyn – Housing (450 Homes), Affordable Housing, Allotments and Recreational Space. The site is phased between 2024 and 2033.
4. Abergele – Mixed Use Employment (4.7 Hectares of B1, B2 & B8), Retail, Recreational Space and a Primary School. The site is phased between 2021 and 2027.

Rural Development Strategy Area (RDSA)

5. Llanrwst Key Service Centre - Housing (200 Homes), Affordable Housing, Allotments and Recreational Space. The site is phased between 2021 and 2026.

*All Key Strategic Sites are supported by a Viability Assessment, Site Assessments and Concept Drawings. All Strategic Sites will be supported by a Placemaking Vision, Design Principles and Development Briefs.

5.3 Welsh language planning policy for Preferred Strategy

- 5.3.1 Strategic Policy 7 within Objective 1 of the Preferred Strategy includes the Welsh language: therefore, the Welsh language is a clear priority within the plan.
- 5.3.2 The policy states that the Welsh language is a material consideration in determining planning applications.
- 5.3.3 In line with this policy, a high-level impact assessment has been undertaken on the Preferred Strategy: the outcome of which is to follow in the sections below.

4.7.6 Welsh Language

Policy CTH/5 – THE WELSH LANGUAGE

1. The Council will ensure that development supports and sustains the long term well-being of the Welsh language, and will resist development which, because of its size, scale or location, will significantly harm the character and linguistic balance of a community. The LDP strategy has been assessed for Welsh language impact and the following requirements identified:
 - a. Allocated housing sites in Abergele and Llanrwst and the allocated mixed use site in Dolgarrog will require 'Mitigation Statements' in line with the results of the Welsh Language Impact Assessment;
 - b. A 'Community and Linguistic Statement' should accompany:
 - Housing applications on unallocated sites of ten units or more in the Urban Development Strategy Area and five units or more in the Rural Development Strategy area;
 - A commercial, industrial or tourist development on unallocated sites with an area of 1,000 square metres or more in the Plan Area and;
 - Development which is likely to lead to the loss of community facilities as defined in [Policy CFS/6](#).
 - c. Once housing windfall delivery is met for a spatial strategy area in line with figures in table 3 HOU1a, this will trigger a review which would introduce assessment of all unallocated housing applications against the Welsh language;
 - d. A more detailed assessment in the form of a 'Community and Linguistic Impact Assessment' should accompany:
 - Housing applications on windfall sites of 20 units or more in the Urban Development Strategy Area and ten units or more in the Rural Development Strategy Area;
 - A commercial, industrial or tourist development on unallocated sites with an area of 2000 square metres or more in the Plan Area.
2. The Council will encourage throughout the Plan Area both the provision of bilingual signs and the retention of traditional Welsh names for new developments and streets.

[view map](#)

5.4 Community Involvement Scheme

- 5.4.1 In line with national policy and guidance, the RLDP must be based on and underpinned by early, effective and meaningful community engagement in order to understand and consider a wide range of views, with the aim of building a broad consensus on the spatial strategy, policies and proposals.
- 5.4.2 The Council published two consultation documents – one in November 2018 and another in January 2019 to inform its planning.
- 5.4.3 Consulting through the medium of Welsh as well as on the impact of the Welsh language and culture is an important part of the consultation process.

5.4.4 The Community Involvement Scheme forms part of the Council's LDP Delivery Agreement and sets out methods to be used during the LDP process for consultation and engagement. Para 3.9 states in accordance with the Council's Welsh Language Scheme, both Welsh and English will be used in public consultation exercises. Participants will be able to respond in either language. Further to this point, the Council's online consultation system provided acknowledgement responses in Welsh if comments were made in Welsh.

5.4.5 Moreover, in line with recent TAN 20 guidance and the Welsh Language Standards regarding engagement and consultation, the consultation will seek views on the impact on the Welsh language. In addition, the Council will ensure that it invites feedback from Welsh speakers and representative groups, including the Welsh Language Commissioner, Menter Iaith Conwy, Welsh medium and bilingual schools and colleges, papurau bro, Merched y Wawr/ Gwawr, and Young Farmers.

5.5 Linguistic Sensitive Areas

5.5.1 In line with TAN 20, Conwy planning authority is required to define its linguistic sensitive areas. In accordance with Planning and the Welsh language: the way ahead (2005), the threshold is recommended at 25% of the population able to speak Welsh.

5.5.2 Based on both statistical analyses undertaken, Table 8 lists the linguistic sensitive sites areas that have been identified in accordance with the requirements in TAN 20 and in line with good practice i.e. that impact assessments are carried out where 25% or more can speak Welsh.

Table 8: Conwy's linguistic sensitive sites

Community Council	Percentage able to speak Welsh in Census 2011
Cerrigydrudion	77.20%
Pentrefoelas	69.90%
Llanfihangel Glyn Myfyr	69.60%
Llangernyw	64.40%
Llansannan	64.00%
Llanddoged and Maenan	62.40%

Llangwm	61.50%
Llanrwst	61.00%
Llanefydd	60.90%
Bro Garmon	58.60%
Eglwysbach	49.00%
Dolgarrog	46.80%
Llanfairfechan	46.70%
Betws yn Rhos	46.40%
Trefriw	44.90%
Caerhun	44.60%
Llanfairtalhaearn	44.50%
Henryd	37.10%
Llansanffraid Glan Conwy	35.80%
Penmaenmawr	33.80%
Conwy	27.30%

- 5.5.3 In addition, the following are strategically important areas: where 19% or more speak Welsh. Whilst they are not above 25%, they are above the national average of 19%.

Table 9: Conwy's additional strategically important Welsh language sites

Abergele
Llanddulas and Rhyd-y-Foel
Llandudno
Llysfaen
Mochdre
Old Colwyn

- 5.5.4 In using the above data, it is really important to remember that there are Welsh speakers and learners everywhere – in all community councils and electoral wards across Conwy. By identifying these areas, it does not prevent or preclude planning activities from taking into account other areas.
- 5.5.5 Furthermore, it is very important to bear in mind that percentages are being used for the purposes of this exercise, however, numbers are just as important. The number

of Welsh speakers may be higher than areas where the percentages are lower. This is because of the population density of an area.

- 5.5.6 For the purposes of the Welsh language impact assessment conducted for the Preferred Strategy, July 2019, these linguistic sensitive areas were used.

6. Welsh language impact assessment of Preferred Strategy

6.1 Introduction

- 6.1.1 This section of the report presents the main findings of the Welsh language impact assessment that has been conducted on Conwy Borough Council's Preferred Strategy. In three parts, the first section presents the high-level impact assessment completed on the allocated sites in the Preferred Strategy based on the linguistic sensitive areas. The next section provides a summary of the high-level impact assessment conducted on the Preferred Strategy overall, using the 18-point checklist (available in Annex 1). The third part provides an analysis of the strategic objectives and priorities in the Preferred Strategy (available in full in Annex 2).

6.2 Welsh language impact assessment on allocated sites

Coastal Development Strategy Area: West

A new mixed-use Strategic Site is proposed in Llanfairfechan consisting of 400 new homes, affordable housing, new primary school, allotments and recreational space. The frontloading approach has determined that there is capacity in the water supply and sewerage/drainage infrastructure and Doctor's Surgery. However, active travel routes and safer routes to school options require improvement from the wider residential areas within Llanfairfechan. A new Band-B Primary School is also planned between 2020 and 2024. The impact of the growth level has been considered and reflected in the appropriate size of school.

Due to the linguistic sensitive areas within this Plan Area as well as the size of the development, a Welsh language impact assessment is required in line with TAN 20 as well as the Welsh

Language Standards, which requires an impact assessment into both positive and adverse effects and opportunities to support and promote the use of Welsh.

When conducting the impact assessment, this will be an opportunity to promote and support the use of the Welsh language as well as to mitigate any adverse effects from the development at Llanfairfechan and its surrounding areas.

The assessment should consider how the allotments being developed and any other social and recreational plans in the area of the Plan are developed in a way that promotes and supports increasing use of Welsh in everyday life. In planning the school development, the impact assessment will need to consider the impact on the Welsh language and opportunities to promote and support the Welsh in Education Strategic Plan and the Welsh language strategy to increase the Welsh speakers in Conwy by 2%.

Coastal Development Strategy Area: Creuddyn

A mixed-use Strategic Site is proposed at Llanrhos between the urban settlements of Llandudno Junction and Llandudno consisting of 250 new homes (including affordable housing), approximately 1 hectare of B1 (office) to promote cluster employment uses, new primary school, allotments and recreational space. The area is also recognised as an area in need of improved public transport, active travel and green infrastructure, which will be progressed via a comprehensive Development Brief. The Strategic Site is phased from 2024 onwards to ensure it links with the 'Band C' School Modernisation Programme.

Due to size of the proposal (more than 10 units and 10,000 sq. metres) means that this allocated site within the Preferred Strategy will require a Welsh language impact assessment in line with TAN 20 guidance.

Llandudno and Conwy are amongst the main urban settlements within this Plan Area. Conwy has a population of 27.3% Welsh speakers (3,901) and Llandudno has 20.3% (4,079) and they are linguistic sensitive areas due to the percentages (as defined by Conwy's Welsh language planning policy and guided by the threshold in Planning and the Welsh language: the way ahead, 2005). Furthermore, the numbers of Welsh speakers are significant overall to Conwy and nationally.

Whereas the mixed-use site being proposed is at Llanrhos, it is strategically placed near Conwy which is a linguistic sensitive area where 27.3% of the population speak Welsh and Llandudno which is a strategically important area where 20.3% of the population speak Welsh. There are also other communities nearby e.g. Mochdre, Deganwy where the percentage of Welsh speakers is above the national average: and therefore, the whole area is strategically important. As recommended in Planning and the Welsh language: the way ahead (2005) these require an impact assessment.

The assessment needs to consider both the positive and negative impacts for the wider area surrounding the sites that have been earmarked for development. Both employment and housing development can have effects both in the locale and wider than the conurbation where building supply is allocated. This assessment needs to consider the potential impact on inward and outward migration from Welsh speaking areas and where this is found, to put mitigation measures in place. Some mitigation tools that may be considered include training and support for local people to access and gain new employment being developed locally. Section 106 agreements could also be used to fund Welsh medium activities in the community to strengthen sustainable and resilient places.

The assessment will also identify the potential for this area to promote and support increased use of the Welsh language going forward including putting plans in place to support recreational activities through the medium of Welsh within the new developments and opportunities for Welsh speakers from surrounding areas to access and use these opportunities.

The assessment will also include consideration of the planned school provision and how this will promote use of Welsh amongst children and young people and contribute to Conwy's Welsh language strategy to increase the percentage of Welsh speakers in the county borough by 2% over the next 5-year period.

Coastal Development Strategy Area: Central

A Strategic Site to the south of Old Colwyn consisting of 450 new homes, allotments and recreational space. The Strategic Site will be phased from 2024 onwards to consider Band C School Impacts. Following the frontloading approach, the site may need to accommodate improvements to the wider highway network, improved public transport service and active travel

linkages. Hydraulic Modelling is also underway to determine whether capacity improvement works will be required to the water supply and sewerage/drainage infrastructure.

This area includes several areas of strategic importance to the Welsh language. For example, Mochdre (22.5%), Old Colwyn, (21.9%) and Llysfaen (21.1%), where the percentage of the population able to speak Welsh is above the national average. In Old Colwyn, the number of Welsh speakers is significant for the County with 1,719 able to speak Welsh in the community council area, Rhos on Sea is also in this area where 18.4% (1,366) of the population speaks Welsh. Due to the culmination of these sites in this area, and the size of the LDP site, a Welsh language impact assessment is required in accordance with TAN 20 and the Conwy's Welsh language planning policy.

This assessment will include an analysis of both the positive and negative impacts of housing growth (35% of the overall plan) on the Welsh language and their communities, including but not limited to Old Colwyn, Llysfaen and Bryn y Maen, but also the surrounding areas and the overall cumulative effects. This assessment will consider how to mitigate negative effects and promote the use of the Welsh language more broadly.

The impact assessment on the Welsh language will look at the employment opportunities being proposed in the plan to ensure that these offer opportunities for local people to access and also ensure that these proposals help support sustainable and resilient Welsh speaking communities in the area.

It will also need to include consideration of the impact on Welsh medium and bilingual education in the area, linking with the Welsh in Education Strategic Plan for the county borough. Considerations will include the language medium of both primary and secondary schools, the effect on language categorisation of the schools, and the impact of development on school places and overall numbers, as well as knock-on effects on communities due to school location and cohort decisions.

Coastal development Strategy Area: East

Mixed Use Employment (4.7 Hectares of B1, B2 & B8), Recreational Space and a Primary School. The site is phased between 2021 and 2027.

In Abergele, 2,014 speak Welsh, which is 19.6% of the population, according to the 2011 Census and therefore has the third largest number of Welsh speakers by community council in Conwy. Abergele has been identified as a strategically important one for the Welsh language in the area. This site is also close to Pensarn electoral ward where 28.4% of the population speaks Welsh – which is a linguistic sensitive area. Llanddulas, Rhyd y Foel and Llysfaen are also close by, where 19%+ of the population can speak Welsh.

This Plan Area is situated to the east on the coastline of Conwy and together with its spatial distribution, could potentially help alleviate some of the impact of this proposed development on the rural heartlands and other Welsh linguistic sensitive sites. However due to it being a large development and the importance of Abergele and its environs, there is potential for this to attract inward commuting and/or migration from the East. Both retail and employment could attract Welsh speakers from heartlands to Abergele out of rural communities.

Due to the size and scale of this site, TAN 20 guidance says that a Welsh language impact assessment is required. This would also be in line with the Welsh language standards and good practice – that significant policy decisions are impact assessed. This will provide an opportunity to promote and support the use of the Welsh language as well as to ensure that mitigation measures are in place so as not to adversely affect the Welsh language.

Rural Development Strategy Area

1. Llanrwst

Llanrwst is a linguistic sensitive area with 61% of the population able to speak Welsh. An area with such a significant percentage of Welsh speakers is defined as a Welsh language heartland (Aitchison, J. and Carter, H. (1998)). The Welsh language is used day to day and in daily life and is the main hub for many Welsh speaking heartlands close by. The Welsh language is part of the fabric of the area and is also strategically important to national policy – Cymraeg 2050.

Furthermore, Llanrwst is strategically important as a town. On the doorstep to many more linguistic sensitive areas in the region (e.g. Trefriw, Llanddoded, Maenan), Llanrwst is typically a service hub of those areas and supports sustainable rural communities more widely.

In summary, Llanrwst is an important strategic site which contributes to the authority's Welsh language strategy and the national strategy of creating a million Welsh speakers by 2050. The size of the proposed housing development in this region is large and TAN 20 requires a Welsh language impact assessment.

Housing development in Welsh linguistic sensitive areas and rural heartlands more widely, are known to potentially impact house prices and net migration effects. The affordable housing to be provided on the strategic site is likely to be around 40-60 units, but exact numbers are dependent on the affordable housing policy. This programme should be assessed for its potential to promote the use of Welsh and prevent negative impacts. The assessment must ensure it meets the needs of Welsh speakers in the area. The impact assessment will need to carefully consider the potential effects of housing growth in the region and how it can safeguard the health of the Welsh language in it.

As part of this assessment, the impacts on local businesses will need to be assessed to identify the potential effects on existing businesses and local jobs. Any negative impacts will need mitigation measures. This assessment should include considering the impacts on jobs for Welsh speakers and opportunities to sustain and enhance services and facilities available through the medium of Welsh for people.

The assessment should also address ways to promote and support the sustainability and resilience of communities in this area in line with national policy on placemaking (Planning Policy Wales, 2018).

The recreational and retail being proposed within the Plan will be assessed to promote their availability through the medium of Welsh.

2. Rural Tier 2 villages

Due to the number of linguistic sensitive sites in this area, a Welsh language impact assessment would be required with mitigation measures if there were any developments in this area.

Mitigation measures that could be usefully considered are targeted affordable housing for local Welsh speakers to reduce the risk of outward migration, as well as use of s106 agreements in line with TAN 6 to provide additional funding for the council to promote and support the use of the Welsh language and create resilient and sustainable Welsh speaking communities. Mitigation measures could include but not be limited to: free Welsh language courses in the

community, Welsh language awareness packs for any new residents moving to the area, financial support for Welsh medium social and recreational activities in the community and increased services in the community through the medium of Welsh.

6.3 High-level Welsh language impact assessment

- 6.3.1 A Welsh language impact assessment has been completed on the Preferred Strategy overall using the 18-point checklist developed by, and recommended in, the report – The Welsh language and planning: the way ahead (2005). The completed checklist can be found in Annex 1.
- 6.3.2 It provides a high-level impact assessment as a whole and draws on numerous sources of evidence including the Preferred Strategy itself, land housing supply analysis, 2011 Census data, Welsh in Education Strategic Plan, employment and population data as well as the Welsh language planning policy of Conwy County Borough Council, national policy and legislation, best practice and wider literature review.
- 6.3.3 The following provides a summary of the main conclusions of that Welsh language impact assessment:
- i. the Preferred Strategy predicts that a population increase is likely and that this will mainly come from inward migration. Based on the data analysis undertaken, it is likely that the growth will mainly be non-Welsh speakers, a small proportion of which are likely to learn Welsh. Where sites have being proposed near Welsh speaking areas, there is potential to adversely effect the Welsh language and careful planning of sites, infrastructure and phasing of developments, as well as proactive measures to promote the Welsh language will need to be considered.
 - ii. In order to meet the growth in population, the allocation of 5,150 new housing, including affordable housing, could positively impact on the housing pressures and therefore house prices. Therefore, it is possible that these plans could have a positive effect to encourage Welsh speakers to remain in the area.
 - iii. The job opportunities being proposed through the Preferred Strategy could broaden and increase the diversification of types of employment and sectors in the county borough. This would be likely to encourage residents, including Welsh speakers, to remain in the area to live and work. However, developments being proposed, including

the Eastern Coastal development around Abergele, could attract in-migration due to for employment. There are opportunities therefore to ensure that local people are both aware and able (through training and infrastructure) to access these new jobs.

iv. The plan includes new school developments and together with the targets in the local authority's Welsh in Education Strategic Plan, there could potentially be positive effects to be realised to increase Welsh medium provision and thereby increasing the number of children and young people receiving Welsh medium education.

v. The Preferred Strategy includes proposals to increase services and recreational/ social facilities e.g. allotments. This provides a potential opportunity to increase the services available in Welsh and also to promote and support the use of Welsh for Welsh speakers in their daily lives.

vi. By increasing the business and/ or retail units in some allocated sites, there is both a potential positive impact on the Welsh language to enhance and strengthen the economy and services in those linguistic sensitive areas, as well as the potential risk of adversely effecting existing businesses and/ or displacing current custom from linguistic sensitive areas to new services and retail hubs. Further impact assessments are advised for these scenarios, as well as mitigation measures and ongoing monitoring of the effects on the Welsh language over the period of the plan.

6.4 Welsh language themes identified through analysis of the Preferred Strategy

6.4.1 An analysis has been completed of the Objectives and Strategic Policy areas of the Preferred Strategy to assess to what extent they address Welsh language considerations. This section provides an overview of this analysis and a more detailed map of this analysis by strategic priority area is available in Annex 2.

6.4.2 The Preferred Strategy identifies that the population of Conwy is expected to increase by approximately 5.6%, of which migration is the biggest driver of this change. Population change within Welsh speaking communities is an important factor, with the loss of Welsh speakers through out-migration and deaths as well as the in-migration of non-Welsh speakers. Some 27% of the population of Conwy speaks Welsh according to the 2011 Census and this is 8% higher than the Wales population. However, the number and percentage of Welsh speakers is declining over time.

- 6.4.3 The population has grown in the area, in the 15 years since 2002 the population has increased by 6,250 or 5.6% - an average of 0.4% per annum. More deaths than births are in the area – with deaths over a ten-year period at an average of 1,500 and births at 1,150 per year on average. The population of Conwy would decrease by around 350 persons per year if there were no net in-migration into the area. Yet, the effect of this trend is that the overall number and percentage of Welsh speakers overall is declining.
- 6.4.4 A second issue identified in the Preferred Strategy is that the population in Conwy is ageing and that the rate is faster when compared with much of the rest of Wales. Whereas 16.2% of the population is aged under 16 years, this compares to 17.9% in Wales as a whole. In Conwy, 27.2% of the population is aged 65 and over compared to 20.6% for Wales as a whole.
- 6.4.5 A key issue for the LDP is to promote a more balanced age structure and to encourage the younger population and families to remain and return to the area in order to contribute to a step change in the predicted population age structure and associated declining workforce.
- 6.4.6 In order for the Welsh language to remain a thriving and living language, it needs to encourage children and young people to speak Welsh and use Welsh in their local areas. Furthermore, securing opportunities for employment and affordable housing are important to make it viable for, and to encourage young people and families to, remain in the area.
- 6.4.7 Sense of place and the well-being of Welsh speakers in Conwy is also important within the planning process in order to ensure the future health of the Welsh language and support vibrant and resilient Welsh speaking communities in the county. Placemaking is explored in the Preferred Strategy and there is potential to link this with the Welsh language more explicitly.
- 6.4.8 Conwy enjoys strong links to wider economies both to the east and across into England and to the west to Anglesey and Ireland. The majority of the population (85%) lives in the main urban centres located across the coastal corridor of the North, which is supported by the A55 and rail link. From East to West, these include Llanfairfechan, Penmaenmawr, Conwy, Llandudno Junction, Llandudno, Mochdre, Colwyn Bay, Rhos on Sea, Old Colwyn, Abergele, Pensarn, Towyn and Kinmel Bay. Just over half of

these urban centres have above higher than national average percentages of Welsh speakers, including the highest in Llandudno of 20.3% (4,079).

6.4.9 Llandudno is positioned at the top of the retail and commercial ranking and is defined as a Sub Regional Centre in the Preferred Strategy. As well as Llandudno, the coastal towns of Conwy and Colwyn Bay are hubs for services, employment, housing and retail for the wider areas and also have high numbers of Welsh speakers. Llanrwst, 13 miles from the coast, typically acts as a key service hub for rural areas. Over 21% of the population of Llanrwst speaks Welsh and this is above the national average.

6.4.10 As important hubs for the county borough, they are recognised in the Preferred Strategy for the role they play in the economy. They are also identified as areas to generate economic growth and prosperity in future. Similarly, where these are also areas of linguistic sensitivity and strategically important to local and national Welsh language policy, a balance must be struck to ensure that no adverse effects are created for the Welsh language and/or Welsh speakers through such developments. The optimum balance is to create a vibrant Welsh language which is supported and complemented by the growing economy.

6.4.11 The Preferred Strategy also identifies housing as an issue and this too is relevant to the health of the Welsh language in Conwy. The average house prices within the county borough has increased and whereas an average property price is £150,846 for Wales, in Conwy, this is £3,016 more.

6.4.12 Affordable housing is known to impact on the ability for Welsh speakers to remain in Welsh speaking areas. The Preferred Strategy has calculated an approximate need of 120 affordable housing units a year or 1,800 up to 2033 .

6.4.13 The impact of the UK voting to leave the European Union is also expected to have an impact on the economy of rural communities. Based on the statistical analysis of the Census data, Welsh speaking rural areas of Conwy will need to be considered as part of the rural economic priorities as set out in the Preferred Strategy.

6.4.15 And finally, the growth anticipated together with the North Wales Growth Deal is an important part of the ambition set out in the Preferred Strategy. Conwy sits centrally within the North Wales Growth Deal and it is expected to generate almost 5,500 new jobs and bring £671m investment to the region over the next 15 years. A total of 16 projects are planned including in low carbon and nuclear energy; university research;

better transport links growing digital businesses; increasing skills and opportunities to keep more young people in the area.

6.4.16 It is important that the LDP provides land to meet the projected requirements for economic development; however, it is just as important that new sites are proportionate and commensurate so as not to adversely impact on the Welsh speaking areas and the Welsh speakers living therein. Similarly, the provision of housing sites should not be of an excessive scale where it could impact detrimentally on the position of the Welsh language in a particular settlement. Also, the planning process needs to consider the impact on education places and how this could have a knock on-effect on the linguistic nature of schools, their Welsh medium / bilingual categorisation and that overall impact on the county council's Welsh in Education Strategic Plans. Furthermore, the planning process needs to enable services and facilities to be available in Welsh and to proactively seek opportunities to promote and support increasing use of the Welsh language for people in their everyday lives.

6.4.17 Based on the analysis completed of the Strategic Objectives in the Preferred Strategy, the following provides a summary of the impacts identified:

Analysis of the Strategic Objectives in the Preferred Strategy – Welsh language impact

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| <ol style="list-style-type: none"> 1. Strategic objective 2 to include affordable housing for linguistic sensitive areas and to include issue of out migration/ net effect of decline of Welsh speakers. This section could also draw on TAN 6 – to target affordable housing and use s106 agreements as mitigation measures. 2. Strategic Objective 4 to include enhancing facilities in linguistic sensitive areas in coastal urban areas of high deprivation. Also, this objective could enhance facilities in rural heartlands / linguistic sensitive areas to support community cohesion, sustainable and distinctive sense of place. 3. Strategic Objective 6 – Transport – where there is limited service or infrequent services in rural areas, the objective could seek to enhance this. By supporting improved transport services in Welsh linguistic sensitive areas, this will improve the opportunities for Welsh speakers to live and work locally: thereby strengthening the sustainability of rural Welsh speaking communities. 4. Strategic Objective 7 – enhancing telecommunications in rural areas – include an objective to enhance infrastructure in linguistic sensitive areas. This could positively impact on the opportunities available for business start-ups and business diversification and thereby positively impact on the sustainability of rural heartlands. 5. Strategic Objective 8 – there is an opportunity to strengthen this objective by including commitments to promote and protect the Welsh language through |
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associated cultural and historical sites. Furthermore, there is an opportunity here to promote a distinctive sense of place by celebrating the distinctiveness of the Welsh language in these places.

6.4.18 Further details on each objective in the Preferred Strategy that has been impact assessed can be found in the table in Annex 3.:

6.5 Mitigation Measures post consultation

6.5.1 When taking the proposals forward post consultation on the Preferred Strategy, mitigation measures will need to be developed further. Examples of mitigation measure that have been identified so far through this initial high-level impact assessment are as follows:

- Phasing housing development to ensure that development is brought forward in a sustainable manner so as not to impact negatively on communities, in terms of assimilation and local culture (e.g. Welsh language).
- For large scale new housing developments, Welsh language awareness packs and Welsh language training in the community may be required.
- The provision of affordable housing for local need will help retain local people, particularly in the rural areas.
- Section 106 agreements can be used to fund proactive actions to promote and support the use of Welsh in the linguistic sensitive areas.
- For employment proposals, where appropriate, local labour contracts and support for local training initiatives, as well as support and funding for language induction and staff language lessons, may be required.
- For new developments with commercial, business and/or retail components, requirements regarding Welsh language signage and bilingual service provision may be included.
- Support and funding for activities through the medium of Welsh which will contribute to a sense of place and sustainable communities as well as opportunities to fund cultural and language initiatives to encourage the use of the language within communities. This should be explored further at planning application stage through consultation with local groups.

- Undertake targeted surveys of occupiers of new build housing developments from both LDP allocations and windfall developments to gather information on the social characteristics of new occupants. Such a survey could assist with monitoring the impacts of new development on the Welsh language. This requirement has been included in the LDP monitoring framework and has also been identified as a potential requirement for including in Mitigation Statements and any subsequent applications requiring either a Community Linguistic Statement or Impact Assessment. The Council will work with the Welsh Language Commissioner and Menter Iaith Conwy to further develop the survey work by including anecdotal evidence alongside statistical sources.
- Promote local distinctiveness through Welsh language place names and signage.
- Tourism proposals can make use of the Welsh language through publicity material to reinforce cultural identity and distinctiveness. Certain tourism developments may require the use of the Welsh language as a labour skill.
- Safeguard local facilities particularly in rural communities where they act as local focal points and meeting places and where the Welsh language can be seen and heard.

7 Monitoring

- 7.1 Annual monitoring of the policy and applications submitted will be undertaken to ensure that the thresholds are appropriate and that development is not impacting negatively on the number of Welsh speakers. It will be important to monitor the effectiveness of the policy through the mitigation statements submitted and use of both community and linguistic statements and community and linguistic impact assessments. Undertaking housing occupancy surveys will also contribute towards monitoring migration and Welsh language speaking patterns.

Appendix 1

Welsh Language Impact Assessment of Conwy Borough Council's Preferred Strategy, July 2019.

This is a high-level Welsh language impact assessment of the Preferred Strategy overall. It draws from the recommended template and 18-point high level impact assessment commissioned and published in 'Welsh language and planning: the way ahead' (2005). This analysis also draws from the previous impact assessment updated for Conwy's LDP in 2011.

It provides a high level impact assessment of the Preferred Strategy as a whole and is supported by a wide range of data and numerous sources of evidence including the Preferred Strategy itself, land housing supply paper, Census data, statistical bulletins and research reports, Conwy's Welsh in Education Strategy, employment and population data as well as the Welsh language planning policy of Conwy County Borough Council, national policy and legislation, best practice and wider literature review.

Population Characteristics

1. Is the strategy likely to lead to a population increase / decrease that might:	
Affect the balance of English / Welsh speakers (in a negative / positive way)?	Lead to an absolute or proportional decline in the number of Welsh speakers?

The Preferred Strategy provides evidence to suggest that Conwy will grow in population over the next 15 years. The Preferred Strategy is addressing the predicted growth in population and the resulting housing need that has been identified as 4,300 (or 5,150 with the contingency).

From Census data we know that whilst the population grew and is set to continue to increase, the population of Welsh speakers in the area is declining overall (with the slight exception of a

few communities where the percentages increased). This means that the growth in population and subsequent growth in housing planned for the area, is likely to serve inward migration. The potential adverse impact on the Welsh language needs to be considered and mitigated in planning decisions.

This assessment looked at the sites being allocated for housing development to identify the overall likely impact on the Welsh language. The high-level assessment of impacts and suggested next steps is contained in the main body of this report.

The Preferred Strategy proposes to focus 90% of growth within the Coastal Development Strategy Area (CDSA) and 10% within the Rural Development Strategy Area (RDSA). This is broadly in line with the current population split in Conwy and has the advantage of focusing development in areas which provide service hubs for the whole county borough. This should also help protect the Welsh language in rural heartland areas.

However, there are some linguistic sensitive areas allocated in the plan. The following shows the locations of key housing development sites in the plan:

Site name	No. dwellings
Llanfairfechan	400
Llanrhos	250
Old Colwyn	450
Llanrwst	200

- 1. Coastal Development Strategy Area: West** - Llanfairfechan and Penmaenmawr are the two urban settlements within this strategy area. A new mixed-use strategic site is proposed in Llanfairfechan consisting of 400 new homes, affordable housing, new primary school and recreational space.

Both Llanfairfechan and Penmaenmawr are linguistic sensitive areas in Conwy with, 46.7% and 33.8% of the population able to speak Welsh, respectively – which is above the national

population of 19% and the threshold of 25% identified in Planning and the Welsh language: the way ahead report. The area also neighbours Snowdonia National Park where high percentages of the population are also Welsh speaking.

A Welsh language impact assessment is required to promote the opportunities to support the Welsh language and to mitigate any adverse effects from the development at Llanfairfechan and surrounding areas.

2. **Coastal Development Strategy Area: Creuddyn** - A mixed-use strategic site is proposed at **Llanrhos** between the urban settlements of Llandudno Junction and Llandudno consisting of 250 new homes (including affordable housing), 1 hectare of B1 (office) to promote cluster employment uses, new primary school and recreational space.

Creuddyn, Llandudno, Llandudno Junction and Conwy are the main urban settlements within this area, performing an important cultural, social and economic role to the Plan Area. Llandudno and Conwy are amongst the main urban settlements within this Plan Area. Conwy has a population of 27.3% Welsh speakers (3,901) and Llandudno has 20.3% (4,079) and they are linguistic sensitive areas due to the percentages (as defined by Conwy's Welsh language planning policy and guided by the threshold in Planning and the Welsh language: the way ahead, 2005). Furthermore, the numbers of Welsh speakers are significant overall to Conwy and nationally.

With the proposed site being at Llanrhos, it is strategically placed near Conwy, which is a linguistic sensitive area where 27.3% of the population speak Welsh and Llandudno, which is a strategically important area where 20.3% of the population speak Welsh. There are also other communities nearby e.g. Mochdre, Deganwy where the percentage of Welsh speakers is above the national average: and therefore, the whole area is strategically important.

As recommended in Planning and the Welsh language: the way ahead (2005) these require an impact assessment. The assessment needs to consider both the positive and negative impacts for the wider area surrounding the sites that have been earmarked for development. Both employment and housing development can have effects both in the locale and wider than the conurbation where building supply is allocated.

3. **Coastal Development Strategy Area: Central-** A strategic site to the south of Old Colwyn consisting 450 new homes and recreational spaces.

Colwyn Bay serves the residential, retail and economic needs of the surrounding catchment and continues to undergo significant investment and improvement to the town centre and beach frontage. To continue investment and further regenerate the area over the Plan Period, a strategic site to the south of Old Colwyn consisting 450 new homes and recreational spaces has been allocated.

This area includes several areas of strategic importance to the Welsh language. For example, Mochdre (22.5%), Old Colwyn, (21.9%) and Llysfaen (21.1%), where the percentage of the population able to speak Welsh is above the national average. In Old Colwyn, the number of Welsh speakers is significant for the County with 1,719 able to speak Welsh in the community council area. Rhos on Sea is also in this area where 18.4% (1,366) of the population speaks Welsh. Due to the culmination of these sites in this area, and the size of the LDP site, a Welsh language impact assessment is required in accordance with TAN 20 and Conwy's Welsh language planning policy.

This assessment will need to include an analysis of both the positive and negative impacts of housing growth (35% of the overall plan) on the Welsh language including but not limited to Old Colwyn, Llysfaen and Bryn y Maen, but also the surrounding areas. This assessment will consider how to mitigate negative effects and promote the use of the Welsh language more broadly. Furthermore, opportunities to learn the language and raise awareness of the Welsh language should be considered in the mix of mitigation measures.

4. **Coastal development Strategy Area: East -** Abergele South East forms a key project within the North Wales Growth Deal. Mixed Use Employment (4.7 Hectares of B1, B2 & B8), Recreational Space and a Primary School. The site is phased between 2021 and 2027.

In Abergele, 2,014 speak Welsh, which is 19.6% of the population, according to the 2011 Census and therefore has the third largest number of Welsh speakers by community council in Conwy. Abergele has been identified as strategically important for the Welsh language in the area. This site is also close to Pensarn electoral ward where 28.4% of the population

speaks Welsh – which is a linguistic sensitive area. Llanddulas, Rhyd y Foel and Llysfaen are also close by, where 19%+ of the population can speak Welsh. Overall, the impact assessment suggests that there could be an adverse effect on surroundings communities due to the draw of new facilities at Abergele. Both retail and employment could attract Welsh speakers from heartlands to Abergele out of rural communities.

This Plan Area is situated to the east on the coastline of Conwy and together with its spatial distribution, could potentially help alleviate some of the impact of this proposed development on the rural heartlands and other Welsh linguistic sensitive sites. However due to it being a large development and the importance of Abergele and its environs, there is potential for this to attract inward commuting and/or migration from the East. This could create competition for jobs in the area and measures to address this should be considered prior to Deposit Plan stage.

5. **Rural Development Strategy – Llanrwst** - Just 10% is allocated from the overall plan to rural sites and the majority of the development planned is focused on Llanrwst.

Llanrwst has been identified as a linguistic sensitive area where 61% of the population is able to speak Welsh. An area with such a significant percentage of Welsh speakers is defined as a Welsh language heartland (Aitchison, J. and Carter, H. (1998)). The Welsh language is used day to day and in daily life and is the main hub for many Welsh speaking heartlands close by. The Welsh language is part of the fabric of the area and is also strategically important to national policy – Cymraeg 2050.

Furthermore, Llanrwst is strategically important as a town. On the doorstep to many more linguistic sensitive areas in the region (e.g. Trefriw, Llanddoged, Maenen), Llanrwst is typically a service hub for many towns, villages and hamlets and supports Welsh speaking rural communities more widely.

In summary, Llanrwst is an important strategic site which contributes to the authority's Welsh language strategy and the national strategy of creating a million Welsh speakers by 2050. The size of the proposed housing development in this region is large and TAN 20 requires a Welsh language impact assessment.

6. Rural Development Strategy – other villages.

There are Tier 2 Main Villages, Minor Villages and Hamlets located within the Rural Development Strategy Area and many of these are linguistic sensitive areas e.g. Betws yn Rhos (46.4%), Llangernyw (64.4%), Cerrigydrudion (77.2%) where the Welsh language is spoken by half or more and is part of the social fabric of the area. Most areas have higher than the 25% threshold and the majority have above the national percentage of Welsh speakers of 19%.

It is vital that the Tier 2 Main Villages are sustainable and resilient in order to ensure the county borough has sustainable places in line with placemaking in Planning Policy Wales (2018). These settlements primarily serve their local population and as such the Preferred Strategy says that local growth and diversification will be promoted to retain community identity, protect the Welsh language and encourage a more balanced age structure.

The Preferred Strategy states that land will not be allocated for new development in the Tier 2 Villages. Alternatively, a flexible approach will be taken as described in TAN 6. A constructive approach towards agricultural development proposals will also be adopted, especially those which are designed to meet the needs of changing farming practices. A positive approach to the conversion of rural buildings for business reuse, in addition to taking a positive approach to diversification projects in rural areas will be adopted. This flexible approach should help support the sustainability and resilience of rural communities which in turn is likely to help support and sustain the Welsh language heartlands of Conwy.

No housing has been allocated in the Preferred Strategy, however if there were any new developments, including windfall, then a full Welsh language impact assessment would be required and any mitigation measures identified and implemented.

2. Is the strategy likely to lead to increased in-migration?	
Might this result in a permanent increase in the proportion of non- Welsh speaking households?	Will the change be permanent or temporary?

When considering previous population data over the last LDP period and forecasts going forward, it is likely that the population will grow in Conwy and that this will include in-migration. This means that the overall percentage of Welsh speakers compared to the overall population could decline due to the overall numbers in the population increasing.

Of the 5 proposed sites in the plan, the proposals for the coastal development to the east (around Abergele) together with the Growth Deal, is most likely to lead to inward migration from the east. This is due to both the employment and retail developments being proposed, as well as the housing being allocated there.

As well as the negative impact of reducing the overall percentage of Welsh speakers in the area, the proposals have the potential risk to increase house prices, change the linguistic categorisations of Welsh/ bilingual schools and reduce the population density of Welsh medium activities in communities where the Welsh language is currently vibrant and in frequent use.

In planning ahead, both proactive measures as well as mitigation measures should be implemented. Examples to consider include the following:

- Section 106 agreements to fund proactive and mitigation measures;
- Welsh language awareness packs in new housing developments;
- Free Welsh language courses in Abergele and surrounding Welsh language sensitive areas;
- Actions included in Welsh in Education Strategic Plan to mitigate effects;
- Support (including funding) for recreational and social activities through the medium of Welsh;
- Ensure that signage in new retail units are bilingual and promote sense of place; and
- Reduce the numbers/ disperse the concentration of housing on any one site near or in linguistic sensitive areas;

- Phasing the developments over time – staggering the impact and monitoring it carefully over time.

3. Is the strategy likely to lead to increased out-migration?	
Is the process of out-migration likely to result in a loss of Welsh speaking households?	Will any change be permanent or temporary?

Between 2001 and 2011 the decrease in Welsh speakers was due to demographic changes in the population (including a reduction in the number of young people, Welsh speakers migrating, non-Welsh speakers in migrating). Despite the overall percentage growth in the population of Wales, there was around a 20,000 decrease in Welsh speakers. Migration accounted for 90% of the growth in the population. The percentage of the population that was born outside Wales rose by 25% in 2001 to 27% in 2011. According to the ONS, 86% of the population that was born outside Wales does not have Welsh language skills⁶.

The trends over time demonstrate that there is a net loss of Welsh speakers and that this is reported by the Office for National Statistics for the whole of Wales and not just for Conwy. From a study by the Welsh language Board in 2012, it is suggested that the annual net loss of Welsh speakers is around 1,200- 2,200.

Therefore, there are opportunities through the Preferred Strategy to promote and support the Welsh language and contribute to Cymraeg 2050, the national strategy. This could be achieved through ensuring housing and employment for Welsh speakers. By ensuring that local people have sufficient and good quality employment and housing, they would be most likely to remain in the area. A vibrant economy generally supports a vibrant Welsh language and vice versa.

Furthermore, there is an opportunity to support and strengthen communities so that they are economically and linguistically resilient and sustainable.

⁶ Office for National Statistics (Dec 2012) Statistical Bulletin - Census 2011: First Findings on the Welsh language

Through the Preferred Strategy, there is an opportunity to promote and support the use of the Welsh language for Welsh speakers living in the area and to foster and strengthen a real sense of place, pride in their communities and sense of belonging. Placemaking has the potential to enhance people's desires to stay in Conwy and use their Welsh.

4. Is the strategy likely to lead to a changing age structure of the community?	
Lead to young / middle-aged / older Welsh speaking people leaving / moving into the area, leading to:	
Changes in traditional activity patterns, resulting in an increasing desire to move away?	Social tensions / break-up of traditional social networks

The Preferred Strategy has planned for 1,800 affordable housing allocations and 1,800 jobs. Therefore, the plan could impact positively on the age structure of the population of Conwy and this is stated as a key aim of the council's planning.

The RLDP could in future, positively impact on local people, including young people, due to the opportunity to gain new forms and types of employment as proposed in the plan, which in turn means that it is viable and/or attractive to remain living in the area.

The plan includes some developments in communications infrastructure and enhancing travel opportunities. These could potentially impact positively on the economic prosperity of the region. It could also potentially provide benefits to residents, who can access more services and facilities from home as well as encourage business set up, efficiency and growth.

Developing transport infrastructure from the east could encourage inward migration which in turn could have an adverse impact on the percentage of people able to speak Welsh in the county and would not encourage achieving the council's target to increase by 2% those able to speak Welsh in the next five years. Planned training programmes for local people could be required to support them to gain employment. Furthermore, proactive language awareness campaigns, deliberate actions within the Welsh in Education Strategic Plan and free Welsh language lessons in the community could be useful mitigation measures to consider.

Quality of life, health and well being

5. Is the strategy likely to have an impact on the health of local people?	
Increase the risk of illness, therefore reducing the desirability to live in the community?	Potentially make life more expensive, therefore increasing the risk of financial problems / stress of the local Welsh speaking population

The RLDP could increase the desirability of living in Conwy and the plan clearly recognises the special qualities of the area including landscape. The Plan recognises the importance of retaining and enhancing the special sense of place, including the beautiful landscape in Conwy. Whilst planning for development and growth, the plan clearly states:

“The RLDP must strike the right balance between protecting those elements that make Conwy special, whilst at the same time helping to facilitate new opportunities for growth and regeneration to contribute to the creation of sustainable places and improved well-being.”

By retaining the rural landscapes and seeking to conserve biodiversity in Conwy county borough, the plan is likely to continue to ensure that it is an attractive place to live.

The allocated sites include several recreation spaces, including allotments. These are likely to contribute positively to health and well-being. In line with Cymraeg 2050 and The Well being of Future Generations Act, the RLDP and wider planning processes should support and promote the well-being of the Welsh language and its culture. One way of doing so would be to ensure that all Council services relating to health and well being are available through the medium of Welsh. Another would be to support (including fund) social and recreation activities through the medium of Welsh – both in deprived urban areas as well as rural linguistic sensitive sites.

The decision of the UK to leave the European Union could in particular potentially impact on rural communities and farming especially. This is noted in the Preferred Strategy and further, more proactive initiatives could be stimulated to generate new forms of enterprise in rural economies, which will help retain and sustain vibrant Welsh language sensitive areas, by working with other departments within the council and with partners more widely.

6. Is the strategy likely to have an impact on the amenity of the local area?	
Deteriorate the environmental quality, therefore reducing the desirability to live in the community?	

As demonstrated in 5 above, the Preferred Strategy is seeking to regenerate areas of Conwy and offer housing (including affordable housing), retail and recreational opportunities and new employment in the area. The infrastructure being proposed could also potentially enhance the travel (including commuting) options of existing residents so that they can access work and recreation elsewhere in hubs whilst at the same remaining viable and attractive to live locally.

Therefore, this impact assessment has not identified any relevant environmental impacts on the Welsh language.

7. Is the strategy likely to lead to the threat of increased crime or violence in the community?	
Increase the risk of crime or violence, therefore reducing the desirability to live in the community?	

During the life of the RLDP, there is an estimated growth in the population and between 4,000 and 5,000 houses are being proposed for development. Ninety percent of this growth is dispersed across Conwy's coastal areas. Whilst there might be some impact on policing, the impact assessment did not identify threats of increased crime or violence in the community that could directly affect the Welsh language and/ or Welsh speakers.

Economic factors

8. Is the strategy likely to have a detrimental impact on local businesses?	
Potentially lead to local – Welsh speaking – businesses closing down, due to:	

A decline in overall local population?	An increase of – non-Welsh speaking – residents?
An increase in harmful / helpful competition?	

Due to the projected growth in the population, there is likely to be a growth in demand for businesses and services in Conwy as a result. This could potentially be positive for existing businesses. Notably, in Abergele, Llanrwst, Llandudno and Old Colwyn, where development and/or housing is being proposed, then the impact on existing businesses in the economy could be positive.

On the other hand, the Preferred Strategy includes retail space in Abergele and this is the community council with the third highest number of Welsh speakers in the county. This proposal could enhance the services and facilities for people local to Abergele and surrounding areas, but it could have the potential to negatively impact on existing retail in Abergele and surrounding areas. Shoppers could be drawn from other nearby communities, including Llandudno, Llysfaen, Llanddulas, Rhyd y Foel to the new development. When developing these proposals, it will be important to ensure that these complement rather than compete with existing business. Furthermore, that these new developments are in-keeping with the area and enhance sense of place. Bilingual signage and services would help support Welsh speakers to continue to use their Welsh.

The RLDP does acknowledge that ‘new development in the retail centres will need to be in keeping with the scale and function of that centre, and have regard to the centre’s position in the hierarchy.’ Further work will need to be carried out to investigate the potential impact on the Welsh language – places, people and services.

More general economic assessment:

Since the adoption of the LDP in 2013, Conwy County has seen an increase in economic activity rates and, until autumn 2018 had seen a steady decline in unemployment levels, which broadly reflects national trends over the past five years. The claimant count unemployment rate for February 2019 was 3.1%, which is significantly higher than figures seen over the past four years or so, and mirrors the national pattern which have seen claimant rates rise month-on-month

since autumn 2018. The overall figure is currently also significantly higher than the Wales and UK rates (2.7% and 2.6% respectively), possibly due to the seasonal nature of tourism-based employment patterns in the County Borough⁷.

Though economic activity rates are on an upward trend, the total number of people who are economically active is more volatile. This is affected by the size of the working age population, and in Conwy, the percentage of the population that are aged 16-64 is estimated at 56.6%, compared to 61.5% in Wales and 62.9% across Great Britain. This leads to high dependency ratios in the population which can place a strain on the economy and on the social structure of the community. Improving the overall age balance of the population of Conwy will also help support the health of the Welsh language – being as the numbers and percentages of Welsh speakers are higher amongst the younger age groups.

There is an opportunity through the RLDP to encourage and support training for local people to gain employment in the areas being targeted for growth e.g. construction, STEM. There is also an opportunity to encourage those working in tourism to promote the Welsh language as a part of the overall strategy for creating a true sense of place.

9. Is the strategy likely to have a detrimental impact on local jobs?	
Create jobs for the local – Welsh speaking – population (perhaps by virtue of local Welsh speaking people having the rights skills)?	Threaten jobs of the local – Welsh speaking – population (perhaps by causing the closure of local businesses)

The Preferred Strategy offers opportunities for job growth and the developments are mostly focused along the A55 main corridor. Of the 5 Key Strategic Sites proposed, 2 are located within the higher order urban settlements consisting of approximately 6 hectares of employment land collectively together with the necessary infrastructure. The proposed coastal site to the east supports the proposals in the North Wales Growth Deal. The sites are proposed having understood the infrastructure capacity and requirements, viability and are supported by concept drawings.

⁷ Source: ONS claimant count

By locating the main employment proposals across the A55 and in urban areas, this should support large proportions of the population in Conwy. And for those travelling from rural areas to work, the infrastructure should be in place for them to access such employment too.

Whilst the Preferred Strategy is focusing development in urban areas and therefore is seeking to minimise the impact in rural areas, it is important to note that there are high numbers of Welsh speakers in urban areas including Llandudno, Abergele, Conwy and Colwyn Bay. It is important that planning ensures employment opportunities for local people, as the developments could risk creating competition from job seekers from outside Conwy. This would not address the employment statistics identified in the plan.

The Preferred Strategy does mention taking a flexible approach to developments to support the rural areas of Conwy. This could provide a positive impact on Welsh speaking communities in rural areas.

10. Is the strategy likely to lead to greater economic diversity?	
Potentially lead to a greater number of different jobs for the local – Welsh speaking – population due to economic diversification?	Lead to increased in-migration of non-Welsh speakers?

The North Wales Growth Deal could have a positive impact on employment opportunities across Conwy and the wider region. The growth of 1,800 jobs planned for up to 2033 should contribute to a more balanced age structure and reduce unsustainable out-commuting levels.

The planning is suggesting a need for around 12 – 14 hectares of employment land for new jobs over the Plan Period. The new Strategy has planned for land to accommodate 50% of the 1,800 jobs to meet needs for B1 Business and 50% for B2/B8 Industrial Warehousing.

Whilst the existing labour market is relatively highly skilled and competitively-priced for businesses, there are relatively low levels of business start-ups and future employment growth is forecast to be flat. Therefore, Conwy's economy faces a number of opportunities and

challenges in the coming years. However, there are a number of regional projects scheduled to come forward within the RLDP period which could have a positive impact on employment levels and attract more people of working age to the area, such as Colwyn Bay Tidal Lagoon, Deeside Advanced Manufacturing Institute, Menai Science Park, Orthios Eco Park and Energy Centre, Parc Adfer and Wrexham Energy Centre.

The production base has declined considerably over the past 20 or so years to about 3.5% of jobs by 2017, and there is a heavy skew towards employment in the service industries (particularly in the public sector) and the tourism sector. In Conwy County Borough employment in the high skills, high wage sectors of information & communication, finance & insurance, professional, scientific & technical, and business administration & support services is relatively low, totalling just 13% of all employment compared to 25% across Great Britain as a whole.

The proportions of employment in the tourism related sectors of retail, accommodation & food services, and arts, entertainment & recreation are high – a total of about 32% of all jobs compared to 21% nationally. These sectors are the ones most likely to include low wage, part time or seasonal employment. The 2017 STEAM report estimates that around 9,950 jobs are provided directly by the tourism industry and a further 2,350 jobs are indirectly supported by tourism – around 12,300 jobs in total, which is well over a quarter of all employment in Conwy County Borough. Tourism brings in around £888 million each year to the local economy.

In the Skills Needs Assessment (Background Paper 20) it is reported that there is/will likely be a shortage of construction workers, engineers (electrical and mechanical), surveyors, project managers and ecology specialists related to projects that are planned for the North Wales Region within the next 15 years. Tourism is another area highlighted for growth within the Conwy Economic Strategy 2017-2027, the need for jobs and skills to support this sector is likely to increase.

In conclusion, the Preferred Strategy does suggest that a more diverse mix of industry and manufacture would be welcome and therefore it would be positive to consider how plans going forward in developing the RLDP can encourage local people, including Welsh speakers to gain employment in these new areas.

11. Is the strategy likely to have an impact on local wage / salary levels?	
Potentially increase / decrease wage / salary levels due to increase work force / business competition?	

Whereas currently, around 32% of the population of Conwy is said to work in tourism, food and recreation related industries, if the Plan were to encourage new opportunities in more diverse employment sectors, then it is possible that the wages/ salaries could increase.

However, this high-level impact assessment has not identified neither positive nor negative impacts on the wages of Welsh speakers in Conwy.

12. Is the strategy likely to have an impact on the average cost of housing?	
Force local – Welsh speaking – people to leave the community?	Potentially lead to an increase in homelessness / housing stress amongst local – Welsh speaking – households?
Prevent local Welsh speaking people from returning to the area / community?	

House prices and need for housing could be increasing:

The Preferred Strategy includes a requirement of 4,300 dwellings over the plan period, with a 20% contingency level to take the overall housing supply requirement to 5,150. The intention is to oversupply in relation to the baseline housing requirement, to ensure delivery of 4,300 dwellings over the plan period. Calculation of, and justification for this housing requirement is provided in detail in BP01 (Housing Land Supply assessments).

The Preferred Strategy identifies four key strategic sites in Llanfairfechan, Deganwy/Llanrhos, Old Colwyn and Llanrwst which form part of the supply. Additional, smaller sites will be included

in the Deposit Plan and whilst the location and number of these sites are not presently known, it is assumed that there will be sufficient sites to meet the required level of housing growth.

Evidence shows that out-migration, an ageing population and retaining its young adult population are issues to be addressed in the planning process going forward. As a result, there is a need to ensure that the RLDP seeks to deliver the housing needs of an ageing population, but at the same time ensuring that new homes seek to retain the younger population.

An ambitious but deliverable target to deliver 1,800 (120 a year) affordable homes is planned for up to 2033. This target is the result of undertaking an assessment of community's affordable housing needs and production of an Affordable Housing Viability Assessment. The Conwy Local Housing Market Assessment suggests that on-site delivery of affordable housing should accommodate 50% Social and 50% Low Cost Home Ownership. This mix will be applied with an element of flexibility to take account of local and changing characteristics of settlements.

Providing ownership plans could be positive for Welsh speakers in the area who wish to remain living locally but cannot afford to do so currently. This could have a positive impact on the Welsh language, if the planning process can ensure that local people/ Welsh speakers can be targeted with Affordable Housing and ownership schemes.

In taking the Preferred Strategy forward, the county borough can take TAN 6 into account and use affordable housing contributions to provide proactive initiatives in linguistic sensitive areas both rural and urban to support local people in their local communities.

Infrastructure supply

13. Is the strategy likely to have an impact on local schools?	
Threaten / secure local schools due to an increase / decrease of student rolls?	Alter the balance between Welsh speaking and non-Welsh speaking students?

Land has been allocated in the Preferred Strategy for new school sites in the following locations:

- i. Llanfairfechan

- ii. Llanrhos
- iii. Abergele

Conwy's Welsh in Education Strategic Plan provides a clear commitment to increasing Welsh medium provision and for all pupils in the county to be fluent in Welsh. The Plan states:

“Conwy County Borough Council has a vision to ensure that all pupils in the county are fluent and have the language skills to be confident in Welsh and English. We want to ensure that children and young people are given every opportunity to become full members of the bilingual community in which they live so that they are able to use the language with the family, in the community and in the workplace. As an Authority we are committed to the Welsh Government's aspiration to create a million Welsh speakers by 2050. We will contribute to this vision by increasing the number who receive Welsh medium education together with encouraging children and young people's pride in the Welsh language, its heritage and culture.”

Conwy County Borough Council has 55 primary schools, 7 secondary schools and 1 special school. The variable linguistic nature of the county together with diversity in the areas where there is a demand for Welsh medium education has meant that Conwy has schools in all 5 language categories. According to the definition of category 1 schools, they are as follows; • Bod Alaw • Glan Morfa • Morfa Rhianedd • Betws y Coed • Betws yn Rhos • Bro Aled • Bro Cernyw • Bro Gwydir • Capel Garmon • Cerrigydrudion • Dolgarrog • Dolwyddelan • Eglwysbach • Llanddoded • Llangelynnin • Llanefydd • Penmachno • Pentrefoelas • Tal y Bont • Ysbyty Ifan

The Welsh in Education Strategy (WESP) states that the demand for Welsh medium provision is growing in the Abergele/ Kinmel Bay area and that Conwy council will expand Welsh medium provision in Abergele area. Therefore, the planned school site in the Preferred Strategy for Abergele area will need to dovetail with the authority's Welsh in Education Strategic Plan (WESP).

The WESP also states that the school in Llanfairfechan will be moved from category 4 to 3 – increasing the provision of Welsh medium there. The proposals for a new school at Llanfairfechan in the Preferred Strategy will need to reflect this.

Conwy county borough council has a statutory duty under section 10 of the Learner Travel (Wales) Measure 2008 to provide transport to Welsh medium schools. Therefore, when developing sites for the new schools in the Preferred Strategy, there could be an impact on travel provision to consider.

More widely, both the WESP and RLDP can work together to, for example:

- encourage those moving into the area to learn Welsh;
- promote Welsh medium education with parents; and
- provide a Welsh language immersion centre for primary school age children to attend to learn Welsh

14. Is the strategy likely to have an impact on health care provision?	
Threaten / secure local – Welsh medium – facilities / services?	

Due to the growth in population expected during the life of the RLDP, as well as the ageing population, it is likely that there will be increased demand for health and social care provision. The Preferred Strategy also acknowledges the ageing population of Conwy and therefore it is likely that more demand will be placed on health and social care services.

The Preferred Strategy does not mention services in Welsh and therefore in future it is important that these considerations are included to ensure that the authority plans and therefore ensures equality of access to services for all, including Welsh speakers in Conwy.

15. Is the strategy likely to have an impact on the provision of local services, such as shops / post offices / banks / pubs?

Threaten/secure local shops / post offices / banks / pubs in Welsh speaking communities, therefore forcing certain sections of the population out of the area / community e.g. the elderly or disabled, or the young?	
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The Preferred Strategy includes a retail development in the Coastal east of Abergele. The impact of this has been assessed and is covered under heading 8 above.

In addition, allotments are being proposed in the following areas:

- i. Llanfairfechan
- ii. Llanrhos
- iii. Old Colwyn
- iv. Llanrwst
- v. Abergele

Four out of five of these areas are important linguistic areas for the county, and therefore providing this offer should enhance facilities in those areas. There are opportunities through the planning process, to encourage the use of Welsh at the allotments, including use by Welsh speaking community groups, Welsh mediums schools and adult learners of Welsh.

Social and cultural aspects

16. Will the strategy potentially lead to social tensions, conflict or serious divisions within the – Welsh speaking - community?	
Have a significant uneven effect on different parts of the local community, potentially advantaging some groups and disadvantaging others?	Violate traditional values of certain parts of the community?

Land has been allocated in the Preferred Strategy to meet the additional need for recreational spaces. These are on the Strategic Sites in Llanfairfechan, Llanrhos, Old Colwyn, Abergele and Llanrwst. Increased opportunities for recreation are likely to have a positive impact on the community. Opportunities to use Welsh at these new spaces would enhance the chances for the Welsh language to remain a vibrant and living language of the area.

17. Will the strategy potentially lead to changes in local – Welsh – traditions / cultures?	
Result in local – Welsh speaking – households moving away from the areas?	Lead to significant increase of nonlocal – non-Welsh speaking – households?
Lead to an erosion of family ties or other social networks?	Lead to significant changes to the economic or social context, threatening traditional lifestyles?
Impact on local – Welsh speaking – households by introducing / accelerating social change?	

Overall, this high-level Welsh language impact assessment did not identify potential adverse effects for the Welsh language, culture or traditions. However, in the area of Llanrwst, where development is being proposed within the Preferred Strategy, it is important that planning decisions fully identify the impacts and mitigate them going forward.

The Conwy local planning authority area hosts 162 Scheduled Monuments, 1,735 Listed Buildings of which 29 are listed at Grade I, 1610 at Grade 2 and 96 at Grade 2*, and 24 Conservation Areas. Conwy Castle is designated as a World Heritage Site. UNESCO considers Conwy Castle to be “one of the finest examples of late 13th century and early 14th century military architecture in Europe.”

Scheduled ancient monuments (SAMs) are nationally important archaeological sites that are protected under the Ancient Monuments and Archaeological Areas Act 1979, of which there are 155 in the Conwy planning area.

A paper titled ‘Heritage Counts’ published by the Historic Environment Group quantifies the impact and influence of the heritage sector in Wales. In total it is estimated that the heritage sector generates £963m into the Welsh economy each year and supports over 40,500 jobs. In addition, many people in Wales are employed in jobs that exist indirectly to the heritage sector – for example, the many people who work in hotels and restaurants catering for visitors to Wales

who visit mainly for a heritage experience. The paper also points out that 43% of the construction industry jobs in Wales (26,340 people) work in conservation repair and the maintenance of traditional buildings built before 1919. Heritage Counts puts the value of heritage in quantifiable terms and demonstrates how valuable the historic environment is to the economy, tourism and education sectors.

The Preferred Strategy says that it will support the protection and enhancement of all nationally designated heritage assets and consider the impact of development within their settings. However, whilst both Strategic Policy 21 and 22 provide commitments in this regard, there is no mention of the Welsh language as part of the fabric of our culture and heritage. Annex 2 to this document provides suggestions of where these sections could embed the Welsh language.

18. Is the strategy likely to have a potential impact on local voluntary / activity / youth groups?	
Force local people active in local groups to move out of the community, due to:	
Drive an increase in unemployment / economic stress?	Drive an increase in house prices / housing stress?

No direct opportunities for Welsh speakers to volunteer were identified through this impact assessment.

Appendix 2 – Welsh language impact assessments of Priority Strategic Policy Areas of Preferred Strategy

Preferred Strategy Aims	Priority issues – Welsh language related	Commentary from impact assessment.
Sustainable Placemaking Aims		
Strategic Objective 1 is to contribute to the creation of sustainable places, social inclusion and improved well-being overall in Conwy through the delivery of inclusive placemaking and regeneration that ensures future growth levels and development takes place in sustainable and accessible locations, seeks to promote good design and healthier places, protects Welsh language and is supported by the necessary social, environmental, cultural and economic infrastructure to create great places. The Welsh language is a named strategic aim in this objective.		
CCBC's Welsh Language Strategy commits the Council to treating Welsh and English on an equal basis when carrying out public business. CCBC is additionally dedicated to helping raise the profile of the Welsh language and culture to residents and employees. There is a need to safeguard and support the increased use of the Welsh language amongst the resident population of the CCBC area	The RLDP should recognise the value of language and include policy provisions to support growth in the use of the Welsh language. The scale and location of housing development, employment and community facilities can all impact on the Welsh language.	These commitments signal that the Welsh language is embedded within the planning process and Conwy aim to take account of the Welsh language when taking planning decisions.
A need to ensure that the Conwy RLDP facilitates sustainable places, social inclusion and well-being for all.	Future growth levels and development should take place in sustainable and accessible locations, seeks to promote good design and healthier places, protect Welsh language and is supported by the necessary social, environmental, cultural and economic infrastructure to create great places.	Proportionate and sustainable growth should also take into account the balancing of considerations, including the Welsh language, in planning decisions. Overall the PS needs to contribute and support the authority to meet its target of increasing Welsh speakers from 27.4% to 29.4% - this means arresting the decline, protecting the Welsh language but also actively promoting and supporting its growth so that it is a thriving and living language as per the Wellbeing of Future

		Generations Act and Welsh Language Standards.
Some parts of the county area, especially in the northern coastal towns, are among the most deprived areas of Wales, with low levels of economic activity and access to facilities and services, particularly for children and young people, and elderly populations	There is a need to reduce poverty and inequality, tackle social exclusion and promote community cohesion, including through enhancing access to community facilities. There is a need to ensure that the communities are in close proximity to existing community facilities, public services and key amenities.	Llandudno, Conwy and Abergele are the three highest in terms of numbers of Welsh speakers in the county. The strategic objective could aim to increase facilities and amenities available through the medium of Welsh in deprived areas of Conwy.
To enhance design quality	To achieve sustainable development in the RLDP, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects. The RLDP needs to promote high quality architecture and design which strengthens local distinctiveness and fosters a sense of place.	There is potential to positively impact on sense of distinctiveness through celebrating the Welsh language in designs
Retaining young people within our area is a major issue, as the population estimates for Conwy County Borough show a big gap in the age structure between the ages of around 18 to 40. This is the age group which is most likely to be economically and socially mobile, seeking work, education and other social opportunities outside the area.	This is where the higher proportion of Welsh speakers are located and yet are declining 27.2% of the population aged 65 and over, which places pressure on public and social services.	The Plan needs to consider how it provides services for Welsh speakers between the ages of 18 and 40 through Welsh and how it supports them to live and work in the area for the longer term. The Plan needs to consider how it will support services through the medium of Welsh for the growing ageing population.
Sustainable place making in rural areas: Being a predominantly rural area, Conwy's countryside is a dynamic and multi-purpose resource. It must be conserved and, where possible, enhanced for the sake of its ecological,	The RLDP needs to conserve these attributes balanced against the economic, social and recreational needs of local communities and visitors. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes	The PPW also talks about Distinctive Places. When the Welsh language is seen and heard in a place, this provides a distinctive sense of place. When the Welsh language is active and vibrant this also in turn, ensures that the community is vibrant and healthy. The PPW talks about

<p>geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources.</p>	<p>when compared to the rural area as a whole. The RLDP will need to consider these issues in progressing the Vision, Objectives and Growth Strategy</p>	<p>Strategic Places – and the Welsh language is included in this description – as an important national priority.</p> <p>“A Vibrant Culture and Thriving Welsh Language will mean building on those unique and special characteristics which give places their distinct ‘feel’ and identity. Fostering and sustaining a sense of place through the protection and enhancement of the natural, historic and built environment and allowing for and supporting uses and activities which provide for creative and cultural experiences” (PPW, 2018).</p> <p>The intrinsic value of a place to people and their communities is particularly important, and are linked to factors including language, culture, history, heritage and identities. A sense of place and the relationship of people and places is important. A sense of place is linked to sense of belonging, sense of identity and when these are solid and sustainable, they support people’s health and well-being.</p> <p>The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use and the ‘Thriving Welsh Language’ well-being goal.</p>
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There is a lack of PDL capacity to accommodate growth over the Plan Period, which places pressure on the need for greenfield lands. Some settlements along the coastal corridor are also highly constrained, mainly resulting from topography to the south, flood risk to the north and highways capacity, which impacts of the ability of those communities to facilitate growth, regenerate and create sustainable places	The RLDP needs to ensure that future growth levels and development takes place in sustainable and accessible locations and protects Welsh language	In accordance with the Welsh Language Standards, the authority must seek to promote and support the use of the Welsh language, must seek to increase its use, and manage or mitigate adverse effects on the Welsh language.
The population of Conwy is expected to increase by approximately 5.6% of which migration is the biggest driver of this change		A 5.6% increase in non-Welsh speakers into Conwy could negatively impact the Welsh speaking population figure of 27.4%. This would adversely affect the authority's ability to reach its target of 2% growth in its Welsh Language Strategy.
Community facilities: Access to services within rural areas is a particular problem with the 9 LSOAs ranked within the 10% most deprived for access to services nationally	The RLDP should identify adequate provision for community infrastructure to meet existing and projected future population need.	TAN 6 states - To ensure that communities are sustainable in the long-term, rural residents need to have reasonable access to essential local services. When preparing development plans planning authorities should obtain information on the availability of services across the area. This applies just as much to Welsh speakers and the facilities they require through the medium of Welsh. Both vibrant and sustainable communities are key to the PPW. It states that development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all. This applies to Welsh speakers and their

		<p>communities – and therefore the planning decisions taken by the local authority need to promote and facilitate this.</p> <p>Community facilities contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places. They can include schools, cultural facilities, health services, libraries, allotments and places of worship.</p> <p>Cohesive Welsh speaking communities are sustained and created by providing spaces for people to interact and undertake community activities, including recreational spaces, play, learning and opportunities to connect with nature.</p>
<p>School capacity:</p> <p>Some schools are at capacity or may reach capacity depending on new homes and population increase in the future.</p>	<p>The RLDP should identify adequate provision for community infrastructure to meet existing and projected future population need.</p>	<p>the Welsh in education strategic plan says that the demand for Welsh medium education in Abergele and Kinmel Bay is growing and this is not as yet included in the Plan.</p>
Prosperous places		
<p>Economic development:</p> <p>The Conwy Employment Land Review (ELR) concludes that the labour force in Conwy, that is the number of economically active people of working age, is forecast to increase by 2033. On this basis between 12.46 and 13.33 hectares of business land (gross) could be required over the RLDP period. · There is a need to ensure local employment sites are safeguarded and allocations come forward to support employment in</p>	<p>The RLDP should direct economic development and investment to the most efficient and most sustainable locations.</p>	<p>There are opportunities to encourage Welsh speakers to remain in Conwy to work and live. This would enhance the authority's chances of reaching its target of 29% of the population speaking Welsh within 5 years, as set in its Welsh language strategy.</p>

<p>communities. - There is a net outflow of 4,784 residents who commute out from Conwy to work in other areas. Conwy has a lower job density ratio of 0.72 compared to the Welsh average of 0.74 and neighbouring authorities (0.78 in Denbighshire and 0.85 in Gwynedd). Rebalancing the land uses of the County to ensure that more (and better quality) jobs are provided could help to reverse this trend and 'claw-back' out commuters, reducing net out-commuting rates.</p>		
<p>Tourism:</p> <p>Tourism is increasingly important to the economy of Conwy.</p> <p>More recently there has been growth in sustainable all-year round outdoor and adventure tourism business.</p> <p>Conwy has seen a demand in different types of tourism accommodation away from the traditional.</p> <p>Tourism development in rural areas will need to be sympathetic in nature and scale to the local environment.</p> <p>Conwy has high levels of traditional caravan accommodation sites, a high level falling within the flood risk area to the east of the County Borough.</p>	<p>Strategic Policy 28:</p> <p>The County boasts a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Conwy. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection. Therefore, the Preferred Strategy encourages tourism development where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. More recently Conwy has seen a growth in sustainable all-year round outdoor and adventure tourism business resulting in greater demand for a variety of holiday accommodation.</p> <p>Cultural tourism - Conwy's cultural heritage is rich and diverse and includes examples such as Conwy</p>	<ol style="list-style-type: none"> 1. Tourism is important to the economy and employs a significant proportion of the population of Conwy. The Plan does not currently consider how the Welsh language could further enhance a Sense of distinctiveness in placemaking policy. 2. A more diverse range of employment as well as permanent posts are likely to be beneficial to Welsh speakers as the whole population of Conwy

	Castle World Heritage Site which is an essential part of the all Wales project as an important historic, economic and social asset	
<p>Rural economy:</p> <p>A strong rural economy is essential to support sustainable and vibrant rural communities. • Conwy's rural settlements accommodate approximately 15% of the County Borough's population.</p> <p>Brexit will have impacts on rural communities</p>	<p>Strategic Objective 9 - Promote and support sustainable and vibrant rural communities by establishing new enterprise, expanding existing business and by adopting a constructive approach to agriculture and changing farming practices.</p> <p>The RLDP will need to adopt a positive approach to diversification projects in rural areas.</p> <p>Whilst the protection of the open countryside should be maintained wherever possible, the expansion of existing businesses located in the open countryside should be supported in the RLDP provided there are no unacceptable impacts</p>	<p>Technical Advice Note 6 states that planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment. Such steps would also most probably have a positive impact on the Welsh language,</p>
<p>Transport infrastructure:</p> <p>The bus service along the coastal corridor is generally very well served, although some areas may require additional services to accommodate growth. The rural area has a good service feeding Llanrwst, but is limited thereafter in supporting the wider rural settlements.</p>		<p>Opportunities for employment and social well-being can be adversely impacted where access to public transport is limited. In rural areas feeding into Llanrwst, there is a need to support and encourage better access to services for surrounding areas and rural communities in order to support sustainable linguistic sensitive areas and thriving Welsh language.</p>
<p>Communications:</p> <p>Areas of Conwy experience shortfalls in mobile telecommunication and areas</p>	<p>The RLDP should seek to support proposals for new broadband infrastructure or</p>	<p>The plan could also ensure that linguistic sensitive areas have the infrastructure their require –</p>

do not have access to fixed-line broadband	improvements to existing networks or apparatus. Policy should also ensure that broadband infrastructure is an essential requirement in new development proposals.	in line with TAN 20 and TAN 6 – to ensure that reasonable needs of Welsh speakers are met.
	Strategic Policy 12 lists the mitigation measures that are necessary and one bullet in the list includes the Welsh language	<p>There is potential to further develop this section as the bullet does not clearly explain what mitigation measures are intended here. There is a more comprehensive list in TAN 20 that could be referred to.</p> <p>There is also potential in linking the various bullets together i.e. economic regenerations, infrastructure, transport, communications, grants, education and training, community initiatives etc will all combine effectively to support and promote the use of the Welsh language and promote sustainable Welsh speaking communities.</p>
Natural and Cultural places		
<p>Landscape:</p> <p>The landscapes of Conwy are rich and varied. Conwy designates 6 Special Landscape Areas at the local level. •</p> <p>Snowdonia National Park. Designated as a National Park in 1951, Snowdonia National Park is the largest and the first to be designated in Wales. It includes an area of 213,200 hectares. The Snowdonia National Park covers parts of Gwynedd and parts of the CCBC area, including shared settlements</p>	<p>The RLDP will need to consider landscapes at the outset of formulating strategies and policies. The RLDP will need to conserve and enhance Conwy's high-quality natural assets.</p>	<p>In PPW, one of the Placemaking Outcomes is - Creating and Sustaining Communities: Enables the Welsh language to thrive.</p> <p>The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use</p>

		<p>and the 'Thriving Welsh Language' well-being goal.</p> <p>The PPW also talks about Distinctive Places. When the Welsh language is seen and heard in a place, this provides a distinctive sense of place. When the Welsh language is active and vibrant this also in turn, ensures that the community is active. The PPW also talks about Strategic Places – and the Welsh language is included in this description – as an important national priority.</p> <p>"A Vibrant Culture and Thriving Welsh Language will mean building on those unique and special characteristics which give places their distinct 'feel' and identity. Fostering and sustaining a sense of place through the protection and enhancement of the natural, historic and built environment and allowing for and supporting uses and activities which provide for creative and cultural experiences" (PPW, 2018).</p>
<p>Historical environment/ Cultural heritage:</p> <p>Conwy Castle is designated as a World Heritage Site. UNESCO considers Conwy Castle to be "one of the finest examples of late 13th century and early 14th century military architecture in Europe".</p> <p>The CCBC area hosts 162 Scheduled Monuments, 1735 Listed Buildings of which 29 are listed at Grade I, 1610 at Grade 2 and 96 at Grade 2*, and 24 Conservation Areas. The RLDP must support the protection and enhancement</p>	<p>Strategic Objective 12 - Conserve and enhance Conwy's high quality natural and cultural heritage assets.</p>	<p>The Well-being of Future Generations Act places a duty on the authority to ensure a thriving culture and Welsh language. The Welsh language can be closely linked with culture.</p> <p>It is unclear if this section currently includes intends to protect Welsh language cultural, heritage assets.</p> <p>There is currently no mention of the Welsh language in Strategic Policy 21 – Historic</p>

of all nationally designated heritage assets, including their setting.		Environment or Strategic Policy 22 (SP/22):
<p>Culturally led regeneration:</p> <p>National Planning Policy recognises the importance of retaining the unique and special characteristics that give a place a sense of identity and distinct feel. There are currently a number of initiatives and regeneration projects ongoing and planned for the near future across the county borough that will have a positive impact on enhancing and retaining the cultural assets of Conwy.</p>		<p>It is not clear from the wording whether or not the Welsh language and Welsh medium aspects have been considered within this priority area.</p> <p>There are opportunities to promote and support the use of Welsh language through culture-led initiatives, activities, grants and groups. Engaging with Menter Conwy and other Welsh language groups could be considered.</p>

Appendix 3 - List of References and Further Information

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- Welsh Government, Stats Wales Bulletin – Welsh language, Census 2011

For further information on the Welsh language including groups and initiatives in Conwy:

Welsh language courses in the community:

<https://dysgucymraeg.cymru/>

Welsh Language Wales Measure 2011

<http://www.legislation.gov.uk/mwa/2011/1/contents/enacted>

Welsh language Commissioner

<http://www.comisiynyddygybraeg.cymru/english/Pages/Home.aspx>

Urdd Gobaith Cymru – Conwy area. The website lists news, contact information and events for children and young people in Conwy.

<https://www.urdd.cymru/cy/fy-ardal/conwy/>

Menter Iaith Conwy - <http://www.mentrauiath.cymru/mentrau/menter-iaith-conwy/?lang=en>

Merched y Wawr - <http://merchedywawr.cymru/>

Mudiad Ysgol Meithrin - www.meithrin.cymru

Wales Young Farmers' Clubs - <http://www.yfc-wales.org.uk/>

Y Lolfa - www.ylolfa.com