



# Local Development Plan 2021 > 2036

Cardiff Council - January 2025

## Deposit Plan

## Welsh Language Impact Assessment



[www.cardiffldp.co.uk](http://www.cardiffldp.co.uk)



02920 872087



[LDP@cardiff.gov.uk](mailto:LDP@cardiff.gov.uk)

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welsh centre for language planning

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## **Cardiff Deposit Replacement LDP 2021 – 2036: Welsh Language Impact Assessment**

Cardiff Council

17 January 2025

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IAITH Cyf. and BURUM  
Owain Wyn and Kathryn Jones

**IAITH Cyf.**

Uned 3,  
Parc Busnes Aberarad,  
Castellnewydd Emlyn,  
Sir Gâr, SA38 9DB

**Ff** 01239 711668

**E** [post@iaith.cymru](mailto:post@iaith.cymru)

[www.iaith.cymru](http://www.iaith.cymru)

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## Key definitions

**Area of linguistic importance** – for a discussion on its meaning see the *Background Technical Paper No. 9 Welsh Language*

**Consequence** - the effect of a hazard /opportunity on the presence of future persons or households who can speak Welsh if it happened, usually measured on a scale of magnitude of outcome (similar to impact).

**Hazard** - a situation or action that could lead to harm to the Welsh language or cause negative effects.

**Impact** - the effect or consequence that a risk/opportunity would have if it happened.

**Likelihood of occurrence** - the likelihood of risk of a hazard occurring or opportunity from a serendipity occurring. Rather than being precise (which is often spurious accuracy) the suggested option in this report is for this to be done in bands.

**Opportunity** – one or a combination of possible serendipitous opportunities and their likelihood.

**Residual risk/opportunity** - the exposure arising from a specific risk/opportunity after action has been taken to manage it and making the assumption that the action is effective.

**Resilience** - the power or ability to recover quickly and appropriately from a deteriorating environment to a previously better condition despite the presence of risk factors.

**Risk** - a combination of possible consequence(s) of hazards and their likelihood.

**Risk Assessment** - the formal process of evaluating the consequences of hazards and their likelihood.

**Risk Management** - the process of identifying, assessing and judging risk and weighing up the available options for responding to risk and deciding upon the preferred strategy.

**Serendipity/Opportunity** - a chance situation or action that could lead to benefits to the Welsh language or cause positive effects.

**Uncertainty** - limitations of our knowledge about the effects of people choosing which language to use and the factors that influence that decision.

**Welsh language Impact Assessment** - the assessment of the likely effect of a proposed development plan or land use development on the present or future use/resilience of the Welsh language in an area.

## Chapter 1: Welsh Language Impact Assessment Methodology

### 1 Introduction and background

- 1.1 This report arises out of Cardiff Council's (the Council) wish to undertake further work to assess the impact that Cardiff's Replacement Local Development Plan's (RLDP) Draft Deposit Plan is likely to have on the Welsh language in the Plan area.
- 1.2 The first LDP was adopted in 2016, shortly after the enactments of the Wellbeing of Future Generations (Wales) Act and Planning (Wales) Acts 2015). Most of the Evidence Base prepared for the Plan took place before 2014 and did not involve conducting a specific or detailed assessment of the Plan's impact on the Welsh language.
- 1.3 The Wellbeing Act includes a specific goal "A Wales of vibrant culture and thriving Welsh language)" and the Planning Act contains a duty on local planning authorities to assess the impact of plans and proposals on the language's developments. Subsequent evolving legislation and policy, such as the Welsh Government's Cymraeg 2050 Strategy and Future Wales 2040 have included strong policy steers to support the language. These, together with the release of the 2021 Census of Population results, have led the Council to consider that a more thorough and comprehensive assessment was now required than in the previous Plan.
- 1.4 Some consideration of the likely effects of the plan on the use of the Welsh language has been included from the outset of the development plan process as part of the Integrated Sustainability Appraisal (ISA) of the Plan. The ISA Framework consists of 11 Sustainability Objectives (SO). SO5 is entitled "Historic and Cultural Heritage, including the Welsh language" and it is within this wider objective that the impact of the proposed Plan had been considered. Whilst an Integrated Sustainability Assessment has strengths in terms of providing a "rounded" view of the impact on sustainability, the weakness of this approach is that assessors are in danger of not necessarily understanding fully the impact on specific dimensions of sustainability, particularly as applied within the Welsh context.
- 1.5 As legally required, a separate Welsh language impact assessment was carried out (and done in-house) as part of a number of impact assessments prior to the consultation on the draft Preferred Strategy. Whilst the WLIA concluded that "It is not anticipated that the Preferred Strategy will adversely affect opportunities for persons to use the Welsh Language or treat the Welsh Language less favourably than the English Language", it also noted that in relation to the Welsh Language Measure Standards on policy formulation, "a range of issues have been identified in discussion with Bilingual Cardiff ....to consider further as part of the preparation of the Deposit or Full plan."
- 1.6 Together with the draft Preferred Strategy and associated ISA of the Preferred Strategy, the Single Integrated Impact Assessment was included as part of the

consultation document pack on the Preferred Strategy over Summer/early Autumn 2023. Whilst limited, most consultation responses in relation to the Welsh language in general welcomed the Plan’s recognition that, in order for the Welsh language to thrive in the city, policies and proposals in relation to new development and infrastructure and signage and interpretation need to be supportive.

- 1.7 One of the issues arising out of the WLIA of the Preferred Strategy was “whether any areas can now be classed as, or approaching, the threshold of being Areas of Linguistic Sensitivity” as required by TAN20.
- 1.8 In addition, during the latter half of 2023/24 Cardiff Council conducted a review of its Policy Development Process which included a review of its compliance with the Welsh Language Standards. In particular, the Council took note of the Welsh Language Commissioner’s view that robust evidence must be provided that a “conscientious effort” has been applied to understand and assess the impact of new policy development, or any review of existing policies on the use of the Welsh language. This was underlined by the findings of the Welsh Language Tribunal in relation to a case appeal.<sup>1</sup> This also lent weight to the need to review how the Plan was addressing its consideration of the impact on the users of the Welsh language.
- 1.9 The requirements of the ISA Framework and Welsh Language Impact Assessment Template place a constraint on whether a sufficiently robust conscientious effort can be demonstrated through these channels.
- 1.10 Confining this work to the Integrated Sustainability Appraisal alone is regarded by the Council as limiting the breadth and scope of the necessary scrutiny to adopt such a policy. By utilising external expertise in planning and language planning that was independent of the Council, the assessment could also draw on LDP planning experiences, strategies and policies from further afield. Given that the Local Development Plan is the Authority’s policy undertaking and to ensure that all possible significant impacts on the Welsh language are brought to light and understood, IAITH/BURUM were commissioned to undertake this independent Welsh language impact assessment. A summary of the full WLIA will be incorporated into the ISA.

## 2 The Approach Adopted

- 1.11 The first step is to agree on the impact assessment methodology to be adopted. The criteria to use when agreeing a methodology is that the method needs to be comprehensive, ambitious and flexible enough to address Cardiff’s linguistic landscape which is likely to change over the life of the Plan.
- 1.12 The approach taken here is to review existing guidance to understand what Local Planning Authorities are required to do and then briefly review the Welsh language

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<sup>1</sup> See Welsh Language Technical Paper for details.

impact assessment methodologies to establish which methodology has the best fit for this purpose.

- 1.13 The review takes into consideration Welsh Government’s advice on the merits of an integrated assessment approach and the need to consider how the Welsh language Impact Assessment will dovetail in due course into the wider impact assessments.
- 1.14 In light of this review, we then investigate what other methodologies are possible, having examined them against the criteria of comprehensiveness, practicality and suitability, we make recommendations on the preferred methodology to be used.
- 1.15 The remaining sections of this chapter:
- i) provide a summary of the legislative and policy context;
  - ii) briefly reviews the outcomes of the Welsh Language impact findings of the ISA and SIIA;
  - iii) reports on the Preferred Strategy (including how the Plan’s Vision, Objectives, Growth and Spatial Strategies and Strategic Policies were considered) and makes a series of recommendations in relation to this strategic framework;
  - iv) assesses the contents of the Draft Deposit Plan as it developed prior to being submitted to Cabinet.

### **3 The Policy Context – Planning Policy Wales and TAN 20: Planning and the Welsh Language**

- 1.16 Planning Policy Wales<sup>2</sup> (PPW) sets out the basic principles of the planning system and outlines Welsh Government policies on land use planning. Together with Technical Advice Notes (TANs), Welsh Government newsletters and policy clarification letters, these form the national policy framework in Wales. The policies are updated and published from time to time as required. The latest version of PPW (Edition 12) was published in February 2024.
- 1.17 The primary objective of the national policy framework is stated as “to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties”.<sup>3</sup>
- 1.18 It is also stated that the aim of the land use planning system in Wales is to create Sustainable Spaces (and improve Well-being). The Government favours the "Place Making" approach described as "a holistic approach to the planning and design of developments and spaces".<sup>4</sup>
- 1.19 It sets out five principles:
- helping the economy grow in a sustainable way
  - making the most of resources
  - facilitating accessible and healthy environments

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<sup>2</sup> Welsh Government (2024) Planning Policy Wales, Edition 12 February 2024.

<sup>3</sup> Ibid. para. 1.2.

<sup>4</sup> Ibid. para. 2.9.

- creating and sustaining communities
  - protecting the environment and limiting the impacts on the environment.
- 1.20 Figure 5 in PPW sets out 37 outcomes within the framework of these five principles. One of the desired outcomes under Creating and Sustaining Communities is "Enabling the Welsh language to Thrive".
- 1.21 Planning Policy Wales makes it clear that the Welsh language "is part of the social and cultural fabric" (Wales) and that 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".<sup>5</sup>
- 1.22 Prior to Planning Policy Wales Issue 10 (published in December 2018), Local Planning Authorities were asked to consider that if the protection/promotion of the Welsh language was identified as a priority in their Single Integrated Plan, then Welsh language protection/promotion needs, to the extent that they applied to development and land use, should be considered when developing their local development plans using the Sustainability Appraisal mechanism.
- 1.23 TAN 20<sup>6</sup> was published before Planning Policy Wales 10, in October 2017 and explains the legislation and policy framework in considering land use planning and the Welsh language (Part A) and provides advice on how to consider the Welsh language in the process of developing local development plans (Part B). It should therefore be noted that it was published prior to the "Place Making" framework being adopted.
- 1.24 TAN 20 states in Section 1.7.2, "The strategy also identifies the imperative need to create favourable circumstances to encourage the number of Welsh speakers... but is also concerned with securing an economic and social future for Welsh speaking communities."
- 1.25 While this emphasises higher density Welsh-speaking communities, Section 1.7.3 directly states that it can apply to communities throughout Wales "The planning system can contribute to the future well-being of the Welsh language, by establishing the conditions to allow sustainable communities to thrive." (See also point 4 under para. 1.28 below).
- 1.26 The emphasis is on using the Sustainability Appraisal framework to develop a sustainable objective for the Welsh language and to assess the robustness of the Local Development Plan (LDP) against the objective set. It is noted that this advice is not prescriptive. It also continues to adopt the advice for carrying out Sustainability Appraisals assessments/Strategic Environmental Assessment that were originally developed in 2005.

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<sup>5</sup> Welsh Government (February 2024) Planning Policy Wales Issue 12, section 3.25.

<sup>6</sup> Welsh Government (October 2017) TAN20 Technical Advice Note "*Planning and the Welsh Language*"

## The National Development Framework - Future Wales 2040 (published February 2021)

- 1.27 The Planning Act (Wales) (2015) places a duty on Welsh Government to produce a National Development Framework (NDF). Part 3 Section 60 (2) of the Act states "The Framework must set out such of the policies of the Welsh Ministers in relation to the development and use of land in Wales as the Welsh Ministers consider appropriate."<sup>7</sup>
- 1.28 From a Cardiff and Welsh language perspective, the main points to note are:
- The specific purpose of Future Wales is to ensure that all aspects of the planning system are consistent with, and supportive of, the Welsh Government's strategic aims and policies (Introduction, p. 10)
  - The figure on page 24 sets out the geographical distribution of the number of Welsh speakers by cluster according to the 2011 Census and it notes the ambition of 2050 - A Million Welsh Speakers.
  - Future Wales's Outcomes are overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales. Together the 11 Outcomes are a statement of where we would like to be as a nation in 20 years' time.
  - The fourth Outcome stated is "Wales where people live ... in places with a thriving Welsh language." **"The language will be an embedded consideration in the spatial strategy of all development plans"** (*author's emphasis*). "Elsewhere (where Welsh is not the everyday language of the community) ... development will be a positive force towards encouraging the creation of education and social infrastructure to enable the language to develop as a natural, thriving part of communities." (Chapter 3)
  - Every five years the Welsh Government will prepare and publish a review of Future Wales. The review will be based on four key sources – The National Indicators; Future Wales policy related indicators; The Integrated Sustainability Appraisal; and Contextual evidence and influencing factors. (p. 59)
  - The strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, which are based on the co-location of homes with jobs and essential services and the efficient use of resources. It enables the creation of sustainable, thriving communities and is in line with the Welsh Government's broader goal of one million Welsh speakers by 2050. (p. 60)
  - In developing the policy framework required by policy 19, each Strategic Development Plan must consider and respond to the Future Wales Outcomes set out in Chapter 3. They must demonstrate how the spatial framework they develop and the key choices they make will contribute to achieving the Outcomes. The examination of Strategic Development Plans

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<sup>7</sup> Op. Cit. Section 60(2).

against Future Wales Outcomes will be an important part of testing the robustness of Strategic Development Plans. (p. 102)

- Each region's overview includes a paragraph detailing the number of Welsh speakers from the 2011 Census and policy encouragement:

“South-East - With 150,792 Welsh speakers across the region, **it is important that Strategic and Local Development Plans consider the relationship between strategic housing, transport and economic growth, and the Welsh language.** (*Author's emphasis*). Strategic and Local Development Plans should include settlement hierarchies and growth distribution policies that create the conditions for Welsh to thrive across the region and encourage the development of communities where Welsh can be the everyday language”. (p. 160)

## Other Considerations

### Welsh Language and Education (Wales) Bill

1.29 The Welsh Language and Education (Wales) Bill was published in July 2024. In terms of land use planning and the Welsh language, the relevant matters are that this legislation will:

- provide a statutory basis for the target of one million Welsh speakers by 2050, as well as other targets relating to the use of the language, including in the workplace and socially;
- establish a standard method for describing Welsh language ability based on the common reference levels of the Common European Framework of Reference for Languages;
- make provisions for designating statutory language categories for schools, along with requirements relating to the amount of Welsh language education provided (including a minimum amount), and Welsh language learning goals for each category;
- link linguistic planning at a national level (by placing a duty on the Welsh Ministers to prepare a National Framework for Welsh Language Education and Learning Welsh), at local authority level (by placing a duty on the local authorities to prepare local Welsh in education strategic plans), and at school level (by placing a duty on schools to prepare Welsh language education delivery plans);
- establish a National Institute for Learning Welsh as a statutory body responsible for supporting people (of all ages) to learn Welsh.<sup>8</sup>

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<sup>8</sup> [Written Statement: Introduction of the Welsh Language and Education \(Wales\) Bill \(15 July 2024\) | GOV.WALES](#). Accessed 16 January 2025.

## 4 Review of existing methodologies

### Sustainability Appraisal/Strategic Environmental Assessment

- 1.30 [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to perform a sustainability appraisal of each of the options, the preferred strategy and proposals in a plan during its preparation. More generally, [section 39 of the Act](#) requires the authority preparing the plan to do so with the objective of contributing to achieving sustainable development.

#### Guidance on Sustainability Appraisal/Strategic Environmental Assessment methodology

- 1.31 Development Plan Sustainability Appraisal stages are as follows:
- **Scope** – identify the context and objectives, establish the baseline and determine the scope;
  - **Assess the strategic options of LDPs** against the Sustainability Objectives and to produce a Sustainability Appraisal Report;
  - **Assess the Deposit Local Development Plan policies and proposals** against the Sustainability Objectives and to produce a Sustainability Appraisal Report;
  - **Producing a Sustainability Statement** stating how the findings of the Sustainability Appraisal have been considered in the final Plan.
- 1.32 In terms of assessing against the objectives of the Sustainability Appraisal, Local Planning Authorities are asked to identify the likely significant impacts of the chosen option. Anticipating impacts means identifying likely changes to the baseline. Anticipating effects should include the magnitude of the plan's impacts, the sensitivity of the receptor and the characteristics of the effect.
- 1.33 Most assessments are based on the adoption of a qualitative approach. This is because it is difficult to separate the effects of the proposed scheme from other effects and the broad scope of the scheme itself.
- 1.34 Generally, Sustainability Appraisal/Strategic Environmental Assessment assessments focus on the direction (i.e. they are broad and descriptive) rather than on a specific outcome. Scores for predicting likely impacts usually follow the guidelines issued for carrying out Strategic Environmental Assessments that were published in 2005.<sup>9</sup> Using these guidelines, the predicted likely impacts are scored as follows:

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<sup>9</sup> Office of the Deputy PM, UK Government (2005) A Practical Guide to the Strategic Environmental Assessment Directive, Appendix 7.

++	Very positive
+	Positive
0	Neutral
-	Negative
--	Very negative

- 1.35 The scoring framework also allows for 'uncertain' where the effects cannot be predicted, or it is unclear what those effects will be.
- 1.36 The Scoring Matrix suggested by Welsh Government in its Development Plans Manual<sup>10</sup> takes this approach and is reproduced in **Figure 1**. This matrix assesses the sustainability of the proposed options in relation to the current situation at the time of delivery. Given that an LDP's timeframe is usually 15 – 20 years, it is our view that the assessment will be more relevant if carried out in relation to the Local Authority's predicted trajectory for population growth over the life of the plan.

**Figure 1: the Rating Matrix suggested by Welsh Government for Sustainability Appraisal/Strategic Environmental Assessment** <sup>11</sup>

Symbol	Predicted effect	Suggested action
++	Very positive effects compared to the current situation	Consider any further enhancement measures
+	Positive effect compared to the current situation	Consider any further enhancement measures
0	Neutral effect compared to the current situation	Consider whether intervention could bring positive effects
-	Negative effect compared to the current situation	Consider mitigation measures: first avoidance of the impact, then reduction of impact, and finally compensation for the impact. Reconsider policy/proposed use.
--	Very negative effect compared to the current situation	Consider mitigation measures to reduce the severity of the effect, but these are likely to be difficult and/or expensive. Reconsider the policy or proposed use.
I	Effect depends on how the policy and allocation are implemented	Suggestions for implementation
?	Uncertain	More information is required. Consider where the information could be sourced? How and when it could be collected.

Source: Welsh Government (2020) Development Plans Manual 3

- 1.37 The Rating Matrix used for the Cardiff ISA framework uses a modified form of the above (**Figure 1**). The main difference is that the matrix identifies the possibility for

<sup>10</sup> Welsh Government (March 2020) Development Plans Manual, Edition 3.

<sup>11</sup> Welsh Government (March 2020) Development Plans Manual, Edition 3

both positive and negative in relatively equal proportion (and recognises that this is different to having a neutral effect).

**Figure 2: Cardiff RLDP ISA Scoring Criteria**

--	Major negative compared to the current situation
-	Minor negative compared to the current situation
+/-	Both positive and negative
0	Neutral effect.
+	Minor positive compared to the current situation
++	Major positive compared to the current situation
?	Uncertain - Uncertain or unknown effect.

Source: op. Cit. , page 6.

### Current approaches to assessing the impact on the Welsh language among Local Planning Authorities

- 1.38 **Appendix 1** provides a summary of local planning authorities' LDP's and Supplementary Planning Guidance that have been adopted and the ways that the Welsh language is considered.<sup>12</sup>
- 1.39 In these plans, additional weighting is given to considerations regarding the Welsh language. These considerations are usually used as part of the general policies and proposals of development plans, against which specific development proposals are assessed.
- 1.40 Apart from Carmarthenshire and Gwynedd and Anglesey LDP's, all the other Local Planning Authorities had adopted the Welsh Language Impact Assessment methodology (or a variation thereof) that is described in the document Planning and the Welsh Language: The Way Forward (2005).

### The Relationship and Interaction with the Cardiff RLDP Integrated Sustainability Assessment (ISA)

- 1.41 In its initial scoping study, the ISA identified the Welsh language as one issue and proposed to assess the impact of the Plan on the Welsh language as part of the Historic and Cultural Heritage topic (summarised as “Heritage” – Sustainability Objective 5 (SO5). The Cardiff ISA measures impact against the rating matrix referred to in **Figure 2** above.
- 1.42 In terms of the impact of the RLDP vision and objectives on SO5 the ISA scored the Overall Vision as “minor positive” compared to the existing situation. It scored the preferred growth option as “minor negative” or “uncertain”. In terms of the preferred spatial option, although the preferred hybrid was not identified at the

<sup>12</sup> Iaith/BURUM reviewed March 2024.

time, the hybrid option contains options 2 - 6. Options 2 – 5 were scored as neutral with Option 6 as minor negative.

1.43 In terms of the Strategic Policies (21 at the time) the impact on Heritage compared to the current situation was described as:

- “neutral” in 14 of the SP’s.
- “positive” in three SP’s (SP4 Design, SP8 supporting the role of the Port and SP13 Protecting and Enhancing the Built Heritage and Culture).
- “uncertain” in two SPs (SP6 and SP9)
- “minor negative” in one SP (SP2) and
- “neutral” (SP1).

1.44 **Table 1** analyses the predicted impact within the parameters of the Welsh language and identifies and provides commentary on suggested areas for further analysis in this report.

**Table 1: Predicted Impact on Historic and Culture Heritage including the Welsh language**

Strategic Policy	Predicted Effect	ISA Action in terms of WL	Initial WL Impact Commentary
SP1 – Providing for sustainable growth	+/-	No commentary on WL provided	Focus of comments is on Spatial Impacts rather than scale of growth of dwellings and jobs. Commentary could consider the likely impact on trajected number of Welsh speakers
SP2 – Sustaining economic growth and resilience	-	No specific commentary on WL provided	Commentary could consider how economic growth, in terms of choice of scale and location of employment sites, could have impact on trajected number of Welsh speakers
SP3 – Ensuring a masterplanning approach	0	No commentary	
SP4 – Securing good quality and sustainable Design	+	No commentary on WL provided	Commentary could consider how Policy could refer to WL as part of “Character”
SP5 – Securing new infrastructure	0	No commentary	Commentary could consider how Policy could refer to supporting the WL as part of provision or contribution towards certain types of “new infrastructure”
SP6 – Securing planning obligations	?	No commentary	Commentary could consider how Policy could refer to WL as part of enhancing or mitigating new developments

			(e.g. Schools and education and community buildings and facilities)
SP7 – Supporting Central and Bay business area	0	No commentary on WL provided	Commentary could consider how Policy could refer to importance of enhancing Welsh character of this key gateway to the Welsh capital
SP8 – Supporting the role of Cardiff port	+	No commentary on WL provided	
SP9 – Tourism	?	No commentary on WL provided	Commentary could consider how Policy y could refer to importance of maintaining, supporting and enhancing the WL “offer”
SP10 – Maintaining a supply of minerals	0	No commentary	
SP11 – Delivering sustainable neighbourhoods, social cohesion and affordable housing	0	No commentary on WL provided	Reference to opportunities to supporting the WL is noted in criterion v.
SP12 – securing health and wellbeing and resilience	0	No commentary	Commentary could consider how Policy could make reference to improving access to WL services
SP13 – Protecting and enhancing built heritage and culture	+?	Commentary suggesting SP could enhance WL through improved access or support. But perhaps needs to say more.	Focus of policy is on physical environment although a more specific reference could be made to protecting and enhancing the WL dimension that characterises much of the “cultural distinctiveness”
SP14 – Protecting the setting of the City through a green wedge	0	No commentary	
SP15 – Managing spatial growth through settlement boundaries	0	No commentary	
SP16 – Delivering sustainable transport and active travel	0	No commentary	
SP17 – Securing new transportation infrastructure	0	No commentary	
SP18 – Securing climate resilience, decarbonisations and renewable energy in new developments	0	No commentary	

SP19 – Protecting, enhancing and compensating green infrastructure and biodiversity	0	No commentary	
SP20 – Minimising impacts on natural resources	0	No commentary	
SP21 – Managing waste	0	No commentary	

Sources: Cardiff Council and Levett- Therivel Sustainability Consultants (May 2023) ISA and SEA Technical Report, Appendix C.

- 1.45 The ISA notes that the city’s own Welsh Language assessment found that *“the RLDP Preferred Strategy is unlikely to negatively affect the Welsh language, and Policy SP11 will help to provide facilities that support the Welsh language.”*

The Relationship and Interaction with the Cardiff Council Single Integrated Impact Assessment and Welsh Impact Assessment of the RLDP Preferred Strategy

- 1.46 The consultation on the RLDP Preferred Strategy in Autumn 2023 was accompanied by Background Technical Paper Number 4.<sup>13</sup> This takes the form of a report which follows the Council’s template for completing a number of impact assessments for assessing new policies or modification or replacement of existing policies. The impact assessment areas covered include:
- equality
  - child rights
  - Welsh language.
- 1.47 Although listed, the following are not reported on at this stage of the plan development:
- habitats regulations
  - environment (Strategic Environmental Assessment)
  - data protection
  - health.
- 1.48 The impacts screened and identified, and proposed actions to address differential impacts, are then summarised in a Single Impact Assessment. The assessments assess the impacts of the Strategic Policies on the various sub-categories of the population.
- 1.49 In terms of the Welsh language impact assessment, the approach adopted is to measure the impact of the Preferred Strategy against the requirement of the Policy Standards of the Welsh Language Measure 2011. Standards 88 to 90 cover policy formulation.
- 1.50 In terms of identifying any differential impacts on:
- the opportunities for persons to use the Welsh language, and
  - treating the Welsh language no less favourably than the English language,

<sup>13</sup> Cardiff City Council (June 2023) Equalities Impact Assessment and Welsh Language Impact Assessment, Background Technical Paper Number 4.

the conclusion of the assessment is:

*“It is not anticipated that the Preferred Strategy will adversely affect opportunities for persons to use the Welsh Language or treat the Welsh Language less favourably than the English Language. However, as the Plan progresses and more detailed policies are formed, the impact of these will need to be assessed and mitigated against where appropriate.”*

- 1.51 The assessment is qualified by the following comments made in relation to the assessment of Standard 89 (*“Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on opportunities for persons to use the Welsh Language?”*)

*“A range of issues have been identified in discussion with Bilingual Cardiff to consider further as part of the preparation of the Deposit or “Full” plan over the next twelve months. These include:*

- Investigate whether any areas could now be classed as, or are approaching, the threshold of being Areas of Linguistic Sensitivity taking into account the latest Census findings.*
- Ensuring the plan references bilingual signage and the Council’s adopted street naming policy in detailed policies and Supplementary Planning Guidance.*
- Including a naming strategy in the Replacement LDP to facilitate greater use of Welsh/bilingual names for places to align with other naming policies such as the adopted street naming policy.*
- Investigate whether a commitment could be included in the plan to undertake Welsh Language Impact Assessments of projects throughout the lifetime of the LDP. Such a commitment would align with the Welsh Language Standards and serve as useful checkpoint.*
- Ensure explicit references are made in the detailed policies and Supplementary Planning Guidance to the links between new developments and future school populations and the provision of Welsh-medium or enhanced Welsh Language provision school places given the positive impact these places have on the Welsh Language.*

*Progress on these issues will be reported on in the next version of the assessment which will accompany the Deposit Plan.”*

- 1.52 In essence, in addition to assessing the overall impact of the Deposit Plan, this assessment report will look as to whether, and how, the Council has addressed these issues. In addition also, the assessment not only looks at the issue of the likely impact on the present opportunities to use the Welsh language but also future opportunities as the Plan is implemented over the period 2021 – 2036 within the context of Cardiff’s contribution to the Cymraeg 2050 goal of a million speakers and of doubling the numbers that use the Welsh language daily from 10% to 20% and the Welsh Government outcome by 2040 of a “Wales where people live ... in places where the Welsh language flourishes.”

- 1.53 Although the WLIA Report will sit alongside the ISA the outputs of the assessment will be used to inform the contents of the ISA of the RLDP Deposit Plan (and in particular the Detailed Policies and Proposals). It also provides an opportunity for the Sustainability Team to revisit the commentaries made in the previous ISA stage in relation to the Vision, Objectives, Strategy and Strategic Policies to inform the ISA of the Deposit Plan.

#### The Relationship and Interaction with the Welsh Language Measure Policy Standards

- 1.54 In September 2020 the Welsh Language Commissioner produced a good practice advice document on how to comply with statutory duties and promote the use of the Welsh language. The methodology suggested in the Guidance for conducting a Welsh Language Impact Assessment broadly follows a similar approach and process advocated here:
- Step 1: Gathering information.
  - Step 2: Identify and assess possible factors to gather evidence about when considering the effect on the Welsh language.
  - Step 3: Addressing the likely positive and negative consequences of such effects and identifying policy formulation solutions that would have positive or enhanced positive effects or that prevent or mitigate adverse effects or help lessen adverse effects.
- 1.55 The focus of the approach here will be on the identifying whether the Plan is likely to have significant effects (either positive or negative) on opportunities for persons to use the Welsh language now and over the course of the plan period.

## **5 Proposed Methodology for the WLIA of the Deposit Plan**

### **Review of Existing Methodologies Planning and the Welsh Language: The Way Forward (2005)**

- 1.56 “Planning and the Welsh language: The Way Forward” was published by a consortium of local authorities, the House Builders Federation, the Welsh Language Board, supported by the Welsh Assembly Government, in December 2005. The study arose out of concern that stakeholders, including local authorities in higher density Welsh speaking areas, although required to consider the Welsh language as a planning issue since 1988, did not know how to implement the guidance in the (original TAN 20) relating to understanding the relationship between land use planning and the Welsh language and how best to assess the impacts of development plans and major proposals on the language.
- 1.57 The consortium was supported in its work by the University College London Bartlett School of Planning. The Study Team in essence advocated an impact assessment framework similar to the Environmental Impact Assessment introduced in the

Planning and Compulsory Powers Act 2004 and the framework assesses the impact on the social fabric of the community in terms of five dimensions – population, quality of life, the economy, infrastructure, and social and cultural life.

- 1.58 The key steps in the methodology to assess the impact on the Welsh language presented in the document *Planning and the Welsh Language: The Way Forward* (2005) involve:
- Compiling a Checklist (including baseline) based on 5 dimensions and 18 individual questions.
  - Score the checklist for likely impacts.
  - Calculating the General Impact Index.
  - Assess against the linguistic sensitivity of the site / area.
- 1.59 Whilst the methodology has a number of advantages, principally its similarity to the SA framework, it also has proven to have a number of major limitations:
- Firstly, *The Way Forward* has no official status and has never been approved by Welsh Government as a methodology to assess the impact on the Welsh language.
  - Although formulated to be used in the production of local development plans and assessment of applications, it is used, mainly for the purpose of assessing individual applications and not to assess the impact of development plans.
  - The role and responsibilities of other stakeholders (in addition to the Local Planning Authority) in completing a Welsh language impact assessment is unclear.
  - The relationship between the impact of a proposed development on the vitality of the Welsh language and some of the 18 questions in the assessment appears weak or difficult to quantify because, at times, the quality of the data is neither current nor robust.
  - The relationship is looked at in terms of past or present indices and no future scenario modelling methods are used.
  - The General Impact Assessment Index provides no guidance on the weighting that should be considered for the results of the 18 questions. Although the methodology recognises the option to provide “weighting” for the five elements of "community life" and the 18 related questions, in practice this weighting is not often used in Welsh language impact assessments.
  - This methodology only measures the impact against the baseline, not the impact of a policy intervention and the trajectories predicted for future change. It fails to recognise that the vitality / resilience of the Welsh language will change over time and responds to economic and social drivers along with other drivers such as people's aspirations and attitudes and to national and local policies.
  - It is often unclear what the subjective basis is to determine whether an impact is significant or not.
  - The response is considered only in the context of mitigation measures and the proposed (mitigation) measures haven't necessarily considered what linguistic factors are appropriate and relevant to the context.

## An Alternative Methodology

- 1.60 The Gwynedd and Anglesey Local Development Plan Supplementary Planning Guidance (adopted July 2019)<sup>14</sup> has pioneered a new approach in this guidance to developers for assessing the impacts that housing or employment developments on major unanticipated sites or major windfall sites are likely to have on the Welsh language.
- 1.61 This methodology has been further developed to consider the impact of a local development plan on the Welsh language. Carmarthenshire County Council's RLDP 2, commissioned IAITH/BURUM to develop a methodology for a proposed Impact Assessment, initially for its Preferred Strategy Stage. This was in response to the County Council's decision in 2019 to declare the whole county as an area of linguistic sensitivity/importance.
- 1.62 Both frameworks broadly follow the methodology that underpins the UK Government's Guidance for Assessing and Managing Environmental Risk, Green Leaves III.<sup>15</sup> In turn, Green Leaves III follows advances in the field of risk assessment and management widely used in a variety of public policy contexts and based on a systems approach to identifying and addressing impacts or risks.
- 1.63 The (31000:2009) *International Standard on Risk Management*<sup>16</sup> provides principles and guidelines to be applied across all organisations and situations. The ISO 31000 introduction explains the rationale behind introducing a global standard:
- “Although the practice of risk management has been developed over time and within many sectors in order to meet diverse needs, the adoption of consistent processes within a comprehensive framework can help to ensure that risk is managed effectively, efficiently and coherently across an organization. The generic approach described in this International Standard provides the principles and guidelines for managing any form of risk in a systematic, transparent and credible manner and within any scope and context.*
- In general terms, ‘risk management’ refers to the architecture (principles, framework and process) for managing risks effectively, while ‘managing risk’ refers to applying that architecture to particular risks.”*
- 1.64 **Appendix 2** has been reproduced from the ISO 31000 document. It depicts a risk management model that sets out the relationship between the principles behind risk management, a framework to be followed when carrying out risk management, and the detailed process of creating a risk assessment.

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<sup>14</sup> Gwynedd and Anglesey Councils (2019) Gwynedd and Anglesey Local Development Plan Supplementary Planning Guidance *Maintaining and Creating Distinctive and Sustainable Communities*.

<sup>15</sup> UK DEFRA/Cranfield University (2011) *Green Leaves III Guidelines for Environmental Risk Assessment and Management*.

<sup>16</sup> International Organization for Standardization (2018) *Risk Management Principles and Guidelines*.

- 1.65 The ISO guidance sets out the following features of effective risk management:
- describe and establish the context;
  - determine, analysing, assessing and addressing risk; and
  - communicate and consult with stakeholders throughout the process.
- 1.66 The characteristics listed above are not dissimilar to the steps in carrying out a Sustainability Appraisal/Strategic Environmental Assessment. While the focus is still broad, the likely predicted effects:
- are more clearly distinguished in terms of the magnitude of the outcomes and the likelihood of them occurring.
  - cease to have a neutral rating and therefore avoids the tendency among users of those frameworks that use odd-numbered scales (e.g. users of the Likert scale use a five-, seven- or nine-point scale) to veer towards or cluster around the mid-point.

### **What is a suitable, acceptable and practical methodology for the City of Cardiff?**

- 1.67 Perhaps the key issue to consider is whether the alternative methodological approach based on risk assessment is appropriate in the Cardiff context. On the surface it appears not. In general, Cardiff has experienced annual growth in the number of Welsh speakers with a wide distribution of that growth across the City. It is therefore in a very different situation to authorities that have places where the density of Welsh speakers is relatively high and Welsh is more commonly a community language, but with both under threat.
- 1.68 Rather than the status quo therefore, one must look at the purpose of policy interventions and the consequences they seek resulting from those interventions.
- 1.69 Firstly, the Welsh Language (Wales) Bill 2011 sets policy making standards and those policy-making standards are intended to "secure, or contribute to securing, one or more of the following outcomes:
- What effects, if any (whether positive or adverse), the policy decision would have on - opportunities for persons to use the Welsh language.
  - How the decision might be made so that the decision has positive or increased positive effects on - opportunities for persons to use the Welsh language.
  - How the decision might be made so that the decision does not have adverse effects, or so that the decision has decreased adverse effects so that the decision has adverse effects, or less adverse effects on - opportunities for persons to use the Welsh language.
- 1.70 Secondly, the prime objectives of Cymraeg 2050 (and the proposal in the Education Bill) is to reach a target of one million speakers and to double the percentage who use Welsh daily from 10% to 20% by 2050. Cardiff will be expected to contribute significantly to these figures.

- 1.71 Cardiff Council’s Mission Statement in its Bilingual Cardiff Strategy document<sup>17</sup> states "Working with partners to double the number of Welsh speakers in Cardiff by 2050 ... in line with the Welsh Government's vision."
- 1.72 Welsh Government makes clear that the role and contribution of the planning system (through Placemaking and Future Wales) is as follows, "In places where Welsh is not the everyday language of the community ... “development will be a positive force in creating educational and social infrastructure so that the language can develop as a naturally thriving part of communities."
- 1.73 In essence, the direction of both national and local policy interventions is increasingly designed to grow the numbers of persons who able to speak Welsh, on opportunities for people to use the language in everyday communication and on creating favourable conditions for this to happen, including the provision of appropriate physical, economic and social infrastructure.
- 1.74 In assessing the impact of the Plan on the future trajectory of the number of Welsh speakers it could be argued that the methodology needs to recognise that having one Four Rating Impact Matrix may not capture our understanding of the likely impact of some policies or proposals within the Plan as those specific policies may be neutral, uncertain or unknown.
- 1.75 It is proposed, therefore, to modify the existing methodology used to have two frameworks:
- Framework 1 – this provides a summary in one table of the likely impact of the Overall Plan on the Welsh Language.
  - Framework 2 – this provides a list of criteria similar to the ISA scoring framework to assess the likely impact of relevant Detailed Development Management Policies and Proposals on the Welsh Language.
- 1.76 A third Framework is proposed to assist the Council, as Local Planning Authority, to assess and make decisions on major windfall sites. This will be developed as part of the proposed Supplementary Planning Guidance and will need to consider and assess significant impacts such as Welsh language densities within the host communities and the opportunities the proposal provides to enhance support for the language.
- 1.77 It is proposed that the key criterion for the Impact Assessment Framework of the overall Plan is:
- The extent to which the Plan's development policies and proposals would facilitate or impede the City of Cardiff's ability to realise Cardiff's mission statement which is to double the number of Welsh speakers in Cardiff by 2050.*
- 1.78 Instead of the emphasis on assessing the impact on the current situation (as in the 2005 methodology), the emphasis is on looking towards the future and assessing

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<sup>17</sup> Cardiff City Council (2022) Bilingual Cardiff Strategy 2022 – 27.

the impact if the outcome of the policy intervention is realised. Appendix 3 provides further detail of this approach.

## 6 Reviewing the WLIA of the Preferred Strategy

1.79 The consultation version of the LDP Vision and Preferred Strategy was reviewed by IAITH/BURUM and Bilingual Cardiff, in consultation with the LDP Team, from the perspective of its impact on its alignment with the Bilingual Cardiff Strategy.

LDP Stage	ISA	WLIA	Comment
Delivery Agreement		Scoping Report Setting of WLIA Methodology and Framework	
Evidence Gathering and Stakeholder Involvement	Stage A (Tasks A1 – A6) Scoping	Assessment of Current Situation Assessment of likely Future with Business as Usual/without the Plan	
Preferred Strategy	Stage B (Tasks B1 – B4) Appraisal of Alternatives	Incorporated within ISA WLIA In-house assessment	Published for Consultation alongside Preferred Strategy
Deposit Plan	Stage C (Tasks C1 – C3) Assessment of Deposit Plan and preparation of SA Report	Assessment of Preferred Strategy and Consultation Responses Assessment of Deposit Plan (including detailed policies and allocations) and preparation of WLIA Report	Published for Consultation alongside Deposit Plan
Examination	Stage D (Tasks S1- D2) Examination and Adoption	Assessment of Representations	Consider any need for support from expert witness at examination
Adoption, Annual Monitoring and Review	Stage E (Tasks E1 – E2) Monitoring for significant effects	Monitoring for significant effects, including those of windfall sites	Publish any findings within AMR

## 7 Methodology for Reviewing the Strategic and Detailed Policies and WLIA

### Likely Future without the Plan

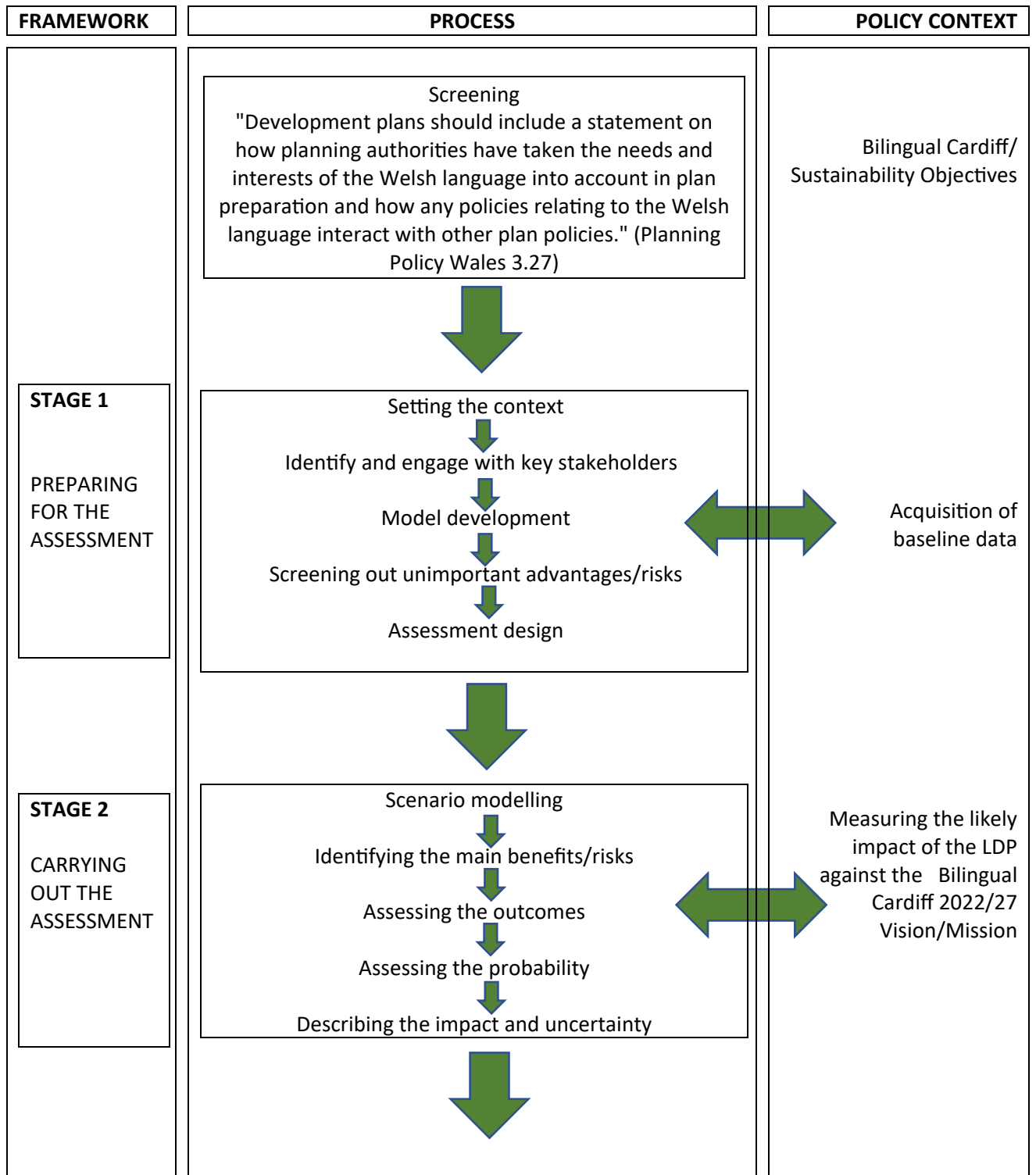
- 1.80 Bilingual Cardiff sets a target to increase the number of Welsh speakers from 42,584 in the 2021 Census to 45,970 by 2027. While there is uncertainty about the likely trajectory required, based on the Welsh Government’s model (where most of the growth is end loaded), Cardiff is still likely to be looking to significantly increase the numbers of Welsh speakers by the end of the Plan period in 2036. Bilingual Cardiff identifies a target of 49,355 by the 2031 Census. Using similar assumptions would identify a target of 55,277 by the end of 2036. This represents a little under 30% (29.8%) increase over the lifespan of the Plan.
- 1.81 The Preferred Strategy is driven by a Policy driven, target-led scenario equating to 1,600 homes per annum to 2036. Together with a 10% flexibility allowance the Plan envisages delivering land for 26,400 homes over the plan period.
- 1.82 The previous LDP, covering the period 2006 – 2026 and adopted in 2016 based its overall strategy on providing 2,071 homes<sup>18</sup> per annum.
- 1.83 The Edge Analytics Report<sup>19</sup> highlighted a number of trends indicating why the expected growth strategy has not been achieved:
- *“The city’s profile of annual population growth has been influenced by the rate at which new homes have been built. Prior to 2018/19, housing delivery rates in Cardiff slowed substantially from a 2006/07 peak, with an average of +1,668 dwellings per annum (dpa) between 2001–2011, compared to +835 dpa between 2011–2021. The data for 2018/19 and 2019/20 indicated a recovery in the build rate, with annual housing completions at their highest level for a decade, however the estimated completions figure for the latest year suggests COVID-19 restrictions have slowed the build rate significantly.*
  - *“Cardiff’s population has grown in the majority of age-groups since 2001, but particularly in the young adult age-groups due to net in-migration and in the older adult age-groups due to the gradual ageing of the larger birth cohorts from the 1950s and 1960s” (para. 2.8).*
  - *Pre-school (aged 0–3) populations increased sharply to 2013 but have declined thereafter. Primary school age-groups (aged 4–10) have naturally followed suite with an appropriate time-lag, whilst secondary school age-groups (aged 11–17) are only just starting to recover back to 2001 levels.*
  - *The 18–24 student age-group has seen the largest growth in numbers since 2001.*
  - *The older-adult, labour force ages (25–64) have increased by approximately 20% since 2001, although the dampened growth of 25–39 year-olds in recent years may be evidence of the effects of Cardiff’s net migration outflow since 2012/13.*

<sup>18</sup> Cardiff City Council, LDP (2016) Table 1: Housing Provision over the Plan Period.

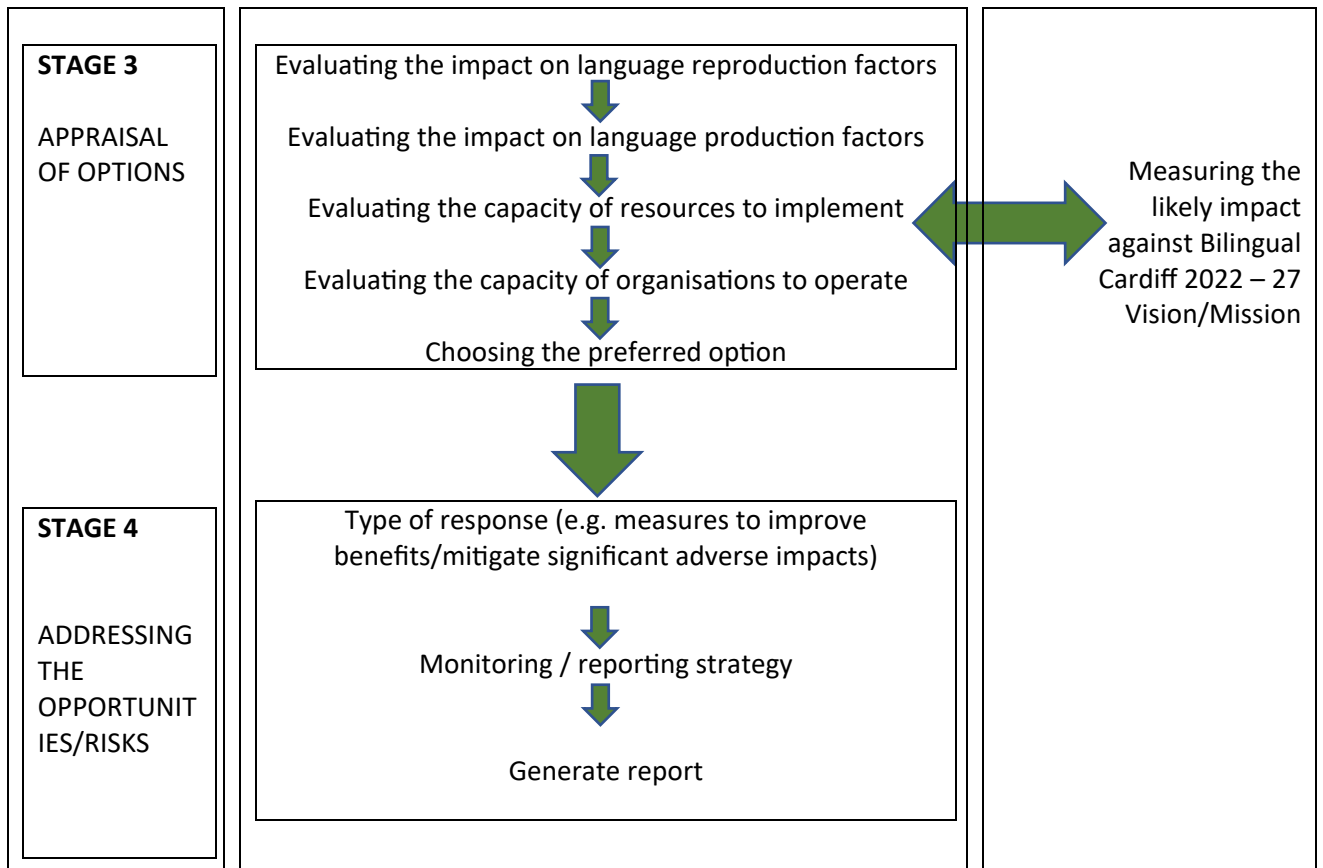
<sup>19</sup> Edge Analytics (2021) *Cardiff Council LDP Demographics Update the Evidence*.

- *The older age-groups (65–79 and 80+) are subject to consistent annual increase, a trend that will continue over the remainder of the Cardiff LDP period, as birth cohorts from the 1950s and 1960s reach older age.*
  - *Of its 29 wards, just three experienced population decline between 2001–2019 (Pentyrch, Llandaff and Lisvane). In contrast, the four wards of Butetown, Cathays, Grangetown and Adamsdown have been responsible for 51% of the city’s 57,000 population growth since 2001.*
  - *Net migration - both the inflows and outflows from and to the rest of the UK have each increased gradually since 2001. A net outflow to 2007/08, reverted to a short period of net inflow to Cardiff. However, since 2012/13, a reduced but recovering inflow accompanied with a rising migration outflow has resulted in a negative net internal migration balance. The annual inflow and outflow of students in the 18–24 age-range, is a key component of Cardiff’s migration balance.*
  - *In the first 11 years of the migration time-series, up to 2011/2012, Cardiff’s most significant net migration inflows (higher inflow than outflow) originated from Ceredigion, Carmarthenshire and Swansea. Its largest net migration outflow exchange (higher outflow than inflow) was with the Vale of Glamorgan, with an average annual net loss to Cardiff’s population of 653 per year). Despite an increasing net outflow through internal migration since 2012/13, the average net inflow exchanges with Ceredigion and Swansea have increased in this period. The top five inflow destinations have altered slightly in comparison to the 2001/02–2011/12 statistics (Figure 20) with a decrease in average net inflow exchanges for Pembrokeshire and Powys. At the same time, Cardiff’s average annual net outflow exchange with the Vale of Glamorgan, Rhondda Cynon Taf, Caerphilly and Newport have all increased since 2012/13.*
  - *For Cardiff, international migration has been a key contributor to population growth since 2001, with an average annual net international migration balance of approximately +1,800 per year*
- 1.84 The Dwelling-led 1600 per annum, the basis of the LDP Growth Strategy envisages a growth of 39,472 (10.7% population change over 2020 base) by 2036, a growth of 23,103 households (+14.6% change) and assumes a positive net migration of 1,390 per annum. This compares to the Dwelling – led (BAU 10-year average 835 dwellings per annum) growth of 13,980 (+3.6%) and a growth in households of 12,063 (7.7%) by 2036 and assumes a negative net migration figure of – 100.
- 1.85 Under the dwelling-led and employment-led scenarios, future internal migration assumptions have been derived from the full nineteen-year historical period (PG-Long Term), with migration altered to meet annual dwelling or employment growth requirements.

**Figure 3: Cardiff Replacement LDP Deposit Plan Assessment and Management Framework and Delivering the Bilingual Cardiff Vision – the relationship between Framework, Process and Context<sup>20</sup>**



<sup>20</sup> Adapted from DEFRA/Cranfield University (2011) – "Green Leaves III – Guidelines for Environmental Risk Assessment and Management"



1.86 In **Figure 3**, the middle column indicates the steps to be taken and the issues to consider at each stage. The right column covers the criteria against which the significant impact is assessed and controlled. The model assumes that the Local Development Plan reflects the Local Authority's aspirations at the end of the plan period (in Cardiff's case by 2036). The sustainability of this scheme (including the sustainability of the Welsh language) will be assessed through the SA process.

### Predicting scores

- 1.87 Her Majesty's Treasury's Orange Book sets out three important principles in identifying risks:
- *"Ensure that there is a clearly identified process in which both likelihood and impact are considered for each risk.*
  - *Record the assessment in a way which facilitates monitoring and the identification of risk priorities.*
  - *Be clear about the difference between inherent and residual risk."*<sup>21</sup>

<sup>21</sup> HM Treasury (2004): *The Orange Book: Management of Risk - Principles and Concepts*

**Results and Likelihood**

- 1.88 The combination of outcomes and likelihood chosen should be based on the impact that something will happen within a defined period. It is also essential to ensure that the likelihood score chosen relates to the likelihood that level of result / impact occurs, NOT only to the likelihood that the activity / event / danger will occur.
- 1.89 It should be noted that it is not necessary to be absolutely certain about facts and problems in order to score an impact. Uncertainty does not automatically create high risk/impact in itself either. The uncertainty level is only one element in the risk/impact calculation process. So assessing risk/impact is a matter of making the MOST informed decision possible that includes uncertainty.
- 1.90 **Figure 4** proposes a matrix for ascertaining impact of the Plan not achieving the expected outcomes in assessing Cardiff's LDP draft Plan. While it is possible to develop more sophisticated matrices, we believe that the proposal better meets the required criteria for the methodology, particularly in terms of practicality. It proposes the use of a 4\*4 matrix based on the following scales of effect and probability.

**Figure 4: Effect and probability matrix**

Effect		Likelihood	
Major Positive	+2	Almost certainly/very likely	4
Minor Positive	+1	Likely	3
Minor Negative	-1	Unlikely	2
Major Negative	-2	Very unlikely/Little chance	1

- 1.91 As explained above, the assumption relating to the likely future without the intervention of the Plan is that the target for the number of Welsh speakers is to increase to 55, 277 by the end of the Plan period in 2036.
- 1.92 The Plan is regarded as likely to have a significant effect if the trajectory of the number of Welsh speakers is, on its own or a result of a combination of effects, 2.5% over or below this ambition over the Plan period.

**Impact**

- 1.93 This proposed framework is considered the “best available” model for conducting the assessment of this Replacement Local Development (Deposit) Plan for likely significant effects on the use of the Welsh language.
- 1.94 As a result of representations made on the Deposit Plan the Development Plan Manual includes provision for the Council to make Focussed Changes (FC’s).

*“If necessary, although they are non-statutory, FCs can be made following the deposit consultation in response to representations made. Such responses should only be made to those elements of the plan the LPA considers require amendment, in order to ensure the plan can be found ‘sound’.”<sup>22</sup>*

- 1.95 Should the Council conclude that, as a result of the consultation process on the Draft Deposit Plan, it needs to make Focussed Changes (FC’s) to the Deposit Plan in order to ensure that the Plan is found sound at inspection, and those elements of the Plan are relevant, then a WLI assessment for likely significant effects of the relevant FC’s may be deemed necessary to ensure soundness.
- 1.96 Once this Process is complete the Assessment will be submitted for inspection alongside the Deposit Plan, the Integrated Sustainability Assessment and other assessments and Consultation Report for inspection.
- 1.97 The ISO9001 model recognises that the impact assessment methodology may need to be revisited during a formal review of the adopted Plan as new or improved information and evidence becomes available.

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<sup>22</sup> Welsh Government (2020) The Development Plans Manual (Edition 3), s. 3.111.

Figure 5: Impact matrix on achieving the Bilingual Cardiff Mission

REALISING THE BILINGUAL CARDIFF MISSION CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN		← THE MAGNITUDE OF IMPACT/OUTCOMES OVER THE PLAN PERIOD →						
		Target Doubling the Number of Welsh speakers to around 85,000 by 2036	Major Positive An increase of 2.5 percentage points or more in the number of Welsh speakers aged 3+ over the trajectory	Minor Positive An increase of less than 2.5 percentage points in the number of Welsh speakers aged 3+ over the trajectory	Minor Negative A decrease of less than 2.5 percentage points in the number of Welsh speakers aged 3+ over the trajectory	Major Negative A decrease of 2.5 percentage points or more in the number of Welsh speakers aged 3+ over the trajectory		
				High	Low	Low	High	
Probability	Frequency	Score		2	1	-1	-2	
↑ LIKELIHOOD ↑	Evidence/Experience shows that growth in the population on the scale of the preferred strategy will make it highly likely in the majority of cases	Evidence to show it occurs at least 8 time out of 10 in the Existing Local Development Plan	Very likely	4	8	4	-4	-8
	Evidence/Experience shows that growth in the population on the scale of the preferred strategy will make it likely in the majority of cases	Evidence to show it occurs 5 - 7 times out of 10 in the Existing Local Development Plan	Likely	3	6	3	-3	-6
	Evidence/Experience shows that growth in the population on the scale of the preferred strategy will make it unlikely in the majority of cases	Evidence to show it occurs 3- 4 times out of 10 in the Existing Local Development Plan	Possibility	2	4	2	-2	-4
	Evidence/Experience shows that growth in the population on the scale of the preferred strategy will make it highly unlikely in the majority of cases	Evidence to show it occurs 1 - 2 times out of 10 in the Existing Local Development Plan	Highly Unlikely	1	2	1	-1	-2

## 8 Limitations of risk assessment and management models

- 1.98 As with other models, risk assessment and management models attempt to represent a system using a collection of concepts and assumptions to help people understand that system. In the context of Welsh language resilience an attempt is made to design a 'real world' model in terms of language use. There are necessarily limitations to the extent to which such a model can represent the complexity of linguistic practices that characterise linguistic 'vitality' or 'resilience' in particular neighbourhoods.
- 1.99 Current understanding of the relationship between changes in land use and its implications for influencing people's language practices, either negatively or positively, over time, particularly in the future, is comparatively limited. To be robust, Welsh language impact assessments need to be based on data that is reliable and of good quality. As such, it is necessary to continue to rely primarily on a proxy measure of language ability – a record of the population's ability to speak Welsh, as expressed in answering a question in the decennial Population Census. While it is essential to be 'objective' and ensure accuracy and replication, the limitations of indicators such as Census 'language ability' data also need to be recognised. Whilst the data gathered may improve over time, it is also necessary to rely on stakeholder input to evaluate the data used in a risk assessment and management model and link them to their experience and understanding of local linguistic practices.
- 1.100 Finally, because of its roots in hazard detection and assessing and managing risk, the model is currently probably more adept at detecting negative effects rather than positive effects and/or opportunities to enhance benefits. In the context of assessing the impact of physical developments on the vitality, resilience or in the specific context of an authority such as Cardiff where the numbers are growing) of the Welsh language – and the need to refine impact assessment and management approaches – this is likely to be ongoing 'work in progress' for the near future. This also meets the requirements of the Welsh Language Measure 2011 and is consistent with the Welsh Language Commissioner's Best Practice Advice that a public body should consider the effects of policy decisions on an ongoing process, including the review of the plan's performance in due course.<sup>23</sup>

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<sup>23</sup> The Welsh Language Commissioner (2020) op. Cit., section 1.5.

## Chapter 2: Welsh language Impact Assessment of Strategic Policies

### 1 Introduction

- 2.1 This chapter contains the WLIA assessment of the proposed Strategic Policies for the current Draft Deposit Replacement Local Development Plan.<sup>24</sup>
- 2.2 The framework for delivering the Plan is set by the Preferred Growth and Location Strategy and guided by Strategic Policies. In summary, the key components of the Preferred Growth and Location Strategy of relevance to the Assessment of allocations are:
- Provide for 26,400 (including 10% flexibility allowance) new homes during the plan period 2021 to 2036;
  - Provide opportunities to deliver a minimum of 32,300 new jobs during the plan period 2021 to 2036 in the city to support the strategic economic and employment ambitions within the city and region;
  - Provide sufficient employment land to support economic growth and job creation;
  - Potential to deliver 5,000 to 6,000 affordable homes depending on make-up of sites;
  - Provide a good range and choice of housing with a 50:50 brownfield/greenfield split;
  - Deliver infrastructure, community facilities and sustainable travel objectives;
  - Respect and enhance the rich and diverse environmental qualities of the city;
  - Recognise the cultural character of the city and promote Welsh language growth and usage wherever possible;
  - Contribute to the delivery of physical and social regeneration opportunities which provide for and reflect a range of diverse and cohesive communities across the city.<sup>25</sup>
- 2.3 The Strategic Policies are structured to align with the three themes and priorities of Cardiff’s vision for the current period of a “Stronger Cardiff”, a “Fairer Cardiff” and a “Greener Cardiff”.<sup>26</sup> There are a total of 22 Strategic Policies proposed within the Draft Replacement Plan. These also shape and enable more tailored Detailed Policies to manage development. Details and descriptions of each policy, together with their reasoned justification based on evidence is included in the Draft Replacement Plan itself.

### 2 Methodology

- 2.4 The assessment method for the Strategic Policies follows the second framework as agreed with the City Client team and as described in Chapter 1. This requires more

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<sup>24</sup> Version – September 2024

<sup>25</sup> Op. Cit. Para. 6.22

<sup>26</sup> OP. Cit. Para. 2.11

granularity and a more nuanced approach to the assessment and a more detailed understanding of how the individual elements of the proposed plan relate to the more detailed themes and outcomes of the Bilingual Cardiff Strategy.<sup>27</sup>

2.5 The overall Bilingual Cardiff Strategy adopts the three strategic themes adopted as part of Cymraeg 2050 and prioritises three outcomes for the period 2022 – 27 with policies and actions aimed at key interventions to achieve progress in these areas. The elements most relevant to the proposed Plan interventions are highlighted:

**Theme 1:** Increase the **number and percentage** of Welsh speakers (in Cardiff)

Outcome 1: The number and percentage of Welsh speakers in Cardiff continues to increase and meets the identified targets to achieve the Welsh Government’s goals of a million Welsh speakers by 2050.

**Theme 2:** Increase the **use** of Welsh (to create a truly bilingual Cardiff)

Outcome 2: The use of the Welsh language significantly increased and **normalised**

**Theme 3:** Creating favourable conditions - creation and maintenance of suitable conditions and an environment where the Welsh language and its speakers can thrive.

Outcome 3: The Welsh language is supported through linguistic planning, **economic development**, digital platforms and **culture**.

2.6 In essence, this framework is based on similar criteria to the more general ISA Assessment Framework but adapted to include an assessment of the future outlook in addition to the current situation. This relates more directly to elements of Theme and Outcome 3 although Housing and Employment Policies may have implications for Theme and Outcome 1 as well, particularly in relation to the relevant policies’ steer on location of development within the city. It also takes on board their relation to existing receptors such as the baselines of higher density Welsh speaking communities recorded in Census 2021 and location of existing Welsh medium secondary and primary schools.

2.7 **Figure 6**, therefore, adopts the ISA framework for judging likely impact of Policies on the existing baseline and anticipated trajectory of growth of the Welsh language. See Appendix 4 for further details.

**Figure 6: Impact of Strategic Policies on achieving Bilingual Cardiff target**

Symbol	Description (likely Impact on Achieving Bilingual Cardiff Target)
++	Major positive compared to “Business as Usual”
+	Minor positive compared to “Business as Usual”

<sup>27</sup> Cardiff City Council (2022) “Bilingual Cardiff Strategy 2022 -27

+/-	Both positive and negative impacts compared to “Business as Usual
0	Neutral
-	Minor Negative compared to “Business as Usual”
--	Major negative compared to “Business as Usual”
?	Uncertainty as to how policy will impact in practice

2.8 The initial commentary on some Policies in earlier assessments – specifically on the likely impact on Outcome 3 - included two scores to illustrate a change in score if a recommended action was accepted or not. The final score reflects the consensus achieved.

- 2.9 The assessment of Strategic Policies (SP’s) has been conducted in eight stages:
- i. A scoping exercise which identified which Strategic Policies should be included or excluded from the assessment. All Strategic Policies were initially assessed to take a view as to whether their contents are likely to have an impact on the ability of Cardiff Council to realise its Bilingual Cardiff vision and target<sup>28</sup> and/or spatial implications in terms of existing receptors. This led to several Strategic policies being scoped out, including all SPs within the Greener Cardiff Theme. This left 11 Strategic Policies.
  - ii. An initial assessment of the Draft Strategic Policies contained in the initial Draft Plan.
  - iii. Circulation of the Initial Draft Assessment for comment within the Client Team and the RLDP Team for internal consultation.
  - iv. Circulation and presentation of Initial Draft Assessment to the Bilingual Cardiff Working Party held on 2 September 2024.
  - v. Consideration of feedback and adaptation of draft report where comments are taken on board.
  - vi. An assessment of further changes contained in the Draft RLDP (September version and subsequent amendments) and production of Round 2 Draft Assessment.
  - vii. Consideration of feedback and adaptation of Round 2 Draft Assessment, and
  - viii. Production of revised final draft Assessment for circulation and comment.

2.10 The relevant Strategic Policies are assessed below:

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<sup>28</sup> The Bilingual Cardiff vision and target is to double the number of Welsh speakers in Cardiff by 2050.

**Theme: Stronger**

SP1: PROVIDING FOR SUSTAINABLE GROWTH		<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>	
Summary of Policy - The plan sets out a strategy to make provision for 26,400 (including a 10% flexibility allowance) dwellings and 32,300 new jobs over the plan period.			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
+/-	+/-	+	<p>Around 80% of the total draft Plan dwelling provision is within the “Completions/Under Construction/Landbank” category leaving the planned “Allocations” category to supply 5,271 dwellings. The “Windfalls” allowance is estimated at 6,202.</p> <p>The increase in the number of <u>allocations</u> up to 2036 is likely to facilitate the trajected increase in the number of Welsh speakers, primarily through increasing the number of pupils aged 3 to 15 benefitting from Welsh medium education. However, the scale of growth is unlikely to facilitate a proportionate increase in the percentage of Welsh speakers nor facilitate the increased use and normalisation of the use of the Welsh language. The opportunity to masterplan the location of the majority of new allocations is likely to facilitate the opportunity to make provision of necessary infrastructure to support the Welsh language.</p>

**1<sup>st</sup> Round RLDP Team Response**

Policy SP1 sets out the growth level for Cardiff for the Plan period to 2036. Is the assessment saying that the level of growth should be higher to achieve Bilingual Cardiff’s mission to double the number of Welsh Speakers in Cardiff by 2050? Would this not be a positive or an unknown rather than a negative? The RLDP is one of many mechanisms to achieve Bilingual Cardiff’s ambition not the only mechanism to support the mission.

**2<sup>nd</sup> Round WLIA Team Response**

The score reflects the likelihood of helping or hindering Outcome 1. We accept that a higher level of growth is more likely to help achieve an increase in numbers (depending on likelihood of the effectiveness of the education strategy). However, the outcome also refers to the percentage of Welsh speakers continuing to increase (doubling) and in our view the higher the level of growth the more it hinders the achievement of that aspect of the outcome.

Outcome 2 has also been changed from – to +/- in light of some evidence that changes over the past few years which suggests that growth has supported an increase in the normalisation of the language but not in the use of the language in everyday life.

**2<sup>nd</sup> Round RLDP Team Response (November)**

Comments noted and amendments accepted.

SP2: SUSTAINING ECONOMIC GROWTH AND RESILIENCE		Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?	
Summary of Policy - Provision will be made for a range and choice of employment sites for different types of employment and in different geographical locations which will effectively contribute towards the delivery of the level of growth set out in the plan			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
+/-	?	+	<p>The increase in the number of jobs up to 2036 is likely to facilitate the trajected increase in the number of Welsh speakers, primarily through increasing the number of pupils aged 3 to 15 benefitting from Welsh medium education.</p> <p>However, the scale of growth is unlikely to facilitate a proportionate increase in the percentage of Welsh speakers nor facilitate the increased use and normalisation of the use of the Welsh language. The opportunity to masterplan the location of the majority of new employment sites is likely to facilitate the opportunity to make provision of necessary infrastructure to support the Welsh language</p>
<b>1<sup>st</sup> Round RLDP Team Response</b>			
Why negative? The alternative is to not allocate the land. Or allocate more?			
<b>1<sup>st</sup> Round WLIA Team Response</b>			
The score reflects the likelihood of helping or hindering Outcome 1 (see WLIA Team response to SP1).			

In terms of outcome 2 whilst our initial score reflected our concern that the scale and location of employment growth might hinder the achievement of Outcome 2 we accept that evidence to support the initial assessment is not robust. We have adapted the score to “uncertain”.
<b>2<sup>nd</sup> Round RLDP Team Response (November)</b> Comments noted and amendments accepted.

SP3: ENSURING A MASTERPLANNING APPROACH		<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>	
<b>Summary of Policy - A master planning approach will be required for both existing and future strategic sites or development including more than 100 homes, or any project involving more than one phase of development</b>			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
0	0	+	<p>The increase in the number of allocations up to 2036 is likely to facilitate the trajected increase in the number of Welsh speakers, primarily through increasing the number of pupils aged 3 to 15 benefitting from Welsh medium education.</p> <p>The stated aim of ensuring the continued provision of local employment opportunities and addressing the geographical employment disparities across the county, within a housing led strategy is unlikely to significantly impact on trajected increase in the number and percentage of Welsh speakers.</p>

			<p>However, the scale of growth is unlikely to facilitate a proportionate increase in the percentage of Welsh speakers nor facilitate the increased use and normalisation of the use of the Welsh language.</p> <p>The opportunity to masterplan the location of the majority of new development is likely to facilitate the opportunity to make provision of necessary infrastructure to support the Welsh language (see SP5).</p> <p>Principle ix. Is welcomed in that it includes requiring developers to the site context <i>“Identify positive, distinctive qualities of place and respond to unique features and opportunities of a location, including heritage, culture and Welsh Language”</i></p>
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>Policy SP3 relates specifically to setting the principles for the masterplanning approach and does not set growth levels? – comments relating to growth relate to policies SP1 and 2. Would this policy in that respect be a neutral as the negatives relate to the growth strategy</p>			
<p><b>1<sup>st</sup> Round WLIA Team Response</b></p> <p>Upon reflection we accept that SP3 relates specifically to setting the principles for the masterplanning approach and the comments relating to impact of the growth level chosen is not relevant to this Policy. However, the scale of housing development, and its phasing, needs for proposals subject to the masterplanning approach to be sensitive to existing and future opportunities for persons to use the Welsh language. This would be helped if the developer identifies at an early stage the baseline scenario and likely evolution of the opportunities for persons to use the Welsh language. This can be made a requirement for those proposals that satisfy the applicable thresholds and criteria of the Town and Country (Environmental Impact assessment) Wales Regulations 2017 by requesting such information (see suggested amendment to SP15).</p> <p>The initial scores reflect the likelihood of helping or hindering Outcomes 1 and 2 (see WLIA Team response to SP1). In terms of outcome 2 whilst our initial score reflected our concern that were the masterplanning approach not to reflect and take on board the requirements to take into consideration the interests of the Welsh language scale the masterplanning approach might indeed hinder the achievement of Outcome 2. The revisions to SP5, SP6 and SP15 will help achieve Outcome 2. We have adapted the score to “neutral”.</p>			

The narrative has been clarified and strengthened in order to reflect the opportunity at Masterplanning Stage to use “conscientious efforts” to satisfy Welsh Language Measure standards 89 and 90.

**2<sup>nd</sup> Round RLDP Team Response (November)**

Comments noted and amendments accepted.

SP5: SECURING NEW INFRASTRUCTURE		Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?	
Summary of Policy - New development will make appropriate provision for, or contribute towards, all essential, enabling and necessary infrastructure required as a consequence of the development			
Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	Outcome 2 The use of the Welsh language significantly increased and normalised	Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	Commentary/Reasoned Justification
0	0	+	<p>SP5 identifies “enhancement measures relating to the Welsh language” as one of the Category 2 areas for necessary infrastructure Whilst accepting that the detail of how this is to be achieved will be the subject of an SPG it is suggested that widening the current description of Category 2 to include social as well as physical facilities (and the examples provided) will help developers better understand how the Welsh language enhancement measures support SP15</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language, an appropriate provision for, or proportion of planning contributions should be negotiated and agreed upon to be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>

<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>Comments Noted.</p>
<p><b>1<sup>st</sup> Round WLIA Team Response</b></p> <p>The score for Outcome 3 has been revised to + The narrative has been clarified and strengthened in order to reflect the opportunity to use SP5 in support of the Council’s duty to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90.</p>
<p><b>2<sup>nd</sup> Round RLDP Team Response (November)</b></p> <p>Comments noted and amendments accepted.</p>

<b>SP 6 SECURING PLANNING OBLIGATIONS</b>		<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>	
<b>Summary of Policy - Planning obligations will be sought to mitigate any impacts directly related to the development</b>			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
0	0	+	<p>The Reasoned Justification of the Policy states that “planning obligations are a means of seeking contributions from developers towards additional demands upon existing services, facilities, infrastructure and the environment as well as negotiating benefits that improve the standard of development proposals by providing necessary infrastructure and community benefits.”</p> <p>Some unanticipated major new developments within or close to areas of higher density Welsh speakers may impact adversely on the linguistic profile of such areas.</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language, an appropriate proportion of planning contributions should be negotiated and agreed upon to be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>

			<p>The suggested addition of reference to the possibility of using planning obligations to mitigate such impact (or enhance benefits) will make clearer the link  “Obligations will be sought from a developer to: Require enhancement and mitigation measures relating to the Welsh Language”.</p>
<p><b>1st Round RLDP Team Response</b></p> <p>Policy amended to refer to enhancement of the Welsh Language. Further detail would be provided in SPG</p>			
<p><b>1st Round WLIA Team Response</b></p> <p>The September version of the RLDP Draft Plan Zero does not contain the suggested amendment If this is an oversight then the score would be revised to +  Suggest adding “including measures relating to offering opportunities for persons to use the Welsh language” to paragraph 2 of reasoned justification. The narrative has been clarified and strengthened in order to reflect the opportunity to use SP6 in support of the Council’s duty to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90.</p>			
<p><b>2nd Round RLDP Team Response (November)</b></p> <p>As this is a generic policy establishing the principle of “Planning Obligations” and the related tests in planning guidance and legislation it is not the intention to include specific reference to the types of infrastructure which may be secured as these are listed in related in Policy SP5 and these two policies should be read together on this basis.</p>			
<p><b>2nd Round WLIA Team Response</b></p> <p>Note the response and reasoning. However, suggest it would be helpful to include cross reference to range of infrastructures listed in Policy SP5 as mitigation. Recommend adding the following sentence to paragraph 2 of the Reasoned Justification.  “The type of mitigation sought may include, but is not limited necessarily, to the types of infrastructures listed in Policy SP5.”</p>			
<p><b>3<sup>rd</sup> Round RLDP Team Response (December)</b></p> <p>Comments noted and amendments accepted.</p>			

SP 7 SUPPORTING PLACE PLANS	<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>		
<b>Summary of Policy - The preparation of community Place Plans ... will be adopted as SPG to promote collaborative action, improve well-being and place making</b>			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
0	0	+	Whilst recognising that Place Plans must work within the LDP policy context, supporting place planning is recognised as having the potential to strengthen linguistic planning, particularly where the local community recognises the language as a current and potential future asset as a route to improved well-being and placemaking
<b>2<sup>nd</sup> Round RLDP Team Response (November)</b>	Comments noted and score accepted. Any specific action?		
<b>2<sup>nd</sup> Round WLIA Team Response</b>	Comments noted and no action required.		

SP10 TOURISM	<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>		
<b>Summary of Policy - Appropriate sustainable tourism developments to build upon Cardiff's role as a capital city and a major tourist, arts, cultural and sporting destination will be supported and promoted where proposals meet with all other relevant LDP policies.</b>			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
0	0	0	<p>The Reasoned Justification of the Policy includes the following statement:</p> <p>“Future Wales emphasises the importance of tourism as part of the foundational economy, which is considered ‘integral to the well-being of places, communities and people and which deliver people’s everyday needs. Whilst making an important contribution to the economy, there is a positive link between tourism and the physical and mental well-being of communities. This is especially enabled through active, green, and cultural forms of tourism.</p> <p>Suggest the addition of “... including Welsh language tourism.” To the end of the last sentence.</p>

<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>WLIA identifies impact as neutral. Reasoned justification amended to include reference to Welsh language tourism.</p>
<p><b>1<sup>st</sup> Round WLIA Team Response</b></p> <p>No Change.</p>

**Theme: Fairer**

SP12: DELIVERING SUSTAINABLE NEIGHBOURHOODS, SOCIAL COHESION AND AFFORDABLE HOUSING		<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>	
<b>Summary of Policy</b> - To ensure liveable, efficient, well balanced and cohesive communities, with improved quality of life and access to employment opportunities and affordable housing, the creation of sustainable neighbourhoods will be promoted and enhanced			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
0	0	+	The draft policy’s criterion v makes reference to “providing facilities that support the Welsh Language...”. This will support linguistic planning.
<b>1<sup>st</sup> Round RLDP Team Response</b>			

<p>WLIA doesn't propose any changes to the policy. Comments noted.</p>			
<p><b>1<sup>st</sup> Round WLIA Team Response</b></p> <p>No Change.</p>			
<p>SP13: SECURING HEALTH AND WELLBEING AND RESILIENCE</p>		<p><b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b></p>	
<p>Summary of Policy - Cardiff will be made a more attractive, sociable, active, welcoming and happier places to live. It will seek to promote economic, social, cultural and environmental benefits and reduce health and wellbeing inequalities through creating accessible and healthy environments</p>			
<p><b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets</p>	<p><b>Outcome 2</b> The use of the Welsh language significantly increased and normalised</p>	<p><b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture</p>	<p><b>Commentary/Reasoned Justification</b></p>
<p>0</p>	<p>0</p>	<p>+</p>	<p>Whilst the draft policy focuses on the role of development and people's health and well-being suggest placing this in the wider social, economic, environmental, cultural context of the Well-being of Future Generation's seven well-being goals.</p>
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>Comments noted however the RLDP is set within the wider social, economic, environmental and cultural context of the Well Being of Future Generations seven wellbeing goals. This policy specifically relates to development and people's health and wellbeing.</p> <p>No change proposed.</p>			

<b>1<sup>st</sup> Round WLIA Team Response</b>			
No Change			
SP14: PROTECTING AND ENHANCING BUILT HERITAGE AND CULTURE		<b>Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?</b>	
<b>Summary of Policy - Cardiff's distinctive heritage assets will be protected, managed and enhanced</b>			
<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	<b>Commentary/Reasoned Justification</b>
0	0	0	The WLIA Team originally suggested that the Reasoned Justification for the Policy included an expectation that all Heritage Impact Assessments include an assessment of the asset's historical, national or communal value to the Welsh language and culture, where relevant.
<b>1<sup>st</sup> Round RLDP Team Response</b>			
Policy SP 13 relates to providing the strategic protection to the Historic Environment. Development Management considerations are dealt with in Policy HE1 which refers to the need for Heritage Impact Assessments. No change proposed.			
<b>1<sup>st</sup> Round WLIA Team Response</b>			
Accept - it is more appropriate that the issue is addressed through Development management policy. Change score to 0.			

SP15: SECURING AND ENHANCING OPPORTUNITIES TO GROW THE WELSH LANGUAGE		Will the Strategic Policy facilitate/hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?	
Summary of Policy - Cardiff's distinctive heritage assets will be protected, managed and enhanced			
Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	Outcome 2 The use of the Welsh language significantly increased and normalised	Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	Commentary/Reasoned Justification
+	+	+	<p>Suggest the following title to the Policy</p> <p><b>“SECURING AND ENHANCING OPPORTUNITIES TO GROW THE WELSH LANGUAGE”</b></p> <p>Suggest the following additional paragraph.</p> <p>The 'Well-being of Future Generations (Wales) Act 2015' requires public bodies throughout Wales named in the act to work towards achieving seven well-being goals, including 'A Wales of vibrant culture and a thriving Welsh language'. The Welsh Government has a duty to promote and facilitate the use of the Welsh language and to work towards achieving the well-being goals.</p> <p>The 'Cymraeg 2050' strategy sets the targets of creating a million Welsh speakers by 2050 and increasing the percentage of the population who speak Welsh every day and who are able to speak more than a few words of Welsh to 20% by 2050.</p>

			<p>Creating sustainable places through placemaking also embraces creating and sustaining communities that enable the Welsh language to thrive.</p> <p><b>And following additions/amendments after paragraph 3.</b></p> <p>As described in the Welsh language technical paper, whilst the Welsh language featured strongly as a feature of the 19th century growth of Cardiff as a trading port, the English language became the dominant language of the City’s public and social life during the twentieth century. The language’s health and vitality only started to reverse its fortunes from the 1970’s onwards due to the growth of the use of the language in education and broadcasting.</p> <p>According to the 2021 Census, Cardiff is the local authority with the third largest number of speakers in Wales who understand, read and write Welsh, and one of the few areas to see growth in the past decade, so the numbers, ages and concentration of Welsh speakers here are significant to the growth of the language over the development plan period. The Annual Population Survey (for the year ending June 2024) also indicates that Cardiff now has the third largest number of speakers of the language (at 80,600) out of all Welsh local authorities. The focus of this policy will therefore be on speaker numbers rather than percentage and on increasing opportunities to use the language in the city.</p> <p>“Where the proposed development meets the minimum threshold and criteria for an Environmental Impact Assessment under Schedule 2.b.10 ii and iii (Urban Development) of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 the Environmental Statement on the likely significant effects and impact on the baseline scenario and likely evolution of the population factors must include the likely effects on the opportunities on the use of the Welsh language. Further guidance will be developed in the Welsh language Supplementary Planning Guidance.”</p>
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<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>Written justification includes the text.</p>
<p><b>1<sup>st</sup> Round WLIA Team Response</b></p> <p>Welcome the amendments.</p> <p>Following further consideration and assessment of current proposals (e.g. Cardiff Peninsula, South of Creigiau) it is apparent that there is a lack of current guidance to developers in Cardiff of the need to consider likely impact of major proposals on the opportunities for persons to use the Welsh language. Where the development meets the applicable threshold and criteria it is suggested that an additional paragraph is included in the Reasoned Justification to the policy.</p>
<p><b>2<sup>nd</sup> Round RLDP Team Response (November)</b></p> <p>Comments noted and amendments accepted.</p>
<p><b>2<sup>nd</sup> Round WLIA Team Response</b></p> <p>The additional narrative is included in the final Draft Plan.</p>

### 3 Summary of Welsh language impact appraisal of Strategic Policies

	Bilingual Cardiff Outcomes		
Strategic Policy	Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	Outcome 2 The use of the Welsh language significantly increased and normalised	Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture
<b>STRONGER</b>			
SP1	+/-	+/-	+
SP2	+/-	?	+
SP3	?	?	+
SP5	0	0	+
SP6	0	0	+
SP7	0	0	+
SP9	0	0	0
<b>FAIRER</b>			
SP12	0	0	+
SP13	0	0	+
SP14	0	0	0
SP15	+	+	+

**Table 2: Changes resulting from appraisal of the Draft RLDP Strategic Policies**

<b>RLDP Policy</b>	<b>Change proposed by WLIA Team</b>	<b>RLDP Team response to proposed change</b>
<b>SP2</b>	Revise O2 to?	Amendments accepted
<b>SP3</b>	Revise O1 and O2 to?	Amendments accepted
<b>SP5</b>	Revise O3 to +	Amendments accepted
<b>SP6</b>	Revise O3 to +	Amendments accepted
<b>SP7</b>	Commentary and scores on New Draft Policy	Accepted
<b>SP14</b>	Revise O3 to 0	Amendments accepted

## Chapter 3: Welsh language Impact Assessment of Detailed Development Policies

### 1 Introduction

- 3.1 This chapter contains the WLIA assessment of the proposed relevant detailed policies within the Deposit Replacement Local Development Plan 2021 – 36. The Detailed Development Policies are a more tailored level and set of policies which work within the Strategic Policies framework and their main role is to provide a framework by which planning decisions are made.
- 3.2 This assessment is confined to the policies scoped in as described in Chapter 1. In addition, the iterative process of the assessment has resulted in the following additional policies being scoped out:
- Policy EC4A - Alternative Use of Protected Employment Land and Premises
  - Policy R3 – Protected Shopping Frontages.

### 2 Methodology

- 3.3 As discussed, the key criterion for the Impact Assessment Framework of the overall Plan is:

*The extent to which the Plan's development policies and proposals would facilitate or impede the city of Cardiff's ability to realise the Bilingual Cardiff's mission statement which is to double the number of Welsh speakers in Cardiff by 2050. ("Bilingual Cardiff").<sup>29</sup>*

- 3.4 The focus of the first framework is on assessing if, and how, the Plan's overall strategy for the scale and growth of the city, and in particular housing and jobs, will impact on the projected growth of the numbers and percentage of Welsh speakers based on the number of persons aged 3 and over able to speak Welsh recorded at each ten-year Census.
- 3.5 The assessment method for the more detailed relevant Development Policies and Development Management Policies follows the second framework as agreed with the City Client team and as described in Chapter 1. This requires more granularity and a more nuanced approach to the assessment and a more detailed understanding of how the individual elements of the proposed plan relate to the more detailed themes and outcomes of the Bilingual Cardiff Strategy.
- 3.6 The overall Bilingual Cardiff Strategy adopts the three strategic themes adopted as part of Cymraeg 2050 and prioritises three outcomes for the period 2022 – 27 with policies and actions aimed at key interventions to achieve progress in these areas. The elements most relevant to the proposed Plan interventions are highlighted:

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<sup>29</sup> Cardiff City Council (2022) "Bilingual Cardiff Strategy 2022 -27

**Theme 1:** Increase the **number and percentage** of Welsh speakers (in Cardiff)

Outcome 1: The number and percentage of Welsh speakers in Cardiff continues to increase and meets the identified targets to achieve the Welsh Government’s goals of a million Welsh speakers by 2050.

**Theme 2:** Increase the **use** of Welsh (to create a truly bilingual Cardiff)

Outcome 2: The use of the Welsh language significantly increased and **normalised**

**Theme 3:** Creating favourable conditions - creation and maintenance of suitable conditions and an environment where the Welsh language and its speakers can thrive.

Outcome 3: The Welsh language is supported through linguistic planning, **economic development**, digital platforms and **culture**.

- 3.7 In essence, this framework is based on similar criteria to the more general ISA Assessment Framework but adapted to the future outlook in addition to assessing impact on the current linguistic situation. This relates more directly to elements of Theme and Outcome 3 although Housing and Employment Policies may have implications for Theme and Outcome 1 as well, particularly in relation to the relevant policies’ steer on location of development within the City and their relation to existing baselines of higher density Welsh speaking communities.
- 3.8 **Figure 7**, therefore, adopts the ISA framework for judging likely impact of Policies on the existing baseline and anticipated trajectory of growth of the Welsh language.

**Figure 7: Impact of Development Policies on achieving Bilingual Cardiff target**

Symbol	Description (likely Impact on Achieving Bilingual Cardiff Target)
++	Major positive compared to “Business as Usual”
+	Minor positive compared to “Business as Usual”
+/-	Both positive and negative impacts compared to “Business as Usual”
0	Neutral
-	Minor Negative compared to “Business as Usual”
--	Major negative compared to “Business as Usual”
?	Uncertainty as to how policy will impact in practice

- 3.9 The initial commentary on some Policies in earlier assessments – specifically on the likely impact on Outcome 3 - included two scores to illustrate a change in score if a

recommended action was accepted or not. The final score reflects the consensus achieved.

- 3.10 The assessment of development policies has been conducted in eight stages:
- i. A scoping exercise which identified which development policies should be included or excluded from the assessment. In essence, the development policies were first assessed in terms of whether they were likely to have significant effects on the Bilingual Cardiff mission and outcomes and scoped out if not. This led to 57 of the 80 policies at the time being scoped out. The remaining 23 detailed policies were then tested for likely effects on the Welsh language in terms of the above scoring framework.
  - ii. An initial assessment of each of the development policies contained in the April version of the Draft Plan.
  - iii. Circulation of the Initial Draft Assessment for comment within the Client Team and the RLDP Team for internal consultation.
  - iv. Circulation and presentation of Initial Draft Assessment to the Bilingual Cardiff Working Party held on 2 September 2024
  - v. Consideration of feedback and adaptation of draft report where comments are taken on board.
  - vi. An assessment of further changes contained in the Draft RLDP (September version and subsequent amendments) and production of Round 2 Draft Assessment.
  - vii. Consideration of feedback and adaptation of Round 2 Draft Assessment
  - viii. Production of revised final draft Assessment for circulation and comment.
- 3.11 The relevant development policies are assessed below:

<b>HOUSING</b>						
<b>Policy H1.A: Strategic Housing Sites</b>			<b>Impact – help/impede the Bilingual Themes</b>			<b>Commentary/Reasoned Justification</b>
<b>Summary of Context</b> - These sites are either allocated for housing or residuals of existing allocations for Strategic Sites (see WLIA of Strategic Sites.) Most of these sites are rolled over from LDP1 and were assessed for Welsh language impacts as part of the production of that Plan. The assessment of these sites is contained within the assessment of major sites.						
<b>Policy Number</b>	<b>Title</b>	<b>Description</b>	<b>Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets</b>	<b>Outcome 2 The use of the Welsh language significantly increased and normalised</b>	<b>Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture</b>	
<b>See assessment of Major Sites</b>						

<b>Policy H1.B: Non-Strategic Sites</b>			<b>Impact – help/impede the Bilingual Themes</b>			<b>Commentary/Reasoned Justification</b>
<b>Summary of Context</b> - These sites are allocated in the proposed RLDP in order to secure the protection of the land for its future use for the provision of housing.						
<b>Policy Number</b>	<b>Title</b>	<b>Description</b>	<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	
<b>See assessment of Major Sites</b>						

Policy H2: Housing Led Regeneration Areas		Impact – help/impede the Bilingual Themes			Commentary/Reasoned Justification
<b>Summary of Context</b> - This policy proposes the designation of fourteen housing led regeneration areas, which are identified on the proposals map. They represent areas of land that are either vacant, under used or the subject of redevelopment proposals, or have future potential to provide an opportunity for high density, sustainable, mixed -use development.					
Site Number	Title Description	Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	Outcome 2 The use of the Welsh language significantly increased and normalised	Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	
H2.1	International Sports Village (ISV) Site Size 5ha. Up to 1000 dwellings	0	0	+	<p>The dwelling units planned for this site form part of a long-term regeneration strategy for this area focused on the provision of water sports facilities (white water, ice arena and swimming pool) together with shops restaurants, offices and tourist accommodation</p> <p>The ISV Masterplan and Outline Planning Application (September 2024) involves the development of 202,000 gross square metres and the construction of 15 new buildings. It includes a residential quarter of just over 1000 homes incorporating a mix of townhouses, apartments and family</p>

				<p>homes in five high rise buildings. Together with accommodation for senior living.</p> <p><b>Baseline</b></p> <p>Grangetown Electoral Ward recorded 3,268 with any Welsh language skills in the 2021 Census representing 16.41% of the population aged 3+.</p> <p>The higher density cluster of Welsh speakers is concentrated towards the north and middle of Grangetown ward and is some distance from the ISV and physically separated by the A4232 Grangetown link road.</p> <p>It is unlikely to have significant impact on the existing cluster of Welsh speakers.</p> <p>In the longer term the development may have significant impact on the Welsh medium education provision.</p> <p>The site is within the following education catchment areas</p> <p>Welsh medium primary catchment - Ysgol Gymraeg Hamadryad provides primary education for pupils from the Bay area (parts of Grangetown and</p>
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				<p>Butetown. PLASC data records 333 pupils for January 2024. with 21% of pupils coming from Welsh speaking homes.</p> <p>English medium primary catchment areas - Grangetown Primary School (PLASC Jan Data 335 pupils) St Paul’s Primary School (Church in Wales) (PLASC Jan data – 180 pupils)</p> <p><b>Assessment</b></p> <p>The outline planning application will be assessed against the current adopted plan – this has no policy in relation to likely impact on the Welsh language.</p> <p>The precise housing mix of the new development is not known at the time of this assessment but is considered likely to yield significant need for either the expansion of existing Welsh and English medium provision or, in combination with the Roath Dock (H2.3) and Porth Teigr/Alexandra Head (H2.4) regeneration areas, a need for new nursery and primary provision. The proximity of the area to the City’s south-west boundary suggests considering the possibility also of working with the Vale of Glamorgan Council - to scope possible future new</p>
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					<p>Welsh medium secondary provision that could cater also for the nearby communities of Llandochau (Llandough) and Penarth - as an avenue worth exploring further.</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
H2.2	Whitchurch Hospital/Velindre Site Site size 26 ha. Up to 410 dwellings	+/-	?	+	<p>This site, together with H1.9 (Whitchurch Hospital formed part of a psychiatric hospital that closed in 2016. The site lies north of off Whitchurch at the junction between Velindre Road and Park Road ac occupies around 4 hectares.</p> <p>The site is within the Whitchurch and Tongwynlais Electoral Ward.</p> <p>The Welsh medium primary and secondary schools. (Ysgol Melingruffydd is within 500 metres of the allocation site). This assesses the</p>

					<p>allocation for likely effects on existing clusters of Welsh speakers and Welsh-medium primary schools.</p> <p><b>Baseline</b></p> <p>The likely impact area includes an important (medium density) cluster of existing Welsh speakers within the catchment area which includes Whitchurch and Tongwynlais.</p> <p>Whitchurch and Tongwynlais 2021 Census records 3645 residents aged 3 and over having any Welsh language skills representing some 23.7% of the relevant population.</p> <p>Radyr and Morganstown 2021 Census records 1050 residents aged 3 and over having any Welsh language skills representing some 17.99% of the relevant population</p> <p>Ysgol Melingruffydd - The school has 467 pupils on roll (2024) (344 of statutory school age) with 52.9% of pupils coming from homes where Welsh is the main language. The figures broadly remain the same as they were reported at the previous inspection in 2015.</p>
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					<p>Whitchurch Primary and Whitchurch High schools are also located close by.</p> <p><b>Assessment</b></p> <p>With up to 410 dwellings the sites are likely to have significant impacts on the percentage of existing clusters of Welsh speakers unless the risk is mitigated and opportunities to promote the Welsh language enhanced</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
H2.3	Cardiff Gate Business Park (West) Site size 6.4 ha. Estimated units up to 200	0	0	+	<p>The Cardiff Gate Business Park (West) site lies adjacent to Strategic Site F (see assessment of Major Sites).</p> <p>It is noted that the Taylor Wimpey permission referred in the assessment of Strategic Site F) includes contributions towards a new nursery</p>

					<p>and 2FE primary school and 10FE secondary school</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language then should the site be assessed against the new RLDP planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision</p>
H2.4	<p>Roath Dock North Side</p> <p>Site Size 3.67 ha. Estimated units up to 316</p>	0	0	+	<p>Roath Dock was opened in 1887 and designed to handle ships importing goods as well as exporting coal,</p> <p>The proposed regeneration of the North site forms part of the long-term regeneration of Cardiff Bay and is intended to accommodate a total of 316 dwellings.</p> <p><b>Baseline</b></p> <p>The North Dock site lies adjacent to the Butetown/Splott electoral wards. Butetown Ward recorded 1,659 with any Welsh language skills in the 2021</p>

					<p>Census representing 14.4% of the population aged 3+.                  Splott Ward recorded 2,061 with any Welsh language skills in the 2021 Census representing 15.14% of the population aged 3+.</p> <p>Ysgol Glan Morfa is a Welsh medium primary school drawing pupils primarily from the Splott area. At the time of the publication of the last Estyn report in 2017 it had 212 pupils on roll, including 33 part-time nursery age children (Estyn 2017). It is understood that by 2022 it had 263 pupils on roll + 48 part time nursery. The Estyn report notes that only a few pupils come from Welsh speaking homes.</p> <p>Moorland is an English medium primary school near Moorland Park in Splott. It provides for 467 pupils, including 64 who attend the nursery part time (Estyn 2018).</p> <p><b>Assessment</b></p> <p>With up to 316 dwellings allocated for this redevelopment site it is unlikely that the allocation on its own will have a major significant impact on the baseline of Welsh speakers but may have a significant impact on neighbouring primary schools.</p>
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					<p>However, in combination with the ISV (H2.1) and Porth Teigr/Alexandra Head (H2.4) regeneration areas, it may generate a need for new nursery and primary provision for the Cardiff Bay Area and in the future new secondary education provision.</p> <p>As the site will have over 100 units it's development site will be subject to SP3 Ensuring a Masterplanning Approach. To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language. In accordance with Strategic Policy SP5 (securing new infrastructure) planning obligations, where possible, should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
H2.5	Porth Teigr and Alexandra Head Site Size 27 ha. Estimated units up to 2,310	?	?	+	<p>The dwelling units planned for this site form part of a long-term housing-led regeneration strategy for this area. No information available at the time of the assessment to understand the development proposed and mix.</p>

					<p><b>Baseline</b></p> <p>The Porth Teigr/Alexandra Dock Head site is located in the Butetown electoral ward. Butetown Ward recorded 1,659 persons with any Welsh language skills in the 2021 Census representing 14.4% of the population aged 3+.</p> <p>It is unlikely to have significant impact on the existing cluster of Welsh speakers.</p> <p>In the longer term the development may have significant impact on the Welsh medium education provision.</p> <p>The site is within the following education catchment areas:          Welsh medium primary catchment - Ysgol Gymraeg Hamadryad lies approximately 1 km to the west of the site albeit separated by the Grangetown Link Road and provides primary education for pupils from the Bay area (parts of Grangetown and Butetown). PLASC data records 333 pupils for January 2024. with 21% of pupils coming from Welsh speaking homes.</p>
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					<p>To the north-east of the site, some 1.5 km in distance, is located Ysgol Glan Morfa again separated by the Grangetown Feeder. Ysgol Glan Morfa draws its pupils primarily from the Splott area. At the time of the publication of the last Estyn report in 2017 it had 212 pupils on roll, including 33 part-time nursery age children (Estyn 2017). It is understood that by 2022 it had 263 pupils on roll (48 part time nursery. The Estyn report notes that only a few pupils come from Welsh speaking homes.</p> <p>Moorland is an English medium primary school near Moorland Park in Splott. It provides for 467 pupils, including 64 who attend the nursery part time (Estyn 2018).</p> <p>English medium primary catchment area - Mount Stuart Primary School (PLASC Jan Data 305 pupils)</p> <p>Other primary schools within proximity but outside the catchment area include</p> <p>St. Cuthberts (RC) – 110 pupils (PLASC Data Jan 2024)</p> <p>St. Mary the Virgin (C/W) 145</p> <p>St Paul's(C/W) 180</p>
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					<p>Moorland primary school near Moorland Park in Splott - 310 pupils (PLASC Data Jan 2024).</p> <p><b>Assessment</b></p> <p>The allocation of up 2,310 dwellings for this regeneration site is highly likely to yield a requirement for new nursery and primary education provision and may have a significant impact on neighbouring Welsh and English medium primary schools.</p> <p>The precise housing mix of the new development is not known at the time of this assessment but although the preliminary assumption is that a high proportion of the development is likely to be one bedroom apartments it is likely to yield significant need for either the expansion of existing Welsh and English medium provision or, in combination with the ISV regeneration area(H2.1) , the need for new nursery and primary provision and possibly secondary education provision.</p> <p>The site meets the criteria to satisfy SP3 Ensuring a Masterplanning Approach.</p>
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					To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or that the policy has less adverse effects on the opportunities for persons to use the Welsh language, in accordance with SP5, planning contributions should, where possible, be used towards necessary infrastructure in support of the expansion of future Welsh language provision.
H2.6	Hadfield Road/Sloper Road Site Size 4.8 ha. Estimated Units up to 200.	+/-	?	+	<p>The site lies at the corner of Bessemer Road and Hadfield Road within the Grangetown Electoral Ward and forms part of a wider regeneration area.</p> <p><b>Baseline</b></p> <p>Grangetown Electoral Ward recorded 3,268 speakers with any skill in the 2021 Census representing 16.41% of the population aged 3+.</p> <p>The site is within the following catchment areas</p> <p>Welsh medium primary catchment - Ysgol Cymraeg Pwll Coch provides primary education for a wide and varied area which includes</p>

					<p>Grangetown, Riverside and parts of Canton, Butetown, Pontcanna and Victoria Park. The number of pupils on roll (NOR) is 324 . A little under 25% of pupil speak Welsh at home (Estyn December 2024)</p> <p>English medium primary catchment - Ninian Park Primary School (NOR 440 PLASC January 2024)</p> <p>Welsh medium secondary – Ysgol Glan Taf English medium secondary – Fitzalan.</p> <p><b>Assessment</b></p> <p>With up to 200 dwelling allocated for this redevelopment site it is unlikely that the allocation on its own will have a major significant impact on the baseline of Welsh speakers but may have a significant impact on neighbouring primary schools.</p> <p>The development of the site will be subject to SP3 Ensuring a Masterplanning Approach. To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not</p>
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					<p>have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language</p> <p>planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision</p> <p>In accordance with SP5, planning contributions should, where possible, be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
H2.7	Callaghan Square	?	?	+	<p>Allocation assessed for WL impact in combination with other strategic and non-strategic allocations as part of LDP1.</p> <p>As at Census Day (28 March 2021) there were no houses completed within Strategic Site A and therefore no record of population resident within the allocation.</p> <p>One of two sites that lie to the south of the Central Station.</p> <p>It is unclear what impact the proposal will have on Bilingual Cardiff ambitions. Major Mixed Use new housing development (whether greenfield or brownfield) provide an opportunity to</p>

					<p>help accelerate the supply of Welsh language Forms of Entry in order to reach the operational target of 27% of 5-year-olds being taught through medium of Welsh by 2032.</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision</p> <p>In accordance with SP5, planning contributions should, where possible, be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
<p><b>2<sup>nd</sup> Round RLDP Team response</b></p> <p>Need to clarify differences in scoring.</p>					
<p><b>2<sup>nd</sup> Round WLIA Team response</b></p> <p>The differences in scoring reflect either the principle of the development of the site for housing has already been subject to WLIA assessment conducted as part of the adopted LDP or the relative importance of the perceived impact on existing density of Welsh speakers or Welsh medium schools in the</p>					

individual zones of influence. The importance of including an assessment of the likely impact on the existing clusters of medium density Welsh speakers or Welsh medium schools is addressed in the Chapter on Methodology.

**Policy H3: Affordable Housing**

**Summary of Context** - The aim of this Policy is to assist the Council to meet evidenced housing need by seeking an appropriate affordable housing contribution from new residential developments in the city. The draft Cardiff Local Housing Market Assessment (which is pending the Welsh Government approval process) estimates an average annual overall additional net affordable housing need of 1,198 per annum over the 15-year plan period to 2036. This estimate is split between 790 per annum social rent and 308 per annum intermediate rent/Low-Cost Home Ownership. The delivery of sites through the planning system is only one of a variety of means to achieving a supply of affordable housing. The Policy applies to all proposed housing developments covered by the policy thresholds, including proposals on previously undeveloped land, redevelopment schemes, schemes providing specialised accommodation (except those in which residents require a significant element of care), conversions, changes of use, and mixed-use developments containing housing. The Council will provide evidence of need based upon the latest Cardiff Local Housing Market Assessment Update, supplemented by current Council and Registered Social Landlord waiting lists and other relevant information. The Cardiff LDP Housing requirement (Table 2 of the Draft RLDP) helps identify what scale of contribution is expected of the Planning system towards meeting the AH need (of 1098 per annum).

Allocations 5,281 (352 a year)

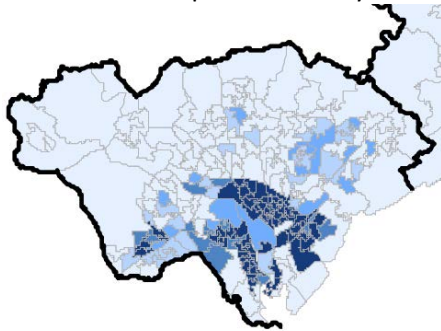
Windfall Allowances 6,202 (413 a year)

Residential Conversions 111 (+7 a year)

Total 11,594 (773 a year)

With AH contributions on new sites expected to be between 20 and 30 % this suggests that AH contributions on new consents will provide between 155 and 232 units per annum.

			<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
H3	Affordable Housing	AH contributions on 5+ sites	?-	?	+	<p>Welsh language skills are not a factor in identifying evidenced housing need and in influencing the choice of occupiers of new affordable housing.</p> <p>In the absence of additional evidence, the profile of occupiers of new affordable is unlikely to be</p>

						<p>significantly different to that of new housing in general (allocations, conversions and windfall).</p> <p>The Housing Dimension of the Welsh Index of Multiple Deprivation 2019 for Cardiff indicates that most of the 30% more deprived areas of the city are in the southern part of the city.</p>  <p>The 2021 Census Data on Welsh language Skills by spatial deprivation suggests a significant correlation between Welsh language ability and area deprivation with persons aged 3 or over in the 40% of most deprived areas being less likely to have Welsh language skills in 2021.</p> <table border="1" data-bbox="1393 1072 1908 1359"> <thead> <tr> <th>Deprivation Fifth</th> <th>Can speak Welsh</th> <th>Cannot speak Welsh</th> </tr> </thead> <tbody> <tr> <td>Cardiff Total</td> <td>12.2</td> <td>87.8</td> </tr> <tr> <td>Least Deprived</td> <td>15.4</td> <td>84.6</td> </tr> <tr> <td>Next Least Deprived</td> <td>14.1</td> <td>85.9</td> </tr> <tr> <td>Middle</td> <td>12.7</td> <td>87.3</td> </tr> <tr> <td>Next Most Deprived</td> <td>10.4</td> <td>89.6</td> </tr> <tr> <td>Most Deprived</td> <td>8.6</td> <td>91.4</td> </tr> </tbody> </table>	Deprivation Fifth	Can speak Welsh	Cannot speak Welsh	Cardiff Total	12.2	87.8	Least Deprived	15.4	84.6	Next Least Deprived	14.1	85.9	Middle	12.7	87.3	Next Most Deprived	10.4	89.6	Most Deprived	8.6	91.4
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						<p>The Census 2021 information on Welsh language Skills by Tenure also suggests residents in the rented sector are less likely to have Welsh language skills.</p> <table border="1" data-bbox="1391 347 2011 555"> <thead> <tr> <th>Tenure of household</th> <th>Can speak Welsh</th> <th>Cannot speak Welsh</th> </tr> </thead> <tbody> <tr> <td>Rented: Social rented</td> <td>6.9</td> <td>93.1</td> </tr> <tr> <td>Owned: Owns outright</td> <td>10.0</td> <td>90.0</td> </tr> <tr> <td>Private rented or lives rent free</td> <td>10.6</td> <td>89.4</td> </tr> <tr> <td>All Residents Aged 3+ in Households</td> <td>12.4</td> <td>87.6</td> </tr> <tr> <td>Owned: Owns with a mortgage or loan or shared owner</td> <td>18.1</td> <td>81.9</td> </tr> </tbody> </table> <p>Comparing the results of the 2011 and 2021 data on Welsh language Skills by Tenure by Household Reference Person (HRP) also confirms that the growth in Welsh language skills in all the sectors is driven by dependent children acquiring Welsh language ability through education rather than reproduced in the home.</p> <table border="1" data-bbox="1391 866 2011 1042"> <thead> <tr> <th>Tenure of household reference person (HRP)</th> <th colspan="2">Can speak Welsh</th> </tr> <tr> <th></th> <th>2011</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Rented: Social rented</td> <td>5.7</td> <td>2.3</td> </tr> <tr> <td>Owned: Owns outright</td> <td>11.3</td> <td>8.6</td> </tr> <tr> <td>Private rented or lives rent free</td> <td>11.9</td> <td>9.1</td> </tr> <tr> <td>Owned: Owns with a mortgage or loan or shared ownership</td> <td>14.3</td> <td>14.0</td> </tr> </tbody> </table> <p>Creating favourable conditions for the Welsh language to thrive can be strengthened by seeking contributions towards Welsh language support and provision (in accordance with SP5 Category 2 (necessary infrastructure making development acceptable) and SP6 securing planning obligations.</p>	Tenure of household	Can speak Welsh	Cannot speak Welsh	Rented: Social rented	6.9	93.1	Owned: Owns outright	10.0	90.0	Private rented or lives rent free	10.6	89.4	All Residents Aged 3+ in Households	12.4	87.6	Owned: Owns with a mortgage or loan or shared owner	18.1	81.9	Tenure of household reference person (HRP)	Can speak Welsh			2011	2021	Rented: Social rented	5.7	2.3	Owned: Owns outright	11.3	8.6	Private rented or lives rent free	11.9	9.1	Owned: Owns with a mortgage or loan or shared ownership	14.3	14.0
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<p><b>1<sup>st</sup> Round RLDP Team response</b></p>																																										

<p>Purpose of this Policy is to set the level of Affordable Housing contributions –it is not considered that the Policy would have an impact on the Outcomes. No changes proposed.</p>
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Upon re-reading the policy we accept that the link between the level of affordable housing contribution and impact on the Welsh language is tenuous. The differentiation between the level of contributions between brownfield sites and greenfield sites is noted and understood. However, such level of contributions is likely to make it more difficult to secure planning obligation contributions (including Welsh language infrastructure contributions) in other ways in both brownfield and greenfield sites. We have thus changed the score on O1 to unknown (?).</p>
<p><b>2<sup>nd</sup> Round RLDP Team response</b></p> <p>Comments noted.</p>

<b>Policy H4 and H5: Conversions to Flats and HMOs</b>						
<p><b>Summary of Context</b> - The subdivision of a building into smaller residential units can be a sustainable form of development as it gives a new lease of life to buildings which might be redundant or economically unviable. The subdivision of existing residential buildings into smaller residential units can be an important source of housing.</p> <p>The conversion of empty space above shops to residential use provides a valuable contribution to the city’s housing stock and provides much needed homes. It also positively contributes to the creation of vibrant, mixed-use communities where people live and shop. Policy H5 identifies areas and small streets where there are concerns of overconcentration of HMO.</p>						
			<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
H3	Conversion to Flats	Describes the strict criteria where conversions to flats could be permitted	0	0	0	As described above most potential conversions to flats derive from subdivision of exiting C3 use or from conversion of empty space above ground level shops. The property size requirement for making conversions acceptable makes it highly unlikely that these policies will significantly impact existing locations and future patterns of Welsh language growth and its locations, within Cardiff, either from individual consents or cumulatively.
H4	Houses in Multiple Occupation	Describes the strict criteria where conversions to HMO’s could be permitted	0	0	0	

<b>1<sup>st</sup> Round RLDP Team response</b>						
H3 and 4 are assessed as having a neutral impact with no changes proposed. Points relating to creating the favourable conditions is included in the relevant policies elsewhere and does not need to be duplicated here. No changes required.						
<b>1<sup>st</sup> Round WLIA Team response</b>						
Agreed – sentence above deleted.						

<b>Policy H8: Change of use of Residential Land or Properties</b>						
<b>Summary of Context</b> - This Policy provides a framework for the assessment of applications for the change of use, conversion or redevelopment of redundant previously developed land and premises outside the Central and Bay Business areas and District and Local Centres and the circumstances in which they will be permitted.						
ID	Title	Brief Summary	Outcome 1	Outcome 2	Outcome 3	Commentary/Reasoned Justification and Suggested Actions
H8	Change Of Use or Redevelopment to Residential Use on Unallocated Sites (outside Central and Bay Business Areas)	Change of use of redundant premises or redevelopment of redundant previously developed land for residential use or mixed-use development	?	?	+	Creating favourable conditions for the Welsh language to thrive can be strengthened by seeking contributions towards Welsh language support and provision in accordance with Policy SP5 Criteria iv., to support Welsh language provision by providing or improving Welsh language community infrastructure. Policy makes reference to SP5.
<b>1<sup>st</sup> Round RLDP Team response</b>						
Policy sets out the criteria for the change of use or redevelopment– points relating to creating the favourable conditions and contributions is included in the relevant policies elsewhere and does not need to be duplicated here. No changes proposed.						

<b>1<sup>st</sup> Round WLIA Team response</b>						
Comments noted.						
<b>Policy H9: Change of use or redevelopment to residential use on unallocated site</b>						
<b>Summary of Context</b> - This Policy provides a framework for the assessment of applications for the change of use or redevelopment of redundant previously developed land and premises for residential use or mixed-use development that includes housing on unallocated sites for residential purposes within settlement boundaries, in recognition of the valuable contribution windfall sites make in meeting housing needs. It is aimed at ensuring that where necessary, land retains its existing use; land that is no longer required for its existing or former use contributes to meeting housing requirements, and new residential accommodation and environments are well-designed, environmentally sound and make a significant contribution to promoting community regeneration and improving the quality of life.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
H9	Change Of Use or Redevelopment to Residential Use on Unallocated Sites	Change of use of redundant premises or redevelopment of redundant previously developed land for residential use or mixed-use development	?	?	+	<p>Creating favourable conditions for the Welsh language to thrive can be strengthened by seeking contributions towards Welsh language support and provision in accordance with Policy SP5 Criteria iv., to support Welsh language provision by providing or improving Welsh language community infrastructure.</p> <p>Suggest the addition of the following</p> <p>Criterion (iv) is intended to ensure that any significant impact on neighbouring communities has been taken into consideration. In the case of major windfall sites, the proposal</p>

						must also demonstrate that it satisfies the requirements of SP15 and WL1 in relation to understanding the impact on current and future opportunities to grow the Welsh language and identifying and responding to opportunities for enhancement and mitigation measures
<p><b>1<sup>st</sup> Round RLDP Team response</b>                  Policy sets out the criteria for the change of use or redevelopment– points relating to creating the favourable conditions and contributions is included in the relevant policies elsewhere and does not need to be duplicated here. No changes proposed.</p>						
<p><b>1<sup>st</sup> WLIA Team response</b>                  Agreed. However, we suggest that cross- refence is made to Policy WL1 to help draw attention to developers of major sites.                  Major development involving 10+ residential units or employment space of 1ha + should be subject to a Welsh language situation statement and possible WLIA and Action Plan as per Policy WL1.                  It is recommended that the narrative for Policy H9 draws major developers’ attention and makes cross reference to Policies SP15 and WL1 as per wording.</p>						
<p><b>2<sup>nd</sup> Round RLDP Team response</b>                  As proposals are assessed against all policies in the plan it is not considered necessary to reference the requirements of SP15 and WL1 separately in the Policy.</p>						
<p><b>2<sup>nd</sup> Round WLIA Team response</b>                  Recommend cross referencing to proposals subject to Policy H9 in WL1.</p>						
<p><b>3<sup>rd</sup> Round RLDP Team response</b>                  Recommendation accepted and text amended.</p>						

<b>ECONOMY</b>						
<b>EC1: Cardiff Central Enterprise Zone and Regional Transport Hub</b>						
<p><b>Summary of Context</b> - This policy seeks to build on the successful development of the CEZ to date through promoting and supporting opportunities for new mixed-use investment and development to further enhance the Zone’s vibrancy, vitality and attractiveness and ensure Cardiff fulfils its role as the economic driver of the city region. Major Grade A office schemes have been completed at Capital Quarter and Central Square and high-density residential schemes, including elements of mixed use and employment floorspace completed and or under construction in the vicinity of Dumballs Road.</p> <p>This policy will promote and support the future priorities and direction for the zone, including the completion of Central Quay, the delivery of the ‘Metro Central’ upgrade of the Cardiff Central Railway Station and interchange bus station, the Callaghan Square and Canal Parade redevelopment sites and the on-going redevelopment and regeneration of Dumballs Road.</p>						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
EC1	Cardiff Central Enterprise Zone And Regional Transport Hub	Describes the proposed uses for the allocation	+	+	+	SP5 and SP6 policies, where appropriate, could be used to encourage SME employers to train their staff to learn and use the Welsh language
<b>1<sup>st</sup> Round RLDP Team response</b>						
No Actions suggested for Policy EC1 – Comments relate to Policies SP5 and 6? See comments for Policies SP5 and SP6.						
<b>1<sup>st</sup> round WLIA Team response</b>						
Comments noted.						

<b>EC2: South of St Mellons Business Park - Strategic employment site comprising up to 90,000 square metres of B1, B2 and B8 uses, ancillary uses and infrastructure .... together with the construction of a new transport hub facility, comprising railway station buildings (up to 2,500m2)</b>						
<b>Summary of Context</b> - This policy seeks to allocate 44ha of business and industrial land at Land South of St Mellons, as a strategic site to deliver a transport hub (including mainline station), and employment land to attract high quality investment to contribute to the LDP economic strategy and the economy of the wider city Region and support Cardiff's status as an internationally competitive city.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
EC2						<p>This is a new Draft Policy for the September Draft and is a rollover site from the adopted LDP. It received planning permission from Cardiff Council but has been called in by Welsh Government for review due to concerns that a high percentage of the site has national and local biodiversity designations. It has been included to protect the Council's position should a decision be imminent.</p> <p>Should planning permission be granted we have concluded that this Policy should be scoped out of the WLIA as the Council will not be in a position to influence the consent</p>
<b>1<sup>st</sup> Round RLDP Team response</b>						
Comments noted and accepted.						
<b>1<sup>st</sup> WLIA Team response</b>						
Comments noted.						

<b>EC3: Protected Employment Land and Premises</b>						
<b>Summary of Context</b> - This Policy responds to the economic vision and objectives of the Plan to ensure a range and choice of employment land and premises are available across the city to assist economic competitiveness, encourage entrepreneurship, promote the growth of indigenous businesses of all types and size, and attract inward investment.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
EC3	Protected Employment Land and Premises	Describes and lists land and premises on 25 sites that will be protected and sub-divided into “Primary” and “Local” Sites.	0	0	+	SP5 and SP6 policies, where appropriate could be used to encourage SME employers to train their staff to learn and use the Welsh language
<p><b>1<sup>st</sup> Round RLDP Team response</b>                      Purpose of the policy is to protect existing employment land from other uses and sets out the criteria for this – not sure why SP5 and SP6 are referred to in this instance? So, would outcome 3 be neutral? No actions suggested for Policy EC1 – Comments relate to Policies SP5 and 6? See comments for Policies SP5 and SP6.</p>						
<p><b>1<sup>st</sup> Round WLIA Team response</b>                      Agreed. Recommend that Policy is scoped out of assessment.</p>						

<b>EC4: Provision of appropriate complementary facilities on employment sites</b>						
<b>Summary of Context</b> - This Policy seeks to enable the provision of appropriate complementary leisure, food and drink, and childcare facilities in existing and new office, industrial and warehousing areas and helps to deliver Plan objectives. Employees in such areas may require good access to a range of facilities, including food and drink, leisure/recreation and child-care. The absence of such facilities in an employment area can increase travel demand and make the areas less attractive to employers and employees. In existing employment areas, change of use of existing premises will be considered for appropriate complementary facilities, including food and drink, leisure and child-care. Where new employment areas are proposed, the need for such facilities should be considered as part of the overall development scheme.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
EC4	Provision Of Complementary Facilities for Employees in Business, Industrial and Warehousing Developments	Describes where Provision for open space, public realm, leisure, food and drink, and child-care facilities will be appropriate	0	+	+	SP5 and SP6 policies, where appropriate, could be used to encourage the provision of Welsh language child-care and early years education facilities
<b>1<sup>st</sup> Round RLDP Team response</b>						
No Actions suggested for Policy – Comments relate to Policies SP5 and 6. See comments for Policies SP5 and SP6.						
<b>1<sup>st</sup> Round WLIA Team response</b>						
Comments noted.						

<b>EC5B: New Workspace Within Mixed Use Development</b>						
<b>Summary of Context</b> - Where alternative use of land is considered appropriate (i.e. where Policy EC2 could be relaxed) , priority will be given to mixed-use development comprising employment, housing and community facilities. Workspace provided or retained within redevelopment proposals can include flexible small workspace for enterprise start up and early-stage growth, Mixed B1(a), B1(b) and B1(c) uses, makerspace, affordable workspace, space for cultural industries, local logistics and community-oriented facilities. Enterprises and premises of this type in emerging key sectors often favour new forms of workspace. Such provision can lead to the intensification of employment use on a site.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
EC5B	New Workspace Within Mixed Use Development	Describes how provision should be made for new employment workspace and community facilities as part of a mixed-use residential redevelopment	0	0	+	SP5 and SP6 policies, where appropriate, could be used to encourage SME employers to train their staff to learn and use the Welsh language and to encourage the provision of Welsh language child-care and early years education facilities
<b>1<sup>st</sup> round RLDP Team response</b>						
No Actions suggested for Policy – Comments relate to Policies SP5 and 6? See comments for Policies SP5 and SP6.						
<b>1<sup>st</sup> WLIA Team response</b>						
Comments noted. Outcome 3 assessment changed to reflect acceptance of changes to SP5 and SP6.						

<b>EC7: Alternative Use</b>						
<b>Summary of Context</b> - Where alternative use of land is considered appropriate (i.e. On land not protected under other policies) , these policies priority will be given to mixed-use development comprising employment, housing and community facilities. Workspace provided or retained within redevelopment proposals can include flexible small workspace for enterprise start up and early-stage growth, Mixed B1(a), B1(b) and B1(c) uses, makerspace, affordable workspace, space for cultural industries, local logistics and community-oriented facilities. Enterprises and premises of this type in emerging key sectors often favour new forms of workspace. Such provision can lead to the intensification of employment use on a site.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Commentary/Reasoned Justification and Suggested Actions</b>
EC7	Alternative Use of Employment Land And Premises Not Identified	Describes under what conditions alternative uses for employment land outside Policies EC2 and EC5 could be considered	0	0	+	Major applications for unanticipated sites will need to understand and explain if and how the proposal is likely to impact on the Bilingual Cardiff Strategy.  SP5 and SP6 policies, where appropriate, could be used to encourage SME employers to train their staff to learn and use the Welsh language and to encourage the provision of Welsh language child-care and early years education facilities

<p><b>1<sup>st</sup> Round RLDP Team response</b></p> <p>No Actions suggested for Policy – Comments relate to Policies SP5 and 6? See comments for Policies SP5 and SP6.</p>
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Comments noted. Outcome 3 assessment changed from ?/+to reflect acceptance of changes to SP5 and SP6.</p>

<b>EC8: Unanticipated proposals for Employment Use on land not identified for Employment Use</b>						
<b>Summary of Context</b> – Policy EC7 provides guidance on how the Council will determine applications for employment development on sites not identified for employment. The policy ensures that a sequential approach to site selection is followed, thereby steering employment allocations to the most appropriate locations consistent with a “town centre first” approach.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
EC8	Employment Proposals on Land Not Identified for Employment Use	Describes under what conditions Proposals for employment use (B Use Class) on unallocated sites will be permitted	?	?	+	<p>In accordance with Policy WL1 major applications for unanticipated sites will need to understand and explain if and how the proposal is likely to impact on the Bilingual Cardiff Strategy.</p> <p>SP5 and SP6 policies, where appropriate, could be used to encourage SME employers to train their staff to learn and use the Welsh language and to encourage the provision of Welsh language child-care and early years education facilities</p>

**1<sup>st</sup> Round RLDP Team Response**

WLIA impact comments noted issues of considering impact on Welsh Language covered under Welsh Policies and SP 5 and 6 and doesn't need to be duplicated. No actions for this policy. See comments for SP6.

**1<sup>st</sup> WLIA Team response**

Comments noted. First sentence clarified to refer to WL1. Outcome 3 assessment changed from ?/+ to reflect acceptance of changes to SP5 and SP6.

<b>EC 10: Night-time and cultural economy</b>						
<b>Summary of Context</b>						
<p>The uses that contribute towards the cultural and night-time economy add significant value to the social fabric and economy of Cardiff. They cannot always be specifically defined in planning terms, but such examples will include: live music and entertainment venues, cinemas, artist studios and galleries, theatres, pubs, museums, sports arenas, clubs, bingo halls and community centres. Night-time economy uses are more suitable in district and local centres. Facilities outside of these locations also serve a critical social role. Greater emphasis on the existing character of an area, and the impact upon it is especially important outside of centres. The agent of change principle is within Planning Policy Wales. This states that a business or person responsible for introducing a change is responsible for managing that change.</p>						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
EC10	Night-Time And Cultural Economy	Describes conditions and locations where proposed new and retention of existing venues and operators to the cultural and night-time economy will be encouraged	+	+	+	<p>Narrative to Policy should include reference to the important role the cultural and night-time economy plays in the growth of the Welsh language in Cardiff.</p> <p>Policy should encourage operators to support Welsh language provision as part of their “offer”.</p> <p>Major applications for unanticipated sites will need to understand and explain if and how the proposal is likely to impact on the Bilingual Cardiff Strategy.</p>

						SP5 and SP6 policies, where appropriate, could be used to encourage developers and operators to train their staff to learn and use the Welsh language and to encourage the provision of Welsh language child-care and early years education facilities
<p><b>1<sup>st</sup> Round RLDP Team response:</b></p> <p>Actions proposed. Written justification updated to include reference to the important role of the Welsh language to the cultural and night-time economy. Policies relates to the locations where such uses will be favoured and protection of the use - with regards to the other points raised these issues are covered in other policies and future SPG. See comments for SP6.</p>						
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Comments noted. Outcome 3 assessment changed from ?/+ to reflect acceptance of changes to EC10 and to SP5 and SP6.</p>						

<b>RETAIL</b>						
<b>Summary of Context</b> - These policies support Strategic Policy SP11 by promoting the viability, vitality and attractiveness of the Central Retail and Commercial Area and existing and new District and Local Centres. Policy R1 supports the City Centre, District and Local Centres as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve. They act as the most appropriate and sustainable locations for new retail, leisure, community facilities and supporting commercial development. Policy SP11 is justified by the need to provide “a range of community, health, religious and educational facilities which are accessible to as many people as possible including facilities for Welsh language is an essential requirement in order to secure sustainable thriving communities.”						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
R2	Development In the Central Retail and Commercial Area	Describes how development in the Central Retail and Commercial Area will be assessed	0	0	0	In terms of promoting the use of the Welsh language the reasoned justification of the policy could be enhanced by referencing the use of planning obligations, where relevant, to support the development of staff’s bilingual skills
R4	District Centres	Describes how Facilities for a range of uses will be encouraged within 11 district centres	0	0	0	The policy seeks to actively promote or protect District Centres. In terms of promoting the Welsh language the policy could be enhanced by encouraging the use of the Welsh language on the frontage and within new developments and by using planning obligations, where relevant, to support the development of staff’s bilingual skills
R5	Local Centres	Describes how Facilities for a range of uses will be encouraged within 20 local centres	0	0	0	The policy seeks to actively promote or protect Local Centres. In terms of promoting the Welsh language the policy could be enhanced by encouraging the use of the Welsh language on the frontage and within new developments and by using planning obligations, where relevant, to support the development of staff’s bilingual skills

R7	The Creation of New Centres	Describes how proposals for developments in areas of growth and regeneration will be assessed	0	0	0	“The provision of future centres within areas of growth and regeneration should not negatively impact on the vitality, viability, and attractiveness of existing centres and therefore proposals for new centres will be assessed against Policy R6”. The policy could be enhanced by encouraging the use of the Welsh language on the frontage and within new developments and by using planning obligations, where relevant, to support the development of staff’s bilingual skills
<b>1<sup>st</sup> Round RLDP Team response</b>						
WLIA is neutral across all outcomes for Policies R2, 4, 5 and 7. Comments raised refer to issues in other policies or potential future SPG and don’t need to be duplicated in these policies.						
<b>1<sup>st</sup> round WLIA Team response</b>						
Comments noted.						

<b>COMMUNITY FACILITIES AND SAFETY</b>						
<b>Summary of Context</b> - These policies support Strategic Policy SP11 by “encouraging the enhancement of communities through better equality of access to services for all, providing facilities that support the Welsh Language, promoting cultural and wider diversity for all groups in society, and creating places that encourage social interaction and cohesion”.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
C1	Community Facilities	Describes where new and improved community facilities will be encouraged	0	0	+	This policy could be enhanced by underlining the role of community facilities as hubs for encouraging the use of the Welsh language in internal and external signage and by using planning obligations, where relevant, to support the development of staff bilingual skills
C2	Protection of Community Facilities	Describes how proposals that lead to a loss or change of use of buildings for community facilities will be assessed	0	0	+	This policy could be enhanced by underlining the role of community facilities as hubs for encouraging the use of the Welsh language
C4	Planning for Schools	Describes how development could support new and improved school facilities through contributions towards costs	+	+	+	<p>Suggest that the second paragraph of the Policy has a new third criterion:</p> <p>Have regard to the Council’s requirement/strategy to provide adequate education facilities to cater for the planned growth in the proportion of the city’s children and young people able to speak Welsh.</p> <p>The reasoned justification for the policy should also be strengthened to describe the role new and improved schools are likely to play in realising the Bilingual Cardiff Strategy</p>

						<p>and in particular the aspiration of moving all pupils along the language continuum so that they all, or an increased proportion, become confident Welsh speakers. The objectives of the new Welsh and Education Bill will require considerable support and investment and in particular to enhance the capacities of existing schools to improve their Welsh language provision.</p> <p>The October version of the Draft Plan now includes Policy H2 Housing Led Regeneration Areas. Current education policy on Welsh medium schools' provision related to greenfield sites only. It is suggested that paragraph 3 is amended to include further elaboration on the principles and context that form the background to the policy (subject to consultation and agreement of the Education Service).</p> <p>The main relevant principles and context for the consideration of new development and the Welsh language are:</p> <ul style="list-style-type: none"> <li>• Cardiff is an area of linguistic importance for the Welsh Language.</li> <li>• To apply the principles of the '15-minute neighbourhoods' to ensure that all learners (including pre-school care/nursery children) have access to Welsh-Medium provision</li> </ul>
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						<ul style="list-style-type: none"> <li>• to establish at least 50% of new school places provision on reasonable distance of their homes.</li> <li>• Seek major greenfield sites as Welsh-medium.</li> <li>• In relation to major housing led brownfield regeneration sites (Policies H2.1, H2.2, H2.4, H2.5 and H2.6), seek through planning obligations to enhance existing WM provision within the immediate locality/relevant catchment area and/or contribute to new WM provision. When warranted by scale of development, (in line with approach on greenfield sites), seek to establish at least 50% of any new school provision on brownfield sites as Welsh-medium.</li> <li>• All Cardiff schools will increase the amount of Welsh taught, used and heard in their schools, consistent with the Curriculum for Wales.</li> <li>• To facilitate the growth of Welsh medium education the Council aims to maintain city wide capacity in the Welsh-medium sector at 10% over the projected intake.</li> </ul>
<p><b>1<sup>st</sup> Round RLDP Team response</b></p> <p>C1 and C2 issues raised referred to in Welsh Language Policy no need to duplicate.  C4 – Policy 4 has been amended in line with the WLIA actions.</p>						

<b>1<sup>st</sup> Round WLIA Team</b>
Comments noted and welcomed on original assessment. Suggested new additions in light of the inclusion of a new Policy H2 Housing led Regeneration Areas.
<b>2<sup>nd</sup> Round RLDP team response</b>
Suggested Amendments accepted.
<b>2<sup>nd</sup> Round WLIA Team</b>
Noted.

<b>HERITAGE AND THE HISTORIC ENVIRONMENT</b>						
<b>Summary of Context</b> - This Policy supports SP13 in seeking to safeguard Cardiff’s heritage assets. All historic assets make up the historic environment which is central to Wales’s cultural heritage and sense of identity. Positive, well-designed change can bring improvements to our understanding and appreciation of the historic environment, as well as social and economic benefits through increased regeneration and tourism.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
HE1	The Historic Environment	Describes how development proposals are required to assess impact on heritage assets and conserve and enhance the asset	0	0	0	The WLIA Team originally suggested that the Reasoned Justification for the Policy included an expectation that all Heritage Impact Assessments include an assessment of the asset’s historical, national or communal value to the Welsh language and culture, where relevant.
<b>1<sup>st</sup> Round RLDP Team response</b>						
The policy seeks to safeguard assets for their heritage value as identified as part of its significance for listing. Separate policy deals with impact on the Welsh language therefore no need to duplicate. No changes proposed.						
<b>1<sup>st</sup> Round WLIA Team</b>						
Accept that referencing commentary on describing, where relevant, the link of the asset to the Welsh language is more appropriate at detailed policy level. Disagree with conclusion that there should not be reference to the link between the asset and the Welsh language. In terms of impact on the proposal including such an analysis will be more positive for the Welsh Language and help demonstrate an understanding of context and with proposing and adopting an appropriate name for the new proposal.						
<b>2<sup>nd</sup> Round RLDP Team response</b>						
See earlier comments. Guidance on content of a Heritage Impact Assessment is set out in separate guidance no need to duplicate here. No change proposed.						
<b>2<sup>nd</sup> Round WLIA Tam response</b>						
We note contents of CADW’s Guidance on “Heritage Impact Assessment in Wales” and, in particular, Section 3 which notes that “heritage impact assessment should take into account sufficient information to enable both the significance of the asset and the impact of change to be understood .... and should be proportionate”. We are of the opinion that this does not preclude decision making authorities from drawing the attention of owners.						

developers and agents to the value of understanding the asset’s historic, national or community value to the Welsh language and culture and how this has been considered in the proposal. Nevertheless, we accept that within the context of this WLIA the intervention would not be significant and note the Team’s view.

#### **HEALTH, WELLBEING AND FOOD SUSTAINABILITY**

HF1 supports Strategic Policy SP12 which seeks “to promote economic, social, cultural and environmental benefits and reduce health and wellbeing inequalities through creating accessible and healthy environments”. Whilst the strategic policy promotes health and well-being in general, Policy HF01 is focused on ensuring that new developments help reduce health inequalities and encourage healthy lifestyles and choices.

<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
HF1	Health, Wellbeing and Development	Describes how developments that impact on health and wellbeing will be assessed and/or support the creation of healthy communities	0	0	0	Whilst acquisition and learning of a new language such as Welsh can generate mental health well-being benefits, the link to the built and natural environment – and land use and development specifically - is likely to be tenuous.

#### **RLDP Team response**

WLIA impact is neutral across all outcomes and no action is proposed. The policy relates to development and land use issues. No changes proposed.

#### **WLIA Response**

Agreed.

<b>WELSH LANGUAGE</b>						
<b>Summary of Context</b> - This policy supports SP14 in seeking to ensure and encourage new development to promote, protect and enhance the use of the Welsh language and the city as an area of linguistic importance and to double the number of Welsh speakers in Cardiff by 2050.						
<b>ID</b>	<b>Title</b>	<b>Brief Summary</b>	<b>Outcome 1</b>	<b>Outcome 2</b>	<b>Outcome 3</b>	<b>Mitigation/Enhancement Measures and Suggested Response</b>
WL1	Welsh Language	Describes how new development, particularly major developments on windfall sites should promote, protect and strengthen the interests of the Welsh language and the city as an area of linguistic importance	+	+	+	Suggest that Sub-paragraph v. relating to what is required of proposers of major unanticipated developments where significant impacts give rise for concern. In the case of major development on windfall sites (for example major unanticipated housing developments under Policy H(9) new proposals are required to be supported by a Linguistic Profile to help identify existing trends and patterns and to enable consideration of any potential positive and significant adverse impacts on the language – and in particular to understand the proposal’s impact on the future growth in the number of Welsh speakers and the growth in use of the language and identify any mitigation/enhancement measures required. Where the Linguistic Profile leads to concerns by the Council about potential significant adverse impacts, the developer will be required to undertake a Welsh Language Impact Assessment of the proposal, together with the submission of

						<p><i>an Action Plan to Promote and Increase Use of Welsh.</i></p> <p>It is also suggested that a paragraph be included in the Reasoned Justification about encouraging proposers of major, large or complex proposals to engage on developing an understanding of the Linguistic Profile at an advanced stage of preparation</p> <p>Where the proposed development meets the minimum threshold and criteria for an Environmental Impact Assessment under Schedule 2.b.10 ii and iii (Urban Development) of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 the Environmental Statement on the likely significant effects and impact on the baseline scenario and likely evolution of the population factors must include the likely effects on the opportunities on the use of the Welsh language.</p> <p>For major developments that require pre-application consultation under Part 1A of the DMPWO the publication of the draft application and planning statement are expected to demonstrate the developer's understanding of any likely significant effect and impact on the baseline scenario and</p>
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						likely evolution on the opportunities for persons to use the Welsh language.
<b>1<sup>st</sup> Round RLDP Team response</b>						
<p>WLIA impacts are positive across all outcomes. Text is included within the written justification.</p> <p>Is this referring to Pre-Application Consultation or advice? The Pre-Application Consultation process is set out in guidance as to which applications it applies to and what they are required to do.</p> <p>The Pre application advice process is a Development Management Process and no need to duplicate here. An application is made for Pre-Application Advice we will consult on the application and Bilingual Cardiff as consultees can advise. Further clarification can be in the SPG.</p>						
<b>1<sup>st</sup> Round WLIA Team Response</b>						
<p>The comments are not a response to Pre-Application Advice from the Council but the requirement under Part 1a of the DMPWO for major applications to carry out pre-application consultation with the public and statutory consultees. As this includes the requirement to publicise a draft of the application it will help demonstrate the applicant’s understanding of the linguistic context at an early stage. Similarly, it is suggested that the RJ repeats the guidance in SP15 for large or complex proposals to include an understanding of the linguistic context in their Environmental Statements.</p>						
<b>2<sup>nd</sup> Round RLDP Team Response</b>						
<p>Comments noted and first paragraph of suggested additional text has been included within the plan. Second suggested paragraph has not been included as the pre-application consultation process is governed by Welsh Government guidance and is beyond the remit of the RLDP.</p>						
<b>2<sup>nd</sup> Round WLIA Team Response)</b>						
<p>Suggest amending sentence to remind proposals subject to EIA that WG Good Practice recommends that information and ES is prepared for Pre- App Consultation.</p> <p>“Welsh Government’s Best Practice Guidance for Developers recommends that information and draft reports that form an Environmental Statement should be prepared in a timely manner and published for consultation as part of the pre-statutory pre-application Process”.</p>						
<b>3<sup>rd</sup> Round RLDP Team Response</b>						
<p>Comments noted. No changes proposed.</p>						
<b>3<sup>rd</sup> Round WLIA</b>						
<p>Note the response and that Policy SP3’s Reasoned Justification includes an expectation that proposals subject to EIA should demonstrate their understanding of likely impact on the Welsh language.</p>						

### 3 Summary of Welsh language impact appraisal of Development Policies

	Bilingual Cardiff Outcomes		
Detailed Policy	Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	Outcome 2 The use of the Welsh language significantly increased and normalised	Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture
<b>HOUSING</b>			
H1A	+/-	+	+
H1B	?	?	+
H2.1	+/-	?	+
H2.2	0	0	+
H2.3	+/-	?	+
H2.4	0	0	+
H2.5	?	?	+
H2.6	+/-	?	+
H2.7	+/-	?	+
H3	?	?	0
H4	0	0	0
H9	?	?	+
<b>ECONOMY</b>			
EC1	+	+	+
EC2	Scope out		
EC3	0	0	+
EC4	0	+	+
EC6	0	0	+
EC7	0	0	+
EC8	?	?	+
EC10	+	+	+
<b>RETAIL</b>			
R2	0	0	0
R4	0	0	0
R5	0	0	0
R7	0	0	0

COMMUNITY FACILITIES AND SAFETY			
C1	0	0	+
C2	0	0	+
C4	+	+	+
HERITAGE AND HISTORIC ENVIROMENT			
HE1	0	0	0
HEALTH, WELLBEING AND FOOD SUSTAINABILITY			
HF1	0	0	0
WELSH LANGUAGE			
W1	+	+	+

Table 3: Changes resulting from appraisal of Draft RLDP Development Policies

RLDP Policy	Change proposed by WLIA Team	RLDP Team response to proposed change
H9	Include statement to remind developers of the interrelationship between major unanticipated developments and the need for a WLIA	Agree to cross reference in WL1 to H9 as example of where WLIA may be required
C4	Include the addition of a 3 <sup>rd</sup> criterion to second paragraph of the Policy and that paragraph 3 of the justification is amended to include further elaboration on the principles and context that form the background to the policy.	Agree to inclusion suggested text in 2 <sup>nd</sup> paragraph of policy 3 <sup>rd</sup> paragraph of written justification
WL1	Include amended sections on Welsh language and Maor Developments and Welsh Language Impact Assessments	Agree to inclusion of R1 suggested text in written justification

## Chapter 4: Welsh language Impact Assessment of Allocations

### 1 Introduction

4.1 This document contains the WLIA assessment of the proposed allocations within the Deposit Replacement Local Development Plan 2021 – 36.<sup>30</sup>

4.2 The key criterion for the Impact Assessment Framework of the overall Plan is:

*The extent to which the Plan's development policies and proposals would facilitate or impede the city of Cardiff's ability to realise Cardiff's mission statement which is to double the number of Welsh speakers in Cardiff by 2050 ("Bilingual Cardiff").<sup>31</sup>*

4.3 The focus of the first framework is on assessing if, and how, the Plan's overall strategy for the scale and growth of the city, and in particular housing and jobs, will impact on the projected growth of the use of the Welsh language in the city based on the number of persons aged 3 and over able to speak Welsh.

4.4 In summary, the key components of the Preferred Growth and Location Strategy of relevance to the Assessment of allocations are:

- Provide for 26,400 (including 10% flexibility allowance) new homes during the plan period 2021 to 2036
- Provide opportunities to deliver a minimum of 32,300 new jobs during the plan period 2021 to 2036 in the city to support the strategic economic and employment ambitions within the city and region
- Provide sufficient employment land to support economic growth and job creation
- Potential to deliver 5,000 to 6,000 affordable homes depending on make-up of sites
- Provide a good range and choice of housing with a 50:50 brownfield/greenfield split
- Deliver infrastructure, community facilities and sustainable travel objectives
- Respect and enhance the rich and diverse environmental qualities of the city
- Recognise the cultural character of the city and promote Welsh language growth and usage wherever possible
- Contribute to the delivery of physical and social regeneration opportunities which provide for and reflect a range of diverse and cohesive communities across the city.<sup>32</sup>

4.5 The assessment method for the allocations follows the second framework as agreed with the City Client team and Chapter 1. In essence this framework is based on similar criteria to the more general ISA Assessment Framework but adapted to the future outlook in addition to assessing harm to the current situation. **Figure 8,**

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<sup>30</sup> Version - April 2024

<sup>31</sup> Cardiff City Council (2022) "Bilingual Cardiff Strategy 2022 -27"

<sup>32</sup> Op. Cit. Para. 6.22

therefore, adopts this framework and judges likely impact of Policies on the existing baseline and anticipated trajectory of growth of the Welsh language.

**Figure 8: Impact of Allocations on achieving Bilingual Cardiff target**

Symbol	Description (likely Impact on Achieving Bilingual Cardiff Target)
++	Major positive compared to “Business as Usual”
+	Minor positive compared to “Business as Usual”
+/-	Both positive and negative impacts compared to “Business as Usual”
0	Neutral
-	Minor Negative compared to “Business as Usual”
--	Major negative compared to “Business as Usual”
?	Uncertainty as to how policy will impact in practice

- 4.6 The initial commentary on some Policies in earlier assessments – specifically on the likely impact on Outcome 3 included two scores to illustrate a change in score if a recommended action was accepted or not. The final score reflects the consensus achieved.
- 4.7 The assessment of allocations has been conducted in eight stages:
- i. A scoping exercise which identified which allocations should be included or excluded from the assessment. Further information on this scoping exercise is contained in Chapter 1. In essence this exercise considered that the majority of the allocations were strategic sites (identified as key strategic sites) that have been “rolled over” from the current Local Development Plan. Many of these allocations had, in theory at least, been assessed for their Welsh Language impact Assessment and wider sustainability assessment as part of the overall Plan in preparation of the adopted LDP with the Plan, and associated assessments, found to be sound. The Plan was adopted in 2016 and therefore took on board the Welsh Language Measure and associated strategies. The Inspectors’ report on the Independent Examination<sup>33</sup>, in discussing the Plan’s Overall Strategy, notes PPW’s requirement that local authorities should consider whether they have communities where use of the Welsh language is part of the social fabric. The Inspectors took the view that whilst there is no prescribed definition “part of the social fabric” meant communities where Welsh is spoken by over 70% of the local population. In terms of the Cardiff context whilst noting that there were clusters of higher

<sup>33</sup> Cardiff City Cabinet (January 2016) Cardiff City Local Development Plan Appendix A Inspectors’ Report

density speakers in such electoral divisions as Canton, Pentyrch and Creigiau/St. Fagan's these were significantly below the 70% threshold. They concurred therefore that the Plan's development proposals would not have a detrimental effect in terms of linguistic balance, that the potential impact on the Welsh language had been adequately considered. The assessors took the view that rolling over the major allocations to the new Plan in theory presented major challenges in deciding whether the needs and interests of the Welsh language had significantly changed since 2016.

- ii. An assessment of the Major Sites' Position. The assessors received an update on the progress being made on the Key Strategic Sites in May 2024. This noted that there had been significant progress in terms of processing applications, or actual starts or completions on Sites A, D, E and F.
  - iii. An initial scoping of the major allocations to assess whether a further WLIA was relevant and useful and to scope out sites where it was felt it was not necessary to conduct a further assessment. This resulted in the impact Assessment focusing on those sites not committed, started or completed as at autumn 2024.
  - iv. An initial assessment of each of the allocations contained in the April Draft Plan version.
  - v. Circulation of the Initial Draft Assessment for comment within the Client Team and the RLDP Team for internal consultation.
  - vi. Circulation and presentation of Initial Draft Assessment to the Bilingual Cardiff Working Party held on 2 September 2024.
  - vii. Consideration of feedback and adaptation of draft report where comments are taken on board.
  - viii. An assessment of further changes contained in the Draft RLDP (September version and subsequent amendments) and production of Round 2 Draft Assessment.
  - ix. Consideration of feedback and adaptation of Round 2 Draft Assessment.
  - x. Production of revised final draft Assessment for circulation and comment.
- 3.12 The relevant strategic and non-strategic site allocations are assessed below:

STRATEGIC SITES						
Strategic Site B: Former Gas Works, Ferry Road						
<b>Summary of Context</b> - Planned total of 500 dwellings (100 affordable). Site now owned by the City Council and is included in the city’s housing partnership programme. AMR 7 notes 200 temporary modular sustainable 1, 2, and 3-bedroom flats on site (48 prior to April 2022). Masterplan being developed.						
ID	Title	Description	Impact – help/impede the Bilingual Themes			Reasoned Justification/Evidence and Suggested Response
SH1.7	Former Gas Works Ferry Road (3.98 ha)	Temporary accommodation on site  Site up to 500 dwellings	?	?	+	<p>Allocation assessed for WL impact in combination with other strategic and non-strategic allocations as part of LDP1.</p> <p>The site forms part of Butetown Ward. The 2021 Census records 1,659 residents 3 and over with any Welsh language skills (14.4%)</p> <p>It is unclear what impact the proposal will have on Bilingual Cardiff ambitions. Major new housing development (whether greenfield or brownfield) provide an opportunity to help accelerate the supply of Welsh language Forms of Entry in order to reach the operational target of 27% of 5-year-olds being taught through the medium of Welsh by 2032.</p>

							To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>WLIA does not suggest any changes to the policy. Comments relate to policy on Planning Contributions. Comments noted. No Action required?</p>							
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Outcome 3 scores changed to + to reflect potential to use SP5 and/or 6 to secure benefits for the interests of the Wesh language. The narrative has been clarified and strengthened in order to reflect the opportunity at Masterplanning Stage to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90.</p>							
<p><b>2<sup>nd</sup> Round RLDP Team Response</b></p> <p>Comments noted and amendments accepted.</p>							

<b>Strategic Site D: North of Junction 33</b>						
<p><b>Summary of Context</b> Planned total of 2,000 dwellings for Strategic Site D (603 affordable). AMR7 records those 317 completions achieved at Strategic Site D by April 2023 (54 affordable). At the time of Census Day AMR 7 records that there were 128 completions (27 affordable) by April 2021.</p> <p>The Annual Education Report to Cabinet (June 2024) notes that “although a large number of children and young people are new to these communities the analysis of school data shows that a large number of these have come from neighbouring or other communities within the city” (par 98). In paragraph 97 the report notes that an annual new build rate equates to roughly a 0.5 school FE intake.</p> <p>In terms of the Bilingual Cardiff ambition, it is likely that some or all of the impact could be classified as “displacement” were the source school and destination school of similar linguistic category. However new capacity is currently planned as 50:50 and given the overall proportion of Welsh medium schools a new school would likely to provide a net gain.</p>						
<b>ID</b>	<b>Title</b>	<b>Description</b>	<b>Impact – help/impede the Bilingual Themes</b>			<b>Reasoned Justification/Evidence</b>
SH1.4	Land to the South of Llantrisant Road (13 ha.)	Site for up to 300 dwellings	?	?	+	Outline planning permission consented for up to 1500 dwellings in existence within Strategic Site boundary. Both SH1.3 and SH1.4 are within this area of the outline planning permission consented and SH1.5 is currently the subject of a live application.
SH1.5	Land Adjacent to Llantrisant Road, Capel Llanilltern (8.73 ha.)	Site for up to 150 dwellings	?	?	+	
SH1.6	Land at Llwynioli Farm (3.4 ha)	Site for up to 70 dwellings	?	?	0	<b>Baseline</b> In the Census 2021 Creigiau recorded a relatively higher density cluster of residents 3 + with any Welsh language skills (LSOA’s W0100027 and W0100028) 785 (30.7%). The percentage for the relevant ward (Pentyrch and St Fagans is 26.5%

					<p>Estyn’s 2017 report records 422 pupils between 3 and 11. 17% of pupils came from Welsh speaking households.</p> <p>The community of Creigiau is within proximity to Strategic Sites D. and E. The Master Plan for the site means that many local facilities and service will be located as part of the development, including a new primary school. It is considered that Site D will have relatively little impact on Creigiau and the primary school there.</p> <p>Strategic Site D Allocation assessed for WL impact in combination with other strategic and non-strategic allocations as part of the adopted LDP.</p> <p>It is unclear what impact the proposal will have on Bilingual Cardiff ambitions. It is also unclear what impact the substantial growth in housing planned for Sites D and E will have on the number of Welsh speakers for Creigiau itself.</p> <p>As referenced above the social interactions between the new development and users of the Welsh language in Creigiau is likely to be limited but it is highly likely to reduce the overall proportion of Welsh speakers</p>
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					<p>in the ward - at least in the short to medium term.</p> <p>Major new housing development (whether greenfield or brownfield) provide an opportunity to help accelerate the supply of Welsh language Forms of Entry in order to reach the operational target of 27% of 5-year-olds being taught through the medium of Welsh by 2032.</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>WLIA does not suggested any changes to the policy. Comments relate to other policies. Comments noted. No Action required?</p>					
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Outcome 3 scores for SH1.3 and SH1.4 changed to + to reflect potential to use SP5 and/or 6 to secure benefits for the interests of the Wesh language. The narrative has been clarified and strengthened in order to reflect the opportunity at Masterplanning Stage to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90. In relation to SH1.5 the opportunities to influence the final decision appear limited.</p>					
<p><b>2nd Round RLDP Team Response</b></p>					

Comments noted and amendments accepted.

<b>Strategic Site F: North-East Cardiff (Lisvane/Pontprennau)</b>					
<p><b>Summary of Context</b> - Planned total of 4,500 dwellings for Strategic Site F of which 1,350 units would be affordable. AMR 7 records that 341 completions achieved at April 2023 (46 affordable). At the time of the Census AMR 7 notes that 78 were completed by April 2021 of which 6 are affordable.</p> <p>Outline planning permission was granted in July 2024 to Taylor Wimpey for a mixed-use development consisting of A1-3, B1, C1, D1, and D2 uses and including up to 2,500 dwellings. Planning Committee report notes that this comprises of approx. 57% of Strategic Site F with the Churchlands site which has planning permission comprising a further 20%. There are further land parcels to the south-west and north-east of Strategic site F which haven't as yet been progressed.</p> <p>The Annual Education Report to Cabinet (June 2024) notes that “although a large number of children and young people are new to these communities the analysis of school data shows that a large number of these have come from neighbouring or other communities within the city” (par 98). In paragraph 97 the report notes that an annual new build rate equates to roughly a 0.5 school FE intake.</p> <p>In terms of the Bilingual Cardiff ambition, it is likely that some or all of the impact could be classified as “displacement” were the source school and destination school of similar linguistic category. However new capacity is currently planned as 50:50 and given the overall proportion of Welsh medium schools a new school would likely to provide a net gain.</p>					
<b>ID</b>	<b>Title</b>	<b>Description</b>	<b>Impact – help/impede the Bilingual Themes</b>		<b>Reasoned Justification/Evidence</b>
SH1.1	Land at Church Farm (14.2ha)	Site for up to 205 dwellings	0	0	<p>These form part of Strategic Site F and constitute 700 of the 891 proposed dwellings remaining.</p> <p>The WL ability baseline in 2021 is highly unlikely to have been significantly impacted by new completions.</p> <p>Welsh Language Technical Paper notes that the Education Plan includes provision for new primary school for this area from 2026-27? onwards at the earliest.</p> <p>It is unclear what impact the proposal will have on Bilingual Cardiff ambitions. Major new housing development</p>
SH1.2	Land south of M4 Motorway, West of Rudry Road, Lisvane (4.96 ha)	Site up to 100 dwellings			
SH1.3	Land north of Tŷ Draw Road (15.3ha)	Site for up to 350 dwellings			

						<p>(whether greenfield or brownfield) provide an opportunity to help accelerate the supply of Welsh language Forms of Entry in order to reach the operational target of 27% of 5-year-olds being taught through the medium of Welsh by 2032.</p> <p>It is noted that the Taylor Wimpey permission referred to above includes contributions towards a new nursery and 2FE primary school and 10FE secondary school. Should the above sites be assessed against the RLDP then planning contributions towards education provision from these additional sites should be used towards necessary infrastructure in support of the expansion of future Welsh language provision</p>
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>WLIA does not suggest any changes to the policy. Comments relate to policy on Planning Contributions. Comments noted. No Action required?</p>						
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Outcome 3 score changed to + to reflect potential to use SP5 and/or 6 to secure benefits for the interests of the Wesh language. The narrative has been clarified and strengthened in order to reflect the opportunity at Masterplanning Stage to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90.</p>						
<p><b>2nd Round RLDP Team Response (November)</b></p> <p>Comments noted and amendments accepted.</p>						

NON-STRATEGIC SITES						
The Rookwood Hospital Site						
<p><b>Summary of Context</b> - Rookwood site is owned by the Cardiff and Vale Health Charity. The site provided specialist neurological and spinal rehabilitation services and part of the site still houses the Artificial Limb and Appliance Service. The site is currently for sale and is listed by the estate agent as being suitable for a mixed new/conversion development.</p> <p>This brownfield site is close to the former BBC studios site which straddles the Llantrisant Road. Work started in 2023 on Phase 1 of Parc Llandaf to build 377 homes which provide a mixture of one- and two-bedroom apartments and three-, four- and five-bedroom houses with 20% affordable housing.</p>						
ID	Title	Description	Impact – help/impede the Bilingual Themes			Reasoned Justification/Evidence
H1.2	Rookwood Hospital (3.4ha)	Redevelopment site allocated in LDP1 for up to 90 dwellings and rolled forward to the RLDP.	+/-	+	+	<p>The original allocation assessed for WL impact in combination with other strategic and non-strategic allocations as part of LDP1. However, the site lies adjacent to the former BBC Studios site which was an anticipated windfall site. As the sites are within existing built areas subject to regeneration and also near an existing cluster of Welsh speakers it is necessary to assess the developments “in combination” for likely effects on existing clusters of Welsh speakers.</p> <p><b>Baseline</b></p> <p>The likely impact area includes an important (medium density) cluster of existing Welsh speakers within the catchment area which includes Llandaff and Canton.</p> <p><b>Llandaff</b></p> <p>2021 Census records 2,016 residents aged 3 and over having some combination of Welsh</p>

						<p>language skills representing some 24.08% of the relevant population</p> <p>Ysgol Glanceubal and Ysgol Pencae are the two Welsh medium primary schools within the catchment area with total pupil population of around 340.</p> <p><b>Canton</b>          Census records 4,659 residents aged 3 and over having some combination of Welsh language skills representing some 30.19% of the relevant population.</p> <p>Parc Llandaf was identified as an anticipated windfall site in the Inspectors’ report on LDP1 in 2025 and is therefore within that LDP’s flexibility allowance. Parc Llandaf was given planning permission for 364 homes (later increased to 377 homes) in November 2016 with the developer acquiring the site in April 2021. Therefore no householders were on site on Census Day 2021 and no information is available as to the linguistic abilities of current householders.</p> <p>Within this context the Rookwood Hospital site is unlikely to have significant impact on its own but in combination with Parc Llandaf may result in the number of household numbers growing by up to 12.5% over the next ten years.</p>
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						<p>This is likely to have a significant impact on the percentage of Welsh speakers within Llandaff but possibly could have a minor positive impact on the number of Welsh speakers.</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>Why is there a negative shown for this site rather than a Blue unknown like the other sites as no explanation is given as to the impact?</p>						
<p><b>1<sup>st</sup> Round WLIA Response</b></p> <p>The assessment is made against Outcome 1 – “The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets”. It is also assessed against the likely harm to the existing baseline. The score is shown as “+/-” as it is expected that the nature of the area is likely to attract and produce some additional Welsh speakers over and above the number recorded at Census 2021 but that the overall percentage of Welsh speakers is likely to see a reduction during the lifetime of the RLDP.</p> <p>The narrative has been clarified and strengthened to reflect the opportunity at Masterplanning Stage to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90.</p>						
<p><b>2<sup>nd</sup> Round RLDP Team Response</b></p> <p>Comments noted and amendments accepted.</p>						



<b>Trowbridge Mawr</b>						
<b>Summary of Context</b> - This greenfield site lies on the southeastern edge of Trowbridge in east Cardiff, close to the redeveloped Ysgol /Coleg Glanhafren education complex. Greenfield site on part of former farm known as Trowbridge Mawr. Allocated in LDP1 for up to 150 dwellings. Site owned by the Council and is within proposed housebuilding programme.						
<b>ID</b>	<b>Title</b>	<b>Description</b>	<b>Impact – help/impede the Bilingual Themes</b>			<b>Reasoned Justification/Evidence</b>
H1.1	Areas 9 – 12, Trowbridge	Greenfield site. Site for up to 150 dwellings (3.98 ha)	?	?	+	<p>The original allocation assessed for WL impact in combination with other strategic and non-strategic allocations as part of LDP1. This is a greenfield on the edge of Trowbridge.</p> <p><b>Baseline</b></p> <p><b>Trowbridge</b>                      Census records 2,123 residents in Trowbridge aged 3 and over having some combination of Welsh language skills representing some 12.91% of the relevant population. Although not significant in percentage terms the numbers are significant at a local level within the context of Cardiff</p> <p>Ysgol Pen y Pîl is the nearest Welsh medium school of which 11% come from Welsh speaking homes Trowbridge, Meadowlane and St. John Lloyd are the three other primary schools that serve Trowbridge. Total pupils aged 5 – 11 (at 4 schools) = 1030 approx.</p> <p>It is unclear what impact the proposal will have on Bilingual Cardiff ambitions. Major</p>

						<p>new housing development (whether greenfield or brownfield) provide an opportunity to help accelerate the supply of Welsh language Forms of Entry in order to reach the operational target of 27% of Reception Age by 2032.</p> <p>To adequately address the Welsh Language Measure requirements to ensure that the policy will have a positive effect, or more positive effect or to ensure that the policy does not have adverse effects or less adverse effects on the opportunities for persons to use the Welsh language planning contributions should be used towards necessary infrastructure in support of the expansion of future Welsh language provision.</p>
<p><b>1<sup>st</sup> Round RLDP Team Response</b></p> <p>WLIA does not suggested any changes to the policy? Comments noted. No Action required?</p>						
<p><b>1<sup>st</sup> Round WLIA Team response</b></p> <p>Outcome 3 score changed to + to reflect potential to use SP5 and/or 6 to secure benefits for the interests of the Wesh language. The narrative has been clarified and strengthened in order to reflect the opportunity at Masterplanning Stage to use conscientious effort to satisfy Welsh Language Measure standards 89 and 90.</p>						
<p><b>2nd Round RLDP Team Response</b></p> <p>Comments noted and amendments accepted.</p>						

## 2 Summary of Welsh language impact appraisal of Allocations

	Bilingual Cardiff Outcomes		
Allocation	Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	Outcome 2 The use of the Welsh language significantly increased and normalised	Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture
<b>STRATEGIC SITE B: Ferry Road</b>			
SH1.7 Former Gas Works	?	?	+
<b>STRATEGIC SITE D: North of J33</b>			
SH1.4	?	?	+
SH1.5	?	?	+
SH1.6	?	?	0
<b>STRATEGIC SITE F: NORTH EAST CARDIFF</b>			
SH1.1	0	0	+
SH1.2	0	0	+
SH1.3	0	0	+
<b>NON – STRATEGIC SITES</b>			
H1.2 Rookwood Hospital	+/-	+	+
H1.1 Trowbridge Mawr	?	?	+

**Table 4: Changes resulting from appraisal of Draft RLDP Allocations**

<b>RLDP Policy</b>	<b>Change proposed by WLIA Team</b>	<b>RLDP Team response to proposed change</b>
SH1.7 Former Gas Works	Change Outcome 3 to +	Amendments accepted
SH1.4	Change Outcome 3 to +	Amendments accepted
SH1.5	Change Outcome 3 to +	Amendments accepted
SH1.6	Change Outcome 3 to 0	Amendments accepted
SH1.1	Change Outcome 3 to +	Amendments accepted
SH1.2	Change Outcome 3 to +	Amendments accepted
SH1.3	Change Outcome 3 to +	Amendments accepted
H1.2 Rookwood Hospital	Change Outcome 3 to +	Amendments accepted
H1.1 Trowbridge Mawr	Change Outcome 3 to +	Amendments accepted

## Chapter 5: Overall Welsh Language Impact Appraisal of the Replacement Local Development Plan 2021 – 2036

### 1 Introduction

- 5.1 This section discusses the overall likely impact on the ability of the Replacement LDP to help or hinder the achievement of the Cardiff Bilingual Mission.<sup>34</sup> This mission has the aim of doubling the number of Welsh speakers by 2050 (from 42,752 in 2021 to 85,504 to 2050). There is continuing uncertainty about the likely trajectory required to achieve this target, based on the Welsh Government’s model (where most of the growth is end loaded). Cardiff is still likely to be looking to significantly increase the numbers of Welsh speakers by the end of the Plan period in 2036. Whilst the growth point for the trajectory in 2036 depends on the assumptions made, particularly in relation to Cardiff’s expected contribution to reaching the million Welsh speakers by 2050, for Cardiff to reach a figure of 85,504 by 2050 the current baseline growth in itself is challenging with the target growth between 850 and 950 per year.<sup>35</sup>
- 5.2 In impact methodology terminology, the trajectory chosen forms the likely evolution thereof the linguistic situation in Cardiff without the implementation of the replacement LDP.
- 5.3 In addition to this mission, the assessment also takes on board Cardiff’s proposed status of the whole County as an area of linguistic importance. This status supports one of the city’s wellbeing objectives of a “Capital city that works for Wales” and a driver of the South-East Wales Region. It recognises the language’s sustained growth in the city over the last thirty to forty years and that Welsh can now be heard spoken on the street, in the home, in school or in work, particularly in communities where there are already several significant clusters of Welsh speakers. The overall spatial elements of the Plan (policies and allocations) are thus also screened and assessed for likely impact on the baseline cluster of Welsh speakers recorded at the 2021 Census.
- 5.4 The draft Plan’s Draft Preferred Strategy Document, published for consultation in June 2023, contained the following sections:
- Influences on the Plan
  - Cardiff – Strategic Context
  - Issues Identification
  - Vision and Objectives
  - Strategic Growth and Spatial Options

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<sup>34</sup> Cardiff City Council (20023) *Bilingual Cardiff Strategy 2022 - 27*

<sup>35</sup> For a fuller discussion on the trajected position by 2036 see Appendix 4 and the Welsh language Technical Paper.

- Preferred Strategy
- Strategic Policies.

- 5.5 Whilst the narrative recognised the importance of the language to the city’s cultural and social fabric, and the need for the Replacement Plan to “promote the Welsh language within the city”, the published Strategy Document did not include appropriate policies and proposals as to how the Replacement Plan’s interventions could help support this need in a practical way. The WLIA assessment of the Preferred Strategy, whilst not being able to significantly influence and undo decisions around scale, pace and strategic location/distribution of growth, has resulted in significant proposed changes which are deemed important and helpful to mitigate impact - and provide opportunities/benefits - for persons (both current and future generations) to use the Welsh language. For example, the Replacement Plan now incorporates “bilingual” in its vision for the city and Sections 2 (Influences) and 3 (Context and Issues) refer to the city’s linguistic context and national and regional aspirations, including the Welsh Government’s current strategy, Cymraeg 2050.
- 5.6 The Plan sets ambitious targets in terms of the scale of growth envisaged by 2036. This is based on a dwelling-led strategy of up to 1600 homes a year to provide and realise a need for 24,000 new dwellings and 32,300 jobs by 2036 to accommodate a population increase of 39,742.
- 5.7 This compares to the current adopted LDP for the period up to 2026 which was based on delivering 41,415 dwellings and 40,000 jobs. The Annual Monitoring Report (AMR) for the year ending March 2023 (AMR 7) recognises that completions on strategic sites have been lower than the annual target set with 21,323 homes built and 21,800 jobs created over the period 2006 to 2023. The AMR notes that average annual completions for the years 2016 to 2023 have been 1,242 compared to 725 completions for the previous nine years.<sup>36</sup>
- 5.8 The Edge Analytics Background Paper (upon which the Preferred Strategy of the proposed RLDP is based) estimates that the population increase 2021-2136 is likely to be 10.7% (2,650 persons) per year and households are likely to increase 14,6%. (1,564 households) per year. Annual average net migration is estimated at 1,390. This compares to the likely evolution of the average increase in the number of Welsh speakers per year referred to above of 17% (483 per year).
- 5.9 The published data on Gross In and Out migration<sup>37</sup> and the mid- year Annual Population Estimates for 2022 and 2023 are 371,104 and 383,536. This suggests an annual change in population of 11,280 and 12,432. Assuming no change in natural births and deaths, this suggests that there is a realistic possibility that the

<sup>36</sup> AMR 8 has been adopted by the Cabinet but at time of completion has not been published on the website.

<sup>37</sup> ONS (October 2021) Tables MIG001 LTLA EW In and MIG001 LTLA EW Out.

assumptions made as the basis for the RLDP for Net Natural Change is likely to be higher and those for Net Migration (in particular Net International Migration) is likely to be significantly lower than actual trends so far (Table 5).

**Table 5: Components of Estimated Population Change 2021 - 2023**

Period	Estimated Population at start of Period	Natural Change	Net Internal Migration	Net International Migration	Other	Estimated Population at end of Period
Mid 2021 to Mid 2022	359,824	903	555	9,833	-11	371,104
Mid 2022 to Mid 2023	371,104	466	2,456	9,416	94	383,536

Source: ONS

- 5.10 The estimated Cardiff population aged 3 and over in 2036 will be around 390,000. Should this be realised, then the percentage target for the proportion of the population (aged 3+) able to speak Welsh will be 13.3%.
- 5.11 Much of the land allocated for both housing and employment is rolled over from the adopted Plan. For example, as of March 2023, over 77% of the target housing provision of 26,400 for the period 2021-2036 consists of completions, houses under construction or land with planning permission. After allowing for adjustments to the existing housing stock and around 20% of the non-delivery of existing commitments, allocations form just under 20% (at 5,281) of the total provision. A further allowance of 6,202 (23,2%) is made for windfall developments.
- 5.12 Similarly, the employment strategy establishes that in quantitative terms there is more than adequate provision of land in the adopted LDP but that, within this quantum, there is an additional requirement for certain types of land uses:

*“In quantitative terms the existing supply of office and research and development (R&D) floorspace across the range of contributing areas (current stock of vacant premises, confirmed pipeline and strategic site allocations) is more than sufficient to meet core requirements.*

*Analysis suggests the LDP should provide for approximately 300,000 sqm of industrial and warehouse space. This is substantially greater than the available supply within the current pipeline and strategic site allocations. The requirement is in the order of 140,000 sqm of floorspace, equivalent to an estimated 35 hectares in land terms.*

*“The Strategy supports the regeneration of land and property for employment purposes including land at Forest Farm, Longwood Drive, Coryton for a Life Science Park”.*

- 5.13 The main focus, however, is on the regeneration of existing employment land.

*“to deliver a higher level of redevelopment and extensive refurbishment of stock within existing employment areas across the city.*

*Where alternative use of land is considered appropriate, priority will be given to mixed-use development comprising employment, housing and community facilities or, where that is not feasible, housing.”*

- 5.14 In terms of the aspirations for the growth in the Welsh language, the thrust of development and regeneration proposals in the plan overall is positive:

*“Identify positive, distinctive qualities of place and respond to unique features and opportunities of a location, including heritage, culture and Welsh Language.*

*Identity: Development must be designed to maintain or enhance the positive, distinctive qualities of places and build in features and take advantage of opportunities provided by a location including heritage, culture and Welsh Language.”*

- 5.15 Finally, the Draft Deposit Plan now incorporates a Strategic Policy (SP15) - *Securing and Enhancing Opportunities to Grow The Welsh Language* which sets the context for the consideration of all major development.

- 5.16 Overall, the assessment found that the draft Replacement Deposit Plan’s Vision would have broadly positive impacts in that the direction of travel includes a vision and objectives that take on board defining the city as an area of linguistic importance, particularly in relation to the capital city’s role and contribution to Cymraeg 2050. However, despite the mitigation measures now incorporated within the draft Plan, concerns remain that the scale, pace, growth and location of some major developments, whilst possibly helping to grow the number of Welsh speakers, are likely to have adverse effects in terms of normalising and increasing the use of the language in community, school or workplace contexts.

## 2 Strategic Policies

A draft version of the Deposit Plan, containing the draft strategic policies was assessed using the methodology adopted in Chapter 1. They were first assessed in terms of whether they were likely to have significant effects on the Bilingual Cardiff mission and outcomes and scoped out if not. This led to four of the Stronger SP’s and all of the Greener themed SP’s being scoped out. The remaining eleven Strategic Policies were then tested for likely effects on the use of Welsh in terms of the scoring framework adopted Chapter 1. **Table 6** summarises the full assessment.

- 5.17 Overall, there was a mixture of neutral, positive, and mixed scores. The positive scores reflected the belief that the infrastructure contribution requirements contained in SP5 and SP6, where effectively implemented, could be used to support

the Welsh language. The possible negative effects identified in SP1 and SP2 reflect the concerns discussed above around the scale, pace and distribution of development and the capacity of, or interactions with, communities on the outskirts of Cardiff such as Creigiau to absorb change without impeding the further use and normalisation of the language.

**Table 6: Summary of WLI appraisal of Strategic Policies**

<b>Bilingual Cardiff Outcomes</b>			
<b>Strategic Policy</b>	<b>Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets</b>	<b>Outcome 2 The use of the Welsh language significantly increased and normalised</b>	<b>Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture</b>
<b>STRONGER</b>			
SP1	+/-	+/-	+
SP2	+/-	?	+
SP3	?	?	+
SP5	0	0	+
SP6	0	0	+
SP7	0	0	+
SP9	0	0	0
<b>FAIRER</b>			
SP12	0	0	+
SP13	0	0	+
SP14	0	0	0
SP15	+	+	+

### 3 Detailed Policies

5.18 A draft version of the Deposit Plan, containing the draft detailed policies was assessed using the methodology adopted in Chapter 1. They were first assessed in terms of whether they were likely to have significant effects on the Bilingual Cardiff mission and outcomes and scoped out if not. This led to 57 of the 80 policies being scoped out. The remaining 23 detailed policies were then tested for likely effects on the Welsh language in terms of the scoring framework adopted in Chapter 1. **Table 7** summarises the full assessment.

5.19 Overall, there was a mixture of neutral and positive scores. The positive impact scores reflected the belief that the infrastructure contribution requirements contained in SP5 and SP6, where effectively implemented, could be used to support the growth of the Welsh language. The neutral effects identified against the employment and retail policies reflect the judgement that the implementation of these policies is unlikely to have significant effects on the growth of the use of the Welsh language or on their impact on existing Welsh language medium-density communities.

**Table 7: Summary of WLI appraisal of Detailed Development Policies**

<b>Bilingual Cardiff Outcomes</b>			
<b>Detailed Policy</b>	<b>Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets</b>	<b>Outcome 2 The use of the Welsh language significantly increased and normalised</b>	<b>Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture</b>
<b>HOUSING</b>			
H1A	+/-	+	+
H1B	?	?	+
H2.1	+/-	?	+
H2.2	0	0	+
H2.3	+/-	?	+
H2.4	0	0	+
H2.5	?	?	+
H2.6	+/-	?	+
H2.7	+/-	?	+
H3	?	?	0
H4	0	0	0
H9	?	?	+
<b>ECONOMY</b>			
EC1	+	+	+
EC2	Scope out		
EC3	0	0	+
EC4	0	+	+
EC6	0	0	+
EC7	0	0	+
EC8	?	?	+

EC10	+	+	+
<b>RETAIL</b>			
R2	0	0	0
R4	0	0	0
R5	0	0	0
R7	0	0	0
<b>COMMUNITY FACILITIES AND SAFETY</b>			
C1	0	0	+
C2	0	0	+
C4	+	+	+
<b>HERITAGE AND HISTORIC ENVIROMENT</b>			
HE1	0	0	0
<b>HEALTH, WELLBEING AND FOOD SUSTAINABILITY</b>			
HF1	0	0	0
<b>WELSH LANGUAGE</b>			
W1	+	+	+

## 4 Allocations

- 5.20 A draft version of the Deposit Plan, containing the draft allocations was assessed. Land identified as allocations are limited to strategic sites containing 500+ dwellings or non-strategic sites containing 100+ dwellings.
- 5.21 Using the methodology adopted in Chapter 1, they were first of all assessed in terms of whether they were likely to have significant effects on the Bilingual Cardiff mission and outcomes and scoped out if not.
- 5.22 In essence, this exercise took into account that the majority of the allocations were strategic sites (identified as key strategic sites) that have been “rolled over” from the current adopted Local Development Plan. Many of these allocations had, in theory at least, been assessed for their Welsh Language Impact and wider sustainability assessment as part of the overall Plan and found to be sound.
- 5.23 Although the Welsh language context has changed significantly since the examination and adoption of the plan in 2015 and 2016, we judged that many of these strategic sites had already been moved sufficiently along the “implementation and delivery road” (in terms of the principle of using the sites for housing, masterplans had been discussed and agreed upon or applications had been submitted and had reached an advanced state of assessment) for these not to be further assessed for Welsh language impact.
- 5.24 The assessment is therefore limited to seven specific allocations (one within Strategic Site B; three within Strategic Site D and three within Strategic Site F). In

addition, two non-strategic sites (Rookwood Hospital and Trowbridge Mawr) were to be assessed. Table 8 summarises the full assessment.

**Table 8: Summary of Welsh language impact appraisal of Allocations**

	<b>Bilingual Cardiff Outcomes</b>		
<b>Allocation</b>	<b>Outcome 1 The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets</b>	<b>Outcome 2 The use of the Welsh language significantly increased and normalised</b>	<b>Outcome 3 The Welsh language is supported through linguistic planning, economic development, digital platforms and culture</b>
<b>STRATEGIC SITE B Ferry Road</b>			
SH1.7 Former Gas Works	?	?	+
<b>STRATEGIC SITE D North OF j33</b>			
SH1.4	?	?	+
SH1.5	?	?	+
SH1.6	?	?	0
<b>STRATEGIC SITE F NORTH EAST CARDIFF</b>			
SH1.1	0	0	+
SH1.2	0	0	+
SH1.3	0	0	+
<b>NON – STRATEGIC SITES</b>			
H1.2 Rookwood Hospital	+/-	+	+
H1.1 Trowbridge Mawr	?	?	+

5.25 Overall, there is a mixture of uncertain effects and positive effects. The uncertainty scores in terms of Outcomes A and B reflect the lack of robust evidence to identify who is likely to become a new resident or household of these dwellings, and their present and future linguistic abilities and use, once the houses are completed. The positive impact scores in terms of Outcome 3 reflect the belief that the infrastructure contribution requirements contained in SP5 and SP6, where

effectively implemented, could be used to support the growth of the Welsh language in these sites, particularly where masterplanning and infrastructure contribution intervention tools are used to shape the planning of such places. The mixed score for Outcome 1 of the Rookwood site reflects concern about its impact in combination with the adjacent Parc Llandaf development on the neighbouring Canton and Llandaf medium-density clusters of Welsh speakers.

## 5 Will the RLDP facilitate/hinder the achievement of the Bilingual Cardiff mission by 2036?

- 5.26 Cardiff Council’s updated Delivery Plan anticipates that the replacement Local Development Plan will be adopted in Spring 2026. Up until this date, the “development plan” for the purposes of decision making on planning applications will continue to be the adopted Cardiff Local Development Plan 2006 – 2026. Thus, although the replacement Local Development Plan covers the period 2021 – 2036, decisions on a large proportion of the proposals (particularly on strategic sites) will be mainly assessed in relation to the 2006 – 2026 Plan rather than the policies and proposals of the replacement Plan (although the status and weighting of the RLDP will increase as the adoption process proceeds).
- 5.27 The Preferred Growth Strategy is a policy dwelling-led target scenario of 1600 per annum representing an additional overall target of an additional 24,000 dwellings and a minimum of 32,300 jobs over the lifetime of the Replacement Plan (2021 – 36). In terms of housing, there is a substantial landbank of new homes already committed (over 20,000 net in April 2023).
- 5.28 In addition to housing the RLDP also set ambitious targets in terms of job creation. No information is currently available on the likely trajectory of development on new employment sites. However, as referred to above, the main focus is on the regeneration of existing employment land. The Welsh language impact of employment generated by the replacement of one activity by another, is overall, unlikely to be significant.
- 5.29 In terms of housing, there is an assumption made in the draft RLDP that the new housing will be delivered at a steady rate of 1600 dwellings per annum and has made assumptions about the take up of the exiting landbank. The latest information from the AMR of the adopted LDP and calculations of Cardiff RLDP Team estimate the likely trajectory of dwelling completions as follows (**Table 9**).
- 5.30 **Table 9** anticipates that, in the short term (up to March 2026) there is an assumption that most of the completions will emanate from the existing landbank, either from completions already achieved (up to March 2024), from dwellings under construction (2024-25), or from an anticipated trajectory resulting from recent discussions with house-building stakeholders.

**Table 9: Estimated Trajectory of Housing Completions by Year and Time Periods**

Year	Completions	Under Construction	Anticipated Trajectory of existing strategic site commitments	New allocations	5 year cumulative	Cumulative	Target for Cumulative Completions (RLDP)	Difference between RLDP trajectory and Estimated Trajectory
2021/22	915							
2022/23	1,681							
2023/24	1,401							
2024/25		2,600						
2025/26			809	20	7,426	7,426	8,000	-574
2026/27			1,412	260				
2027/28			1,418	540				
2028/29			914	1,280				
2029/30			1,039	960				
2030/31			1,238	815	9,876	17,302	16,000	+1,302
2031/32			1,231	710				
2032/33			1,256	456				
2033/34			953	350				
2034/35			925	275				
2035/36			900	0	7,056	24,358	24,000	+358

## 6 Short term Impacts (2021 – 26)

- 5.31 The latest monitoring data<sup>38</sup> records that 3,992 homes were built over the 3-year period between April 2021 and March 2024. Based on estimates by the RLDP Team, **Table 9** shows an anticipated completion total of 7,426 homes over the five years which correspond to the first five years of the replacement plan.
- 5.32 Since the vast majority of new homes (over 95%) are expected to be delivered on Strategic Sites already allocated within the adopted LDP (2006 – 2026), the anticipated impact on the opportunities for persons to use the Welsh language have not been assessed as part of this WLIA as they are deemed to have been considered as part of the WLIA of the adopted Plan. The adopted Plan was considered to have a sound basis for the planning of the city up to 2026 by the Inspectors, including the Council’s statement that the needs and interests of the Welsh language have been taken into account in plan preparation. It does not contain a specific Welsh Language strategic or development management policy.
- 5.33 Although not directly referred to in the adopted LDP, the Supplementary Planning Guidance (SPG) on Planning Obligations<sup>39</sup> includes a section describing how the Council will seek contributions from developers towards the provision of new school places in circumstances where the need generated by a new development cannot be reasonably met by existing schools. The principle has been applied to secure the provision of new schools at Plasdŵr (Strategic Site C), including the provision of a dual language model 2FE school (Welsh and English with substantial amounts of Welsh). Ysgol Gynradd Groes-wen Primary School opened in September 2023.
- 5.34 Further provision is unlikely to be delivered within the first five-year term of the RLDP.

### Conclusion

- 5.35 In the short term (up to March 2026), the RLDP will not be in a position to make a contribution to conditions that significantly help the achievement of the Bilingual Cardiff mission as the development taking place during this period will almost certainly be steered by developments consented under the Policies and Site Allocations of the existing adopted LDP.

## 7 Medium term impacts (2026 – 31)

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<sup>38</sup> Cardiff Council (October 2024) Cardiff Adopted LDP 8th Annual Monitoring Report 2023.

<sup>39</sup> Cardiff Council (2017) Cardiff Planning Obligation SPG, section 7 Schools and Education.

- 5.36 During the period 2026 – 31 the allocations in the RLDP will start to be subject to the RLDP’s Policies. A crude estimate suggests that by April 2026, the cumulative total of dwellings completed in the first five years of the Plan period will be around 7,426, leaving an estimate of the inherited landbank at around 10,750 dwellings. The Cardiff RLDP Team’s trajectory estimates that 9,876 dwellings will be delivered during the period 2026 – 31. An analysis of the RLDP’s trajectory suggests that the majority of dwellings (61%) will derive from this landbank, with the remainder (3,875 – 39%) deriving from RLDP allocations (Strategic Sites, non-Strategic Sites, and Major Regeneration Sites).

### Conclusion

- 5.37 In the medium term, the RLDP will increasingly contribute to creating favourable conditions that significantly help the achievement of the Bilingual Cardiff mission. The development taking place during this period is likely to be largely steered by developments consented under the Policies and Site Allocations of the existing adopted LDP but will be significantly affected by the policies and proposals in the draft Plan.

## 5 The long terms impacts (2031 – 36)

- 5.38 During the period 2031 – 36, the allocations in the replacement LDP will largely be subject to the RLDP’s Policies. A crude estimate suggests that by April 2031, the cumulative total of dwellings completed in the first ten years of the Plan period will be around 17,302 leaving an estimate of the inherited landbank at around 5,000. The Cardiff RLDP Team’s trajectory suggests that there is a strong possibility that a significant proportion (28%) of dwellings during the 2031-36 period will derive from RLDP allocations. Where such sites are subject to Environmental Impact Assessment, they will also be required to set out their assessment of the impact of the proposed development on the opportunities to use the Welsh language in community, education and work contexts. Where the impact analysis indicates a possible significant negative impact, plans for mitigation and / or maximising enhancement will be expected in line with policies SP15 and WL1.

### Conclusion

- 5.39 In the long term, the RLDP has a realistic possibility of making a substantial contribution to creating favourable conditions that significantly help the achievement of the Bilingual Cardiff mission as the development taking place during this period is likely to be largely steered by developments consented under the Policies and Site Allocations of the replacement LDP.

## 9 Overall Conclusion

5.40 The overall impact of the draft Plan is framed in terms of the ability of the Plan to facilitate/hinder the achievement of the Bilingual Cardiff vision and mission.

5.41 The Bilingual Cardiff Strategy adopts the three strategic themes that form part of Cymraeg 2050 and prioritises three outcomes for the period 2022 – 27 with policies and actions aimed at key interventions to achieve progress in these areas. The elements most relevant to the proposed Plan interventions are highlighted:

**Theme 1:** Increase the **number and percentage** of Welsh speakers (in Cardiff)

Outcome 1: The number and percentage of Welsh speakers in Cardiff continues to increase and meets the identified targets to achieve the Welsh Government’s goals of a million Welsh speakers by 2050.

**Theme 2:** Increase the **use** of Welsh (to create a truly bilingual Cardiff)

Outcome 2: The use of the Welsh language is significantly increased and **normalised**

**Theme 3:** Creating favourable conditions - creation and maintenance of suitable conditions and an environment where the Welsh language and its speakers can thrive.

Outcome 3: The Welsh language is supported through linguistic planning, **economic development**, digital platforms and **culture**.

5.42 **Table 10** summarises our assessment.

**Table 10: Summary of Appraisal**

Key WLIA Question	Outcome	Overall Impact of Plan Policies	Overall Impact of Site Allocations
Will the draft Replacement Local Development Plan facilitate or hinder the achievement of the Bilingual Cardiff mission which is to double the number of Welsh speakers in Cardiff by 2050?	<b>Outcome 1</b> The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	0	?
	<b>Outcome 2</b> The use of the Welsh language significantly increased and normalised	?	?
	<b>Outcome 3</b> The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	+	+

- 5.43 In terms of Outcome 1, we have assessed the overall impact of the Plan Policies as neutral. Whilst some policies (such as the potential use of masterplanning and planning obligations) will help increase numbers (particularly through facilitating an increase in Welsh medium education), other policies designed to support the scale and location of growth of the population and the economy will be higher than the anticipated projected growth in Welsh speakers and thus are likely to lead to a lower growth (or even decline) of Welsh speakers in percentage terms. The main allocations initially focus on the Strategic Sites which are largely greenfield and so there remains considerable uncertainty as to who will live in the new homes. Consequently, our assessment is that the overall impact is uncertain.
- 5.44 In terms of Outcome 2, the use and normalisation of the language and its ability to flourish or wither, is largely a product of social and economic factors rather than physical factors although physical proximity to a concentration of other speakers can facilitate such use and normalisation. We assess the likely impact as uncertain.

- 5.45 In terms of Outcome 3, the effective use of the “infrastructure toolbox” provided by the Plan is likely to facilitate linguistic planning. Firstly, requiring major developers to develop their understanding of the baseline linguistic and social landscape can help factoring in positive interventions. Secondly, the requirement of developing a linguistic action plan can deliver positive outcomes for the Bilingual Cardiff Strategy. Thirdly, the use of planning obligation contributions can help the Council and others involved in realising the Bilingual Cardiff vision to plan and deliver their investments and other interventions. We assess the likely impact as positive.
- 5.46 **Table 11** summarises our assessment in terms of a Risk/Opportunities Matrix. We conclude that, assuming the adoption of the proposed mitigation and enhancement measures, there is a realistic possibility that the overall impact on the evolution of the trajected number of Welsh speakers by 2036 to be +2 (minor beneficial). That is, there is a realistic possibility that the number of people aged 3 and over able to speak Welsh will be higher than the trajected figure of 50,000 by 2036. There is less certainty that the overall impact on the trajected percentage of Welsh speakers is likely to be positive due largely to the assumptions made for the RLDP’s Dwelling-Led preferred growth strategy which is driven by assumptions of net migration.

Table 11: Overall Scoring of Likely Impact

REALISING THE BILINGUAL CARDIFF MISSION CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN					← THE MAGNITUDE OF IMPACT/OUTCOMES OVER THE PLAN PERIOD →			
					Major Positive	Minor Positive	Minor Negative	Major Negative
Target increasing the percentage of Welsh speakers to at least 17% by 2036 as part of the overall target of 86,000 by 2050					An increase of 2.5 percentage points or more in the number of Welsh speakers aged 3+ over the trajectory	An increase of less than 2.5 percentage points in the number of Welsh speakers aged 3+ over the trajectory	A decrease of less than 2.5 percentage points in the percentage of Welsh speakers aged 3+ over the trajectory	A decrease of 2.5 percentage points or more in the percentage of Welsh speakers aged 3+ over the trajectory
					High	Low	Low	High
LIKELIHOOD	Probability	Frequency	Score		2	1	-1	-2
↑	Evidence/Judgement/Experience shows that growth in the population on this scale will make it highly likely in the majority of cases	Evidence/Judgment/Experience - it is likely to occur at least 8 times out of 10 in existing Local Development Plans	Very likely	4	8	4	-4	-8
	Evidence/Judgement/Experience shows that growth/decline in the population on this scale will make it likely in the majority of cases	Evidence/Judgment/Experience - it is likely to occur 5- 7 times out of 10 in existing Local Development Plans	Likely	3	6	3	-3	-6
	Evidence/Judgement/Experience shows that growth/decline in the population on this scale will make it possible in the majority of cases	Evidence/Judgment/Experience - it is likely to occur fewer than 2- 4 times in existing Local Development Plans	Possibility	2	4	2	-2	-4
	Evidence/Judgement/Experience shows that growth/decline in the population on this scale will make it highly unlikely in the majority of cases	Evidence/Judgment/Experience - it is likely to occur fewer than 2 times out of 10 in existing Local Development Plans	Highly Unlikely	1	2	1	-1	-2

## Appendix 1: Local Development Plans and consideration of the impact on the use of the Welsh Language

Cynlluniau Datblygu Lleol yng Nghymru a'u Hystyriaeth o'r iaith Gymraeg (fel ar Mawrth 2024)				Local Development Plans in Wales and their consideration of the Welsh language (as at March 2024)						
Awdurdod	Authority	Cynllun Datblygu Development Plan	Cyfnod Period	Blwyddyn Mabwysiadu Year of Adoption	Polisi Penodol ar yr iaith Gymraeg Specific Policy on the Welsh language	Canllaw Gofodol Spatial Guidance	Map Cyfyngiadau gydag Ardaloedd Sensitifurwydd/Pwysigrwydd Ieithyddol Constraints Map with Areas of Linguistic Sensitivity/Importance	Gofynion ar Safleoedd Annisgwyl Requirements on Windfall Sites	Gofynion ar Safleoedd Annisgwyl Requirements on Windfall Sites	Canllaw Cynllunio Atodol Supplementary Planning Guidance
								Angen DIG/CG Require WLS/Action Plan	Angen AEIG Require WLIA	
Abertawe	Swansea	CDLI/LDP	2010 - 2025	2019	Oes Yes	Oes Yes (19%+)	Oes Yes	Na No	Efallai Perhaps (10+)	Na No
Arfordir Penfro	Pembrokeshire Coast	CDLI2/LDP2	2016 - 2031	2020	Oes Yes	Oes Yes (19.2%+)	Oes Yes	Na No	Oes Yes	Na No
Bannau Brycheiniog	Bannau Brycheiniog	CDLI/LDP	2007 - 2022	2013	Na No	Oes Yes (30%+)	Na No	Na No	Na No	Na No
Blaenau Gwent	Blaenau Gwent	CDLI/LDP	2006 - 2021	2012	Na No	Na No	Na No	Na No	Na No	Na No
Bro Morgannwg	Vale of Glamorgan	CDLI/LDP	2011 - 2026	2017	Na No	Na No	Na No	Na No	Na No	Na No
Caerdydd	Cardiff	CDLI/LDP	2006 - 2026	2016	Na No	Na No	Na No	Na No	Na No	Na No
Caerffili	Caerphilly	CDLI/LDP	2006 - 2021	2010	Na No	Na No	Na No	Na No	Na No	Na No
Casnewydd	Newport	CDLI/LDP	2011 - 2026	2014	Na No	Na No	Na No	Na No	Na No	Na No
Castell Nedd Port Talbot	Neath Port Talbot	CDLI/LDP	2011 - 2026	2016	Oes Yes	Oes Yes (25%+)	Na No	Na No	Oes Yes	Oes Yes
Ceredigion	Ceredigion	CDLI/LDP	2007 - 2022	2014	Na No	Na No	Na No	Na No	Na No	Oes Yes
Conwy	Conwy	CDLI/LDP	2007 - 2022	2013	Oes Yes	Na No	Na No	Oes (5+)	Oes (20+)	Oes Yes
Eryri	Eryri	CDLI/LDP	2016-2031	2019	Oes Yes	Oes Yes(100%)	Na No	Oes (5+)	Oes ("sylweddol uwch na 5") Yes ("substantially higher than 5")	Oes Yes
Gwynedd	Gwynedd	CDLI/LDP (ar y cyd ag/joint with Ynys Môn)	2011-2026	2017	Oes Yes	Oes Yes(100%)	Na No	Oes (5+)	Oes Yes (5+)	Oes Yes
Merthyr	Merthyr	CDLI2/LDP2	2016 - 2031	2020	Na No	Na No	Na No	Na No	Na No	Na No
Penybont ar Ogwr	Bridgend	CDLI/LDP	2006 - 2021	2013	Na No	Na No	Na No	Na No	Na No	Na No
Powys	Powys	CDLI/LDP	2011 - 2026	2018	Oes Yes	Oes Yes (25%+)	Na No	Na No	Oes Yes (10+)	Na No
Rhondda Cynon Tâf	Rhondda Cynon Tâf	CDLI/LDP	2006 - 2021	2011	Na No	Na No	Na No	Na No	Na No	Na No
Sir Benfro	Pembrokeshire Coast	CDLI/LDP	2006 - 2021	2013	Oes Yes	Oes Yes	Na No	Na No	Na No	Na No
Sir Ddinbych	Denbighshire	CDLI/LDP	2006 - 2021	2013	Na No	Na No	Na No	Oes (5+)	Oes Yes(20+)	Oes Yes
Sir Fflint	Fflintshire	CDLI/LDP	2015- 2030	2023	Na No	Na No	Na No	Na No	Na No	Na No
Sir Fynwy	Monmouthshire	CDLI/LDP	2011 - 2021	2014	Na No	Na No	Na No	Na No	Na No	Na No
Sir Gâr	Carmarthenshire	CDLI/LDP	2006 - 2021	2014	Oes Yes	Oes Yes (60%+)	Oes Yes	Na No	Na No	Oes Yes
Torfaen	Torfaen	CDLI/LDP	2006 - 2021	2013	Na No	Na No	Na No	Na No	Na No	Na No
Wrecsam	Wrexham	CDLI/LDP	2013-2028	2023	Oes Yes	Oes Yes (20%+)	Oes Yes	Oes Yes(5/15)	Oes Yes(5/15)	Oes Yes
Ynys Môn	Ynys Môn	CDLI/LDP (ar y cyd ag/joint with Gwynedd)	2011-2026	2017	Oes Yes	Oes Yes(100%)	Na No	Oes Yes (5+)	Oes Yes (5+)	Oes Yes

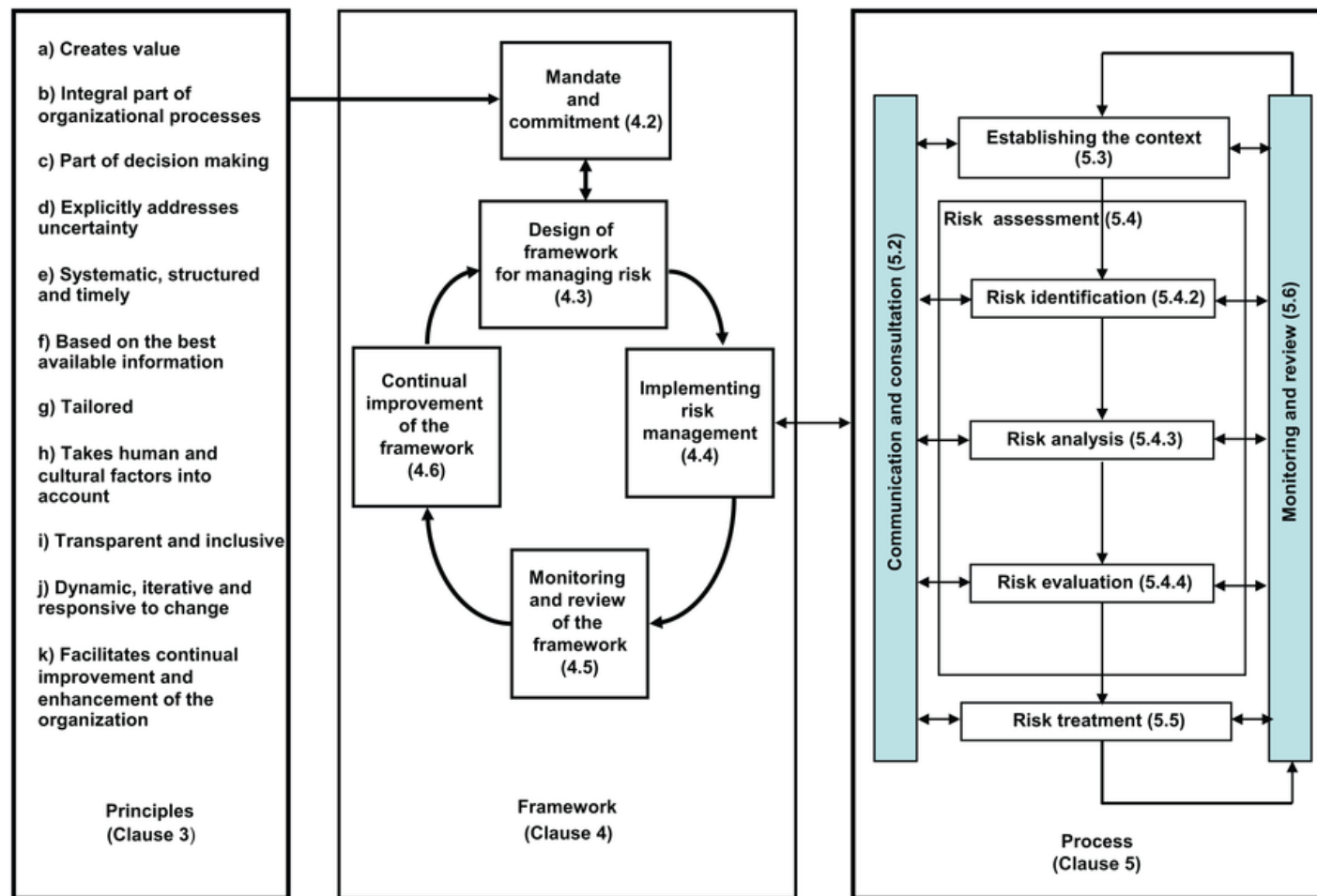
## Analysis

- Of the 24 Development Plans<sup>40</sup> examined, ten of the Local Planning Authorities had a specific policy 'hook' relating to the Welsh language. This is a decrease of one compared to the situation in 2019. Flintshire's adopted Local Development Plan does not have a policy hook compared to the old Unitary Development Plan.
- Nine Local Planning Authorities had designated geographical/spatial areas within their boundaries, including Gwynedd and Anglesey and Eryri National Park which regard their whole areas as being an area of linguistic sensitivity.
- Four LDP's have identified linguistically sensitive areas on their Constraints Maps.
- One authority, Bannau Brycheiniog, has a policy hook but no spatial guidance.
- In addition to these adopted plans Carmarthenshire's Local Development Replacement Deposit Plan also has a proposal to adopt a language sensitivity policy for the whole of the LDP Area.
- Ten planning authorities require an Impact Assessment for major unanticipated windfall sites (with the threshold varying between 10+ and 20+)
- Five authorities require a Welsh Language Statement or Action Plan for sites of 5 units or more.
- Nine authorities have an adopted Supplementary Planning Guidance.

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<sup>40</sup> Gwynedd and Anglesey have jointly adopted a Local Development Plan

## Appendix 2: Effective Risk Management Architecture – the relationship between principles, framework and process<sup>41</sup>



<sup>41</sup> Source: International Organization for Standardization (2018) *Risk Management Principles and Guidelines*.

## Appendix 3: Impact Assessment/Maximisation Framework Proposed

### Framework 1

Bilingual Cardiff	Will the Vision/Objective/Strategy Policy help/hinder	Indicator and wished for direction
Increase the number of Welsh speakers	Meet the city’s contribution towards a million Welsh speakers by 2050 Achieving the target of 55,277 by the end of 2036	The number and percentage of Welsh speakers continues to increase and meets the city’s contribution to the goal of a million speakers by 2050 Baseline Census 2021 figures Adjusted Cardiff Annual Population Survey Results 2031 Census of Population (subject to confirmation)
Increase the use of the Welsh language	The use of the Welsh language becoming increasingly used and normalised	The proportion of new developments with Welsh place names
Creation and maintenance of suitable conditions and an environment where the Welsh language and its speakers can thrive.	The creation of employment opportunities to retain the number of young Welsh language speakers Promotion of the use of the Welsh language in all new developments	Value of planning obligations used to support the Welsh language

## Framework 2

### Methodology for Assessment of Strategic and Non-Strategic Housing and Employments Allocations

Bilingual Cardiff	Will the Allocations Sites help/hinder	Indicator and wished for direction
<b>Increase the number of Welsh speakers</b>	Achieving the target of 55,277 by 2036	Baseline Census 2021 figures for relevant wards Adjusted Cardiff Annual Population Survey Results 2031 Census of Population (subject to confirmation)
<b>Increase the use of the Welsh language</b>	The use of the Welsh language becoming increasingly used and normalised	The proportion of new developments with Welsh place names
<b>Creation and maintenance of suitable conditions and an environment where the Welsh language and its speakers can thrive.</b>	Promotion of the use of the Welsh language in all new developments	Value of planning obligations on site used to support the Welsh language

## Appendix 4: Establishing the baseline for the number and percentage of Welsh speakers in Cardiff by 2036

### Introduction

1. As part of the assessment of the likely impact of the RLPD on the Welsh language, the methodology requires the development of a baseline (or ‘business-as-usual’) model of what the position might be in 2036 (the end of the Plan period) without the policy intervention of the Plan’s Preferred Strategy.
2. This is not easy to establish because, notwithstanding the problematic field of population projections and trajectories, forecasting future language transmission, acquisition, use, and loss is an extremely difficult and complex field, made even harder by trying to model the impact of policy interventions.

### Approach

3. As a first stage in the development of the baseline, IAITH/BURUM have sought to understand Welsh Government’s (WG) latest trajectory for how it might achieve its aspiration of achieving a million Welsh speakers in Wales by 2050 and its implications for what might be Cardiff’s situation by the end of 2036.<sup>42</sup>
4. It should be noted that it was the Welsh Government’s intention to update the trajectory after the publication of the relevant 2021 Census statistics. However, there is a delay at time of writing due to the need to understand why the Census results differ significantly to the suggested picture emanating from the results of the Annual Population Survey (APS).
5. The latest APS figures for end 2023 suggest that for Wales 896,000 people aged 3 and over able to speak Welsh (29.2% of the population. This compares to 538,000 people aged 3 and over recorded in the 2021 Census. For Cardiff the corresponding figures are 84,600 (23.1%) for the APS compared to 42,000 (12.2%) for the Census.
6. As a precursor to the analysis and discussion, it is important to re-emphasize the important differences between a projection and a trajectory.
7. A projection in this context is defined as “*the number of Welsh speakers that is predicted if the current patterns and trends regarding the Welsh language and the population continue until 2050.*”<sup>43</sup> A trajectory in this context is defined as “the number of Welsh speakers estimated based on the projection as well as a number

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<sup>42</sup> Welsh Government Statistics for Wales (June 2017) *Technical report: Projection and trajectory for the number of Welsh speakers aged three and over, 2011 to 2050.*

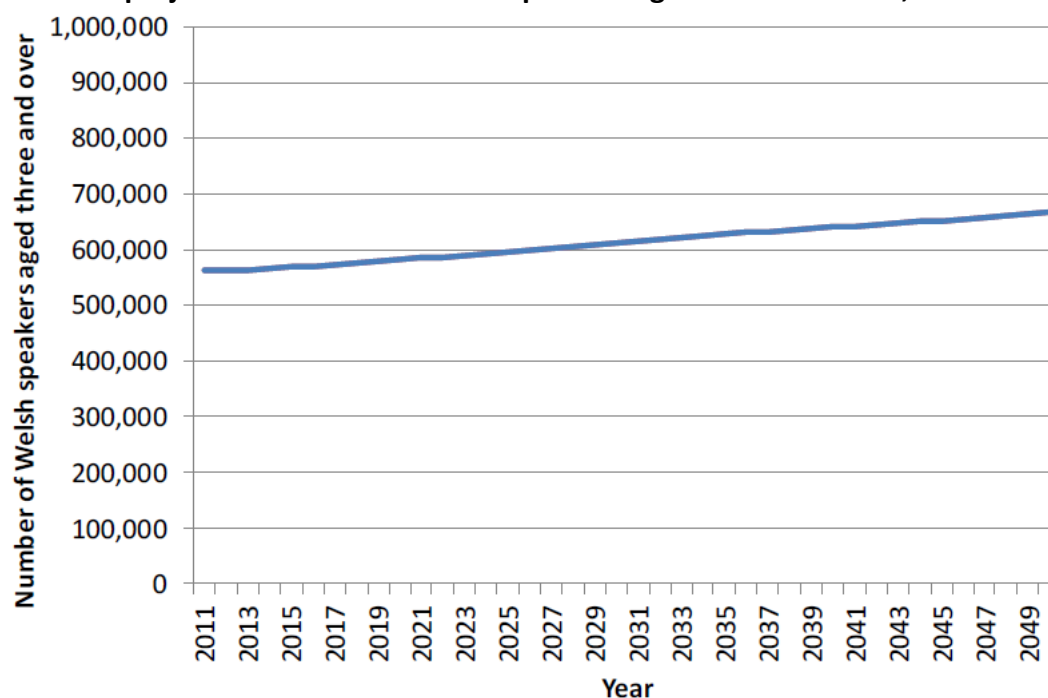
<sup>43</sup> Ibid. p2.

of assumptions in relation to the aims of the WG strategy to reach the target of a million Welsh speakers by 2050.”<sup>44</sup>

### Welsh Language Speaker Projections

8. The data used for the projection contained in the WG report was based on the following three sources:
  - ONS mid-year population estimates by age for the period 2011 to 2013;
  - ONS national population projections by age for period 2014 to 2050;
  - data about Welsh language ability by age from the 2011 Census.
  
9. The projection is based on the conceptual model devised by Sankoff (2008)<sup>45</sup> and broadly assumes that the percentage of Welsh speakers in one age group in one year will be equal to the percentage in the age group in the previous year with adaptations on assumptions made about language acquisition by children.
  
10. **Figure 9** and **Table A12** present WG projections for the growth in the number of Welsh speakers aged three and over during the period 2011 to 2050. As stated previously, care needs to be taken as they are based on a set of assumptions about trends, trends that will possibly/probably change over time.

**Figure 9: WG projected numbers of Welsh speakers aged three and over, 2011 to 2050**



Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit. Chart 2, p. 5.

<sup>44</sup> Ibid. p7.

<sup>45</sup> Sankoff, D. 2008. ‘How to predict the evolution of a bilingual community’ in Meyerhoff, M. a Nagy, N. (eds.) *Social Lives in Language – Sociolinguistics and Multilingual Speech Communities Celebrating the Work of Gillian Sankoff*. Edinburgh University/ Toronto University.

**Table 12: WG projected numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050**

Year	Number	Percentage
2011	562,000	19
2017	570,000	19
2021	580,000	19
2026	600,000	19
2031	610,000	20
2036	630,000	20
2041	640,000	20
2046	650,000	20
2050	670,000	21

Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit., Table 1, p.5.

11. The more detailed background tables<sup>46</sup> show a projected number of Welsh speakers aged three and over as reaching 631,000 by 2036 which suggests an increase of a little under 68,000 by 2033 (+12.1%).
12. Although not directly shown in the statistics, the WG 2014 based projections estimated a population aged three and over for Wales of 3,153,560 giving a percentage figure of 19.7% (rounded up to 20%) for Welsh speakers.
13. The projected figure for Cardiff total population for 2036 using the WG 2014 projection was 433,371.<sup>47</sup> The city's projected population aged three and over is assumed to be 421,055 (97.1% of total). The number of persons aged 3 and over in 2011 able to speak Welsh was 36,735.
14. Applying the same change (12.5%) over the period 2011 – 2036 in the percentage of the overall population of Wales aged three and over who speak Welsh to the projected change in the overall percentage figure for Welsh speakers aged three and over in Cardiff would lead to a growth in number of 36,735 \* 12.5% = 41,326.
15. This would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 9.8% by 2036. This compares to 11.1% recorded in the 2011 Census.
16. The WG 2018 based projection revises the total population for Wales aged three and over by 2036 to 3,266,671. The population projection for Cardiff is revised to 364,384.
17. The 2021 Census results for Wales showed a significant diversion to the trajectory assumption (538,296 versus 580,000). The figures for Cardiff showed 42,753 (out of 351,236 – 12.2%) were recorded as being able to speak Welsh. This figure is already

<sup>46</sup> This data is available at <https://statswales.gov.wales/Catalogue/Welsh-Language>.

<sup>47</sup> Stats Wales

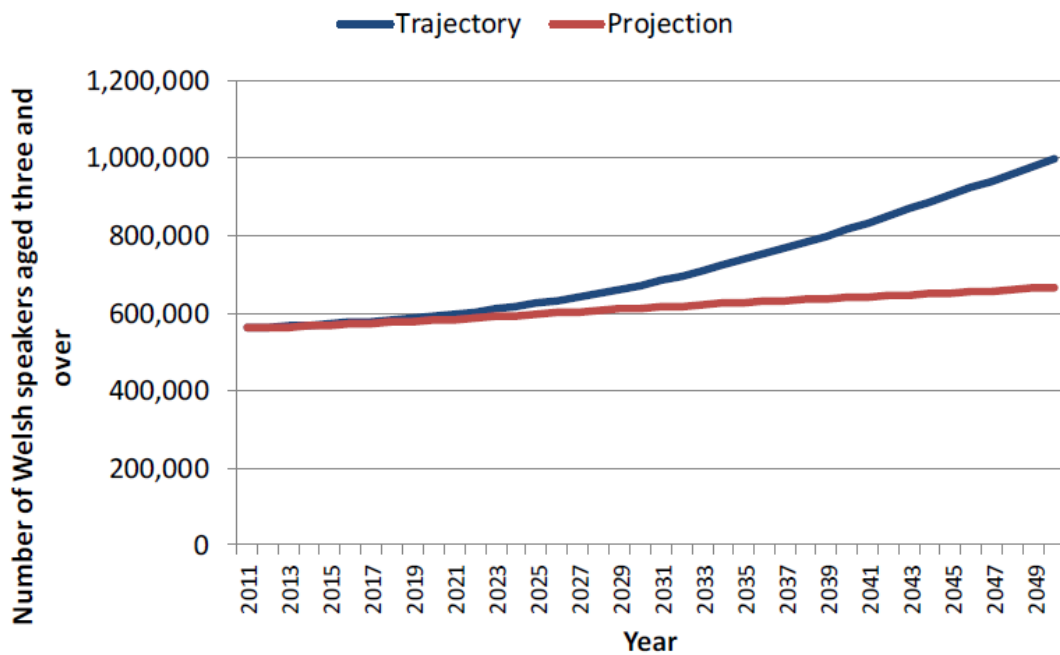
significantly higher than the assumption of 41,326 were Cardiff to have followed a similar growth pathway to that of the Wales projection.

18. For the reasons given in paragraph 4 above, the percentages of Welsh speakers produced in the Welsh Government data presented in **Figure 9** and **Table 12** above will not be updated until after the results of the 2021 Census are known.

**A possible Welsh language speaker Trajectory**

19. The WG’s trajectory has been calculated building upon the WG 2014 projection produced above as a baseline and using four main assumptions based on the policy aims of the strategy:
  - Welsh language transmission at home.
  - learning Welsh in school.
  - learning Welsh through Welsh for Adults; and
  - improved continuation of Welsh-speaking ability post-16.
20. **Figure 10** and **Table A13** are reproduced from the WG report.

**Figure 10: WG projection and trajectory for the number of Welsh speakers aged three and over in Wales, 2011 to 2050**



Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit. Chart 6, p. 10.

21. The more detailed background tables<sup>48</sup> show that the trajectory estimated number of Welsh speakers aged three and over as 750,000 by 2036. The WG 2014 based

<sup>48</sup> This data is available at <https://statswales.gov.wales/Catalogue/Welsh-Language>.

projection aged 3 and over for Wales of 3,155,276 gives a percentage figure of 23.8%.

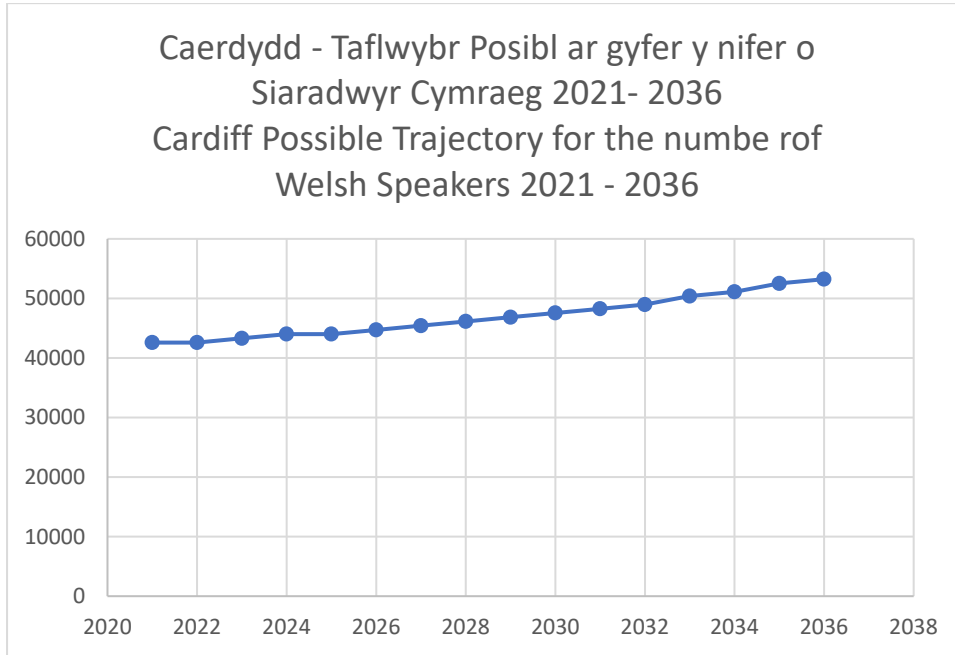
**Table 13: Numbers and percentages of Welsh speakers aged three and over at specific periods up to 2050 according to WG trajectory**

Year	Number	Percentage
2011	562,000	19
2017	580,000	19
2021	600,000	20
2026	630,000	20
2031	680,000	22
2036	750,000	24
2041	830,000	26
2046	920,000	29
2050	1,000,000	31

Source: reproduced from Welsh Government Statistics for Wales (2017) Op. Cit., Table 2, p 11.

22. Applying the same change (23.8%) in the percentage of the population aged 3 and over who speak Welsh to the projected change in the overall percentage figure of Welsh speakers in Cardiff, using the 2021 Census as a baseline would possibly lead to a growth in the number of Welsh speakers aged 3 and over to 70,893 by the end of 2036.
23. Based on the Growth Strategy population assumption of around 410,000 (and 398,100 aged 3 and over) by 2036 this would provide an estimated percentage of the population aged 3 and over able to speak Welsh as 17.8%. This compares to 12.2% recorded in the 2021 Census. **Figure 11** shows the trajectory of the growth in numbers of Welsh speakers in Cardiff, based on the overall trajectory for Wales.

**Figure 11: Estimated trajectory for growth in Welsh speakers in Cardiff by 2036**



Note: The 2021 baseline uses the numbers recorded in the 2021 Census.

### Limitations

24. A note of caution needs to be re-emphasised. The above assumes that the *Cymraeg 2050: a million Welsh speakers* strategy outcomes are apportioned equally across Wales. It is understood that, at present Welsh Government, does not intend to produce spatial trajectories or targets for regions and each individual local authority. In the absence of such trajectories, the assumption of equal impact across Wales is the best working 'guesstimate'.

\* \* \* \* \*