

ATTACHMENT 1**Summaries of representations received regarding:****Welsh Language and the Community SPG**

	Respondent	Issue Raised by Respondent	LPA Comment	Proposed Change to SPG?
1.	Natural Resources Wales	NRW submitted a response to the consultation process to formally note that they had no Comment to make with regard to this SPG.	LPA note the response	No change required
2.	Lampeter Town Council	p.14 pt 2. This is a very important question. There must be management of the increase in immigration affecting the increase of non-Welsh speaking households. p.15 pt 8. Very important again. It must be ensured that there is no threat to Welsh businesses from any development. p.16 pt 12 The average cost definitely affects the	LPA note the comments however these are made as observations by the Respondent and therefore do not require a modification to the existing SPG.	No change required

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		ability of local young people to buy housing in their areas. Very happy with the nature of the questions and discussions. Many areas are already affected by an excessive immigration of non-Welsh speakers.		
3.	Melindwr Community Council	Comment that documentation not received on time.	The LPA acknowledge there was a slight delay in the delivery of the consultation notification. however, this was a matter of a few days and the documentation were delivered within the 1st week of consultation and not 3 weeks as noted by the Objector. The LA consider that there was still sufficient time to respond, particularly as the period given was already slightly over the 6 week period required for such consultations.	No change required
4.	Plans Branch, Welsh Government (WG)	WG recognise that SPGs are generally useful tools to assist decision makers and planning applicants	The LPA welcome the support and recognition of the value of SPGs generally. The comment is non-specific and does not require amendment to this particular SPG.	No change required

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		when considering appropriate mitigation measures or determining a planning application and WG therefore support the preparation of SPGs generally. WG highlight that the SPG should not introduce policy, but amplify and add detail to existing policy set out in the LDP.		
5.	Plans Branch, Welsh Government (WG)	WG request an explanation of the relationship between criteria 1 b of Policy DM01 in the adopted Local Development Plan (LDP) and how the authority will measure the rate that development comes forward at the specified locations, specifically at a "faster rate than that referred to in the Settlement Group". In	Para 8.13 Volume 1 of the LDP clarifies the seven Service Centres to which criterion 1b applies. It clarifies that rate of development is not an issue other than in those settlements therefore criterion 1b only applied to those seven named. The para also makes reference to the fact that the individual Settlement Group Statements, to avoid any confusion also mentions the need for phasing where it is to be required (again the seven named). Where phasing is not referenced	Additional text is provided in response to point 6 below.

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		addition, if a rate is not specified whether this means that the policy would not be applicable?	then it is not a requirement. By way of example, in relation to Talybont, para 22.2.11 sets out that phasing will be required. It sets out how the LA will look at rate, that is when in the plan period we are at and how many completions and outstanding consents exist.	
6.	Plans Branch, Welsh Government (WG)	Paragraph 2.5.2 of the SPG lists villages in Volume 2A of the LDP which require phasing, but the application of the phasing is not clarified. The SPG should explain how the authority measures the phasing and anticipated delivery rates so that applicants can access this information to ensure clarity and transparency. This would assist the planning application process.	Para 2.5.2 of the SPG specifies a number of settlement groups (where phasing is required. It is agreed that this para should make clearer that it is the Service Centres for those seven Settlement Groups that phasing will apply and not any of the other settlements within those Groups.	Explain the role and purpose of phasing. Highlight where anticipated delivery rates are set out. The word 'only' has been inserted into the following sentence in Para 2.5.2: '2.5.2In relation to housing, the LPA have identified within the individual Settlement Group Statements for Aberaeron (Llwynceilyn), Felinfach/Ystrad Aeron, Llanilar, Llanrhystud, Pontarfynach, Pontrhydfendigaid and Talybont only that it will be necessary to control the rate at which new housing development comes forward.' The following text has been added in relation to phasing in para 2.5.2: For example, if a settlement has an allocation of 90 houses, the LPA will seek to monitor delivery and ensure that approx. 30houses come forward in for any 5 year period of the

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				<p>plan period. If this is not the case, the LPA will look at phasing to mitigate impacts.</p> <p>The following sentence has also been added to the end of Para 2.5.2 for further clarification: in accordance with Policy DM01 criterion 1a. In Linked Settlements, the rate of development is considered to be an issue where it exceeds 4% in any rolling 5 year period in accordance with policy DM01, criterion 1b. The Council monitors the rate of development in Linked Settlements on a monthly basis. The latest results are published here: http://www.ceredigion.gov.uk/index.cfm?articleid=17012.</p>
7.	Plans Branch, Welsh Government (WG)	The questions included in the Welsh Language Impact Assessment questionnaire also raise some concerns. The Council will need to reassure itself that all of the questions are based on robust evidence, are quantifiable and therefore assist the decision making process, rather than introducing ambiguity.	<p>Concerns were expressed by WG about the questions included within the CLIA, however no specific examples were referred to.</p> <p>The LPA have reviewed all the questions in CLIA questionnaire to ensure they can be supported by robust evidence. The LPA is confident that this is the case and that further amendment is not required.</p>	No change required.
8.	Cymdeithas	The Council	LPA note the comment	No change required.

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	Yr Iaith, Rhanbarth Ceredigion	acknowledges that there has been a reduction in the number of Welsh speakers according to the results of the last two Censuses. It also acknowledges that there remains a substantial percentage of Welsh speakers in each ward and that the Welsh language is a significant element of most communities in the county. This is an important factor to consider.		
9.	Cymdeithas Yr Iaith, Rhanbarth Ceredigion	Policy DM01 - Although Policy DM01 'Managing the Impacts of development on Communities and the Welsh Language' is part of the Ceredigion LDP, if that Plan were to be based upon housing need – in terms of the number and location of	Housing need in Ceredigion's LDP is estimated in two ways: <ul style="list-style-type: none"> •A county-level, medium-term estimate of need suitable for strategic planning is made by modelling primary survey information and secondary statistical data •A short-term estimate of particular aspects of need in a small rural area useful for specific 	No change required.

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		<p>houses – such a policy would be unnecessary. This is also true in relation to point 2.5.2. of the Guidance. It refers to specific areas where more care and consideration is needed, and the recommendation is to develop in phases. Again, housing need should be the basis for building houses.</p>	<p>projects (e.g. work of the Rural Housing Enabler) is provided by a local survey.</p> <p>The county-wide housing need is estimated using a supply and demand model which accounts for the major elements such as household dissolution, household formation, savings and incomes, housing costs (rents and prices), and additional needs such as adaption for disabilities. The basis of the initial Ceredigion housing needs study in 2004 was a comprehensive face-to-face interview survey with 1,500 households sampled randomly from across the county. The survey included information not available from secondary sources such as household savings, household intentions, attitude to finance, special housing needs etc. At its simplest working the model calculates the total demand for housing, and the total available supply. The model matches all sources of supply to the demand in terms of affordability (rental and sale), and in aspects such as</p>	

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			<p>household size and dwelling size. Households which cannot meet their needs from the existing supply at an affordable level of rent or price, or which have special requirements, are defined as being in housing need. The initial interview survey was benchmarked to county level using a variety of secondary data. The initial study results were designed with a 5-year currency, and the model has subsequently been updated with secondary data and other survey information. The local small area studies undertaken by the Rural Housing Enabler are of a very different nature, being based on a survey of household formation intentions and perceptions of a self-selected sample of existing residents of a small area (e.g. a ED Ward or Community Council area). These surveys provide an idea of local views on housing and some information on housing need, and can be especially useful as an exercise in opening up the debate on housing in a local area. The</p>	

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			value of the survey results, however, is limited by the methodology: they may capture aspirations, rather than need; they may be quickly superseded by changes in individual circumstances; they do not capture the need of people who do not respond. In particular, the approach cannot provide a methodology for capturing housing need on a larger scale as they fail to account for households in need who may have to move between locations.	
10.	Cymdeithas Yr Iaith, Rhanbarth Ceredigion	Impact Assessments - Point 2.6.1 of the Guidance refers to situations which will require assessments of the impact of development upon the Welsh language, but the impact upon the Welsh language should be considered when dealing with all planning applications under the LDP, and all other	The Welsh language is a material consideration in the formation of Local Development Plans (LDPs) and the Council has made every effort, in particular through the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) process, that its LDP will not cause significant harm to the use of the Welsh language. This process did indeed place the Welsh language on the same level as other sustainability considerations. It is the Council's	No Change required

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		<p>applications. It would appear that this relates to developments that are in addition to the LDP, but it isn't entirely clear what assessment has been made of the impact of developments in the LDP upon the Welsh language.</p>	<p>opinion however, that there are also certain types of proposal where the Welsh language should be given further consideration at the planning application stage. As such, Policy DM01 of Ceredigion's LDP requires Community and Welsh Language Impact Assessments (CWLIA's) to be submitted as part of certain planning applications.</p> <p>It is not appropriate to ask for assessments on all applications as most are unlikely to have any effect on the use of the language. However, the Council maintains that where an application proposes a development that is of a significant scale in relation to a locality, or would result in a rate of development that is beyond that historically experienced by a locality, then evidence needs to be submitted that demonstrates that there will be no significant damage to the use of the Welsh language, or more favourably, demonstrates the proposal's benefit to the maintenance or growth of Welsh language use. It</p>	

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			will apply to most applications, because most settlements have reached their capacity to absorb development. All planning applications must consider if policy DM01 applies, but in accordance of criterion 1 a & b and 2, it is dependent on the rate and scale of development proposed.	
11.	Cymdeithas Yr Iaith, Rhanbarth Ceredigion	Although the Community and Linguistic Impact Assessment Questionnaire in section 2.13 gives consideration to inward and outward migration, the Welsh language and the provision of key services at local community and county level, it is a cause for concern that it is the applicant / developer whom will undertake the assessment. This relies on the assumption that the applicant will	Clarify references within the SPG which set out who undertakes the assessment and who is the 'assessor'. Ensure it is clear that the applicant is responsible for submitting the assessment undertaken by an assessor, with their planning application, and that the LA is the responsible for considering, checking and verifying that information. The SPG recognises in para 3.3.1 that this process is a subjective assessment, but should be informed by evidence available (therefore it won't always be possible to provide statistical information, sometimes qualitative information is also relevant)..	Amend SPG to clarify that the assessment itself will be undertaken by the applicant and submitted to the LPA. The LA will have responsibility for reviewing the assessment as part of the planning application determination process.

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		<p>possess enough information and expertise to make an unbiased and objective assessment; this is difficult as they have an interest in the matter.</p> <p>Linguistic impact assessments should be undertaken by a suitably qualified and neutral third party – the County Council itself could provide a list of persons qualified to do so. It seems that this questionnaire also relates to developments that are in addition to the LDP – and again it is unclear whether or not developments that are part of the Plan have been subject to this process.</p> <p>If developments were brought forward on the basis of local need – in terms of their number and location – this</p>	<p>The LPA are unable to recommend agents / persons qualified to undertake CLIA's due to competition rules / data protection etc.</p> <p>All policies and sites allocated in the LDP were subject the LDP SA/SEA process which assessed community & language impact which can be viewed here: http://www.ceredigion.gov.uk/index.cfm?articleid=17756</p> <p>The questionnaire will apply to all planning applications captured by criterion 1 or 2 of Policy DM)01 regardless of whether they are on allocated sites or windfalls.</p> <p>See LPA response to comment 10 above in relation to local need points.</p>	

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		questionnaire would be neither relevant nor necessary.		
12.	Mr Narrainen	Supports para 2.3.3	LPA notes the support	No change required
13.	LA	N/A	A number of grammatical spelling and flow of wording matters need to be addressed in the document. These will be addressed prior to adoption along with some reformatting.	Various grammatical, spelling, word flow, publication matters to be dealt with throughout the document.

The LA have also identified other minor changes to the SPG and these are summarised below (none change the principles or context of the SPG):

Community and Language Impact Assessment SPG Amendment Table

Change	Reason	Page number
Deleted following text from Para 2.2.3 and re format and divide in to two new paras 2.3.5 and 2.36: Furthermore, the impact new development can have on a community is also a material consideration, elements that could be considered are whether the development is too large for the settlement, would development put undue pressure of local services e.g. the school and utilities etc. Where negative impacts may arise, mitigation measures such as phasing may be used to alleviate them, though an assessment of local evidence should inform such a condition, as is noted in the Examination Report on Ceredigion County Council's LDP. The Examination also concluded that the use of assessments in relation to individual planning applications would be appropriate in certain circumstances given the linguistic character of	Moved to para 2.3.5 and 2.3.6	3 / 4

the area.		
<p>Added the following text to the end of Para 2.3.1: and include the following LDP polices:</p> <ul style="list-style-type: none"> •S01: Sustainable Growth •S02: Development in Urban Service Centres (USCs) •S03: Development in Rural Service Centres (RSCs) •S04: Development in 'Linked Settlements and Other Locations' •S05: Affordable Housing •DM01: Managing the Impacts of Development on Communities and the Welsh Language •DM08: Bilingual Signs and Place Names •DM19: Historic and Cultural Landscape 	Cross referencing to relevant sections of the Local Development Plan.	3
<p>Added the following text to the end of Para 2.3.2: in the form of a Community and Language Impact Assessment (CLIA) .</p>	Further clarification	3/4
Moved part of para 2.3.4 to 2.3.5 and re-formatted.	Improved readability	4
<p>Added para number (2.4.2) to para after to para 2.4.1 and create new para 2.4.3 with the following text: Appendix 3 provides population statistics on the numbers and proportion (%) of Welsh Speakers by Electoral Ward.</p>	Cross reference	5
<p>Added the following text to para 2.5.2: Add 'only' after Talybont After the sentence that end Settlement during any period of the plan add 'For example, if a settlement has an allocation of 90 houses, the LPA will seek to monitor delivery and ensure that approx. 30 houses come forward in for any 5 year period of the plan period. If this is not the case, the LPA will look at phasing to mitigate impacts.' Add '(over the plan period)' after Phasing Add the following at the end of the para: 'in accordance with Policy DM01 criterion 1a. In Linked Settlements, the rate of development is considered to be an issue where it exceeds 4% in any rolling 5 year period in accordance with policy DM01, criterion 1b. The Council monitors the rate of development in Linked</p>	Cross referencing and clarification	8

Settlements on a monthly basis. The latest results are published here: http://www.ceredigion.gov.uk/index.cfm?articleid=17012.		
Following text added to para 2.5.5: After 1 st sentence add: Further guidance on potential negative effects is provided in section 4.1 Notes. Add at end of para: Mitigation Measures the LPA may seek to negotiate include: Phasing, Bilingual Signage, and Language Plans / programmes.	Cross referencing and clarification	8/9
Change para number 2.9.1 to para number 3.3.1 / 2.9.1 And change the text as follows: 3.1.1The Community and Linguistic Impact Assessment (CLIA) methodology comprises a checklist questionnaire to allow the developer and LPA to make an assessment of the likely impact of a development proposal against five aspects of community life: A.Population Characteristics (levels and the characteristics of that population); B.Quality of life (therefore providing the impetus for people to remain, leave or move to the community); C. The Economy Economic Factors (affecting employment opportunities for different social groups as well as the cost of living and, more specifically, the cost of housing); D.Infrastructure Provision (needed to sustain the community, particularly schools, health care and essential services); and E. The Social and Cultural Life Social and cultural aspects of the community life (expressed through the viability of cultural institutions, particularly those affecting younger & older people). Also amended para 2.12.2 / 3.4.2, and sub headings in Appendix 1 Questionnaire accordingly.	Consistency in terminology	11/12
Replaced word 'Checklist' with 'Questionnaire' throughout the document.	Consistency / Terminology	N/A
Deleted '(the LPA)' where it appeared following the word 'assessor' throughout the document.	Consistency / terminology	N/A

Attachment 1

Summary of representation received regarding the LDP – Welsh Language & the Community SPG

Deleted following sentence from Notes for Question2: 'A holiday home development, however, is unlikely to cause any permanent shift in social structure, and may lead to economic benefits assessed in later questions.'	Irrelevant example	21/22
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