

POLICY AND STRATEGY

Commission for Welshspeaking Communities: position paper

The position paper has been prepared by the Commission for Welsh-speaking Communities, and outlines their initial findings and summarises the discussions on evidence collected by the Commission to date.

First published: 1 June 2023

Last updated: 1 June 2023

Contents

Executive summary

- 1 Introduction: the work of the Commission
- 2 Language planning principles
- 3 Areas of (higher density) linguistic significance
- **4 Community development**
- **5 Economy**
- **6 Education**
- 7 Housing
- 8 Town and country planning
- 9 Equality and inclusion

Annex: 2021 Census

Executive summary

The Commission for Welsh-speaking Communities was established by the Welsh Government in August 2022 with the aim of making recommendations to strengthen Welsh-speaking communities. The Commission's final recommendations will be published in the form of a report by August 2024. This Position Paper explores some initial findings in the field. It aims to discuss principles and ideas.

Language is a phenomenon that is used between people, and linguistic practices are associated with the interaction of speakers rather than just being a characteristic of speakers individually. Therefore, for the Commission for Welsh-speaking Communities, the consolidation of social contexts and conditions that facilitate the acquisition and use of language is at the heart of language planning. One of the most important contexts for this are Welsh-speaking communities.

The Commission emphasises that Welsh is a national language. It has a number of universal attributes and language policy should reflect this. For example, language rights in Wales should be universal: they belong to every citizen wherever they live in Wales.

In order to support Welsh as a national language, it also needs to be supported as a community language. In areas facing language shift to English there should be a willingness to permit the variation of public policy in socio-economic and sociolinguistic domains in order to stabilise Welsh as a community language. These domains include policy fields such as town and country planning, land use, housing, education, community development, language planning and economic policies. This is essential for the community sustainability we consider to be vital for the linguistic sustainability of Welsh-speaking communities.

In order to be able to vary public policy in these communities, areas of linguistic

significance should be designated. These areas should be known as 'areas of (higher density) linguistic significance'. This would acknowledge the reality of language demography and also highlight that the Welsh language is significant in all parts of Wales.

The advantage of designating areas of (higher density) linguistic significance would be:

- allowing policy variation and policy emphasis to support Welsh as a community language
- 2. ensuring that the policy variation responds to the diverse social and linguistic needs of these areas
- 3. increasing the consideration given to the Welsh language within a policy framework
- 4. allowing interventions in support of the Welsh language in order to stabilise and strengthen it as a community language
- 5. giving communities the necessary powers to reverse language shift

Not all policies would have to be varied. The designation of areas of (higher density) linguistic significance creates the ability to vary policy.

Designating such areas could also facilitate the most effective use of resources, promote joint working across county boundaries, and provide a framework for local action in the context of the Welsh Language Measure (Wales) 2011 Promotion Standards.

As part of the designation of these areas, the Welsh Government could set a statistical threshold in order to identify communities with a high density of Welsh speakers. We are considering whether this should be a statutory requirement. However, this would not be the only way, nor perhaps the main way, of designating areas of (higher density) linguistic significance.

Many communities in Wales have an intermediate linguistic profile. Careful

consideration should be given as to whether they should be designated. The Commission believes that local authorities should make this decision. Such a decision would not be based solely on statistics: there may be an element of self-definition connected to a desire to implement specific policies. By responding to local democracy, the possibility that areas might be excluded contrary to the wishes of their residents would be reduced. One possibility would be to designate two tiers within areas of (higher density) linguistic significance to reflect the needs of different communities. The Commission will consider this further after discussing with stakeholders.

As well as giving consideration to areas of (higher density) linguistic significance, the Commission has begun scrutinising specific policy fields. Our discussions to date do not include recommendations, but rather initial views and comments. As we are working to a timetable with the aim of making recommendations by August 2024, we have not yet discussed all topics.

The Commission is convinced that community development can promote the sustainability of Welsh-speaking communities. Communities should be given legal, financial and political power in a meaningful way. For example, the Commission believes that it is important for communities to be able to have ownership of assets. It also notes the importance of the foundational economy and social enterprises.

The economy is important to the future of Welsh as a community language. Further research should therefore be undertaken on the relationship between economic development and the language. The Commission welcomes the contribution made by ARFOR. ARFOR should be made permanent, have its own executive, and include areas of (higher density) linguistic significance outside the four counties currently included in the programme. The Welsh language should also be treated fairly within economic development structures arranged along an east-west axis. In the next stage of its work, the Commission will discuss, amongst other things, public sector jobs, tourism, agriculture and land use.

Education is vital to the future of the Welsh language as a viable community language. The Commission believes that all children in Welsh-speaking areas should be fluent in Welsh when they complete their education at 16. This is essential to the child's wellbeing, to social inclusion and in order to reverse language shift.

The Commission welcomes the Welsh Language Education Bill White Paper and its commitment to the wellbeing of Welsh-speaking communities. It agrees that there should be higher linguistic expectations for schools in authorities or communities where the density of Welsh speakers is high. In this context, increasing the numbers of those who study a range of post-14 and post-16 qualifications through the medium of Welsh is important. There is also a need to give Welsh more prominence in the extra-curricular activities of schools in order to strengthen Welsh as a social language for young people. Welsh language immersion centres are essential, both in terms of language planning and as part of an equality agenda. The Commission also notes that language transmission within families is crucial for a minoritised language such as Welsh.

Tackling the housing needs of Welsh-speaking communities is important. The Commission supports the Welsh Language Communities Housing Plan and the Dwyfor Pilot Scheme. In principle, the work of the Welsh Language Communities Housing Plan could be expanded in order to create a 'whole system' strategic vehicle to implement and vary housing policy in areas of (higher density) linguistic significance.

Community Landlords should have a central role in responding to housing needs in these areas. Community-led housing initiatives should be supported. The existing housing stock should be better utilised. The Commission will consider the content of the Green Paper on the Right to Adequate Housing once it is published. The Commission also notes the development of new policies with regards to second homes.

In town and country planning, there is a need for broader interventions than

those which currently exist in relation to the Welsh language. The Commission will host a workshop in the autumn to begin developing policy recommendations in the field. The workshop will consider whether more guidance should be provided to planning authorities on planning policy and the Welsh language, whether policies in favour of the Welsh language should be strengthened, and discussions on local community planning will be held. It will also consider the exact role areas of (higher density) linguistic significance should play in relation to planning policy.

Equality and inclusivity are at the heart of the Commission's work. The Commission will make recommendations in relation to protected characteristics and the Welsh language, as well too as social class.

A summary analysis of the first data of the 2021 Census is attached. A full breakdown of the census in Welsh-speaking communities will be prepared when all the statistics are available.

1 Introduction: the work of the Commission

The Commission for Welsh-speaking Communities was established in August 2022 with the aim of making recommendations to strengthen public policy to support linguistic sustainability in Welsh-speaking communities.

The Government has also asked the Commission to provide a breakdown of the 2021 Census results as part of evidence gathering for further action. In addition, the Government asked the Commission to provide views on public policy that is being developed, specifically on the development of the Welsh Language Communities Housing Plan and in the context of developing a white paper on the Welsh Language Education Bill.

In terms of offering advice on the development of the Welsh Language

Communities Housing Plan and in the context of the Welsh Language Education Bill, the Commission has made suggestions to Welsh Ministers.

The Government expects that the Commission's final recommendations will be published in the form of a report by August 2024. These are intended for communities where Welsh is the majority language, or where this has been the case until relatively recently. There will then be a second phase of the Commission's work which will scrutinise Welsh as a social language in other parts of Wales. This phase will be completed by 2026.

The Commission is keen for its recommendations to be based on appropriate expertise, and for the evidence-gathering process to be open and transparent, a process to which everyone can contribute.

With that in mind, the Commission launched a call for evidence in November 2022. The call ended in January this year. We received 179 responses, a summary of which was published in May. These responses have been invaluable to us as a Commission, and we thank everyone who submitted evidence.

As a result of this call for evidence, and following meetings of the Commission held regularly since August last year, we are now publishing a Position Paper exploring some of our initial observations.

This Position Paper does not aim to make policy recommendations. That will be done in the final report. It aims to discuss principles and ideas in different policy areas that may form the basis of full and detailed recommendations.

2 Language planning principles

The Commission believes that language is a social phenomenon as it is

intended to allow people to communicate with each other. This happens in a social context. The social context in which the Welsh language can be used can be highly varied. It can be rural, urban or civic, it can happen in a community where the majority can speak Welsh, or in a community where it is a minority language. The social context may be a geographical community, or in some places it may be a network within a wider community. It may be an online community, or a print community. Other considerations are important. The use of Welsh can vary by language of household, language of neighbourhood, language of education, language of economic sector, and other factors such as age and social class are crucial.

The Commission believes that all social contexts in which the Welsh language is used are valuable, and that Welsh speakers are of equal value wherever they live, and whatever their characteristics. The Commission is committed to the fundamental principle that Welsh is a national language that belongs to everyone in Wales, and it belongs too to its speakers in the rest of the world.

But whatever the context in which the Welsh language is used, its use is shaped by social conditions. That is why language use patterns vary so widely in Wales between, as well as within, different communities.

Language use patterns have also changed over time. Broadly speaking, the pattern has been a gradual (and occasionally sudden) language shift from Welsh to English over a number of decades. In 1891, the first census in which questions were asked about the ability to speak Welsh, the majority of people in Wales could speak Welsh, almost everyone could speak the language in vast parts of Wales, and in many areas there was a Welsh monoglot majority. Between 1891 and the Second World War, the population in Welsh-speaking areas became increasingly bilingual although the Welsh language remained the customary language of a large majority. From the 1940s onwards, the non-Welsh-speaking population grew in Welsh-speaking areas, resulting in Anglicisation on the periphery and then in the interior of these districts. As a result of these long-term processes, the Welsh language is weaker as a

territorial community language today than ever. If current trends persist, it is not impossible that it might eventually disappear as a community language used across a wide territory.

The history of the Welsh language's relationship with different social groups is complex. In some areas of Wales, and perhaps particularly in some of our communities where Welsh is spoken more widely, it is possible to identify some sociological trends that are more likely to be associated with Welsh speakers, particular patterns in terms of the economy, employment, land use, and relationships with some socio-economic domains. This has been demonstrated in academic studies of Welsh speakers which attempt to identify them as a social group, such as 'Language Planning and Language Use: Welsh in a Global Age' (2000).

Although we have limited empirical evidence in the field, there is still a feeling among many Welsh speakers that the Welsh-speaking group (taken as a whole) experience relative disadvantage in some of these socio-economic domains in some parts of Wales. That has certainly been the perception behind some recent public discussions, such as debates about fair access to certain essential resources, such as housing in communities where there are high numbers of second homes.

Given the geographical location of Welsh-speaking communities far from the centres of power and major economic markets of Britain, and also the history of Welsh speakers as a minoritised group over a period of centuries, such a perception should hardly be unexpected. However, the evidence for a direct connection between such disadvantage and the ability to speak Welsh today is unclear, and in matters such as economic development and housing policy, the exact nature of the relationship between development and its impact on the Welsh language is not entirely clear either. This is partly due to a lack of research in the field, and partly because tracking such connections in all their complexity is extremely difficult.

However, the result of all these processes is that the debate on Welsh-speaking communities often turns on the issue of social equity in matters such as the housing market, the economy and so forth. Although evidence showing a direct link between specific policy actions and the Welsh language is not available in every case, it seems reasonable to the Commission that we can reach some general conclusions.

2.1 Some initial general conclusions

Language is a phenomenon used between people, as well as a characteristic which belongs to individuals, and linguistic practices are therefore associated with the interaction of a group of speakers with one another, rather than simply being a characteristic of speakers as entities in isolation.

Therefore, for the Commission for Welsh-speaking Communities, the consolidation of social contexts and conditions that facilitate the acquisition and use of language is at the heart of language planning. To achieve this, it is necessary to identify factors which destabilise the Welsh-language group, and respond to them through public policy. This will be central to recommendations made in the final report.

Our work will be based on some general observations:

- 1. sustainability in areas where there is a high density of Welsh speakers is essential in order to maintain the Welsh language as a community language
- 2. promoting effective language acquisition and social use is vital
- 3. promoting social equity in socio-economic domains is likely to be beneficial from a linguistic perspective
- increasing the consideration given to the Welsh language within public policy is necessary in order to stabilise and strengthen Welsh as a community language

Many of the Commission's recommendations will stem from these general observations. The Commission believes that there is a general consensus that this is the best way to proceed. Almost all submissions to the Commission's call for evidence raised as their starting point assumptions that strengthening Welsh-speaking communities would be a good thing. They then went on to suggest different ideas to promote their socio-economic and social well-being, as well too as social equity, and also suggested different ways of promoting social inclusion through more effective Welsh-language learning in the education system.

2.2 Universal rights of Welsh speakers: developing Welsh as a national language

Welsh is a national language with official status throughout Wales affirmed in legislation. By arguing in favour of strengthening Welsh-speaking communities, it is important to note that we are not in favour of the Welsh language being weakened in any other part of Wales. And because of internal networks within Wales, we also note that strengthening the Welsh language in Welsh-speaking communities is likely to have a positive long-term impact across Wales.

In philosophical terms, the Commission believes that the Welsh language in Wales has some universal characteristics and public policy should reflect this. For example, language rights should be universal, they belong to every citizen wherever they live within Wales. The Commission wishes to see this realised in practical as well as philosophical terms. During the second phase of the Commission's work, which will scrutinise the Welsh language as a social language in other parts of Wales, we will make recommendations to facilitate this.

Therefore, as we discuss our support for the concept of areas of (higher density) linguistic significance in the next section of this Paper, it is important to note that we do not believe that this will breach the universal rights of Welsh speakers. The aim of designating areas of (higher density) linguistic significance is to be

able to vary public policy in socio-economic and sociolinguistic fields in areas facing language shift to English. These are policy fields such as:

- town and country planning
- land use
- housing
- education
- community development
- economic policy

These policy fields are the main influence on the use of Welsh as a spoken language in everyday life in Welsh-speaking communities.

3 Areas of (higher density) linguistic significance

A clear question that arises in relation to the work of the Commission for Welsh-speaking Communities is what constitutes a 'Welsh-speaking community', and what are the implications of this in terms of language planning. The Commission's terms of reference describe a Welsh-speaking community as a community 'where [Welsh] is the language of the majority of the population, or where this has been true until relatively recently.' However, this wording is intended to set out the Commission's area of work, and is not a definition for public policy.

3.1 The importance of the density of Welsh speakers in particular communities

The density of Welsh speakers locally is important in terms of language planning. It is possible to live a full and comprehensive life through the medium of Welsh in contexts where it is the language of a relatively small minority, as

shown by the history of the Welsh language in Cardiff, for example, and before that in Liverpool. That depends on the nature of social networks that are sometimes linguistic in nature. But in areas where Welsh is a territorial community language, there are opportunities to use Welsh outside such specific networks, or there may be more networks available. There is also often a higher likelihood of the Welsh language being passed on from one generation to the next. In areas where the Welsh language is very strong, it is often the default language of social interaction within the community.

In terms of public policy, it is important to note that the Welsh Government's commitment in 'Cymraeg 2050: A Million Welsh Speakers' is for 'the percentage of the population that speaks Welsh daily, and can speak more than just a few words of Welsh, to increase from 10 per cent (in 2013 to 2015) to 20 per cent by 2050.'

The Commission believes that the density of Welsh speakers in Welsh-speaking communities is associated with its frequency of use in those communities, and that this has national implications in terms of reaching targets for Welsh language use. As a result, nurturing communities with high densities of Welsh speakers is central to the government's language strategy and to language planning in general.

3.2 Areas of linguistic significance or sensitivity: history of a concept

The concept of areas of linguistic significance or sensitivity has been part of the discussion about holistic language planning since the days of the Welsh Language Board. In a document from 2005, for example, 'Planning and the Welsh Language: The Way Forward', which was a summary of work undertaken by a consortium of organisations including local authorities, the Welsh Language Board and the Welsh Assembly Government (as it was then known), 'defined Areas of Linguistic Sensitivity' are discussed in the context of implementing

planning policies within the context of Welsh language policy.

The term is also found in the early 2010s in order to promote language planning in areas that faced language shift. For example, the Welsh Language Board towards the end of its life referred to the Aman-Tawe area as an 'area of linguistic sensitivity' and wanted to use the concept in order to promote language planning in the area across county borders.

The term sometimes appears in policy documents by local authorities. For example, Cyngor Gwynedd used the term 'areas of linguistic significance' recently when handling the investment of the Welsh Medium Education Capital Grant to improve the resources and infrastructure of some of its schools.

However, references are mainly made to areas of linguistic sensitivity or significance in Local Development Plans. But in a document, 'Planning and the Welsh Language: a survey of planning authority procedures in Wales' (2019), the Welsh Language Commissioner suggested that there is confusion, or at least uncertainty, as to how this concept is used. The Commissioner quotes an unnamed planning authority:

"We understand that there is no definition of linguistically sensitive areas currently in place, although authorities are free to define these areas as they wish. But this can lead to inconsistencies and a failure to identify some areas as being linguistically sensitive, where they should be identified as such, or vice versa."

In response to the Commission's call for evidence, some bodies sought further guidance from the Welsh Government. Eryri National Park Authority said, for example, that it would be desirable to 'get clearer guidance on what is meant in terms of areas of linguistic sensitivity or significance.'

The concept of areas of linguistic significance or sensitivity has been part of

policy debate, and policy itself to some extent, for almost twenty years. However, the use of the term has been patchy and inconsistent. The Commission believes that this concept should now be defined and introduced to language policy in Wales in a structured manner.

3.3 Accepting the principle of designating areas of linguistic significance

The Commission supports the designation of areas of linguistic significance in order to support Welsh as a community language. Without such intervention, it is likely that the Welsh language will continue to decline in its heartlands.

3.4 Inclusive terminology

The Commission's terms of reference require it to '[identify] areas of linguistic sensitivity where policy intervention may be required in order to support and strengthen the Welsh language as a community language.' As part of that process, the Commission considered what terminology should be used when referring to such areas.

The Commission prefers 'linguistic significance' to 'linguistic sensitivity' as a term.

The Commission also notes that all communities where the Welsh language is spoken are of linguistic significance or sensitivity to those who live there. The Welsh language heartlands are not unique because they alone are 'significant' or 'sensitive', but because they are 'significant' or 'sensitive' in a particular way.

Welsh is a networked community language throughout Wales. But it is not a community language everywhere in Wales in a context where there is a high density of speakers as a percentage of the local population.

In order to refer to the areas discussed in this Position Paper in an objective and inclusive way, and to emphasise that the Welsh language is significant wherever it is spoken, the Commission favours using a term that makes this clear. The term the Commission wishes to use to refer to these areas is 'areas of (higher density) linguistic significance'.

This would allow other areas of Wales to be referred to as 'areas of (lower density) linguistic significance'. In its current work, it is not part of the Commission's remit to consider whether this would be appropriate, but by using inclusive terminology, the Commission is creating a space that would allow this to happen.

The fundamental point is that 'lower density' areas are also areas where the Welsh language is significant. 'Higher density' and 'lower density' are technical terms for identifying the possibility of varying public policy in a way that responds to relevant sociolinguistic circumstances. They are not statements about the validity of the Welsh language in any particular area.

3.5 The purpose of areas of (higher density) linguistic significance

Designating areas of (higher density) linguistic significance would provide a strong mechanism for:

- allowing policy variation and policy emphasis to support Welsh as a community language
- 2. ensuring that the policy variation responds to the diverse social and linguistic needs of these areas
- 3. increasing the consideration given to the Welsh language within a policy framework
- 4. allowing interventions in support of the Welsh language in order to stabilise and strengthen it as a community language

5. giving communities the necessary powers to reverse language shift

In order to give an idea of how such a designation could be used, the Commission has set out some possible ideas within specific policy fields below. This is not a definitive list, and some of these suggestions may be omitted, or added to, in our final report. Its main objective is to give examples of the possible benefits of designating areas of (higher density) linguistic significance.

- Provision of resources: areas of (higher density) linguistic significance could provide a context for the strategic provision of resources to reverse language shift. It would also facilitate the most effective use of existing resources within these areas.
- Education: areas of (higher density) linguistic significance could be used in order to assess and set various targets in language policy in education. This is particularly important in the context of a category continuum for the language medium of schools.
- Economy: areas of (higher density) linguistic significance could be used in the context of economic policy in order to take advantage of opportunities which arise. This may be at the level of a cluster of counties (for example, ARFOR), at county level, or areas within a county.
- Collaboration: designating areas of (higher density) linguistic significance could provide a context for strategic working, as well too as sharing resources and expertise, across county borders in a way that would be beneficial to the Welsh language.
- Community language planning: in areas of (higher density) linguistic significance, it would be beneficial for language planning to be conducted in the main on the basis of holistic community action. By designating such areas, this could be implemented more effectively.
- Housing: identifying areas of (higher density) linguistic significance could facilitate the strategic use of housing policy. It may be relevant in relation to the Welsh Language Communities Housing Plan, for example, in order to target policy interventions.
- Promotion Standards: designating areas of (higher density) linguistic

- significance would enable the identification of areas where Welsh Language (Wales) Measure 2011 Promotion Standards could be used in a particular way to intensify efforts to reverse language shift.
- Town and country planning: although the idea of areas of linguistic significance or sensitivity is already being used, there is considerable uncertainty and inconsistency regarding its application. Designating areas of (higher density) linguistic significance in a more systematic way could offer greater certainty and consistency in planning policy.

3.6 Non-variable national policies

While it may be beneficial to implement local variations in policy areas likely to have a sociolinguistic impact, we do not anticipate that all policy matters relating to the Welsh language in these communities will be subject to variation. In many policy fields, it may be desirable to have a national policy without local variations. Within areas of policy which have a sociolinguistic impact too, some policies will be non-variable.

This is not an argument against designating areas of (higher density) linguistic significance as the purpose of the policy is to create the ability to vary policy. The Commission also believes that the act of designation would affect the climate for policy and implementation in general. Such a designation would be useful even if it was not used in all policy fields.

3.7 How to designate areas of (higher density) linguistic significance: some initial considerations

One way of defining areas of (higher density) linguistic significance would be to formulate a top-down definition based on statistical evidence. Such evidence could include language statistics from the 2021 Census, but other sources could also be used. Such a definition would seek to identify areas with high densities

of Welsh speakers on the basis of a presumption that such areas may have some common characteristics relevant to public policy.

However, in order to be meaningful from the point of view of public policy, the interpretation of the significance of statistics would have to be embedded in an understanding of the circumstances of the Welsh language group locally. This suggests that a policy mechanism with a measure of local autonomy would be required in order to interpret statistics.

Therefore, the Commission would not favour a model that considers statistics as the only benchmark for designating areas of (higher density) linguistic significance. If a benchmark were to refer to a specific percentage of the local population who speak Welsh, we would not be in favour of excluding a community because a slightly lower percentage could speak Welsh, and for that reason alone.

The Commission is highly sympathetic to the argument that population mobility in everyday life makes defining Welsh-speaking areas based on overly limited geographical considerations difficult and potentially counter-productive. We would not wish to see non-designated 'islands' within relatively wide areas of higher density linguistic significance. In practical terms, such a situation could be problematic.

Areas of (higher density) linguistic significance must be large enough to be meaningful, and for that reason they must have the ability to include communities within them that fall below a certain threshold, but whose inclusion is important because of their geographical location, or perhaps because they are local centres (they may be the location of secondary schools, for example), or for another valid reason.

3.8 Setting a national threshold for designating areas of (higher density) linguistic significance

Every community in Wales where there is a high density of Welsh speakers is characterised by language shift to some extent, and the science of language planning suggests that it is better to act sooner rather than later. The Commission would therefore be in favour of designating communities with the highest density of Welsh speakers as areas of (higher density) linguistic significance as well too as Welsh-speaking communities where signs of language shift are more obvious.

In order to do this, the Commission believes that the Welsh Government should set a statistical threshold that would identify communities with a very high density of Welsh speakers. We are considering whether this should be a statutory requirement.

This would not be the only way of designating areas of (higher density) linguistic significance, but the Commission considers that a national threshold would prevent a situation arising where a local authority (if it had that responsibility) could decide not to designate certain places as areas of (higher density) linguistic significance, even if it was absolutely clear that they should be designated in that way.

For this national threshold, we propose using the 2021 Census, although we could review our approach following the results of the joint work between the Welsh Government and the Office for National Statistics on how best to interpret statistical sources about the Welsh language. Using the census would be a simple, easy to understand and transparent method of identifying such areas. We would like to hear the views of stakeholders on an appropriate threshold for a national designation of this kind. The reason for using census figures when setting a national threshold is that the only aim of these figures would be to identify the minimum number of communities to be designated. As a result, the

complexities of using only one statistical source would not arise, for example, splitting an area because one part of it is just below a threshold, and part of it just above that threshold. This is because we suggest adopting a second method of identifying areas of (higher density) linguistic significance that would be able to address situations like this.

3.9 Setting a threshold or local definitions for areas of (higher density) linguistic significance

Only a minimum number of places would be designated as areas of (higher density) linguistic significance via a national threshold. The Commission presumes that many other places, possibly a significant number, will also be designated. In these cases, a range of statistical figures from different sources will need to be used, as well as considerations that are not based on linguistic statistics alone, in order to make a designation.

There are many communities in Wales that have an intermediate linguistic profile, although the Welsh language is not dominant, the language is an important part of the social fabric. Such communities are linguistically sensitive to social or socio-economic changes. Careful consideration will need to be given as to whether or not they should be designated as areas of (higher density) linguistic significance.

The Commission believes that the decision on whether to designate areas which have a significant density of Welsh speakers, but that fall below the national threshold, should not be made by central government. We anticipate that this would be done by local authorities.

This is because designation as an area of (higher density) linguistic significance would bring some responsibilities. There should be support for this locally. In order to be effective, language planning must be embedded in the community. Making the decision locally would also allow for the inclusion of some

linguistically weaker communities if desired. If a linguistically weaker community were prepared to accept the responsibilities that would come with such a designation, the Commission does not see why it should not be included.

All of this could bring flexibility to a designation. It would ensure that language planning takes place on a 'bottom-up' rather than a 'top-down' basis. By responding to local democracy, the possibility of areas being excluded contrary to the wishes of their residents could be reduced. To some extent therefore, the Commission believes that self-definition can be a consideration in the process of designating areas of (higher density) linguistic significance.

While local accountability could be achieved in a number of ways, by taking into account the views of community groups, along with the views of town and community councils, the most suitable body to draw up the final designation would be the local authority. This already happens to some extent as there is an opportunity for local authorities to designate areas of linguistic sensitivity within their Local Development Plans.

In some circumstances, it might be beneficial for a whole county to be an area of (higher density) linguistic significance, and in other circumstances it could be argued that it would not be appropriate to designate the whole county as an area of (higher density) linguistic significance.

Taking the above into account, by allowing a fairly broad definition of an area of (higher density) linguistic significance, local authorities with lower percentages of speakers could be enabled to adopt the concept if they wished. Furthermore, a requirement on local authorities to designate an area of (higher density) linguistic significance could create a national will to protect and strengthen Welsh-speaking communities. We are aware that it may be appropriate to provide advice to assist local authorities in identifying such areas.

3.10 Areas of (higher density) linguistic significance in

local authorities with a lower density of Welsh speakers

One clear benefit of designating areas of (higher density) linguistic significance is that it could invigorate the Welsh language in communities with a high density of Welsh speakers in local authorities where the percentage of Welsh speakers across the county is lower. There are majority Welsh-speaking communities in Pembrokeshire, Neath Port Talbot, Powys, Conwy and Denbighshire, for example.

The majority of these communities border the 'four core counties' of the Welshspeaking areas:

- Gwynedd
- Anglesey
- Ceredigion
- Carmarthenshire

Therefore, the designation of areas of (higher density) linguistic significance would facilitate strategic bridge-building across local authority boundaries and strengthen Welsh-speaking communities outside these counties as well too as within them.

3.11 A possible definition of areas of (higher density) linguistic significance

In the definition below, the Commission for Welsh-speaking communities has sought to summarise its discussions to date in the form of a proposal. This is a draft proposal, and we may refine it before publishing the final report:

Possible definition for an 'area of (higher density) linguistic significance':

- 1. If:
 - a. a substantial percentage of an area's population can speak Welsh
 - b. or an area borders closely with an area defined as '(a)' above

A Local Authority may identify it as an area of (higher density) linguistic significance.

- Areas of (higher density) linguistic significance may cover the whole or part(s) of a county.
- 3. It would not be possible for Local Authorities not to designate an area as an area of (higher density) linguistic significance if the percentage of Welsh speakers in that area is higher than X%.
- 4. Local Authorities and the Welsh Government must give very careful consideration to the vitality of the Welsh language within areas of (higher density) linguistic significance.
- 5. Local Authorities may collaborate by sharing expertise along areas of (higher density) linguistic significance.
- 6. Welsh Government may draw up guidance or make orders to vary public policy that would be of linguistic significance for areas of (higher density) linguistic significance.

In our final report, we will outline how we believe these principles could be achieved in practice, for example, whether legislative action would be required to achieve the aim, and if so, what type of legislative action.

3.12 Welsh Language (Wales) Measure 2011 Promotion Standards

There was a general feeling among members of the Commission that there is a need to look again at the potential of Welsh language promotion strategies in connection with the future of Welsh-speaking communities. In particular, the Commission will consider various possibilities to see whether the promotion

standards of the Welsh Language (Wales) Measure 2011 have a potential, that is not currently being realised, in relation to areas of (higher density) linguistic significance. The Commission wishes to consider whether it might be possible to strengthen the link in these areas between the objectives and strategic trajectory of *Cymraeg 2050* and the promotion standards.

To that end, the Commission, in conjunction with stakeholders, will consider whether, as one option, the promotion standards already in place should be strengthened in order to strengthen language policy in areas of (higher density) linguistic significance.

In addition, the Commission will consider, again with stakeholders, whether one way forward would be for Welsh Ministers to determine new standards through regulations. These would place a duty on bodies to which the promotion standards apply, local authorities, national park authorities and corporate joint committees, to promote the Welsh language in a particular way in these areas.

These standards could be known as 'promotion standards for areas of (higher density) linguistic significance' which would facilitate variation of national policy in order to meet a target to increase or maintain the density of Welsh speakers. It could also be considered whether promotion standards could be imposed on other relevant bodies to require them to enable the variation of policy and procedures in these areas.

Should this route be taken, the Commission believes that a national reporting framework should be created to ensure that linguistic targets are met in these areas. Provisions could be made through regulations which would place a responsibility on the Welsh Language Commissioner to regulate and enforce compliance by bodies subject to the promotion standards of areas of (higher density) linguistic significance with these standards, and also to review the extent to which policy variations made as a result of these promotion standards are having the intended impact.

The Welsh Language Commissioner could enforce compliance with the promotion standards by exercising duties in Section 4 of the Welsh Language Measure in order to ensure that promotion strategies operate in the interests of these areas. The success of this kind of framework would depend on strong, unambiguous and enforceable standards and regulations which would enable the Welsh Language Commissioner to implement an enforcement and monitoring system. The Commission notes that the Welsh Language Commissioner would need resources to accompany this work.

3.13 Areas of (higher density) linguistic significance: one or two tiers

There is a further question that the Commission believes is of great importance. It is clear that considerable linguistic variation exists within Welsh-speaking communities. The linguistic nature of a community where more than 70% of the population speak Welsh is very different from one where 40% speak it, for example.

This raises the question whether different strategies need to be adopted in these communities, and consequently whether there is a need for more than one class or tier of areas of (higher density) linguistic significance. In submissions to the Commission's call for evidence, some respondents supported establishing two tiers of linguistic significance in Welsh-speaking areas, one for areas where the Welsh language is very strong as a community language, and one where the Welsh language is an important part of the social fabric of the local community, but is not dominant.

The Commission sympathises with the view that having more than one tier could facilitate the creation of public policy variations that would match local conditions. But the Commission also considers that having more than one tier could complicate the designation of these areas, as well too as complicate the task of varying policy.

However, the Commission is still considering whether two tiers should be designated in communities with a higher density of Welsh speakers. This would mean having a designation for areas with a very high density of Welsh speakers, and a further designation for areas with a high (but lower) density of Welsh speakers.

The Commission has not come to a final conclusion on this issue. We wish to hear the views of stakeholders and others, and will publish our conclusion in our final report.

3.14 Policy consistency in areas of (higher density) linguistic significance

The Commission was also aware of the argument that there may be merit in using different borders in defining areas of (higher density) linguistic significance in different policy areas in order to meet the requirements of particular elements of public policy. For example, it could be argued that an area of (higher density) linguistic significance in terms of agricultural policy could be different to such an area in education policy.

As a result, the Commission discussed in detail whether areas of linguistic significance should be designated 'on request', for example, in a flexible way, which would permit areas to have different borders in different statutory instruments or guidance according to the requirements of the policy in question. After consideration, the Commission concluded that this could lead to confusion in public policy, as well as practical complexities such as having to redefine designations in each piece of policy work.

3.15 Administrative arrangements

The Commission received several suggestions in submissions to its call for

evidence regarding administrative arrangements to co-ordinate the work of strengthening the Welsh language in Welsh-speaking communities. Among proposals received was a unit within the Welsh Government, an arm's length body, and a regional language planning agency. We will consider these issues in our final report.

Specific policy areas

The Welsh Government has asked the Commission to make public policy recommendations in its final report published in 2024. It is therefore important to note that it is not the aim of this Position Paper to make those recommendations. Instead, we are publishing our ideas in terms of general principles and initial observations. The nature of our policy considerations varies from subject to subject. As the aim is to publish recommendations by August 2024, we are working in line with that timescale.

4 Community development

4.1 Offering local and holistic solutions

The future of Welsh as a living language depends on creating sustainable economic and social foundations. The Commission therefore suggests that any attempt to strengthen Welsh-speaking communities needs to discuss them as areas with different housing, economic, community development and language planning needs. There is no one-size-fits-all solution to promoting community development. This also means that what works in terms of language planning in one area will not necessarily work in another.

However, the Commission believes that these needs should not be looked at separately but as a way of finding a holistic solution to many of the issues facing

Welsh-speaking communities more generally. Therefore, public policy should take into account individual socio-economic contexts as well too as what these areas have in common.

4.2 Context

Since the COVID-19 pandemic, some communities have demonstrated their ability to support themselves in challenging circumstances. There are successful examples of integrated and holistic models of community development in parts of Gwynedd (particularly in the slate communities), and also on Anglesey and in Pembrokeshire. The Commission believes that the Welsh Government should formulate and support a programme to roll out these successful models across Wales.

Trusting communities and empowering them to deliver their own solutions, with additional support through public policy, is key. It is also vital to engage and consult with the communities themselves. In order to do this, the Commission sees value in using existing local expertise to realise a national linguistic vision.

Organisations, associations and groups already working within these communities in ways that support the Welsh language and the wider community are best placed to operate locally in many areas. Mapping these community organisations and the work they undertake would be an initial step. In addition, they should be given the opportunity to share ideas with each other. However, not all communities have the capacity to deliver some of their ideas, and this means providing more effective and specific support from local and central government.

4.3 Long-term planning

There is a need to increase capacity, resources and funding for these

organisations, institutions and groups. One thing that needs to be done is to improve the current system of securing funding. The current grant system does not allow long-term planning, which is essential for the language. For example, Mentrau laith are currently funded on the basis of an annual grant agreement. Such funding can act as a barrier to long-term language planning as well as the ability to attract or retain staff because of the length of their contracts.

4.4 Community assets

Communities should be given legal, financial and political power in a meaningful way. In addition, there is a need to think about ways in which people within communities can have community control over assets. What is suggested here, essentially, is grass-roots intervention.

It can be argued that community groups, social enterprises and community councils are often at the forefront of maintaining and saving services and facilities for the benefit of the local community. Libraries, leisure centres and community centres are examples of services and facilities that have been transferred into the hands of the community. The Commission anticipates that this can also provide an effective basis for protecting Welsh-speaking communities. Recent examples of establishing community pubs in Welsh-speaking areas, along with other community centres, are encouraging. As part of this, community groups should be encouraged to adopt language policies that protect the use of Welsh. This also means protecting the right of town and community councils, as the most local and community-based tier of democracy, to operate through the medium of Welsh.

Community ownership is the antithesis of inequality. It will not replace all that is public and all that is private, but it should play a more prominent role in any economic, social and linguistic development model within areas of (higher density) linguistic significance.

Policy efforts that encourage community ownership would be supportive of the Welsh language in communities where there is a high density of Welsh speakers. The Commission believes that it is increasingly important for communities to be able to take ownership of assets to ensure the sustainability of these communities and their language. A community asset may include the built environment (for example, use of buildings and facilities); land, including green spaces and parks; and also the people living in the community (for example, their skills, knowledge and social networks).

The Commission agrees with the premise of the Local Government and Housing Committee's report on Community Assets published in May 2022 that legislative changes are needed to empower communities, and we note that 15 of the 16 recommendations have been accepted by the Welsh Government. The Welsh Government will also need to make a financial investment for community enterprises to succeed, through development grants and/or long-term loans for community groups.

However, the Commission notes the need to ensure that the transfer of assets to the community does not undermine the Welsh language. For example, when considering whether to allow an applicant to submit a full business case for transferring an asset, the criteria should include the ability to provide services through the medium of Welsh, and to create social capital through the medium of Welsh.

4.5 Linking community development policy with economic policy

Economic policy and the Welsh language are discussed in more detail in the next section, but the Commission notes the link between economic policy and community development policy. 'Making the economy work' is not always the economic undertaking that is required. Heterogeneous economic zones require different policy interventions. As with language planning, any economic

development needs to take account of the unique needs and characteristics of the areas in question. This would mean delivering their economic aspirations, recognising what is possible and identifying their diversity rather than simply considering them through the lens of traditional economic development models.

There is a strong case for developing a foundational economy model in areas of (higher density) linguistic significance which seeks to reverse the decline in employment conditions and reduce the amount of money that leaves Welsh communities. This is a model based on the activities that provide the essential goods and services used on a daily basis, regardless of the social status of users. This includes, for example, infrastructure, utilities, food processing, retail and distribution, health, education and welfare.

4.6 A foundational approach to community and language development

The foundational approach to community and language development is quite straightforward and is based on one social principle. If individuals belong to a particular area, then the role of public policy, in general, is to enable them to continue to live there on the assumption that they have the imagination and the ability to continuously reinvent the place, and provided that the essential basic services are available to them.

5 Economy

One of the long-term reasons for the decline of the Welsh language in its heartland communities is economic restructuring over a century. Welsh communities played a leading role in the Industrial Revolution, for example in coal, slate and granite, in industries associated with tin, copper, lead, manganese and other minerals, and in maritime industries. This brought

employment to areas on the periphery of Britain that otherwise may not have been able to support a large population. In addition, the agricultural industry employed a significant workforce to work on the land.

Like much of the western world, these areas experienced deindustrialisation during the recession of the 1930s, and then from the Second World War (and particularly from the 1960s) onwards. This was detrimental to the Welsh language. Areas that had previously been economic powerhouses became less prosperous and a long-term pattern of out-migration was established. There was also counter-urbanisation, with people leaving urban and civic areas to move to the country. As a result, complex patterns of out-migration and in-migration occurred in Welsh-speaking areas, which changed their linguistic demography as a result.

Long-term processes have led to a number of structural economic weaknesses in Welsh-speaking areas, such as a relatively small economic base, weak infrastructure, low wages, an older population, and in general Welsh-speaking communities tend to be economically weaker than other parts of Britain. Of course, there are strengths, for example in agriculture, tourism and perhaps the public sector to a certain extent. However, the relationship between the Welsh language and tourism, for example, is ambiguous, and the agricultural sector, which is essential for the Welsh language, faces challenges following leaving the European Union and for other reasons. More so than in any other area of public policy, when it comes to the economy and the Welsh language, there are no easy solutions.

5.1 The linguistic paradox of economic prosperity

The relative economic weakness of Welsh-speaking areas means that there is a need to think strategically about the economy of these areas in the long term. But first, the linguistic paradox attached to this question needs to be acknowledged. For Welsh-speaking communities to survive in the long term, we

need an economy that incentivises people to live there. But as they involve the restructuring of communities, some types of economic development can lead to linguistic destabilisation. There is no easy solution to this problem either. It is an ongoing dilemma that will need to be addressed, but building the resilience of the Welsh-speaking community so that it can deal with and benefit from social, economic and cultural transitions is a policy priority.

In the long term, the economy of Welsh-speaking areas may become stronger. Having many relevant natural resources, the western parts of Wales may be able to take advantage of the economic opportunities of a 'green' transformation. Perhaps another transformation may come as a result of technological advances which allow more people to work from home, and therefore outside civic centres. As the natural environment of many Welsh-speaking areas makes them pleasant places to live, this could lead to an influx of population and capital, and keep more of the local population in the area. In a knowledge economy that uses the web, geographical distance between Welsh-speaking areas and Britain's main markets will not be as important as it once was. At present, it is difficult to predict the impact of all this on the language.

5.2 The need for research on the link between the Welsh language and the economy

In discussing this paradox, the Commission noted that there is a lack of current research into the link between the economy and the Welsh language. At the most basic level, it is not clear to what extent, and under what conditions, economic developments of particular types may be beneficial to the Welsh language and the extent to which they may be harmful. This was noted in a report commissioned by the Welsh Government, 'The Welsh Language and the economy: a review of evidence and methods' (2021). Research is available on the impact of linguistic factors on economic variables such as labour market outcomes, attitudes towards enterprise, business expenditure and turnover. But

there is less empirical evidence about the impact of economic policies, activities and trends on the Welsh language, and this is a clear gap in the evidence.

The Commission fully appreciates how vital economic development is to the viability of Welsh-speaking communities. People need to be able to live in these communities. However, it is a concern for the Commission that we do not know more about the link between economic development and the Welsh language as it is vital that policy is based on evidence, or at the very least on a high likelihood of probability. More research is needed on the link between economic development and the Welsh language, and the Commission regards this as a priority.

5.3 East-west models of economic development

Regional structures in economic development in Wales are arranged along an east-west axis. Except in the ARFOR programme, Welsh-speaking areas are not recognised as an economic region.

There was discussion in the Commission about the suitability of east-west regions from the point of view of Welsh-speaking communities. Some argued that the model recreates within Wales the divide between 'core' and 'periphery', with the western Welsh-speaking areas on the periphery, hence impeding their development as in the past. Some submissions to the call for evidence, such as from Aberystwyth University, also highlighted this risk. As a result of this concern, some members of the Commission argued that these east-west regions should be restructured so that Welsh-speaking areas could form a cohesive unit. But other members believed that Welsh-speaking areas, although similar to one another linguistically, do not form a natural economic unit.

However, there was agreement in one important matter – namely, that if existing structures continue, it is essential that Welsh-speaking areas are given a level playing field within them. The ARFOR programme has a very small budget in

comparison to North Wales Ambition, Growing Mid Wales and the Swansea Bay City Region.

5.4 The ARFOR Programme

The Commission discussed the ARFOR Programme, the collaborative economic partnership between Anglesey, Gwynedd, Ceredigion and Carmarthenshire, several times. Through this programme, the hope is to support Welsh-speaking communities.

As the ARFOR 2 programme has just begun, the Commission did not feel that its role was to comment on specific current initiatives. Instead, it was decided to focus on a strategic discussion regarding the idea of further developing ARFOR.

The Commission believes that ARFOR is important to the linguistic sustainability of Welsh-language communities. Not only does it facilitate investment in these areas, but it also allows for strategic discussions along the north-south axis, and offers space to focus on the economy and the Welsh language, and to scrutinise and understand the relationship between them.

The Commission is of the view that ARFOR should be made permanent, and certainly it should be presumed that ARFOR continues beyond the end of the current scheme, which ends in March 2025.

To that end, while the Commission has not formed an opinion as to whether ARFOR should be a corporate entity rather than a collaboration strategy between local authorities, the Commission believes that ARFOR should at least have its own executive.

As the Commission is concerned that there is little research on the link between the Welsh language and the economy, it will also consider whether ARFOR should have a research function in order to undertake such work. The Commission notes that one of the recommendations of the ARFOR 1 evaluation interim report was that a research group should be established to develop an understanding of the link between the economy and the language.

It is important to strengthen the ARFOR programme by including Welsh-speaking communities that are outside the four counties covered by the programme, for example, areas in Pembrokeshire, Neath Port Talbot, Powys, Conwy and Denbighshire. As they are part of the linguistic continuum of the whole region, their involvement would not only benefit those communities themselves, but also the four counties currently involved in the programme.

If areas of (higher density) linguistic significance are designated, it should be possible to ensure that these communities are included within future ARFOR programmes on the basis of that designation. They should have representation on the ARFOR board. Such a move would also strengthen the argument for the continued operation of ARFOR after March 2025.

5.5 Public sector involvement in supporting Welshspeaking communities

The Commission recognises the vital role of the public sector as an employer in Welsh-speaking communities. It is possible that an appropriate supply of public sector jobs can be a meaningful part of an economic policy that is consistent with linguistic objectives. Integrating the Welsh language within the local public sector is one reason why Caernarfon and its surrounding villages have the highest density of Welsh speakers in Wales. But even here, due to a lack of research, robust evidence is lacking, and there is a danger that the sector could grow faster than the ability of the Welsh-speaking labour market to service it.

The Commission will consider two issues specifically before presenting its final report. Firstly, it will ask whether more public sector jobs should be moved along a language continuum in areas of (higher density) linguistic significance,

increasing the use of Welsh as the internal language of organisations. Secondly, it will ask what would be the likely effect of relocating some Welsh-medium jobs to these areas.

5.6 Social enterprises

Social enterprises are organisations that operate between the public and private sector and use commercial strategies to create and retain wealth locally. Like any business, social enterprises are meant to generate profit but that profit is not extractive. This means that the value they offer communities is wider than market value as they tend to create jobs and employ locally, contribute to the economic development of deprived areas, and sustain key services. In the context of the Welsh language and areas of (higher density) linguistic significance in particular, social enterprises can strengthen the local economy in a responsible way with a focus on creating jobs and maintaining services for local people. In 2020, the social enterprise sector in Wales involved over 2,000 social enterprises employing 55,000 people and contributing over £3bn to the economy.

5.7 Tourism

Tourism has social, cultural and economic value to Wales. It can also be a sensitive subject, particularly in cases of over-tourism as seen during the COVID-19 pandemic. The development of tourism within areas of (higher density) linguistic significance should aim to support a positive context to promote Welsh language and culture. Healthy and responsible tourism should ensure that more profits remain in the community to a large extent, for example through community ownership of some assets and the use of business supply chains that support the local economy. The Commission will consider this issue carefully in the next stage of its work and make any recommendations in its final report.

5.8 Agriculture and land use

The future of agriculture is important to the future of Welsh as a community language. In the 2011 Census, 43% of the agricultural sector workforce were Welsh speakers, the highest percentage in any industry. The industry and its culture are central to the social fabric of Welsh-speaking rural areas. In these communities, the percentage of those in the agricultural industry who can speak Welsh is usually higher than the percentage in the community on average, and is sometimes significantly higher. The Farmers' Union of Wales argued in its submission to the Commission's call for evidence that this is most evident in communities where the percentage of Welsh speakers is higher than the national average but where the Welsh language is not dominant.

As a social network linked to the agricultural industry offers Welsh a foothold, it is possible that Welsh may have an important community function in some communities even though it is not the majority language. This raises the question of whether such areas should be designated as areas of (higher density) linguistic significance even though the percentage of Welsh speakers in the community as a whole is below 50%, and sometimes significantly lower.

As the Agriculture (Wales) Bill is currently undergoing scrutiny by the Senedd, it makes more sense for the Commission to discuss the agricultural sector in detail later in the year. This will also give the Commission an opportunity to host a session at the Royal Welsh Show before reaching conclusions.

Issues that need to be addressed include the importance of the interaction of relevant policy areas. These issues include the relationship of agriculture and rural development, the protection of nature, alongside the creation of strong foundations for the Welsh language to prosper as a community language.

Many responses to the Commission's call for evidence emphasised the importance of family farms from a linguistic and community perspective. The

Commission will bear this in mind when making recommendations.

6 Education

Up to the last third of the 20th century, many Welsh-speaking communities were characterised by a very high density of Welsh speakers which meant that language transmission from one generation to the next occurred quite smoothly. As a result, the need for Welsh-medium education was not as obvious as it was in more English-speaking parts of Wales, where a network of designated Welsh-medium schools was established. Indeed, as children in Welsh-speaking areas needed to master the English language, English-medium education offered itself as a means of achieving this. The mixed linguistic pattern of educational provision in Welsh-speaking communities today, particularly in secondary education, is the historical legacy of this situation.

Today, the linguistic composition of Welsh-speaking areas has changed completely. Only in a few communities could children from non-Welsh-speaking households pick up the language without the support of the education system. There are also children from Welsh-speaking households within Welsh-speaking communities who do not become fluent in Welsh. Even in those communities with the highest density of Welsh speakers, English permeates the life of every child, for example through online media. In many communities, these social changes mean that historical language models of education provision are no longer suitable.

6.1 Fluency in Welsh

The Commission believes that all children in areas of (high density) linguistic significance should be fluent in Welsh by the time they complete their education at 16. At present, this does not always happen.

6.2 Community inclusion

The Commission's view that all children in Welsh-speaking areas should become fully fluent in Welsh is based on the welfare of the child. The Commission agrees with the Minister for Education and Welsh Language in his foreword to the White Paper for the Welsh Education Bill, that 'every pupil in Wales, deserves to become a Welsh speaker', and also agrees with the national reasons why this is justified. In this context, the Commission notes the special circumstances of Welsh-speaking communities, and the particular need to ensure that all children in these communities acquire the Welsh language up to full fluency.

In areas with a high density of Welsh speakers, Welsh is the language of a large number of community activities, and it is often the language of civic life locally. The Welsh language also plays an active role in the local labour market, and is important in the economy. In communities with a high density of Welsh speakers, it is more likely that it is the common public language.

It appears to the Commission that it is essential from an equality perspective that all children living in these communities become fluent in Welsh. This is a matter of community inclusion, and of linguistic and social equity.

6.3 Reversing language shift

The Commission also believes that Welsh language provision in several areas that might be designated as areas of (higher density) linguistic significance is not sufficiently strong to enable the reversal of language shift. The general emphasis of this Position Paper is that strengthening community sustainability is the approach most likely to stabilise, and then improve, the long-term prospects of Welsh as a community language. However, this assumes that these communities contain a significant density of Welsh speakers.

In view of the language shift that has already taken place, the education system has a central role in ensuring that this density is available. In order to achieve this goal, the education provision of many areas will need to become more Welsh-medium; in fact, transformational improvements will be required.

6.4 The Welsh Education Bill White Paper

The Commission welcomes the Welsh Language Education Bill White Paper published in late March. It warmly welcomes the central viewpoint of the Paper, that the medium of instruction of schools in Wales needs to move along a linguistic continuum that will mean more pupils having more contact with the Welsh language with the aim of achieving public policy aims that enable language acquisition.

6.5 The Welsh Education Bill White Paper: areas of (higher density) linguistic significance

The Commission warmly welcomes commitments to the linguistic wellbeing of Welsh-speaking communities included in the White Paper.

The Commission agrees with the Minister for Education and Welsh Language in his foreword to the White Paper, that education policy needs to assist in 'protecting Welsh-speaking communities with high percentages of Welsh speakers but which have shown a decline.'

In particular, the Commission welcomes clauses 59 and 89 of the White Paper:

"As part of the [local] authority's considerations in determining in which catchment areas it wants to see an increase in Welsh-medium provision, we propose that the authority will have to consider the demographics of

the Welsh language in those catchment areas. In practice, evidence from the Commission for Welsh-speaking Communities, tasked with making recommendations regarding areas of linguistic sensitivity, will form part of what Ministers will need to consider when setting targets for local authorities. (clause 59)

"In some local authorities, where the density of Welsh speakers is generally high and the Welsh language is an integral part of the social fabric of the area, the challenge is to protect these areas from language shift and to stabilise the density of speakers so that they remain Welsh-speaking communities. The evidence of the Commission for Welsh-speaking Communities in relation to areas of linguistic significance will provide a basis for setting higher expectations in such areas. (clause 89)

The Commission welcomes these proposals, and confirms that it will undertake the necessary work to achieve this.

6.6 The Welsh Education Bill White Paper: the Commission's full response

In any white paper there are a number of considerations that need to be discussed in order to ensure policy success, but because of their more technical nature, they would not normally be aired in a more general position paper of this type. Such considerations include linguistic outcomes in the context of the European Common Framework of Reference for Languages (CEFR), technical issues regarding the nature of a language continuum, arrangements to monitor progress and so on. As the Commission's terms of reference require us to offer advice to the Welsh Government 'in the context of developing a white paper on the Welsh Language Education Bill', we will respond to the consultation on the White Paper, and in our view, that is the best place to discuss such matters.

6.7 Language transmission in families

Although it does not fall within education as such, we want to highlight the importance of language acquisition by transmission in the family. The Commission considers successful language transmission between generations to be crucial for minoritised languages such as Welsh. The Commission notes the Welsh Government's policy in the field, *National policy on Welsh language transmission and use in families* (2021). The Commission will discuss transmission as a priority during the next phase of its work, taking into account the 2021 Census figures regarding language transmission in the family.

6.8 New provision: new schools and the Childcare Offer

The Commission believes that any new school established in areas of (higher density) linguistic significance should be a Welsh-medium school. As the Childcare Offer for two-year-olds is extended, there should be a presumption that that care provision will be available in Welsh only in these areas.

6.9 Social use of the Welsh language

The Commission believes that extra-curricular activities conducted through the medium of Welsh play a vital role in reinforcing Welsh as a social language, and thus increasing provision would be beneficial. It is acknowledged that the schools Welsh Language Charter has achieved various successes in increasing the social use of the Welsh language. However, the Commission considers that the effectiveness of the Welsh Language Charter is not adequately monitored and it should be better monitored through regulation, whether this be through statutory instruments or public policy which includes criteria to monitor success. It would also be beneficial to extend Estyn's functions to include inspecting the

success and implementation of the Charter within schools.

The Commission also notes that Welsh-language activities outside school are an important part of language planning, in Welsh-speaking communities as in other parts of Wales. In particular, we note the importance of community sport activity and the language used there, youth clubs and movements and arranged activities for young people, and youth culture in general.

6.10 Welsh language immersion centres

The Commission believes that Welsh language immersion centres are essential for maintaining and supporting the infrastructure of Welsh-medium education in areas of (higher density) linguistic significance. Without a network of centres, there is potential for latecomers to education locally to change the formal and informal language of schools. Immersion centres also promote community inclusion, namely the inclusion of recently arrived children within their new communities. This is important in terms of equality.

Whilst it is acknowledged that the specific grant provided to all local authorities in Wales for Welsh language immersion provision is highly beneficial, it is also necessary to recognise that significant provision is required in Welsh-speaking communities, which as a result is more expensive.

6.11 Post-14 and post-16 education

The Commission believes that increasing the numbers studying a range of post-14 and post-16 qualifications through the medium of Welsh is key to securing a workforce in the future which will be confident in using the Welsh language. It appears that a percentage of secondary school pupils in Welsh-speaking communities receive bilingual provision, namely the use of Welsh and English with different pupils within the same lesson, which is a challenge for both

teachers and pupils alike. It should be ensured that areas of (higher density) linguistic significance have clear targets, and resources to help them achieve those targets, in terms of substantially increasing the percentage of pupils studying a range of post-14 and post-16 qualifications through the medium of Welsh.

6.12 Categorising schools by language medium

The Commission welcomes the White Paper's proposal to give Welsh Ministers powers to set statutory descriptions for categorising schools according to language medium. In particular, it welcomes clause 48 of the White Paper which states that the best way to achieve this would be through subordinate legislation: this would also give Ministers the freedom to amend the descriptions, should that be necessary in the future. The Commission believes that such freedom is essential in order to have the necessary flexibility to meet the linguistic needs of areas of (higher density) linguistic significance. Without going into detail at this stage, we want to note the importance of developing schools as Welsh-language institutional communities, where Welsh is the language of administration and all extra-curricular activities. The Commission will make any recommendations on the descriptions of these categories, that might in its opinion be appropriate, in its final report.

7 Housing

In Welsh-speaking communities, there is often a sense of injustice that residents face difficulties in accessing the housing market. The frustration found expression in the discussion about second homes, but it also involves the wider housing market. To some extent, the problem is similar to that in other parts of Britain where long-term increases in house prices have led to a significant percentage of the population being priced out of the housing market. In Welsh-

speaking communities, however, the situation is complicated by the need to ensure linguistic sustainability. This is much more difficult if people cannot buy property in their own communities. As a result, the discussion about housing is important in terms of the future of the Welsh language as a community language.

7.1 The Future of the Welsh Language Communities Housing Plan

In October 2022, the Welsh Government published a Welsh Language Community Housing Plan. The aim of the Plan is to bring together interventions within the policy areas of housing, economy, community development and language planning in order to respond to challenges facing Welsh-speaking communities which also have a high density of second homes. In June 2022, a Pilot Scheme was established in the Dwyfor area to trial a number of interventions linked to affordability and second homes.

The Commission is pleased that the Welsh Language Communities Housing Plan and the Dwyfor Pilot Scheme are in place and supports them. Welsh-speaking communities will probably need ongoing support in this area, and the Commission believes that there is a case for making the Welsh Language Communities Housing Plan permanent.

The Commission believes that, in principle, the work of the Welsh Language Communities Housing Plan could be expanded in order to create a 'whole system' strategic vehicle to implement and vary housing policy in areas of (higher density) linguistic significance.

7.2 Social housing

The Commission recognises the important role of social housing which are

rented on social rents by Community Landlords (Community Landlords could be Local Authorities, Housing Associations or Registered Social Landlords). In 2020, the housing stock of Community Landlords accounted for 18% of all households in Wales. 63% are owned by Registered Social Landlords and 37% are owned by the 11 local authorities that have retained their stock. Community Landlords also own or partially own other types of housing, including intermediate market housing, and open market housing.

The Commission recognises that Community Landlords have a long history of responding to the housing needs of Welsh-speaking communities, including employing and working with Rural Housing Enablers to identify local needs, and taking advantage of the rural exception policy of local planning authorities and implementing local lettings policies.

In their evidence to the Commission, a number of Registered Social Landlords and planning authorities explained that it was 'nearly impossible' to develop smaller-scale housing in Welsh-speaking communities which desperately need new homes. The reasons are likely to be a combination of land prices and land availability, planning policy and requirements of the Social Housing Grant regime (development standards, acceptable cost guidance, grant rates, affordable rents). The Commission believes that Registered Social Landlords should have a central role in responding to housing needs in areas of (higher density) linguistic significance. Further work is therefore needed to consider how to respond to some of their concerns. The Commission will consider this issue carefully and make any recommendations in its final report.

7.3 Community-led housing

The Welsh Government is already committed to supporting communities to develop housing options tailored to their local needs, including co-operative and community owned housing. A number of community housing associations were established in north and south-west Wales during the 1970s and 1980s.

However, current examples of community-led housing initiatives in Welshspeaking communities are few and far between.

The vision of the founders of housing associations in the 1970s and 1980s was similar, namely to sustain Welsh-speaking communities. They were mutual organisations with members and voluntary management committees drawn from the local community: the exact model proposed for community-led housing initiatives in the Welsh Language Communities Housing Plan. The Commission believes that lessons should be learned from the factors that led to the demise of the original community housing associations. Above all, the ambition of the Welsh Language Communities Housing Plan to develop community-led housing initiatives should be supported by a funding and support system that enables them to offer a range of housing options and ensures ongoing management by the communities that establish them.

The Welsh Language Communities Housing Plan and the Dwyfor Pilot Scheme aim to support communities to develop community-led housing solutions. The Welsh Language Communities Housing Plan has established a revenue grant fund to support community groups in preparing feasibility studies and business plans, valuations and surveys. The Commission believes it would be beneficial if capital funding was also available to help communities buy land or property.

7.4 Making better use of the existing housing stock

Often in rural Welsh-speaking communities, there is little opportunity to develop new housing stock on a small scale that is viable for development. Also in some situations, it may be beneficial to use the existing housing stock if there is a risk that excessively expanding the housing stock would damage the Welsh language locally.

The Commission therefore considers that it would be beneficial when responding to local housing needs to make better use of the existing housing

stock – along with other buildings, such as places of worship (a growing number of which will come on the market over the coming years). The Commission will further consider this principle, along with property purchasing support schemes, in the autumn.

7.5 Private rented sector

The private rented sector accounts for 14% of the total housing stock, around 200,000 homes in Wales. There is some anecdotal evidence that many private landlords have recently left the sector, or intend to do so. Their operating environment became more challenging following the introduction of the Renting Homes Act in 2022, recent economic pressures and increased lending costs. This could create opportunities for Community Landlords or co-operatives to buy and manage properties sold by private landlords.

We must also recognise that this sector does not always offer certainty and stability to a number of tenants. In order for it to become a preferred housing option, policy changes will be required that give tenants greater control over rents and much greater security of tenure.

The Welsh Government is about to publish a Green Paper on the Right to Adequate Housing, including fair rents, and the Commission will consider the contents of the Paper once it is published.

7.6 Second homes

New policies have recently been introduced by central and local government in relation to second homes. These include making changes to local taxes on second homes and short-term holiday accommodation, modifying the planning framework, developing changes to land transaction tax and issuing a £50m empty homes grant. The Welsh Government has also consulted on establishing

a statutory licensing scheme for tourism accommodation providers in Wales. The Commission will keep developments in the field under review, and make recommendations in its final report if necessary.

8 Town and country planning

Town and country planning is vital to the future of Welsh-speaking communities. The relationship between planning and the interests of the Welsh language has long been a regular point of discussion, but perhaps less progress has been made in this area than in other policy areas.

The Commission believes that wider planning interventions than the current ones will be necessary in order to help stabilise Welsh-speaking communities. Areas of (higher density) linguistic significance can be a suitable vehicle for enabling this by allowing, and indeed encouraging, policy variation.

The Commission believes that more work is needed to further consider how best to achieve this. In response to the Commission's call for evidence, for example, planning authorities referred to their perception that there could be clearer guidance in terms of policies relating to the Welsh language and planning.

The Commission is also interested in the potential of local community planning. Community planning helps communities to develop a shared vision for their neighbourhood and shape the development and growth of their local area.

Because of the work that needs to be done in this field, the Commission has decided to host a workshop with stakeholders in the autumn. The workshop will bring together experts to discuss possible policy actions and contribute directly to the Commission's considerations in the context of its final report.

The workshop will consider whether more guidance should be provided to

planning authorities, whether Welsh language policies should be strengthened, and discussions on local community planning will be held. It will also consider what the role of areas of (higher density) linguistic significance should be in relation to planning policy.

9 Equality and inclusion

The Commission is committed to the principle that all Welsh speakers are equal, and that the Welsh language should be available to everyone. To that end, the Commission wants to consider equality and inclusion in Welsh-speaking communities from two perspectives: protected characteristics and social class.

9.1 Protected characteristics

In the Commission's call for evidence, the majority of responses received in relation to equality related to race and to LGBTQ+ rights. There was an emphasis on the need to link the principles of the 'Anti-racist Wales Action Plan and the LGBTQ+ Action Plan for Wales' to policy actions in Welsh-speaking areas, for example through local authority strategic equality schemes. The Commission agrees with this emphasis.

Recently some statistics from the 2021 Census on language and ethnicity were released. The statistics show that individuals from all ethnic backgrounds are able to speak Welsh. They also show that the percentage of the population able to speak Welsh varies by ethnic background, and that there is also variation in these patterns within Wales. In order to fully understand this, the Commission will scrutinise these statistics in its analysis of the 2021 Census.

Previous research has suggested that bilingual education models in Welshspeaking areas, which mean that only some pupils receive Welsh-medium education, have led to a sense of social exclusion among some, and there has sometimes been a tendency for linguistic divisions in the education system to map onto children's backgrounds. The Commission believes that enabling children to become fluent in Welsh is a matter of equality. This can be an important argument for adopting alternative models of linguistic provision that ensure children are fluent in Welsh when they leave school at the age of 16. Welsh language immersion centres for newly-arrived children are also important in terms of equality.

Equality and inclusion are priorities for the Commission. The Commission will discuss the matter with stakeholders and others during the next phase of its work, and will publish its conclusions in its final report.

9.2 Social class

Evidence on the use of Welsh by social class is fairly scarce. Indeed, there is a clear research gap here. The term social class is also complex and definitions are constantly changing. In one response to the Commission's call for evidence, it was suggested that there were 'signs that the language group is dividing along class lines', with language shift progressing more quickly in the working class than in the middle class in a number of Welsh-speaking communities. Obtaining evidence to verify this observation would be beneficial. Welsh-speaking areas include a number of communities that would traditionally be regarded as working class, some of which are amongst the areas where the Welsh language is strongest (for example, the slate-quarrying communities of Gwynedd and some towns in Gwynedd and Anglesey). The result of such research could be important from a public policy perspective. There is a need to embed activity in the community, and ensure that steps taken in favour of the Welsh language reflect the needs and aspirations of everyone, from all social backgrounds. The Commission will discuss this in the next stage of its work.

Annex: 2021 Census

The Welsh Government has asked the Commission for Welsh-speaking communities to provide an analysis of the results of the 2021 Census, and also scrutinise other relevant sources, in order to investigate the current position of the Welsh language.

Analysis of initial data from the 2021 Census

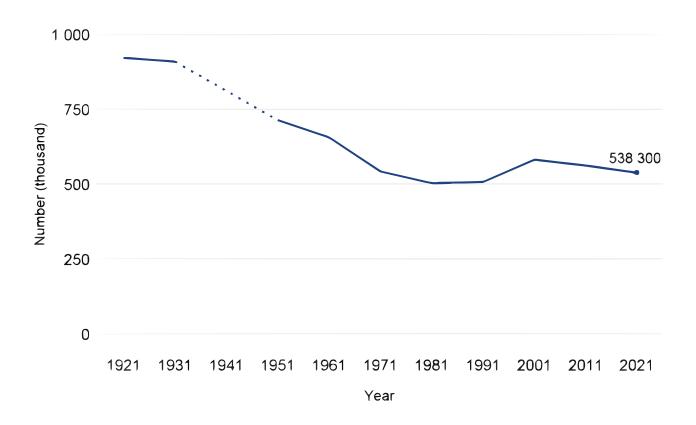
This annex provides a summary breakdown of the first census data available on the Welsh language: it was released on 6 December 2022 by the Government, in close collaboration with the Office for National Statistics (ONS).

The 2021 Census took place during the coronavirus (COVID-19) pandemic on 21 March 2021. This followed periods of lockdown, remote learning for many children, and working from home for many people. We do not know how the pandemic affected how people reported their Welsh language skills (or perceptions of other people's Welsh language skills).

It must be remembered that reporting Welsh language ability, and any other language ability, is essentially subjective. What is included in the census, and other surveys, is an individual's assessment of their Welsh language ability. This can vary from person to person. In some cases, particularly for children, Welsh language skills were reported by someone else, for example by a parent or guardian.

According to the 2021 Census, 538,300 people aged three or over were able to speak Welsh in Wales, or 17.8% of the population. This is the lowest percentage ever recorded in a census.

Number of people aged three years or older able to speak Welsh, 1921 to 2021



Source: Censuses of population

This was a decrease of approximately 24,000 people since the 2011 Census (or a decrease of 1.2 percentage points), when 562,000 people were able to speak Welsh (or 19.0% of the population).

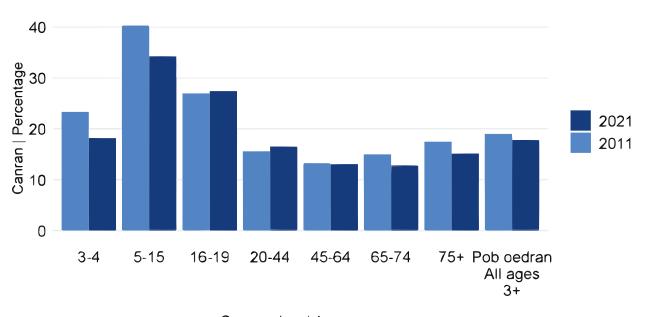
Welsh by age

The decrease in the number and percentage of people aged three or over who can speak Welsh is mainly due to a decrease in the number and percentage of

children and young people identified as being able to speak Welsh.

Although the percentage has fallen overall, there has been a slight increase in the percentage of people who can speak Welsh in the young adult groups (those aged 16 to 19 and 20 to 44), with decreases in the older age groups.

Percentage of people aged three or over who can speak Welsh, by age group, 2011 and 2021



Grwp oedran | Age group

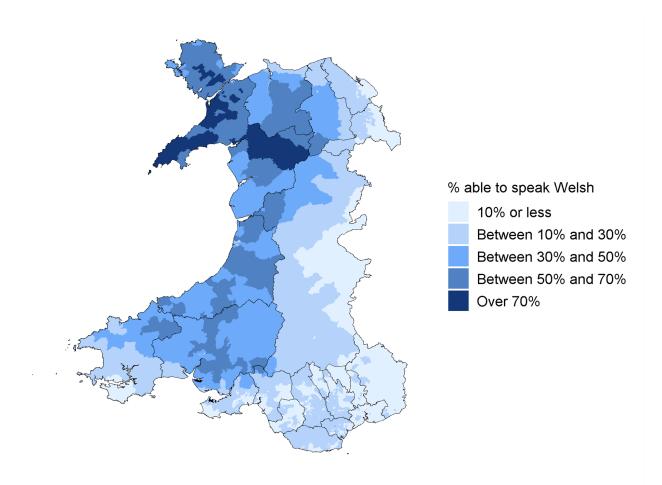
Source: Census of population, 2011 and 2021

Welsh by area

Census data allows us to look at how the ability to speak Welsh varies across and within local authorities, including at small area level. For statistical purposes, we use data based on lower layer super output areas (LSOAs). These areas are fairly consistent in size, and relatively consistent over time, which facilitates statistical comparisons. **Data on electoral ward level** is also available on the Office for National Statistics (ONS) website.

The map below shows the percentage of people aged three or over who can speak Welsh by small area.

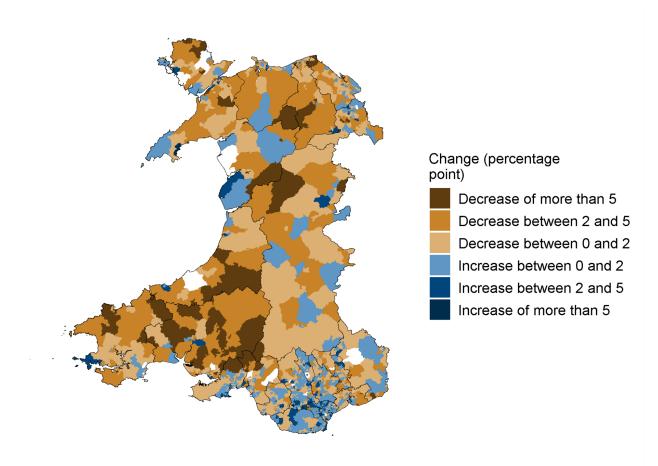
Percentage of people aged three or over who can speak Welsh, by LSOAs, 2021



Source: Census of population, 2021

The map below shows the change in the percentage of people aged three or over who can speak Welsh by small area. The areas that have seen a decrease are highlighted in brown and the areas that have seen an increase are in blue.

Percentage of people aged three or over able to speak Welsh, by LSOA, 2011 to 2021



Source: Census of population, 2011 and 2021

Note: the data in the map above is based on LSOAs that had not changed or that had been split between 2011 and 2021 only. It was not possible to calculate

changes for LSOAs that were combined between 2011 and 2021. These areas are in white on the map.

The percentage of people aged three or over who can speak Welsh fell between 2011 and 2021 in all local authorities except for Cardiff, the Vale of Glamorgan, Rhondda Cynon Taf and Merthyr Tydfil.

Carmarthenshire saw the largest decrease in the percentage and number of people aged three or over able to speak Welsh, from 43.9% in 2011 to 39.9% in 2021, a decrease of 4.1 percentage points. This is almost double the size of the next largest decrease, 2.1 percentage points in Denbighshire, Powys and Pembrokeshire. Carmarthenshire also saw the largest decrease between the 2001 and 2011 Censuses.

These patterns varied within local authorities. Looking at the small areas across Wales that saw decreases in the percentage of Welsh speakers, the majority of the largest decreases in small areas occurred in local authorities with the highest percentages of people able to speak Welsh.

The percentage of small areas within local authorities which saw a decrease in the percentage of people aged 3 or over who could speak Welsh between the 2011 census and 2021 census for local authorities with high percentages of Welsh speakers

	Decrease between 0 and 2 percentage points	Decrease between 2 and 5 percentage points	Decrease of over 5 percentage points
Anglesey	29%	37%	11%

Decrease between 0 and 2 percentage points	Decrease between 2 and 5 percentage points	Decrease of over 5 percentage points
30%	33%	13%
23%	39%	20%
14%	45%	35%
	and 2 percentage points 30% 23%	and 2 percentage points 2 and 5 percentage points 30% 33% 23% 39%

Source: Census of population, 2011 and 2021

Carmarthenshire had the highest percentage of small areas where the percentage of Welsh speakers decreased between 2011 and 2021, only 8 small areas there saw an increase. Small areas around Cwmaman and Llanybydder had the largest decreases, ranging from 11.8 to 10.8 percentage points.

There have also been decreases in the majority of small areas in Ceredigion, Gwynedd and Anglesey.

In Ceredigion, the largest decreases were 8.5 percentage points in a small area near Cardigan, 8.2 percentage points around Tregaron and 7.5 percentage points around Llanddewi Brefi.

In Gwynedd, small areas near Bangor, Corris, Blaenau Ffestiniog and Bala saw the largest decreases (between 6 and 7 percentage points).

On Anglesey, small areas near Llangefni and Amlwch had the greatest decreases (falling 7.9 percentage points and 6.3 percentage points respectively).

Looking at the small areas that saw an increase in the percentage of people

aged three or over who can speak Welsh between 2011 and 2021, over two thirds of all small areas had over 5 percentage points in Cardiff. The Canton area had the largest increase, 9.2 percentage points (from 25.5% in 2011 to 34.7% in 2021).

Plans for submitting a full breakdown of the 2021 Census

When this Position Paper was produced, the 2021 Census statistics in relation to the Welsh language had not been fully published. It is not possible to offer a thorough breakdown of the census until the statistics are published.

The Commission will publish a full breakdown of the 2021 Census once all the results are available. We will discuss the best way to do this with Welsh Government statisticians and researchers of the 'Sociolinguistic Survey of High Density Welsh Language Communities'.

The Commission also notes the work underway between the Welsh Government and the Office for National Statistics to improve their understanding of the main sources of administrative data and surveys used to produce statistics on the Welsh language.

This document may not be fully accessible.

For more information refer to our accessibility statement.