HASTON REYNOLDS
CHARTERED SURVEYORS

Welsh Language and Community Statement

Expansion of Tomlinson's Dairies
Phases 1, 2 and 3

Tomlinson's Dairies Limited
Five Crosses Industrial Estate
Minera
Wrexham
LL11 3RD

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1. INTRODUCTION

1.1 Tomlinson's Dairies Limited (TDL) principally operates from the Five Crosses Industrial Estate in Minera, Wrexham and is currently the largest processor of liquid milk in Wales, with a throughput of approximately 95 million litres of milk per annum.

1.2 TDL has recently been selected by J Sainsbury to process 100 million litres of milk and cream for sale in their stores in Wales and parts of England from July 2017. This will generate a further 60 full time jobs at the Five Crosses site, together with many more jobs in the wider rural economy.

1.3 Whilst the existing Five Crosses Dairy has sufficient capacity to process the additional milk, delivery is constrained principally due to insufficient cold storage capacity, insufficient storage for the increased number of poly bottles that will be blow moulded on site and inadequate car parking.

1.4 In order to help facilitate the required increase in output and the associated increase in employment, TDL needs to; increase the size of its cold storage facilities through the extension of the existing main dairy building; provide additional poly bottle production and storage facilities through the extension of the existing blow moulding building; and to re-organise and extend on-site car parking.

1.5 Given that the dairy has to continue operating throughout the development process, the development will be arranged into three Phases, with each Phase being the subject of a separate planning application.

1.6 The three Phases of the development will cumulatively create an additional 60 full time jobs, which exceeds the 50 job threshold specified within the Wrexham CBC LPG Note 31, and which, given the site's location, triggers the requirement for a Welsh Language and Community Impact Statement.

1.7 The TDL site is located on the Five Crosses Industrial Estate at Minera. The majority of the Five Crosses Industrial Estate lies within the Coedpoeth Settlement limit. A portion of the existing TDL site, including the main Dairy processing building and the vehicle workshop, lies within the Coedpoeth Settlement Limit. The cold store extensions to the main Dairy building would lie within an area covered by the original planning permission for the Dairy, but outside of the existing settlement limit. The extension to the blow moulding building (Phase 3) would lie outside of the existing Settlement Limit, but within the area covered by the planning permission for the existing blow moulding building. The proposed permanent staff car parking area (part of Phase 2) would lie within an area outside of the Settlement Limit.

1.8 Representations have been made to the emerging LDP seeking an employment allocation for those parts of the TDL site already subject to planning permissions. That would include the Phase 1 and Phase 2 cold store extensions, the additional hardstanding and relocated surface water attenuation pool (Phase 2) and the extension to the blow moulding building (Phase 3). Those areas will consequently have been subject of sustainability appraisal by WCBC as part of the site assessment process. Those areas have been identified as a Candidate Site in the Preferred Strategy and have been commented upon as follows by WCBC:

'*The site complies with the Council's preferred Strategy and may have potential to contribute to meeting future growth demands within the County Borough. The site has planning permission.'*

1.9 Only the proposed permanent staff car parking area lies outside of the Candidate Site. Representations have however been made seeking the allocation of that area as an Alternative Site.

1.10 It is therefore questionable as to whether a Welsh Language Impact Assessment is required given the advice within PPW at paragraph 4.13.5 which post-dates Local Planning Guidance Note No. 31 and states:

'Considerations relating to the use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission. If required, <u>language impact assessments may only be carried out in respect of major development not allocated in, or anticipated by, a development plan</u> proposed in areas of particular sensitivity or importance for the language.'

1.11 Notwithstanding the above, this Welsh Language and Community Impact Statement (WLCIS) has been prepared to assist Wrexham CBC in the determination of the planning applications for Phases 2 and 3 of the Dairy expansion proposals. The WLCIS is intended to provide:

- Background to the dairy farming industry in Wales
- Background to the dairy processing industry in Wales
- Background to Tomlinson's Dairies Limited;
- A description of the proposed developments;
- An overview of the relevant planning policy context relating to the Welsh Language and Community; and
- An assessment of the impact of the proposed development in the light of that policy context.

2. BACKGROUND TO THE DAIRY FARMING INDUSTRY IN WALES

2.1 The dairy industry is one of the main agricultural sectors in the Welsh economy with the main areas of production, commonly referred to as 'milk fields', focussed in the north east (Wrexham, Conwy, Denbighshire and Flintshire) and the south west (Carmarthenshire, Ceredigion and Pembrokeshire).

2.2 AHDB Dairy[1] / DairyCo statistics show that the number of dairy producers (dairy farms) within England and Wales fell from 16,977 in June 2003 to just 9,559 producers by June 2016, equivalent to a 44% reduction over the period.

2.3 Within Wales the number of dairy producers fell from 2,909 in June 2003 producers to 1,753 producers by June 2016, equivalent to a 40% reduction over the same period. Between June 2015 and June 2016 the number of dairy producers in Wales reduced by a less dramatic, but still significant, 2.4%.

2.4 However, despite the reduction in the number of producers, the number of dairy cows in Wales has been much more stable with 268,000 cows in 2003 and 238,386 cows in June 2005 compared to 246,331 in June 2015. This reflects consolidation within the sector with a shift towards fewer larger dairy farms.

2.5 Data from the UK Rural Payments Agency indicates that milk output from dairy farms in Wales was approximately 1,400 million litres in 2009/2010, rising to 1,580 million litres in 2011/2012, then falling to 1,527 million litres in 2012/2013 and then reaching 1,800 million litres in 2014/2015. The trend over recent years has however been one of increasing milk production.

2.6 It is anticipated that milk production in Wales will increase by around a further 400 million litres per annum to approximately 2 billion litres per annum by 2020[2].

2.7 Whilst low milk prices may test this aspiration, research for AHDB Dairy indicate that factors such as the level of optimism and family succession have a stronger influence on a farmer's investment decisions than short term factors affecting profitability.

2.8 Key factors in the continued success of the Welsh dairy sector will be a higher milk price coupled with reduced price volatility. Increased demand for milk by the Welsh dairy processing sector will be a key driver in that respect.

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[1] AHDB Dairy is a division of the Agriculture and Horticulture Development Board and is a levy-funded, not-for-profit organisation funded entirely by milk producers

[2] A Review of the Dairy Sector in Wales by Andy Richardson (February 2015) and South West Wales Dairy Processing Feasibility Study Report by Brookdale Consulting (November 2015)

3. BACKGROUND TO THE DAIRY PROCESSING INDUSTRY IN WALES

3.1 The Welsh Government, together with DairyCo, commissioned a Scoping Study of the Welsh Dairy Processing Sector through the *'Improving the Welsh Dairy Supply Chain'* project. The study was undertaken by Promar International and their final report was published in 2011. The study provided a wide range of information on the status of Welsh dairy sector at that time.

3.2 A further study was undertaken in 2013 by Promar International on behalf of the Welsh Government and DairyCo and was published in April 2014. '*The Welsh Dairy Processing Sector – 2014*' report updated and built upon the previous 2011 study and provides a very useful and more up to date snap shot of the status of the Welsh dairy sector.

3.3 Some of the key findings of the 2014 report, inter alia, included:

- Welsh milk production averaged almost 1,500 million litres over the previous five years;

- Around 55% (835 million litres) of the total milk produced on Welsh farms was processed in dairy plants located in Wales, whilst 45% (690 million litres) was transported to England for processing;

- In the 2011 study it was estimated that 13% (190 million litres) of Welsh milk was exported to England for processing and then re-exported back to Wales for consumption as fresh Welsh milk. In 2013, it was estimated that that amount had reduced to 9% (140 million litres);

- Around 40 million litres of milk from English farms was processed in Wales;

- Of the approximately 875 million litres of milk processed in Wales (milk produced on Welsh and English farms), nearly 90% was processed into cheese;

- Only around 8% (70 million litres) of the milk processed in Wales was liquid milk and around 3% (30 million litres) was processed into other products such as yoghurts and ice cream;

- Having allowed for some high profile departures from the industry, there were estimated to be around 1,200 people employed in the dairy processing sector in Wales in 2013;

- In 2013, there were 45 FSA 'approved' establishments processing cows' milk in

Wales. Only seven of these processed liquid milk and cream;

- Although the Welsh dairy processing industry is able to produce a wide range of products, the industry continues to lack a milk powder processing capability or a truly large scale liquid milk processor;

- In the future, Welsh dairy plants will require even more investment to keep them competitive; and

- Competition from buyers for milk in Wales increased significantly in the previous three years, with most Wales-based processors expected to require more milk in the future.

3.4 In terms of processor scale, it is important to note that whilst of modest size in a UK context, Tomlinson's Dairies is the currently largest processor of liquid milk in Wales.

3.5 The study outlined how the industry considered the Welsh Government could continue to work effectively with the industry, including:

- Focussing on the competitive advantages of Wales;

- Encouraging collaboration;

- Increasing demand for dairy products that help to build provenance of Welsh milk;

- Understanding milk processor needs and requirements; and

- Ensuring that CAP reform[3] supports Welsh dairy farmers.

3.6 One of the issues broached within the 2014 study was whether a large dairy processing facility should be established in Wales. The study noted that processors such as Dairy Crest had struggled to identify a viable model for producing local milk in Wales and that they were unable to reconcile the volumes and prices that buyers were willing to pay for locally processed Welsh milk. However the study also recognised that processors such as Tomlinson's Dairies Limited had created a stable positioning in the market by processing their own milk for local distribution as well as that of other processors.

[3] This is now more likely to concern assurances as to continuity of support for Welsh dairy farmers from the UK and Welsh Governments.

3.7 The study noted that almost all of the processors agreed that demand or competition for milk (including milk produced in Wales) had increased and that they were open to sourcing more milk from Wales, but that this milk would not necessarily be processed in Wales. For example, Muller Wiseman had three processing facilities in England that were capable of handling milk from Wales.

3.8 Clearly, the ability to process more milk in Wales, whether produced in Wales or in England, provides a range of social and economic benefits as well environmental benefits subject to the location of milk fields/producers and outlets. The ability to process milk in Wales that has been produced on Welsh farms also has significant benefits from cultural identity and branding perspectives.

3.9 Following on from the Promar International studies the Welsh Government commissioned a report entitled *'A Review of the Dairy Sector in Wales',* the final version of which was published in February 2015. The purpose of the Review was to make recommendations for a package of measures that would deliver competitiveness, resilience and economic growth and create additional jobs in the industry. It also aimed to provide a strategic direction for the dairy sector and the associated supply chain in Wales that will help inform the Welsh Government's Agricultural Strategy for Wales.

3.10 The conclusion of the review process was that without strong leadership, the industry lacks direction, cohesiveness and the development of those who influence and support others to achieve the industry's shared tasks. The Review goes on to explain that: '***At the same time 'there is a real imperative for action to address the needs of a diverse Welsh dairy industry'.*** The report goes on to identify key actions that the Government and industry should take now.

3.11 The SWOT analysis contained within the Review identified a range of strengths, weaknesses, opportunities and threats for the whole dairy sector, including producers and processors.

3.12 Strengths of particular relevance to the processing sector include:

- a large market on the doorstep; and
- dense milk fields in the south west and north of Wales.

3.13 Weaknesses of particular relevance to processing sector include:

- a lack of processing capacity in Wales;
- small population cannot support the dairy industry alone (hence Wales being a net exporter of milk and milk products); and

- dependent upon the English market.

3.14 Opportunities of particular relevance to processing sector include:

- fantastic location for milk production and processing investment;
- competitive raw material and efficient processing;
- increasing world demand;
- development of the Welsh brand;
- export market; and
- feasibility study for milk processing in South Wales.

3.15 Threats of particular relevance to processing sector include:

- failure of a major milk buyer could have a big impact;
- costs to access the English market; and
- challenge of moving niche to large scale – small manufacturers find it difficult to expand.

3.16 The Review included a recommendation that the Welsh Government should, as a priority:

'Complete a feasibility study by December 2015 to evaluate the potential of a market driven dairy processing facility in South West Wales to provide a secure added value market for the anticipated additional 400 million litres of annual Welsh milk produced by 2020.'

3.17 In light of that recommendation, Brookdale Consulting was subsequently commissioned by the Welsh Government to assess the feasibility of establishing additional dairy processing capacity in South West Wales.

3.18 The feasibility study inter alia concluded that:

- a new large scale dairy processing facility on a greenfield site in south west Wales is unlikely to be affordable in the short term due to high capital costs;

- it is possible that a large inward investment could be made in a new large scale dairy processing facility but the challenges of locating in south west Wales are a lack of proximity to retail distribution, large conurbations, relatively poor connectivity and a risk of displacing existing processors in the region;

- there are already strong expansion plans from existing processors which could, in the short to medium term, see 350 million litres per annum of additional

processing capacity with modest Government support. In the longer term, this figure could be much higher but would require more substantial government support;

- the expansion of existing dairy processing facilities is likely to lead to only limited displacement within Wales;

- the proposed increases in processing capacity are based on identified market demand;

- the Welsh Government should continue to support and prioritise indigenous dairy business;

- the Welsh Government should also review inward investment opportunities for dairy processors in Wales;

- support should be focussed on those who drive innovation in production, new product development, marketing and export; and

- support should be provided in capital terms, but also by helping to ensure that companies understand the changing consumer market, make use of emerging opportunities and harness the support available within Wales through the Welsh Government, Dairy Development Centre, Innovation Centres, AHDB and universities.

3.19 The Welsh Government issued a Written Statement in response to the Feasibility Study on 10 March 2016.

3.20 The Written Statement acknowledged that a fundamental restriction on the further growth of the dairy sector in Wales has been its low processing capacity for the milk that is produced in Wales, with much of the milk in Wales having to be transported out of the country for processing.

3.21 The Written Statement confirmed that the Welsh Government accepted that the establishment of a new market driven dairy processing facility in south west Wales should not be pursued and instead favoured the expansion of existing and established milk processors. The Written Statement opined that this could add 350 million litres per annum of additional processing capacity in the short to medium term and between 700 million to 1 billion litres of additional capacity if all the current plans of Welsh processors came to fruition. The Written Statement also confirmed the increased competition for milk arising from increased processor capacity will help to hold the milk price paid to farmers at a sustainable level and would help to reduce the

considerable amounts of milk that continue to leave Wales for processing.

3.22 The Welsh Government's strategy for significantly and rapidly increasing milk processing capacity in Wales is through the expansion of existing and established processors' sites.

3.23 Following recent mergers, the UK liquid milk processing sector is currently dominated by two very large processors, namely Arla and Muller Wiseman. However, through its supplier tender process, J Sainsbury have recently added two more processors to its supply base, with Tomlinson's Dairies Limited and Medina Dairy have been selected to supply milk to their stores from 1 July 2017. Tomlinson's Dairies will supply stores in Wales and parts of England, whilst Medina Dairy will supply milk to a number of stores in southern England (See J Sainsbury press release at Appendix 1)

3.24 The award to Tomlinson's Dairies Limited is a significant development which will assist in the delivery of the Welsh Government's strategy for the dairy sector in Wales.

4. BACKGROUND TO TOMLINSON'S DAIRIES LIMITED

4.1 Tomlinson's Dairies Limited was founded in 1983, when liquid milk from Pen y Palmant Farm was bottled and sold in the local area. This led to the operation of a full milk round and, after a short period of time, additional milk rounds were purchased and supplied with milk produced and processed on the farm.

4.2 Milk was originally processed in a converted farm building. However, due to the progressive expansion of the dairy business, a purpose-built dairy was constructed on a site adjacent to the Pen y Palmant Farm farmstead. At that the time, the business was processing around 1.5 million litres of milk per annum and the new dairy was planned to process up to 9 million litres of milk per annum.

4.3 From 1996, Tomlinson's Dairies operated from the purpose-built dairy at Pen y Palmant Farm and this facilitated the expansion of the business. The processes operated at the Pen y Palmant dairy included the pasteurisation, separation and bottling of liquid milk (both conventional and organic) and the production of cream. However, by 2005, the Pen y Palmant dairy had exceeded its original design capacity and by 2012 was processing approximately 25 million litres of milk per annum through innovative shift management and production processes. The scope to substantially extend the existing dairy at Pen y Palmant Farm had however been restricted due to that site's location within the Green Barrier.

4.4 In order to facilitate the further expansion of the business, planning permission was sought for a completely new dairy processing facility on land owned by Messrs Tomlinson at the Five Crosses Industrial Estate in Minera. As part of the pre-application evaluation process, other siting options, including relocation to the Wrexham Industrial Estate, were considered, evaluated and ultimately discounted, principally due to the need for the dairy to be accessible to its dairy farm suppliers and to its existing skilled workforce, the majority of whom worked outside of normal working hours and could not therefore rely on public transport.

4.5 Planning permission for the new dairy at the Five Crosses Industrial Estate was granted by Wrexham County Borough Council on 31 July 2006. Construction and commissioning of the main dairy building and associated delivery vehicle repair workshop was been completed and the new dairy was brought into full operation.

4.6 Since being brought into operation, processing at the Five Crosses Dairy has increased to approximately 95 million litres of milk per annum.

4.7 Since the Five Crosses Dairy has been brought into operation, the number of dairy farms supplying milk to Tomlinson's Dairies has increased from 24 in 2012 to a

current total of 71 farms. Of these, 48 farms are direct suppliers to Tomlinson's Dairies and are located within an average distance of approximately 13 miles of the dairy. The remaining 23 farms supply the dairy under third party contracts (e.g. with Arla) and are mainly located within the Welshpool area.

Map indicating the location of direct supply farms to TDL. Note one supplier is located off the map at Caernarfon and some are overlayed.

4.8 The dairy processes milk into a range of products including:

- Whole milk;
- Semi-skimmed milk;
- Skimmed milk;
- Organic milk;
- Flavoured milk;
- Single, double and whipping cream; and
- Yoghurts.

4.9 Milk is supplied in glass bottles (which is bottled at Pen y Palmant Farm site), poly bottles, paperboard cartons and Eco pouches, all of which are recyclable and in the case of glass, re-usable.

4.10 The main customers of Tomlinson's Dairies are currently:

- Marks and Spencer;
- Asda stores throughout Wales via Arla;
- Tesco;
- Costa Coffee;
- Small to medium sized shops;
- Hospitals across North Wales;
- Schools across North Wales;
- Hopewell Farm Foods;
- Other wholesalers; and
- Around 60 milk rounds run by other businesses.

4.11 The number of people employed by Tomlinson's Dairies has also rapidly increased since the Five Crosses Dairy has been brought into operation. Overall, Tomlinson's Dairies now directly employs 174 staff of which 171 are full time employees and 3 are part time employees.

4.12 34 of the staff are drivers, of whom 13 operate from Pen y Palmant Farm and 21 operate from the Five Crosses site. Some of those operating out of the Pen y Palmant Farm site also make collections of products from the Five Crosses site for onward delivery.

4.13 The remaining 140 staff include the two company directors, 115 staff involved in dairy processing operations, 8 staff involved in poly bottle blow moulding, 7 mechanics and 8 administration and office staff. Of these staff, 6 are employed in the glass bottling operation at Pen y Palmant Farm and 134 work at the Five Crosses site.

4.14 The dairy processing sector has seen a number of high profile processing plant closures and large scale redundancies over the last decade with 900 redundancies within the processing sector between 2005 and 2009. Since then, the sector has seen the closure of the Dairy Farmers of Great Britain plant at Bridgend in June 2009[4] the closure of the Dairy Crest Proper Milk dairy in Camarthenshire in 2014 and the closure of the First Milk site at Maelor with the loss of around 230 jobs, in response to which Cllr Neil Rogers of Wrexham BC was quoted by the BBC as saying it was '*a sad day for Wrexham'* and that *'It is important that Wrexham does everything it*

[4] National Assembly for Wales Rural Development Sub-Committee. Inquiry into the Dairy Industry. November 2009.

can to develop its economy by attracting new business into the county borough'.

4.15 The need to reverse this recent decline and increase milk processing capacity within Wales through the expansion of existing and established milk processors is a core element of the Welsh Government's strategy for the dairy sector as a whole i.e. for producers and processors. Tomlinson's Dairies has helped to deliver this strategy over the last few years through:

- its investment in and development of the new Five Crosses, with the support of the Welsh Government;
- its progressive increase in milk processing output;
- the significant increase in people employed directly by the company;
- the increase in people indirectly employed by the company including contractors, hauliers and others in the supply chain; and
- the increase in the number of dairy farms from which milk is sourced, which helps to support employment in the wider rural economy.

4.16 From 1 July 2017, Tomlinson's Dairies Limited will also be supplying J Sainsbury with 100 million litres of processed milk together with cream to its stores in Wales and parts of England.

4.17 This will result in:

- a further capital investment in the site of around £14 million;
- the creation of an additional 60 full time jobs at Tomlinson's Five Crosses site;
- additional indirect employment and employment in the supply chain; and
- a further 47 farms supplying milk to the dairy (the majority of these are under existing contracts to supply J Sainsbury), with consequential support for the wider rural economy.

4.18 This will consolidate Tomlinson's Dairies position as the largest liquid milk processor in Wales and will contribute to Wrexham's emerging status as a major food and drink manufacturing and processing hub.

5. PROFILE OF THE LOCATION

5.1 The Tomlinson's Dairies site is located on the Five Crosses Industrial Estate, Minera Wrexham.

5.2 The Five Crosses Industrial Estate is located very close to the boundary of the Minera and Coedpoeth wards. Indeed, whilst the site lies within Minera, the UDP Proposals Map shows the site lying within the Coedpoeth Settlement Limit. The development is consequently of relevance to communities in both wards.

5.3 Based on the 2001 Census, 20.8% of the population of Wales in 2001 could speak Welsh. The corresponding figure derived from the 2011 Census had reduced to 19%,

5.4 Within Wrexham County Borough, 14.6% of the population was able to speak Welsh in 2001, reducing to 12.9% by 2011, representing a -1.7% change over the period.

5.5 Within Coedpoeth, 21.3% of the population was able to speak Welsh in 2001, reducing to 18.3% by 2011, representing a -3.0% change over the period.

5.6 Within Minera, 20.8% of the population was able to speak Welsh in 2001, reducing to 18.5% by 2011, representing a -2.3% change over the period.

5.7 It can be seen that the proportion of Welsh speakers in Wrexham County Borough is below the national average and that in common with trends nationally, the proportion of Welsh speakers within the County Borough declined over the period 2001 to 2011.

5.8 The proportion of Welsh speakers within the wards of Minera and Coedpoeth similarly declined over the period, however the figures remain just below the national average.

5.9 Of a total population (aged 3+) of 124,024 within the County Borough in 2001,

18,105 were able to speak Welsh. In contrast, of a total population (aged 3+) of 129,425 within the County Borough in 2011, 16,659 were able to speak Welsh. This suggests that the changes over the period in the proportion of people able to speak Welsh have arisen from both a decline in the actual number of Welsh speakers within the County Borough and from an increase in the number of non-Welsh speakers.

5.10 Interestingly, the change in Welsh speakers over the period has not been demographically uniform. Whilst there have been reductions in the number of Welsh speakers in most age groups, there has been an increase in the 16-19 age group (+38) and just a small reduction in the 20-44 age group (-7).

5.11 Identity by community derived from the Census 2011 is as follows:

Location	Population	Identity			
		Welsh only	Welsh & British	Other Welsh combined	No Welsh
England & Wales	56,075,912	3.7%	0.5%	0.2%	95.7%
Wales	3,063,456	57.5%	7.1%	1.2%	34.1%
Wrexham CB	134,844	52.0%	6.8%	1.5%	39.7%
Coedpoeth	4,702	63.0%	6.2%	1.5%	29.3%
Minera	1,617	56.5%	6.9%	2.2%	34.3%

5.12 As can be seen from the above table, Welsh identity is higher in Coedpoeth than that in Wrexham CB or Wales as a whole. Whilst still higher than that in Wrexham CB, Welsh identity is however slightly lower than the national average in Minera.

5.13 In light of the above, it is recognised that the use of the Welsh language within the wards of Coedpoeth and Minera should, where possible, be safeguarded and maintained.

6. PLANNING POLICY CONTEXT

6.1 Introduction

6.1.1 The wider planning policy context for the proposed developments is set out within the Planning Design and Access Statements relating to the various Phases of the proposed developments. This section accordingly sets out the policy context relating more specifically to linguistic and community related issues.

6.2 National Planning and Language Legislation

6.2.1 The Welsh Language (Wales) Measure 2011 made provision for the official status of the Welsh language in Wales and created a new legislative framework for the Welsh language.

6.2.2 The Well-being of Future Generations (Wales) Act 2015 sets ambitious, long term well-being goals to reflect the Wales that the people of Wales want to see in the future. This should put a thriving Welsh language at the heart of defining a sustainable Wales. It will also help to reinforce the language's official status and will help to ensure that Welsh is part of the agenda for Wales' long-term future.

6.2.3 The Planning (Wales) Act 2015 sets out a series of legislative changes intended to deliver reform of the planning system in Wales in order to ensure that it is fair, resilient and enable development. Taken together with changes to secondary legislation, policy and guidance, the Act is intended to:

- support the delivery of the homes, jobs and infrastructure that Wales requires;
- provide opportunities to protect and enhance important built and natural environments; and
- support the use of the Welsh language.

6.2.4 The Planning (Wales) Act 2015 also makes it mandatory for all Local Planning Authorities to consider the effect of their development plans on the Welsh language by undertaking an appropriate assessment as part of their Sustainability Appraisal for the plan. The Act also confirms that where relevant, impacts on the Welsh language may constitute a material consideration in the determination of planning applications.

6.3 National Planning Policy

6.3.1 Planning Policy Wales (PPW) (Edition 8 January 2016) sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs).

6.3.2 Section 4.13 sets out the Government's policies on supporting the Welsh language. Paragraph 4.13.5 confirms that considerations relating to the use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission. If required, language impact assessments may only be carried out in respect of major development not allocated in, or anticipated by, a development plan proposed in areas of particular sensitivity or importance for the language. Any such areas should be defined clearly in the development plan. Decisions on applications for planning permission must not introduce any element of discrimination and should not be made on the basis of any person(s)' linguistic ability.

6.3.3 Technical Advice Note (TAN) 20 Planning and the Welsh Language (October 2013), provides guidance on how the planning system considers the implications of the Welsh language when Local Development Plans are prepared (rather than in the determination of planning applications).

6.3.4 TAN 20 explains that there are substantial variations between the proportion of Welsh speakers in different communities, varying from below 6% to over 85%. TAN 20 notes that while most fluent Welsh speakers were born and educated in Wales, many people who have moved to Wales from other parts of the UK or elsewhere have learned the language and make a valuable contribution to the use of the language and the communities in which they now live.

6.3.5 TAN 20 estimates that between 1,200 and 2,200 fluent Welsh speakers are moving out of Wales each year and confirms that one of the aims of the Welsh Government is to reverse this trend; the creation of jobs to sustain communities and the local economy is a key priority.

6.3.6 Practice Guidance on Planning and the Welsh Language (June 2014) supports the advice provided in TAN 20 and confirms that the planning system can help to create the social and economic conditions which give people the opportunity to speak Welsh.

6.3.7 The Wales Spatial Plan was published in 2004 and was updated in 2008. The Plan explains that the North East Wales Area makes a very important contribution to both the Welsh and UK economy. The future prosperity of this Area is closely linked with that of the north west of England, in particular Cheshire, as well as the neighbouring Spatial Plan Areas of North West Wales and Central Wales.

6.3.8 The Spatial Plan goes on to explain that North East Wales is highly dependent upon the manufacturing sector, both in terms of jobs provided and gross value added to the

local and national economy. Maintaining the competitiveness of this sector is of fundamental importance to the long term prosperity of North East Wales and the wider North Wales Region.

6.3.9 Paragraph 16.64 of the Spatial Plan states that the use of the Welsh language varies across North East Wales and is currently more prominent in Conwy and Denbighshire than in Flintshire and Wrexham. It goes on to explain that across North East Wales a new generation of Welsh learners and speakers is being fostered through the teaching of Welsh in schools and through adult education.

6.4 Local Planning Policy

6.4.1 The Wrexham Unitary Development Plan (UDP) sets out the Council's planning policies for the period 1996 to 2011. Whilst the Plan period has time expired, it nevertheless forms the Development Plan for the area pending the adoption of the emerging Local Development Plan 2013 – 2028.

6.4.2 Social, economic and environmental considerations are set out in Section 2 of the UDP. These inter alia explain:

'Pockets of severe deprivation, long term unemployment, a lack of accessibility to jobs and education opportunities, a high level of criminality and delinquency, and particularly run down environments exist in Wrexham and some of the urban villages to the west. The plan through its land use and development strategy, reflects the Council's priorities to combat poverty and to promote social inclusion via community based initiatives as well as physical and economic regeneration projects.'

6.4.3 Policy GDP1 sets out a range of requirements for new development which includes:

j) Have regard to the need to safeguard those areas that possess a strong Welsh culture and/or linguistic identity from development that could harm this identity.'

6.4.4 Paragraph 4.3 of the UDP goes on to explain that the unique character of parts of the County Borough is derived from its Welsh culture and landscape. The Welsh language is an important part of the daily lives of many local inhabitants and a key determinant of the social fabric of various communities including Coedpoeth and Minera. The safeguarding and nurturing of this cultural and linguistic identity cannot occur in isolation from the development of the local economy and conservation of the landscape.

6.4.5 The emerging Wrexham Local Development Plan 2013 – 2028 is still at a relatively early stage of its preparation. However, the Preferred Strategy explains that:

'The future wellbeing of the Welsh language and its contribution to Welsh cultural heritage is dependent upon a variety of key factors such as education, demographic change and community activities and economic prosperity.

The strategic approach to the Welsh language is to encourage employment opportunities and new homes to help retain Welsh speakers in the locality….'

6.4.6 Topic Paper 11 (February 2016) Welsh Language is one of a number of topic papers which have been prepared in order to inform the preparation of the LDP. Topic Paper 11 confirms that:

'The future wellbeing locally of the Welsh language and its contribution to Welsh cultural heritage is dependent on a variety of key factors such as education, demographic change and community activities as well as economic prosperity. The planning system can take account of the needs and interests of the Welsh language and its wellbeing by preventing development that could have a significantly harmful effect.

New development can have both beneficial and harmful effects on the Welsh language. Beneficial effects can occur when development encourages Welsh speakers to remain in their communities, for example affordable housing for local need in a primarily Welsh speaking area, or when it supports the viability of village facilities, such as the school. Providing employment opportunities can help retain Welsh speakers in the area and prevent them from migrating out of Wales. Harmful effects can occur when a disproportionate number of non-Welsh speakers move into a community, when essential services or facilities needed to sustain communities and the Welsh language are lost or there are few employment opportunities. These can often have cumulative effects, for example, by reducing the use of the Welsh language among Welsh speakers.'

6.4.7 Section 5 of Topic Paper 11 provides a summary of the key issues and themes which have emerged from the policy context, local evidence base and the LDP pre-deposit consultation, with recommendations on inclusion within the Deposit LDP. Those relating to employment are outlined below.

Issue	Include in Preferred Strategy	Include in Deposit LDP
Welsh speakers are moving out of Wales each year. One of the aims of the Welsh Government is to reverse this trend; the creation of jobs to sustain communities and the local economy is a key priority	The growth strategy of the LDP can provide the foundations with which to address this issue – Chapter 4 Strategic Growth Options. Also see strategic policies SP1, SP3, SP& (Housing), SP* (settlement hierarchy) and SP9 (key sites).	Detailed policies to emerge in the Deposit plan, policies to be sensitive to impacts on Welsh language sensitive areas, in particular the provision for local businesses, SMEs, farm and rural diversification, tourism and protection of existing employment areas (Rhosllanerchrugog, Coedpoeth, Chirk).
Strategic approaches to support the language might include; the distribution of economic growth; ensuring there is a sufficient level and range of economic opportunities including sites and premises to support and develop local communities.	The settlement hierarchy supports growth in several of the Welsh language sensitive areas (Coedpoeth, Rhosllanerchrugog, Glyn Ceiriog and Penycae) that can help sustain communities. Glyntraian and Minera are small rural communities that will not be suitable for growth but can benefit from opportunities in Coedpoeth, Chirk and Glyn Ceiriog. Policy SP1 supports rural, tourism and leisure development which would be of particular benefit to the isolated communities in which Welsh speaking is relatively high.	Detailed policies to emerge in the Deposit plan, policies to be sensitive to impacts on Welsh language sensitive areas, in particular the provision for local businesses, SMEs, farm and rural diversification, tourism and protection of existing employment areas (Rhosllanerchrugog, Coedpoeth, Chirk).

6.4.8 Local Planning Guidance Note (LPGN) No. 31 – The Welsh Language and Welsh Communities amplifies development plan policies contained within the Wrexham UDP designed to protect the Welsh language and Welsh communities and it sets out how the Council will assess the likely future impact of relevant developments, individually or cumulatively, on the wellbeing of the Welsh language and Welsh communities.

6.4.9 LPGN 31 confirms that local planning authorities are advised not to discriminate against individuals on the basis of their linguistic ability. It goes on to explain that the future wellbeing locally of the Welsh language and its contribution to Welsh cultural heritage is dependent on a variety of key factors such as education, demographic change and community activities as well as economic prosperity.

6.4.10 LPGN 31 confirms that the planning system can also take account of the needs and interests of the Welsh language and its wellbeing as a material consideration in the determination of planning applications.

6.4.11 LPGN 31 explains that Coedpoeth and Minera are considered by WCBC to be language sensitive wards and as such, the submission of a Welsh Language and Community Impact Statement is required in support of planning applications involving:

- the construction of 25 or more dwellings;
- employment proposals of 2 hectares or more or those creating more than 50 jobs;
- retail development greater than 2,000 sqm; or
- other developments which provide individually or cumulatively for significantly more than local needs

6.4.12 Given that the proposed developments will collectively create an additional 60 jobs at the Five Crosses Industrial Estate, the requirement for a Welsh Language and Community Impact Statement is triggered.

7. ASSESSMENT

7.1 Employment

7.1.1 The UDP identifies severe deprivation, long term unemployment, a lack of accessibility to jobs and education opportunities as problems with Wrexham and the western urban villages.

7.1.2 The TDL site is located on the Five Crosses Industrial Estate at Minera. The majority of the Five Crosses Industrial Estate lies within the Coedpoeth Settlement limit. A portion of the existing TDL site, including the main Dairy processing building and the vehicle workshop, lies within the Coedpoeth Settlement Limit. The cold store extensions to the main Dairy building would lie within an area covered by the original planning permission for the Dairy, but outside of the existing settlement limit. The extension to the blow moulding building (Phase 3) would lie outside of the existing Settlement Limit, but within the area covered by the planning permission for the existing blow moulding building. The proposed permanent staff car parking area (part of Phase 2) would lie within an area outside of the Settlement Limit.

7.1.3 Representations have been made to the emerging LDP seeking an employment allocation for those parts of the TDL site already subject to planning permissions. That would include the Phase 1 and Phase 2 cold store extensions, the additional hardstanding and relocated surface water attenuation pool (Phase 2) and the extension to the blow moulding building (Phase 3). Those areas have been identified as a Candidate Site in the Preferred Strategy and have been commented upon as follows by WCBC:

The site complies with the Council's preferred Strategy and may have potential to contribute to meeting future growth demands within the County Borough. The site has planning permission.'

7.1.4 The allocation of the areas to be used for employment purposes within the site will consequently already have been subject of sustainability appraisal by the WCBC as part of the site assessment process.

7.1.5 Wrexham LDP Topic Paper 11 confirms that one of the key factors upon which the wellbeing of the Welsh Language is dependent is economic prosperity.

7.1.6 Topic Paper 11 also confirms that providing employment opportunities can help retain Welsh speakers in the area and prevent them from migrating out of Wales. Harmful effects can occur when a disproportionate number of non-Welsh speakers move into a community, when essential services or facilities needed to sustain

communities and the Welsh language are lost or there are few employment opportunities.

7.1.7 LDP Topic Paper 6 (Economy, Employment and Retail) identifies the Five Crosses Industrial Estate as the only employment site in the Coedpoeth and the North West cluster area and notes that it is at full capacity. Expansion of the TDL site at the Five Crosses Industrial Estate would therefore improve the economic prosperity of the area, which will in turn assist in maintaining the wellbeing of the Welsh language locally.

7.1.8 TDL is a local family business which was first established in 1983 when it operated solely from the Pen y Palmant Farm site.

7.1.9 By 2004, the business employed 26 full time employees and 1 part time employee. The business also sourced milk from 14 local Welsh dairy farms.

7.1.10 Following the establishment of the new dairy at the Five Crosses Industrial Estate, Tomlinson's Dairies currently employs 172 full time and two part time staff across the two sites.

7.1.11 The business also now sources milk from 71 dairy farms located within the north east Wales milk field of which 48 are under direct supply contracts with Tomlinson's Dairies and are located an average of 13 miles from the Dairy. Kite Consulting estimate that Tomlinson's Dairies currently supports 234 on-farm jobs. This is particularly significant given that within Wales the number of dairy producers fell from 2,909 in June 2003 to 1,753 by June 2016, equivalent to a 40% reduction over the period. This is mirrored by a fall in jobs within the wider primary producer (principally agriculture) sector within Wrexham from 1,187 jobs in 2001 down to 829 jobs in 2011. The agricultural sector anecdotally employs a greater proportion of Welsh speakers and the support provided by Tomlinson's Dairies helps to provide opportunities for, and facilitate the on-farm retention of, the younger generation of the farming community.

7.1.12 In addition, Tomlinson's Dairies' annual spend (excluding purchase of raw milk) is in the order of £7,200,000 per annum which represents a significant economic contribution to the wider economy.

7.1.13 With the proposed expansion of the Dairy (Phases 1, 2 and 3), an addition 60 full time jobs will be created by Tomlinson's Dairies. These will be full time positions including around 45 dairy operatives / machine operators, around 11 supervisor roles and 4 manager roles. All salaries will be above the national living wage and none

will be zero hours contracts. The additional salary spend in the local area will be in the order of £1.7 million per annum.

7.1.14 In order to meet the increase in output, milk will be sourced from an additional 47 dairy farms, the majority of which are already contract with J Sainsbury.

7.1.15 The additional Tomlinson's Dairies' annual spend (excluding purchase of raw milk) is expected to be in the order of £7,000,000 per annum which represents another significant economic contribution to the wider economy.

7.1.16 In terms of the development itself, the three Phases of development represent a £14,000,000 investment by TDL.

7.1.17 The expansion of the Dairy also assists in delivering the Welsh Government's strategy for increasing milk processing capacity and output within Wales, with attendant benefits for employment with the dairy processing and farming sectors.

7.1.18 The award of the J Sainsbury processing contracts to TDL represents a significant shift in the dairy processing sector with an additional 100 million litres destined for sale throughout stores in Wales and parts of England being processed at a Welsh dairy rather than at an English dairy.

7.1.19 This builds on the success of TDL as the only major Welsh processor able to process Welsh branded milk produced on Welsh dairy farms for sale in the stores of major retailers across Wales.

7.1.20 The success of TDL will also help to reverse the decline in the dairy processing sector within Wrexham CB, following the closure of the First Milk site at Maelor with the loss of around 230 jobs.

7.1.21 The expansion of Tomlinson's Dairies will help to consolidate Wrexham County Borough's position as a major food and drinks processing hub.

7.1.22 The proposed development will consequently provide a significant boost to the local economy. It will also provide local people, within Coedpoeth and Minera, with additional employment opportunities, which offers the potential to counter the trend in the outward migration of Welsh speakers from the local community and the wider rural community.

7.2 Staff Education, Training & Skills

7.2.1 Tomlinson's Dairies already has British Retail Consortium Grade A accreditation, a

prerequisite for this accreditation is that the business invests in Continual Professional Development and training for its staff. The dairy runs a comprehensive education, training and skills program which encompasses:

- Induction;
- Preparation of skills matrix;
- Individual training plan for all staff;
- One-to-one review at least annually and plan for employee progression;
- In-house and outside training (including regular 3-4 day off site HACCP courses and training at Reaseheath Centre of Dairying, Royal Foods, Wrexham, and regular on site courses with Tetra and Alliance); and
- Following induction into the dairy each employee at TDL undertakes training on manual handling, health and safety, HACCP and specific training on their work area including machine operation, fork lift truck driving etc.

7.2.2 TDL has embarked on a dairy technology apprenticeship program in conjunction with the Eden program at Reaseheath College.

7.2.3 The business places great emphasis on its FastTrack training and development policy where individuals' training needs are identified at annual review. The Policy provides the opportunity for staff to set out their aspirations to develop their careers which the company will aim to support. New roles are always advertised within the company first as TDL is very keen to promote from within. Examples of career progression include:

- the Dairy's Processing Manager who originally joined the company as a delivery driver then rose through the business having been placed on a 2 year management course paid for by TDL;

- the Dairy's Production Manager who began work with the business driving a milk float as a doorstep delivery driver before being promoted through a range of roles having been with business for 13 years;

- the Dairy's Engineering Manager originally joined the business as a shop floor engineer before being promoted into his current role; and

- most Supervisors at the Dairy began their career as machine operators and were promoted as the business expanded.

7.2.4 The range of roles that will be created as a consequence of the proposed, coupled with in-house training and the scope for career progression within the company would provide a significant number of job opportunities for local people and would offer the

potential to help reverse the trend in outward migration of local people, some of whom would be Welsh speaking.

7.2.5 The advertising of job vacancies both within the company and within the local communities will also help to ensure optimum opportunities for local people, including Welsh speakers, to secure jobs at the Dairy.

7.3 Company Welsh Language Policy

7.3.1 TDL operates a bilingual policy which incorporates general guiding principles in relation to the Welsh language. The policy is subject to periodic review and is updated as new policy initiatives are introduced.

7.3.2 Permanent signage within the Dairy is currently in English only, however as and when renewed, permanent signage will be provided in Welsh and English.

7.3.3 Wherever possible, TDL will endeavor to have product literature brochures available in Welsh when displayed in Wales.

7.3.4 Similarly, packaging material for products designated for the Welsh market will be presented in both Welsh and English.

7.3.5 TCL uses stationery, including letter heads, business cards, compliment slips etc., versions of which are printed in Welsh and English. Company correspondence can be in Welsh or English

7.3.6 Welsh speaking staff are encouraged to speak Welsh with other Welsh speaking staff and with Welsh speaking customers.

7.3.7 Accordingly, the company actively accommodates and supports the use of the Welsh language within the workplace.

7.4 Housing

7.4.1 The proposed developments will not result in any direct loss or gain in open market or affordable housing stock.

7.4.2 Coedpoeth has been identified within the emerging LDP (Preferred Strategy) as a Tier 2 Key Settlement within the Sustainable Settlement Hierarchy. Under the WCBC Preferred Strategy, this would see a proportion of new development being directed to Coedpoeth.

7.4.3 It is currently anticipated that 930 dwellings will be directed to the six Tier 2 settlements / settlement groups, equating to an average of approximately 133 per settlement / settlement group.

7.4.4 The provision of around 133 open market and affordable dwellings within Coedpoeth, without making provision for significant additional local employment opportunities could have a negative effect on the wellbeing of the Welsh language through inward migration and would encourage the use of Coedpoeth as a dormitory settlement.

7.4.5 The TDL developments would, with the creation of an additional 60 new full time jobs at the Five Crosses Industrial Estate, within reasonable walking and cycling distance of the entire settlement, help to maintain the balance between employment and housing for the benefit of local people whether Welsh speaking or not.

7.4.6 The provision of both housing and employment within Coedpoeth would help to maintain the current level of affordability of open market housing which should serve to reduce the risk of more local people being priced out of the housing market. The requisite inclusion of affordable dwellings would further serve to provide for those local people on low incomes who might otherwise have to leave the area, with consequential implications for the wellbeing of the Welsh language.

7.5 Education

7.4.1 The developments are not expected to have a detrimental effect on education in the locality.

7.4.2 The developments would take place within and immediately adjacent to the existing Dairy site and would not result in the loss of any educational facilities.

7.4.3 The impact of additional employment provision in the locality is unlikely to have significant effect on school capacity in the locality.

7.4.4 The positive effect of the proposed developments in potentially reducing outward migration of local people within the 16 to 67 age group is likely to have a stabilising effect on both the existing working population and families, which includes Welsh speakers. As a consequence, it should serve to help maintain the use of the Welsh language in primary and secondary schools.

7.6 Other Factors

7.6.1 As part of its review into the Welsh Dairy Processing Sector, the Welsh Government commissioned a report from Brookdale Consulting (published November 2015) which inter alia recommended that:

- The Welsh Government should continue to support and prioritise indigenous dairy businesses;
- The Welsh Government should also review inward investment opportunities for dairy processors in Wales;
- Rather than establish a large new dairy processing facility on a greenfield site in South Wales, expansion of existing dairy processors should be encouraged to deliver 350 million litres of processing capacity within Wales in the short to medium term and significantly more in the longer term; and
- Support should be focused on those who drive innovation in production, new product development, marketing and support.

7.6.2 The expansion of the TDL cold storage and poly bottle blow moulding facility is fully in accordance with, and would make a significant contribution towards, the delivery Welsh Government's dairy processing sector strategy.

7.6.3 The Tomlinson's Dairies expansion would see the processing of more milk in Wales (Wales is currently a net exporter of raw milk to England).

7.6.4 However perhaps of more importance to Welsh cultural identity, is that TDL is the only processor supplying the Welsh stores of major supermarket chains with milk that has been both produced on Welsh dairy farms <u>and</u> processed in Wales. This puts TDL in a unique position of being able to provide branded Welsh milk that is sold within stores across Wales (currently including ASDA and M&S) and within England.

7.6.5 This, together with the efforts of other local food and drinks processors, is making a positive contribution in raising awareness of products produced in Wales and is helping to offer greater choice for Welsh consumers.

8. CONCLUSIONS

8.1 The creation of a prosperous local economy is one of the key factors in supporting and maintaining the Welsh language and Welsh cultural identity, as set out within PPW, TAN 20, the UDP, the emerging LDP, LPG 21 and LDP Topic Paper 11.

8.2 TDL is already a successful local family business which was first established in 1983 and which now:

- Processes approximately 95 million litres of milk per annum;
- Directly employs 174 members of staff;
- Purchases milk from 71 dairy farms within the north east Wales milk field, of which 48 are direct suppliers located an average of approximately 13 miles from the Dairy;
- Supports an estimated 234 on-farm jobs;
- Directly and indirectly supports employment within the wider economy with an annual spend on suppliers, contractors and other service providers (excluding raw milk) of approximately £7.2 million per annum; and
- Supplies Welsh milk and other dairy products to small, medium and large chains of shops, including ASDA stores across Wales, Marks & Spencer, Tesco, Costa Coffee, hospitals across North Wales, schools across North Wales, wholesalers and around 60 milk rounds run by other businesses.

8.3 The proposed expansion of the TDL site at the Five Crosses Industrial Estate will provide significant employment and economic benefits to the local community by virtue of:

- Creating an additional 60 full time jobs with roles at a range of levels within the company structure which will equate to an additional annual salary spend in the local area of around £1.7 million;
- A capital spend of approximately £14 million at the Five Crosses site; and
- An increase of in the order of £7 million per annum on services, contractors and suppliers (excluding raw milk), a significant proportion of which will be based locally.

8.4 The TDL site is located within the Five Crosses Industrial Estate and is accessible from both Coedpoeth and Minera on foot and by bicycle. It is also accessible by regular public transport. Coedpoeth has been identified as a Tier 2 Key Settlement within the emerging LDP Preferred strategy and as such is deemed to be an inherently sustainable settlement and a suitable location for new development. The majority of the TDL site is located within the Coedpoeth Settlement Limit or within areas that are already covered by planning permissions for employment developments. That area has been identified as Candidate Site for an employment allocation within the emerging LDP and as such, sustainability assessments (including that relating to the Welsh language) will have been undertaken as part of the LDP preparation process.

8.5 The significant contribution that the proposed development will make to the local economy in terms of direct employment creation and indirect employment support and creation (agricultural sector, construction sector and the service and supply chain) will have a significant positive effect on the wellbeing of the Welsh language within Coedpoeth and Minera, through the retention and creation of local jobs and thereby diminishing a key driver for outward migration of local people.

8.6 TDL has a positive approach to the use of the Welsh language within the workplace. It also has an effective staff development programme which has seen the rapid promotion of staff to key upper management positions within the company. This provides the opportunity for career progression for existing and new employees which should encourage the retention of the local workforce.

8.7 The emerging LDP will make provision for additional new open market and affordable housing within Coedpoeth. Whilst the numbers are not fixed, the average provision across Tier 2 Settlements is likely to be in the order of 133 dwellings per settlement. Without the provision of additional employment opportunities within Coedpoeth, this is likely to result in inward migration and the gradual shift in the nature of Coedpoeth and Minera towards dormitory settlements. The expansion of TDL and the additional economic and employment opportunities this will afford to local people will help to balance the potentially negative effects for the wellbeing of the Welsh language which might otherwise occur from residential only development within the village.

8.8 The provision of additional housing within Coedpoeth by way of the emerging LDP will help to counter any potential upward pressure on house prices arising from the TDL development. This will help to ensure the availability of affordable open market housing and affordable housing to local people, whether Welsh speaking or not.

8.9 The TDL developments should not adversely affect educational provision within the locality or the use of the Welsh language within the school environment. On the contrary, a possible effect of retaining more local people of working age (and by association, their families) would be the retention of more local Welsh speaking children.

8.10 Accordingly, it is considered that the proposed developments will have a positive impact on the use of the Welsh language within Coedpoeth and Minera and will also help to improve the vitality and sustainability of these communities.

Haston Reynolds Ltd
July 2016