

## Appendix 2

### Street Naming Policy consultation: comments and amendments to the text of the policy

From	Comments	Response	Amended policy text (changes in underlined font)
Welsh Language Commissioner	In relation to point 1.2.3 in particular, the policy would be further strengthened by including a direct reference to the Welsh Language Commissioner's responsibility to standardise Welsh Place-names and including a hyperlink to the <a href="#">List of Standardised Welsh Placenames</a> published on our website. It would also be valuable to refer to the <a href="#">Guidelines for Standardising Welsh Place-names</a> that guide our panel's work: although these Guidelines deal mainly with settlement names, they do include principles that are equally relevant to street and property names. In addition, some street names will include the names of other settlements or locations in Cardiff and beyond so it's important to ensure that those elements are spelt consistently. We would encourage you to reference these resources in a prominent place on your website and refer to them as	Recommend that reference is included in the policy and on website, as per suggestion.	1.2.3. The Council has statutory responsibilities and powers to maintain accurate and updated lists of the names of towns, villages, communities and wards as well as new developments. In each case, the Council will ensure that the lists are of a high standard and will conduct an audit of the list that it maintains to ensure standardisation where necessary. <u>Additionally, the Welsh Language Commissioner has responsibility for standardising Welsh place-names.</u> <u>Useful reference documents include the <a href="#">List of Standardised Welsh Placenames</a> and the <a href="#">Guidelines for Standardising Welsh Place-names</a>, both published on the Welsh Language Commissioner's <a href="#">website</a>.</u>

	<p>part of your planning processes in order to raise developers' awareness of them. I would also like to draw your attention to the guidance section on our website that includes advice for developers and local authority officers relating to naming new development and including place-names on signage.</p>		
<p>Welsh Language Commissioner</p>	<p>Including a reference to the <a href="#">List of Historic Place-names</a> would also strengthen the policy further. I'm aware that several local authorities refer developers to this list early on in the planning process in order for them to seek suitable historic names before unsuitable marketing names start to gain currency. I should emphasise, however, that this is a list of historic names and that the forms will not have been standardised. We would be more than willing to advise you regarding how to represent these names in modern and standardised Welsh should you require.</p>	<p>Recommend that reference is included in the policy and on website, as per suggestion.</p>	<p>3.1.1. Cardiff has a significant historical background and therefore to ensure preservation of this heritage, preference will be given to naming schemes with an historical and local context. The Council has a naming panel with external expertise to facilitate, advise and suggest options for all naming matters concerning new developments (see also 1.2.1). <u>Appropriate resources, such as the <a href="#">List of Historic Place-names</a>, should also be referred to.</u></p>
<p>Welsh Language Commissioner</p>	<p>I would also like to suggest that the advice in 4.6 regarding renaming properties could be strengthened by emphasising that there may be historic or linguistic significance to the existing names of properties and that you will urge people to</p>	<p>Recommend that policy text is amended to refer to historically/ linguistically significant names and to include reference to the Historic Environment Records, as per suggestion.</p>	<p>4.6.1 The name of an existing named property may be changed. The proposed name must not already be in use by any other property, nor sound too similar to any other property name, in the area. A detailed check will be undertaken on receipt of the</p>

	<p>reconsider renaming some historic names. This is common practice in some local authorities and although the problem is not as apparent in an urban area like Cardiff there is a risk that some important names could be lost. The annex to the <a href="#">Historic Environment Records in Wales: Compilation and Use document</a> provides further guidance on how to consult the List of Historic Place-names when considering renaming applications. Your proposed naming panel may also be able to advise you regarding which names are of special historic significance.</p>		<p>application to avoid duplication and names that could be construed as offensive, discriminatory or obscene, or are open to misinterpretation, will not be accepted. <u>Where existing names have particular historic or linguistic significance, renaming may be discouraged.</u> Further guidance is available in the annex to the <a href="#">Historic Environment Records in Wales: Compilation and Use document</a>.</p>
Welsh Language Commissioner	<p>I wrote to the Chief Executive in 2018 to note my eagerness to review the entries in the List of Standardised Place-names on-line for Cardiff. Indeed, it would be timely for you to ensure that they are current and correct before you start to implement this policy. Dr Eleri James, the senior officer responsible for the standardisation project, would be more than willing to discuss this further with you: <a href="mailto:eleri.james@cyg-wlc.cymru">eleri.james@cyg-wlc.cymru</a>.</p>	Work is underway through Bilingual Cardiff – no direct implications for draft policy.	
Welsh Language Commissioner	<p>I look forward to learning what your next steps will be in relation to this work and I would appreciate it if you</p>	Noted	

	would send Eleri James an update once this policy has received the necessary approval and is in operation. We will be very interested in learning more about the implementation of the policy and its results in due course.		
Cymdeithas yr Iaith – template email	Dear Cardiff Council,  I welcome the council's decision to ensure that all new streets to be built in Cardiff will have a Welsh only name. However, I feel there is room for the council to improve this draft policy, by adding a number of clauses to strengthen it and which will be a clear reflection of local heritage, linguistically and historically:	Noted	
Cymdeithas yr Iaith – template email	New developments  The council should ensure that all new developments have a Welsh only name, including estates and new areas.  The council should insist that development companies have Welsh language names for any development, at the beginning of the development process, in order to resolve the issue of developments	Recommend that policy text is amended to reflect the Council position of encouraging the use of Welsh names and seeking to ensure that names reflect local historical/cultural/linguistic heritage through encouraging developers to consult with local communities.	<b>3.2 Use of Unofficial Marketing Titles</b>  <u>3.2.1 In order to ensure that naming reflects the local historical, cultural and linguistic heritage, the Council will encourage developers to consult with local communities at an early stage in the development process. Where naming is considered at an early stage, it may be inappropriate to use unofficial marketing titles.</u>

	<p>having temporary names that become common names for new developments, such as the 'Regency Park' example to the north of the city.</p>		<p>3.2.2 The Council will not adopt unofficial 'marketing' titles or themes used by developers for the sale of new properties, unless an historical or local context has been agreed in advance (see also 3.1.1). In such cases the agreed theme will be adopted as the basis of the approved street naming scheme.</p> <p>3.2.3. The adoption of 'marketing' titles will not be permitted in creating attractive 'unofficial' locality or village names.</p> <p>3.2.4. It is therefore advisable for developers to be cautious in the use of development names for marketing purposes if the name has not been agreed in advance.</p> <p>3.2.5. It should also be pointed out in literature distributed to prospective purchasers that any marketing names are subject to approval and therefore may change.</p>
<p>Cymdeithas yr Iaith – template email</p>	<p>The council also needs to look at the wider effect of its planning policy</p>	<p>Discussed with Bilingual Cardiff, – no direct implications for draft policy.</p>	<p>N/A</p>

	and how that undermines the general principle.		
Cymdeithas yr Iaith – template email	<p>Streets in the City Centre</p> <p>The section concerning the 'bilingual' street names on the main routes into the city centre and the Cardiff Bay area should be revisited.</p> <p>It should be ensured that all streets in these areas show the historical Welsh language names, which are not currently shown on signs. For example, 'Heol y Fuwch Goch' should be used for 'Womanby Street': Heol y Plwca for 'City Road'</p>	Discussed with Bilingual Cardiff and there are no direct implications for wording in the draft policy, however the naming panel will in due course review all the existing bilingual street names in the city as well as suggesting any new names to be adopted, for instance where bilingual names in the Centre and Bay are required to be consistent with the new policy.	N/A
Cymdeithas yr Iaith – template email	<p>Restoring Welsh language Names to streets that already exist that have monolingual English names</p> <p>I also believe that a process should be in place to reconsider monolingual English street names that exist already.</p>	The policy confirms that bilingual names will be used for certain streets and areas of the city. The naming panel will consider any issues that arise concerning bilingual street names in these areas. It follows therefore that there will be no monolingual names in these areas. Outside of these areas, predominantly in the city's residential streets, the policy proposes that streets will remain as they are now in the 'known' language.	N/A

<p>Dr Dylan Foster Evans</p>	<p>I agree with the Council's intention to work 'towards parity of usage between Welsh street names and English street names across the city'. I also agree with the intention to adopt 'a Welsh name that's consistent with the heritage and local history of an area' for each street. Cardiff has a rich toponymic heritage and in the areas of new developments, there are plenty of historic Welsh names (farmsteads and fields). However, I would like to make another important point, that being that the Welsh place names are part of Cardiff English speakers' heritage as well (and part of the heritage of other language speakers). Welsh names have been borrowed by Cardiff English for centuries, and Prof Peter Wynn Thomas has noted that they form part of the 'most important body of examples of quite a rare phenomenon: words that were borrowed from Welsh into English'. (The situation with regard to</p>	<p>Noted.</p>	<p>N/A</p>

borrowing in the other direction is very different, of course; the English influence on Welsh is expansive in numerous ways.) In this category of historic names that have been lent to Cardiff English is Cardiff itself and names such as *Cyncoed*, *Gabalfa*, *Lisvane*, *Maindy*, *Mynachdy*, *Pentrebane*, *Radyr*, *Rhiwbina*, *Roath*, *Wentloog* and a number of other names. The way in which these names have been borrowed, from Welsh to English, and adapted with regard to pronunciation and/or spelling, is an unique part of the English language culture in Cardiff. In that respect, Welsh names have enriched that culture. Although Welsh street names are not as common as English streets in Cardiff, there are examples of using Welsh names in a number of areas. In Grangetown, you have streets such as *Coedcae*, *Llanbradach*, *Clydach*, and *Abercynon* (through the influence of the Bute family), amongst others. In Splott, there are streets called *Aberystwyth* and *Aberdovey*, for instance, and in

Gabalfa you have *Aberteifi* and *Aberporth* as street names. Prof. Nicholas Coupland (1984) has discussed how the people of Cardiff would pronounce these names in a variety of ways that is unique to the city. To summarise, history shows that Welsh names have become the property of everybody in the city, and a unique part of Cardiff English. As well as affording us the opportunity to safeguard historic Welsh names, this policy would allow the people of Cardiff that do not speak Welsh to own that inheritance in their own way. Coupland, Nicholas. 1984. Social and linguistic considerations in the pronunciation of Welsh place-names in Cardiff. *Papurau Gwaith Ieithyddol Cymraeg Caerdydd / Cardiff Working Papers in Welsh Linguistics*, 3, 31–44

Thomas, Peter Wynn. 1992. Ynganiadau gwael a llygriadau: ffurfiau Saesneg ar enwau priod Cymraeg. *Papurau Gwaith Ieithyddol Cymraeg Caerdydd / Cardiff Working Papers in Welsh Linguistics*, 8, 71–92”

Consultation report	Three in five (60.8%) respondents agreed with the proposal to ensure the Council works towards parity between the number of Welsh street names and English street names across the City. In contrast, almost a quarter (23.6%) disagreed with the proposal.	No changes proposed to policy.	N/A
	The overwhelming majority of respondents (93.8%) agreed that preference is given to naming schemes and streets with an historical and local context.	No changes proposed to policy.	N/A
	Over a third (34.6%) of respondents felt that Heritage/History groups should be involved in the naming process, this was followed by local community organisations/affected residents (31.4%) and Welsh Language groups (20.0%)	Noted and recommend that further discussion is needed as to how stakeholder groups/individuals can be involved in the process of street naming. Suggest that the Street Naming Panel offers an appropriate mechanism for this.	N/A
	Almost three-fifths (58.0%) were unsure whether the protocols clearly explain the process which should be followed, while a third (34.8%) felt that they are clearly explained.	A process map has been provided in the Policy.	Process map added to policy document (Appendix 2).
	One in four (23.5%) respondents felt that local residents/businesses/general public should be notified on completion of an application for street naming and numbering. This was followed by	Noted and recommend that further discussion takes place with relevant Council stakeholders to inform operational procedure as	N/A

	delivery companies (18.1%) and Sat Nav systems (14.9%).	appropriate. No changes proposed to policy.	
	Free text responses - How could positive effects on the Welsh language be increased, or negative effects be mitigated?	The response to the consultation included a number of suggestions for increasing positive effects and mitigating negative effects, including supporting the use of the Welsh language through providing help with the pronunciation of street names. Whilst no changes to the policy wording have been made as a result of this feedback, the feasibility of taking forward some suggestions as actions will be explored with appropriate stakeholders. For example, developing a pronunciation guide which would be available on the Council's website, exploring opportunities to involve stakeholders (e.g. local communities, local history groups, children and young people) in the street naming process and providing background information about the development of new street names on the Council's website.	N/A
Councillor response 1:	What is unclear is that where a new site consisting of say 20 roads is	No changes proposed to policy. Provision is made for local	N/A

Councillor response 2:	constructed, how the Welsh/English ratio in naming is calculated. My instinctive choice would be 50/50. But the Council's policy is unclear to me. There needs to be a proportional approach  I would echo the comments and observations of my colleague	discretion in identifying street names, with preference to be given to naming schemes with an historical and local context in order to support Cardiff's historical and linguistic heritage.	
Other amends	Historic Environment Act could be referenced in policy.	Reference added as suggested.	1.1.5 Street naming is also a key element of place-making, and it is important in the context of the Council's commitments to the Well-being of Future Generations Act, and <u>Welsh Language Standards and Historic Environment (Wales) Act 2016</u> .
Other amends	Remove full hyperlink from text and add link to 'website'	Amendment made as suggested.	2.2.3 For the appropriate fees, please refer to the Council's <a href="#">website</a> .
Other amends	Include reference to circumstances in which the use of street names in other languages may be considered.	Amendment made as suggested.	<b>1.2 Welsh Language Considerations</b> 1.2.1. Since the Council has the right to decide on the names of new streets, it recognises the importance of considering local opinion. The policy in relation to new street names will therefore be to adopt a Welsh name that is consistent with the local

			<p>heritage and history of the area. This will remove the issues of English to Welsh translations for street names. The Council will also utilise the external academic expertise of the Bilingual Cardiff Welsh Place/Street Names Panel when deciding on new names. Names will need to be decided in line with the Council's governance procedures. <u>The use of street names in other languages may be considered in exceptional circumstances, where a street name would clearly reflect and be congruent with specific local historical, cultural and linguistic associations and considerations and following consultation with the Street Names Panel and local communities/stakeholders.</u></p>
Other amends	Clarify the decision making process for street naming and numbering.	Amendment made as suggested.	<p><u>1.5.5 On receipt of applications for street naming, following advisory input from the Street Names Panel consultation will be carried out with Royal Mail and the cabinet member whose portfolio this falls under, plus all</u></p>

			<p><u>wards members and community councils, where appropriate. For more detail, please see Appendix 2 (Street Naming and Numbering Process Map).</u></p> <p><u>Any decisions in respect of street naming applications shall be made in line with the Council's Scheme of Delegations.</u></p> <p><u>In the event of concerns being raised regarding an application for a proposed street name not being accepted, the officer with delegated authority will work with the relevant parties and cabinet member to identify a suitable alternative. If it is not possible to reach an agreement, the decision may be referred to Cabinet.</u></p>
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