



Democracy and Boundaries Commission for Wales

By email to:

enquiries@dbcc.gov.wales

27/09/2024/

Dear Commission,

2026 review of Senedd constituencies: Initial proposals

Thank you very much for the invitation to respond officially to the initial proposals for constituency names. We are delighted to have the opportunity to respond for the first time as a statutory consultee on these names in accordance with the requirements of the Senedd Cymru (Members and Elections) Act 2024. The Act creates a number of specific requirements to consult with the Commissioner at all stages of the process and we very much welcome that as it sets a statutory basis for the regular collaboration that has been between our officers about naming matters for a number of years now.

As you know, we have already introduced a number of minor amendments in the run-up to the publication of the report, in accordance with the requirements of the act, to tidy up grammatical slips and orthographic errors etc. You have amended the forms set out in the consultation document to reflect our advice in the majority of cases, but there are some matters that require further consideration set out in the list in Appendix 1. This consultation period has afforded us the opportunity to consult with our Place-names Standardisation Panel and it's our pleasure to present their expert comments also in Appendix 1.

The Act states very specifically that you had a duty to consult with us about the 'orthography' of the names in preparing your initial report and that this is the opportunity for us to present a wider view on the proposed names. We would like to note formally and publicly that which we have already communicated informally, namely that the naming methodology you have adopted for these initial proposals inevitably leads to long and rather unwieldy names. It has also led to some inconsistencies in the use of commas to separate elements. But more than that, the methodology of combining already established

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names has resulted in a list where different names are to be used in Welsh and English for all names except *Bangor Aberconwy Ynys Môn* and *Clwyd*.

We do not feel that this is consistent with the spirit of the Act which creates a requirement for each Senedd constituency to have a 'single name' unless the Commission considers that this would be unacceptable. In such cases 'the constituency may have different names for the purposes of identifying it in communication through Welsh and English'. The wording of the Act creates an expectation that having one single name would be the norm, but allows for creating two names when that is not possible.

In the case of the proposed names, the only way to create a single name for each constituency would be to decide to adopt only the Welsh names, as is done in the case of *Bangor Aberconwy Ynys Môn*. This name is fundamentally different from the other names in that it omits commas and conjunctions in order to create a single name for both languages. Our Panel had divided opinions on this convention – some saw the merits of omitting the conjunction in Welsh as it eliminates the need to mutate Welsh names. Time is needed to discuss this convention further and we will be very interested in understanding what the public reaction is to this proposal. It may provide a pattern to emulate.

We know that you are open to considering comments on the names as part of the 2026 review and we sincerely hope that you will receive innovative and bold suggestions from the electorate as to which names would best represent them. We also have some suggestions for alternative names that we would gladly discuss with you. We would like to reaffirm our willingness and statutory commitment to support you as you reconsider the names in light of the evidence provided in this consultation.

We also understand, of course, that a further full review will take place before the 2030 Senedd elections. This will be a golden and necessary opportunity to revisit these boundaries and consider which names would best represent them. It is vital that the Commission leads on this discussion, with the deliberate and ambitious aim of finding one name for each constituency, thereby seizing this symbolic opportunity to emphasise the status of the Welsh language in Wales and celebrate the richness of its historic place names.

Yours sincerely,

Efa Gruffudd Jones
Welsh Language Commissioner

Email copy to: Shereen Williams, Chief Executive/Secretary



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Appendix 1

<p>Argymhelliad y Panel Safoni Enwau Lleoedd (Enw Cymraeg)</p> <p>Recommendation of the Place-names Standardisation Panel (Welsh name)</p>	<p>Argymhelliad y Panel Safoni Enwau Lleoedd Comisiynydd y Gymraeg (Enw Saesneg)</p> <p>Recommendation of the Place-names Standardisation Panel (English name)</p>	<p>Sylwadau Comisiynydd y Gymraeg ar y Cynnig Cychwynnol</p> <p>Welsh Language Commissioner's comments on the Initial Proposal</p>
<p>Aberafan, Maesteg, Rhondda ac Ogwr</p>	<p>Aberafan, Maesteg, Rhondda and Ogmore</p>	<p>Roedd y Panel o'r farn y byddai'n well gwahanu'r elfennau <i>Aberafan</i> a <i>Maesteg</i> â choma er cysondeb. Nid oedd y Panel yn credu bod gan <i>Aberafan Maesteg</i> ddigon o hunaniaeth fel uned i'w gynnwys fel un enw yn rhan o enw hwy, ac nid yw bodolaeth etholaethau diweddar yn ddigon o gyfiawnhad dros eu huno.</p> <p>The Panel felt that the elements <i>Aberafan</i> and <i>Maesteg</i> could be separated by a comma for consistency. The Panel did not feel that <i>Aberafan Maesteg</i> has sufficient identity as a unit to be treated as a single name as part of a longer name and that recent constituency names do not provide sufficient justification for joining them.</p>



<p>Alun, Glannau Dyfrdwy a Wrecsam</p>	<p>Alun, Deeside and Wrexham</p>	<p>Dylid anelu at arfer un ffurf yn unig pan nad oes ond llythyren neu ddwy o wahaniaeth rhwng y 'ffurf Gymraeg' a'r 'ffurf Saesneg'. Rydym felly'n argymhell defnyddio'r ffurf safonol <i>Alun</i> yn yr enwau Cymraeg a Saesneg, fel y gwneir yn enw'r ysgol uwchradd yn yr Wyddgrug, er enghraifft.</p> <p>If the difference between the 'Welsh form' and the 'English form' consists of only one or two letters, the use of a single form is recommended. We, therefore, recommend using the standard form <i>Alun</i> in both Welsh and English names, as seen in the name of the high school in Mold, for example.</p>
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<p>Bangor Conwy Môn</p>	<p>Bangor Conwy Môn</p>	<p>Dylid nodi bod yr enw hwn yn eithriad i'r patrwm cyffredinol gan hepgor cysyllteiriau ac atalnodau a chynnig un enw Cymraeg i'w ddefnyddio ym mhob iaith (gweler y sylwadau pellach yng nghorff y llythyr).</p> <p>Roedd y Panel o'r farn y dylid symleiddio'r enw hwn ymhellach drwy ddefnyddio <i>Môn</i> yn unig. Awgrymodd y Panel ymhellach y gellid defnyddio <i>Conwy</i> yn hytrach nag <i>Aberconwy</i>.</p> <p>It should be noted that this name is an exception to the general naming pattern as it omits conjunctions and commas and is a single name for use in all languages (please see the related comments in the accompanying letter)..</p> <p>The Panel believes that this name could be further simplified by using simply <i>Môn</i>. The Panel also suggested that <i>Conwy</i> could be used instead of <i>Aberconwy</i>.</p>
<p>Blaenau Gwent, Rhymni a Chaerffili</p>	<p>Blaenau Gwent, Rhymney and Caerphilly</p>	



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<p>Brycheiniog, Maesyfed, Nedd a Thawe</p>	<p>Brecon, Radnor, Neath and Tawe</p>	<p>Sylwer mai <i>Brycheiniog (Breckonshire)</i> sydd ei angen fan hyn gan fod ardal ehangach dan sylw na thref <i>Aberhonddu</i>.</p> <p>Sylwer mai <i>Nedd (Neath)</i> sydd ei angen fan hyn gan fod ardal ehangach dan sylw na thref <i>Castell-nedd</i>.</p> <p>Roedd y Panel yn awgrymu y byddai <i>Tawe</i> yn gallu cynrychioli'r ardal yn y ddwy iaith gan hepgor yr angen am bwyntiau cwrpawd yn yr enw hwn ac yn enw <i>Gorllewin Abertawe a Gŵyr</i>.</p> <p>Please note that <i>Brycheiniog (Breckonshire)</i> should be used here as the name refers to a broader area than the town of <i>Aberhonddu (Brecon)</i>.</p> <p>Please note that <i>Nedd (Neath)</i> should be used here as the name refers to a broader area than the town of <i>Castell-nedd</i>.</p> <p>The Panel believed that <i>Tawe</i> could be used to represent the area in both languages and would avoid the need for compass points in this name and in <i>Swansea West and Gower</i>.</p>
<p>Dwyrain a Gogledd Caerdydd</p>	<p>Cardiff East and North</p>	



<p>Gorllewin a De Caerdydd a Phenarth</p>	<p>Cardiff West and South and Penarth</p>	<p>Nid yw'r cynnig a nodwyd yn y cynigion cychwynnol yn gweithio'n foddhaol yn y Gymraeg.</p> <p>The form suggested in the initial proposals does not work in Welsh.</p>
<p>Sir Gaerfyrddin</p>	<p>Sir Gaerfyrddin</p>	<p>Byddai modd i'r Comisiwn fachu yn y cyfle i fabwysiadu'r enw <i>Sir Gaerfyrddin</i> yn unig yn yr achos hwn gan fod cynsail wedi ei osod drwy ddefnyddio <i>Caerfyrddin</i> yn unig yn enw ar etholaeth Senedd y DU.</p> <p>. The Commission could take the opportunity to adopt the single name <i>Sir Gaerfyrddin</i> in this case as there has been a precedent set in adopting only <i>Caerfyrddin</i> as the name of the UK Parliamentary Constituency name.</p>



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Ceredigion a Sir Benfro	Ceredigion and Pembrokeshire	<p>Byddai modd i'r Comisiwn ystyried cwtdogi'r enw hwn yn y ddwy iaith gan y byddai'n dderbyniol hepgor yr elfen <i>sir/shire: Ceredigion a Phenfro; Ceredigion and Pembroke.</i></p> <p>The Commission could consider shortening this name in both languages as it would be acceptable to omit <i>sir/shire: Ceredigion a Phenfro; Ceredigion and Pembroke.</i></p>
Clwyd	Clwyd	



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<p>Dwyfor, Meirionnydd, Maldwyn a Glyndŵr</p>	<p>Dwyfor, Meirionnydd, Montgomeryshire and Glyndŵr</p>	<p>Roedd y Panel o'r farn y byddai'n well gwahanu'r elfennau <i>Dwyfor</i> a <i>Meirionnydd</i> â choma er cysondeb. Nid oedd y Panel yn credu bod gan <i>Dwyfor Meirionnydd</i> ddigon o hunaniaeth fel uned i'w gynnwys fel un enw yn rhan o enw hwy, ac nid yw bodolaeth etholaethau diweddar yn ddigon o gyfiawnhad dros eu huno.</p> <p>Beth fyddai barn y Comisiwn am hepgor yr elfen <i>shire</i> yn yr enw <i>Montgomeryshire</i> (cymharer â <i>Brecon, Radnor</i>)?</p> <p>The Panel felt that the elements <i>Dwyfor</i> and <i>Meirionnydd</i> could be separated by a comma for consistency. The Panel did not feel that <i>Dwyfor Meirionnydd</i> has sufficient identity as a unit to be treated as a single name as part of a longer name and recent constituency names do not provide sufficient justification for joining them.</p> <p>How would the Commission feel about omitting the <i>shire</i> in the name <i>Montgomeryshire</i> (compare with <i>Brecon, Radnor</i>)?</p>
<p>Abertawe a Gŵyr</p>	<p>Swansea and Gower</p>	<p>Gweler y nodyn am <i>Brycheiniog, Maesyfed, Nedd a Thawe</i>. Byddai derbyn yr argymhelliad</p>



		<p>hwnnw yn hepgor yr angen i ddefnyddio pwynt cwmpawd yn yr enw hwn.</p> <p>Please see the note on <i>Brecon, Radnor, Neath and Tawe</i>. Adopting this recommendation would avoid the need to use a compass point in this name.</p>
Merthyr Tudful, Aberdâr a Phontypridd	Merthyr Tydfil, Aberdare and Pontypridd	
Mynwy a Thorfaen	Monmouthshire and Torfaen	<p>Roedd y Panel yn teimlo y gellid symleiddio'r enw Cymraeg ymhellach drwy hepgor yr elfen <i>sir</i>. Beth fyddai barn y Comisiwn am hepgor yr elfen <i>shire</i> yn yr enw Saesneg (cymharer â <i>Brecon, Radnor</i>)?</p> <p>The Panel believed that the Welsh name could be simplified further by omitting the <i>sir</i> element. How would the Commission feel about omitting the <i>shire</i> in the English name (compare with <i>Brecon, Radnor</i>)?</p>
Casnewydd ac Islwyn	Newport and Islwyn	



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Bro Morgannwg a Phen-y-bont ar Ogwr	Vale of Glamorgan and Bridgend	<p>Rydym yn argymhell defnyddio'r enw llawn, <i>Pen-y-bont ar Ogwr</i>, mewn cyddestunau ffurfiol a swyddogol.</p> <p>We recommend using the full name, <i>Pen-y-bont ar Ogwr</i>, in formal or official contexts.</p>
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