

Agenda – Petitions Committee

Meeting Venue:

Committee Room 1 – Senedd

Meeting date: 21 November 2017

Meeting time: 09.15

For further information contact:

Graeme Francis – Committee Clerk

Kath Thomas – Deputy Clerk

0300 200 6565

SeneddPetitions@assembly.wales

1 Introduction, apologies, substitutions and declarations of interest

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2 New petitions

- 2.1 P-05-785 Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff

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- 2.2 P-05-786 Save our Countryside – Revise TAN 1

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Health and Social Services

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Cynulliad
Cenedlaethol
Cymru

National
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- 3.4 P-05-763 Introduce updated stroke advice – B.E.F.A.S.T. – and help save lives and livelihoods
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- 3.5 P-04-667 Roundabout for the A477/ A4075 Junction
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- 3.7 P-05-770 Reopen Crumlin Railway Station
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- 3.8 P-05-774 Pass Wide and Slow Wales
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- 3.10 P-05-778 Protect the Razor Clams on Llanfairfechan Beach
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Education

- 3.11 P-04-628 To improve access to Education and services in British Sign Language
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4 Evidence session for – P-05-736 To Make Mental Health Services More Accessible

(09.50) (Pages 149 – 154)
Laura Williams, Petitioner

Alun Thomas, Chief Executive – Hafal

Attached Documents:

Cover sheet

Research brief

5 Motion under Standing Order 17.42 to resolve to exclude the public for the remainder of the meeting

6 Discussion of previous evidence sessions

6.1 P-05-736 To Make Mental Health Services More Accessible

6.2 P-04-472 Make the MTAN law

6.3 P-04-575 Call in All Opencast Mining Planning Applications

7 Consideration of summary – P-04-564 Restoration of Inpatient Beds, Minor Injuries Cover and X-Ray Unit to the Ffestiniog Memorial Hospital

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Document is Restricted

Agenda Item 2.1

P-05-785 Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff

This petition was submitted by Tim Deere-Jones, having collected 7,033 signatures online and 138 on paper – a total of 7,171 signatures.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to direct Natural Resources Wales to suspend the licence it has granted to NNB Genco, which permits up to 300,000 tonnes of radioactively contaminated material, dredged from the seabed at the Hinkley Point Nuclear power station site, to be dumped into Welsh inshore waters.

We further request that the suspension of the licence is used to ensure that a full Environmental Impact Assessment, complete radiological analysis and core sampling are carried out under the auspices of Natural Resources Wales, and that a Public Inquiry, a full hearing of independent evidence and a Public Consultation take place before any dump of the Hinkley sediments is permitted.

Additional information:

Marine Licence 12/45/ML, granted by the Welsh Government, permits the disposal of up to 300,000 tonnes of radioactively contaminated marine sediment, dredged from the seabed at the Hinkley Point nuclear site, into the Cardiff Grounds marine dump site close to the South Wales coast. This will allow work to begin on the 2 new Hinkley C nuclear reactor pipelines.

The sediments to be dredged are adjacent to the waste pipes used for the discharges from Hinkley's 4 existing reactors. Analysis, commissioned by UK Government agencies, shows that the sediment is contaminated by radioactive waste discharged to sea over 50+ years of operations at the Hinkley site. Calculations derived from the official data indicate that the proposed dredge sediments may hold at least 7 billion Bqs of aggregated radioactivity, yet reports state that doses to humans would be very low.

Hinkley's radioactive discharges to sea contain over 50 radio-nuclides, but the analysis has only investigated 3 of them. Thus, the actual aggregated radioactivity content of the sediments will be much higher than indicated by the available analysis. The available evidence also implies that only surface samples (0 to 5cms deep) of the sediment have been analysed, despite the fact that core sample research from elsewhere in the Irish Sea demonstrates that, at depths below 5cms, radioactivity concentrations may be up to 5 times higher.

While sedimentary radioactive material is initially likely to disperse, studies prove that it later re-concentrates in coastal and estuarine mudflats and saltmarshes, and is also available for sea-to-land transfer during onshore winds and coastal flooding. We note the absence of research on the fate of such radioactivity in South Wales inshore waters. In this context we are concerned that the environmental and human health (dose) risks from the proposed disposal have not been adequately researched and that any conclusions based on the current incomplete data, are unreliable.

Assembly Constituency and Region

- Carmarthen West and South Pembrokeshire
- Mid and West Wales

Petition: Suspend Marine Licence 12/45/ML ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff

Y Pwyllgor Deisebau | 21 Tachwedd 2017
Petitions Committee | 21 November 2017

Research Briefing:

Petition number: [P-05-785](#)

Petition title: **Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff**

Text of petition:

We call on the National Assembly for Wales to urge the Welsh Government to direct Natural Resources Wales to suspend the licence it has granted to NNB Genco, which permits up to 300,000 tonnes of radioactively contaminated material, dredged from the seabed at the Hinkley Point Nuclear power station site, to be dumped into Welsh inshore waters.

We further request that the suspension of the licence is used to ensure that a full Environmental Impact Assessment, complete radiological analysis and core sampling are carried out under the auspices of Natural Resources Wales, and that a Public Inquiry, a full hearing of independent evidence and a Public Consultation take place before any dump of the Hinkley sediments is permitted.

Marine Licence 12/45/ML, granted by the Welsh Government, permits the disposal of up to 300,000 tonnes of radioactively contaminated marine sediment, dredged from the seabed at the Hinkley Point nuclear site, into the Cardiff Grounds marine dump site close to the South Wales coast. This will allow work to begin on the 2 new Hinkley C nuclear reactor pipelines.

The sediments to be dredged are adjacent to the waste pipes used for the discharges from Hinkley's 4 existing reactors. Analysis, commissioned by UK Government agencies, shows that the sediment is contaminated by radioactive waste discharged to sea over 50+ years of

operations at the Hinkley site. Calculations derived from the official data indicate that the proposed dredge sediments may hold at least 7 billion Bqs of aggregated radioactivity, yet reports state that doses to humans would be very low.

Hinkley's radioactive discharges to sea contain over 50 radio-nuclides, but the analysis has only investigated 3 of them. Thus, the actual aggregated radioactivity content of the sediments will be much higher than indicated by the available analysis. The available evidence also implies that only surface samples (0 to 5cms deep) of the sediment have been analysed, despite the fact that core sample research from elsewhere in the Irish Sea demonstrates that, at depths below 5cms, radioactivity concentrations may be up to 5 times higher.

While sedimentary radioactive material is initially likely to disperse, studies prove that it later re-concentrates in coastal and estuarine mudflats and saltmarshes, and is also available for sea-to-land transfer during onshore winds and coastal flooding. We note the absence of research on the fate of such radioactivity in South Wales inshore waters. In this context we are concerned that the environmental and human health (dose) risks from the proposed disposal have not been adequately researched and that any conclusions based on the current incomplete data, are unreliable.

Background

Marine disposal and dumping at sea

The UK is a contracting party of the [*Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972*](#) (the London Convention). This requires contracting parties to take effective measures to protect and preserve the marine environment from all sources of pollution, including dumping at sea. This is reinforced by Article 4 of the [*OSPAR Convention*](#) that aims to protect and conserve the North-East Atlantic and its resources. The Convention combines and updates the 1972 Oslo Convention on dumping waste at sea and the 1974 Paris Convention on land-based sources of marine pollution. The Convention, which has been signed and ratified by the United Kingdom, entered into force on 25 March 1998.

Under the [*Waste \(England and Wales\) Regulations 2011*](#) a waste hierarchy exists, with disposal being the last option to be considered. Applicants seeking to dispose of waste at sea must, therefore, demonstrate that appropriate consideration has been given to the beneficial re-use of dredged material. As such no waste should be disposed at sea if there is a safe and practicable alternative.

According to the [*UK Marine Policy Statement*](#) (2011):

3.6.1 Most marine dredging and disposal is for the purposes of navigation and existing and future port development, though other works can take place to facilitate the construction of pipelines, outfalls and tunnels. Since 1998, in compliance with international obligations, the UK Administrations have – with some minor exceptions – only licensed the disposal at sea of capital and maintenance dredgings and small amounts of fish waste.

[...]

3.6.5 The primary environmental considerations include the potential risk to fish and other marine life from the release of sediments, chemical pollution and morphological changes including burial of seabed flora and fauna; hydrological effects; interference with other marine activities; increases in turbidity; increases in marine noise; possible adverse effects for designated nature conservation areas and potential destruction or destabilisation of known or unknown heritage assets. Removal of dredged material can also cause adverse impacts to the natural sedimentary systems.

3.6.6 When sediments are contaminated, dredging has the potential to cause significant environmental and health effects through exposure to contaminants in the dredging plume. These contaminants arise from diverse sources such as the legacy of industrial pollution, for example metals and poly chlorinated biphenyls, or historical and current use of antifoulants including tributyltin and heavy metals and new contaminants which are now finding their way into the marine environment, such as flame retardants including poly brominated diphenyl ethers.

There are a number of open licenced disposal grounds in Welsh waters, for example, in the Bristol Channel, Swansea Bay and waters around Pembrokeshire and Ynys Mon. These can be viewed on the Welsh Government's [marine planning portal](#). The Cardiff Grounds site can be seen in Figure 1, located off the coast of Cardiff.

Dredging and disposal occurs in a number of marine [Special Areas of Conservation \(SACs\)](#) designated under [the Habitats Directive](#). This includes capital dredging for new development such as the construction or expansion of ports. Maintenance dredging is regularly undertaken to maintain navigational safety in areas such as docks and waterways. According to the [UK Marine SACs Project website](#), 3,460,000 m³ per year of material is dredged in or near to the [Severn Estuary SAC](#). This SAC is part of the [Severn Estuary European Marine Site](#) overseen by the [Association of Severn Estuary Relevant Authorities \(ASERA\)](#). A [draft \(ASERA\) Management scheme and draft Relevant Authority Action Plans](#) were produced in 2011.



Figure: 1 Marine dumping grounds (disposal sites) in the Bristol Channel

(Source: Welsh Government, [Marine Planning Portal](#))

Marine Licensing Legislation

The key legislation covering the marine licensing regime is contained within Part 4 – Marine Licensing – of the [Marine and Coastal Access Act 2009](#) (“the Marine Act”). Under Section 66 of the Marine Act, licensable marine activities include:

- Depositing any substance or object, in the sea or on or under the sea bed, from:
 - Any vehicle, vessel, aircraft or marine structure;
 - Any container floating in the sea; or
 - Any structure on land constructed or adapted wholly or mainly for the purpose of depositing solids in the sea.
- Construct, alter or improve any works either in or over the sea or on or under the sea bed;
- Use a vehicle, vessel, aircraft, marine structure or floating container to remove any substance or object from the sea bed; and
- Carry out any form of dredging, whether or not involving the removal of any material from the sea or sea bed.

Commonly licensed activities include grab sampling, seawall or embankment repairs, pontoon installations and slipway repairs. There are a number of exemptions set out in [The Marine Licensing \(Exempted Activities\) \(Wales\) Order 2011 \(PDF 244KB\)](#).

Welsh Ministers are the licensing authority for Welsh waters out to 12 nautical miles – the Welsh inshore region. The [Wales Act 2017](#) will devolve marine licensing powers to include the Welsh offshore region (12 nautical miles out the median line with Ireland, England and the Isle of Man). At present marine licensing in the Welsh offshore region is administered by the Marine Management Organisation (“the MMO”).

The operation of marine licensing in the inshore region was delegated to Natural Resources Wales (NRW) in April 2013, via the [Marine Licensing \(Delegation of Functions\) \(Wales\) Order 2013](#). This is administered by NRW’s Marine Licensing Team (MLT). NRW publish a list of [marine licence applications received and determined](#) on their website. Prior to the creation of NRW, marine licensing was handled by the Welsh Government’s Marine Consents Unit.

Determining an application

When determining an application, Section 69 of the Marine Act sets out that the licensing authority must have regard to:

- (1a) The need to protect the environment;
- (1b) The need to protect human health; and
- (1c) The need to prevent interference with legitimate uses of the sea, and such other matters the authority things relevant.

With respect to the 1c, the licensing authority will carry out an Environmental Impact Assessment under the [Marine Works \(Environmental Impact Assessment\) Regulations 2007](#)

(as amended) and Habitat Regulations Assessment under [*the Conservation of Habitats and Species Regulations 2010*](#). In the absence of a marine plan for Wales, which is currently being prepared by the Welsh Government, regard must be given to the [UK Marine Policy Statement](#). Activities must also be compliant with, *inter alia*, the European [Marine Strategy Framework Directive](#) and the European [Water Framework Directive](#).

Decision making (right of appeal, call in, suspending a marine licence and stop notices)

Under the Marine Act there are no statutory timeframes associated with determining a marine licence. Applicants have a [right of appeal to the Welsh Ministers against a decision made by the licensing authority](#) under Section 71 of the Marine Act. Appeals must be made in accordance with the [Marine Licensing \(Appeals Against Licensing Decisions\) \(Wales\) Regulations 2011](#).

In England, under the [Marine Licensing \(Delegation of Functions\) \(Amendment\) Order 2015](#), a licensing application can be called-in by the Secretary of State. Such a call-in (recovery) process does not exist within the Welsh Delegation Order.

Section 72 of the Marine Act provides a procedure for ‘varying, suspending or revoking’ a licence. There are numerous grounds for suspension of a licence to include where there has been a change in circumstances relating to the environment or human health (3a), or because of an increase in scientific knowledge relating to either of those two matters (3b). Section 102 of the Marine Act allows the enforcement authority (Welsh Ministers) to issue a notice to stop activity, subject to satisfying a number of criteria.

Section 100 of the Marine Act gives a specific direction making power to Welsh Ministers as the licensing authority with regards to performance of delegated functions under the Act. Furthermore, Article 11 of the [Natural Resources Body for Wales \(Establishment\) Order 2012](#) gives the Welsh Ministers a general power to direct NRW as to the exercise of its functions.

Marine licence: 12/45/ML

Marine licence 12/45/ML was issued on 11 July 2014 by NRW acting on behalf of the Licensing Authority (Welsh Ministers) to the licensee – NNB Genco¹.

The description of the substances or articles for deposit in Cardiff Grounds (LU110) disposal site are as follows:

Arisings from the capital dredge (and secondary dredge during construction) associated with the preparation of the offshore site for the cooling water infrastructure for the proposed new nuclear power station at Hinkley Point. These arisings as described in Marine Licence Application dated 06 August 2012.

Arisings from the capital dredge of the berthing pocket for the Hinkley Point C Project Temporary Jetty. These arisings as described in Marine Licence Application dated 13 September 2012.

¹ NNB GenCo Limited is a wholly owned subsidiary of EDF Energy.

Section 9 of the licence set out project specific conditions, which includes:

9.1 The Licence Holder must submit a proposal for a monitoring programme of the disposal site and immediate environs to Natural Resources Wales acting on behalf of the Licensing Authority for written approval at least **12 weeks** before any disposal operation. The scheme will include details of pre, during and post disposal operation surveys, and any actions to be taken as a consequence of the survey findings. The purpose of the scheme will be to enable the avoidance of significant build up of material and any consequent shallowing.

[...]

9.3 The Licence Holder must submit a proposal for a sediment sampling scheme of the source sites and immediate environs to Natural Resources Wales acting on behalf of the Licensing Authority for written approval at least 6 months before any disposal operation to occur after 4th March 2016. The scheme will include details of sampling grid, analyses suites (including any appropriate radiological assessment) and proposed format of a report determining the suitability of the material for disposal at site LU110 along with timescales for carrying out these actions.

9.4. The Licence holder must ensure the sediment sampling must be undertaken in line with the agreed scheme, as referenced in paragraph 9.3. Sampling scheme reports must be submitted to Natural Resources Wales acting on behalf of the Licensing Authority within the timescales agreed within the scheme.

9.5. The Licence Holder must ensure that no material is deposited after 4th March 2016 without written confirmation from NRW, acting on behalf of the Licensing Authority, that they are satisfied the material is suitable for deposit at site LU110.

Hinkley Point C

The dredged sediment being disposed at sea under marine licence 12/45/ML is associated with the construction of a cooling water system for [Hinkley Point C](#) in Somerset, south-west England. EDF Energy is building two new nuclear reactors at the Hinkley Point C, capable of generating a total of up to 3,260MW of electricity. The site is located beside the currently operational Hinkley Point B and Hinkley Point A that is being decommissioned. The project was [awarded planning permission](#) March 2013 in the form of a Development Consent Order (DCO) under the [Planning Act 2008](#). The material, estimated to be at most 200,000m³, will be placed into barges and transported to the Cardiff Grounds to be deposited.

National Assembly for Wales action

This matter has been discussed in Plenary on a number of occasions, for example, as a [question to the Cabinet Secretary for Environment and Rural Affairs from Neil McEvoy, AM on 20 September 2017](#) and a [question to the First Minister from Leanne Wood, AM on 26 September 2017](#).

Welsh Government action

The Cabinet Secretary for Environment and Rural Affairs' [Energy statement](#) on 6 December 2016, included the following:

To deliver secure and affordable low-carbon energy, we need a mix of different technologies and sizes, from community scale to major projects. In the medium term, this means transitioning to low-carbon generation, which includes nuclear.

In response to a [question in Plenary](#) (26 September 2017), from Leanne Wood, AM, on the dumping of material from Hinkley Point C in Welsh waters, the First Minister responded:

Well, she's telling half the story. First of all, she knows full well that licensing is not done by Ministers; it's done by an outside body—that's the whole point—so that the politics is taken out of it. What I've seen so far is one person has said there may be an issue here. Well, of course, that issue needs to be addressed, but we've got to be careful here because the waste from Wylfa goes to England, and if it wasn't for Sellafield's reprocessing plant it would shut immediately.

She has views on nuclear power that perhaps I wouldn't share, but it's too crude simply to say, 'Well, this is nuclear waste being exported from England to Wales.' We export a lot more out towards Sellafield. So, I don't accept that this is an import-export issue. Where we have nuclear power, it's important that there are adequate disposal facilities, but simply to present it in terms of an England-Wales battle ignores the fact we have our own nuclear power station, and we don't have our own disposal facilities; we rely on England to deal with the waste that comes from Wylfa.

On 29 September 2017 the Cabinet Secretary made a [statement](#) entitled 'Marine licence for the disposal of dredged material, arising from construction of Hinkley Point C'. It states:

To clarify, it is important to note, **the licence is not for the disposal of nuclear waste**. The material licenced for disposal is sediment dredged from the Severn Estuary. **To date, no disposal activity has taken place**. Any dredged material to be disposed of will be sampled, tested and the licence holder is subject to further written approval by NRW before any disposal activity can take place under the licence. I can reassure members a sound assessment process is in place to protect the marine environment and human health for present and future generations.

In relation to the associated Environmental Impact Assessment:

Applications for the disposal of dredged material were received by the MCU and were processed in line with the requirements under the MCAA and the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) (MWR). Two separate applications were received (due to the dredged material arising from two sites – the temporary jetty area and other offshore works) but one licence was issued. Records show the applications for the disposal of material in Welsh waters took into account the overall EIA for the Hinkley Point C project.

The marine licensing determination process provides for a thorough and robust assessment of projects against the following key criteria:

- Protection of the marine environment
- Protection of human health

- Prevention of interference with other legitimate uses of the sea.

Given the location of the source site, at Hinkley Point C, a radiological assessment was undertaken by the Centre for Environment, Fisheries and Aquaculture Science (Cefas) as part of the determination process for the marine licence, and following consultation with experts (including the lead nuclear regulator at the Environment Agency), **no concerns were raised regarding the level of radiological contamination.**

The Cabinet Secretary for Environment and Rural Affairs's response to this petition, received 24 October 2017, notes that she is "concerned by the public perception around this matter" and signposts to her written statement on the matter. Her letter sets out that NRW as the marine licensing authority in Wales, acting on behalf of the Welsh Ministers, issued the licence and will be responsible for it, including ensuring compliance with the conditions imposed on the licence. She then draws attention to conditions 9.3 and 9.5 of the licence (set out above in section Marine Licence: 12/45/ML). In its consideration of the petition, the Cabinet Secretary asks the Chair of the Committee to consider a number of points, which include:

The marine licence has a number of conditions requiring the sampling and testing of material to be disposed of and NRW must still provide an approval before any disposal can happen. [...]

No material has been disposed of under the terms of the licence to date and material will be only be disposed of if the result of sampling show the material is considered safe and suitable for disposal at sea.

Also, in light of the Welsh Ministers role in relation to appeals under the marine licensing system, she states that it is not appropriate for Ministers to comment on the specifics of a marine licensing decision. She advises that representations relating to the decision must be made directly to NRW, not the Welsh Ministers.

Lastly, given the concerns that remain, she indicates:

I will ask my official to consider with NRW how they can communicate information on this licence as clearly and openly as possible to alleviate concerns further.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-785
Ein cyf/Our ref LG/02382/17

David John Rowlands AM
Chair - Petitions committee.
National Assembly for Wales
Cardiff Bay
CF99 1NA

government.committee.business@wales.gsi.gov.uk

24 October 2017

Dear David

Thank you for your letter of 27 September, regarding Petition P-05-785 calling to 'suspend Marine Licence 12/45/ML to deposit radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff'.

I am concerned by the public perception around this matter and the resulting support for this petition. I issued a written statement on 29 September to clarify the position and with a view to alleviate concerns on this matter. The full written statement can be found via the links below:

<http://gov.wales/about/cabinet/cabinetstatements/2017/marinelicencehinkleypoint/?lang=en>

Natural Resources Wales (NRW) are the marine licensing authority in Wales, and they act on behalf of the Welsh Ministers. NRW issued this licence (12/45/ML) and continue to be responsible for it, including ensuring compliance with the conditions imposed on the licence.

I would like to draw your attention to the project specific conditions 9.3 to 9.5:

9.3. The Licence Holder must submit a proposal for a sediment sampling scheme of the source sites and immediate environs to Natural Resources Wales acting on behalf of the Licensing Authority for written approval at least 6 months before any disposal operation to occur after 4th March 2016. The scheme will include details of sampling grid, analyses suites (including any appropriate radiological assessment) and proposed format of a report determining the suitability of the material for disposal at site LU110 along with timescales for carrying out these actions.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Lesley.Griffiths@llyw.cymru
Correspondence.Lesley.Griffiths@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

9.4. The Licence holder must ensure the sediment sampling must be undertaken in line with the agreed scheme, as referenced in paragraph 9.3. Sampling scheme reports must be submitted to Natural Resources Wales acting on behalf of the Licensing Authority within the timescales agreed within the scheme.

9.5. The Licence Holder must ensure that no material is deposited after 4th March 2016 without written confirmation from NRW, acting on behalf of the Licensing Authority, that they are satisfied the material is suitable for deposit at site LU110.

As Chair of the Petitions Committee, I would ask you to consider the following points as part of your first formal consideration of this petition:

- The marine licence has a number of conditions requiring the sampling and testing of material to be disposed of and NRW must still provide an approval before any disposal can happen.
- As a matter of good practice, Welsh Ministers must be mindful of their role in relation to appeals under the marine licensing system and as such it is not appropriate for Ministers to comment on specifics of a marine licensing decision. Therefore, I am concerned I will be unable provide additional information to my written statement or comment further on this matter.
- Representations relating to this decision should be made directly to NRW, not the Welsh Ministers.
- However, concern remains with the public of South Wales and I will ask my officials to consider with NRW how they can communicate information on this licence as clearly and openly as possible to alleviate concerns further. NRW will also need to take into account the concerns raised in their decision making process.
- No material has been disposed of under the terms of the licence to date and material will only be disposed of if the result of sampling show the material is considered safe and suitable for disposal at sea.

Thank you for your letter on this matter and if I can be of any further assistance, please do let me know.

A handwritten signature in black ink, appearing to read 'Regards Lesley'.

Lesley Griffiths AC/AM

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs

P-05-785 Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff – Correspondence from the Petitioner to the Committee, 13.11.17

Outline/Summary submission from the Stop the Dump campaign to the Petitions Committee

The Campaign to re-assess the decision to permit the disposal of 300,000 tonnes of radioactively contaminated sediment at the Cardiff Grounds disposal site is concerned that the environmental and human health (dose) risks from the proposed disposal have not been adequately researched and that any conclusions based on the current incomplete data, are unreliable.

The sediments to be dredged are adjacent to the waste pipes used for the discharges from Hinkley's 4 existing reactors. Analysis, commissioned by UK Government agencies, shows that the sediment is contaminated by radioactive waste discharged to sea over 50+ years of operations at the Hinkley site. Calculations derived from the official data indicate that the proposed dredge sediments may hold at least 7 billion Bqs of aggregated radioactivity, yet reports state that doses to humans would be very low.

We note that although sedimentary radioactive material is initially likely to disperse, a number of studies carried out in Wales have proved that it later re-concentrates in coastal and estuarine mudflats and salt marshes, and is also available for sea-to-land transfer during episodes of coastal flooding.

Two studies at Welsh coastal sites have demonstrated sea to land transfer of marine radioactivity, one has clearly shown the entry of marine radioactivity into coastal terrestrial food chains (dairy/meatstock) up to 10 miles inland, evidence which further implies the entry of marine radioactivity into arable and horticultural food chains and hence dietary doses (via terrestrial foodstuffs) of marine radioactivity. The presence of airborne marine radioactivity in terrestrial coastal zone environments plainly also implies the potential for inhalation doses

Additional concerns are based upon the following issues|:

1: Absence of baseline data:

a: Despite our ongoing review of the scientific literature, the Campaign has, to date, found no evidence of any (empirical or modelling) study of the long, medium and short term environmental behaviour and fate of radioactive material deposited into the Cardiff Grounds site.

b: Thus, there appears to be a complete absence of information information about how the (at least) 7 billion Bqs of aggregated radioactivity, attached to the sediments, will behave in the Welsh inshore waters, or where those contaminated sediments will eventually end up being deposited

c: apart from some small area investigations of liquid radioactive discharges from the GE Healthcare Ltd/Maynard Centre, consisting of a very limited sample set taken from sites between the Orchard Ledges and Lavernock Point, we have, to date, found no evidence of any wider research into the nature and concentrations of South Wales coastal environment radioactivity.

d: thus there appears to be a complete absence of any data on the current levels of radioactivity in the extensive inter-tidal and sub-tidal sedimentary environments (estuarine mudflats (Usk, Wye etc) and the very extensive coastal fringing inter-tidal mudflats along the coast of the Gwent levels etc.

(NB: these are repeatedly shown by many studies to be the kind of environment where radioactively contaminated sediments suspended in the marine water column, will be deposited and where, as a result of such deposition, radioactivity concentrations will be elevated)

e: without such baseline data, it is impossible to properly check/monitor the impact of the disposal of the 7 billion bqs of aggregated radioactivity in the Hinkley sediments

2: Incomplete data on the radiological status of the Hinkley sediments:

a: Hinkley's radioactive discharges to sea contain over 50 radio-nuclides, but the analysis in support of the proposal to dump has only investigated 3 of them. Thus, the actual aggregated radioactivity content of the sediments will be much higher than indicated by the available analysis suggests.

b: the campaign does not believe that the analysis for only 3 of the 50+ radio nuclides believed to be constituents of the liquid waste streams of the Hinkley site, is

The Campaign requests series of actions as follows:

A: a full Environmental Impact Assessment including improved radiological surveying as advised and requested by this Campaign and the completion of the appropriate baseline data gathering studies recommended above

B: a Public Inquiry, or some form of “open hearing” of contra-indication independent evidence and a Public Consultation to take place before any dump of the Hinkley sediments is permitted. “

C public disclosure of precisely which Agency and which WG minister “signed off” on the Licence and what radiological expertise was available to NRW. (and/or their predecessors) and the Welsh Government

D: complete radiological analysis and core sampling, commissioned and scoped by Natural Resources Wales, after public hearings of contraindicating evidence, to be publicly reported and discussed, to take place before any dump of the Hinkley sediments is permitted.

Tim Deere-Jones (*Marine Radioactivity Research & Consultancy*) on behalf of the Stop the Dump Campaign

Diane McCrea
Chair
Natural Resources Wales

13 November 2017

Dear Diane,

Disposal of dredged sediment at sea under marine licence 12/45/ML.

You will be aware of recent public interest in the marine licence you granted (11 July 2014) to NNB Genco for the disposal of dredged sediment in the Cardiff Grounds disposal site, relating to the construction by EDF Energy of a water cooling system for Hinkley Point C.

Assembly Members have raised concerns on this issue on several occasions in Plenary and the Cabinet Secretary for Energy, Planning and Rural Affairs has made related statements. This matter is also the subject of an Assembly petition, "Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales's coastal waters off Cardiff", which has been supported by 7,171 members of the public.

Given the level of public interest, the Climate Change, Environment and Rural Affairs Committee agreed to receive a presentation from EDF Energy on this matter on 26 October. A number of issues were raised during that presentation on which the Committee would like further clarity.

1.Compliance with Marine licence 12/45/ML

Section 9.5 of the license requires that the Licence Holder must ensure that "no material is deposited after 4th March 2016 without written confirmation from NRW, acting on behalf of the Licensing Authority, that they are satisfied the material is suitable for deposit at site LU110".

Question 1: *Can you explain the process NRW will undertake to ensure that the dredged sediment is "suitable" for deposit in the Cardiff Grounds site?*

Section 72 of the Marine and Coastal Access Act 2009 (hereafter the Marine Act) provides a procedure for "varying, suspending or revoking" a licence. The



grounds for suspension of a licence include where there has been a change in circumstances relating to the environment or human health, or because of an increase in scientific knowledge relating to either of those two matters.

Question 2: *Can you clarify how you will assess whether the grounds for suspension outlined in Section 72 have been met in relation to the results of the new samples acquired in May and reported to NRW in September 2017? Against what criteria would those grounds be assessed?*

2.Public health concerns

Section 69 of the Marine Act requires the licensing authority to have regard to the need to protect human health when determining an application. You will be aware that there has been considerable public concern and media coverage about the potential impact on human health of the disposal of sediment in the Cardiff Grounds site, specifically in relation to the radioactivity of the sediment. The Assembly petition relating to Marine licence 12/45/ML states that “Hinkley’s radioactive discharges to sea contain over 50 radio-nuclides, but the analysis has only investigated 3 of them. Thus, the actual aggregated radioactivity content of the sediments will be much higher than indicated by the available analysis.”

Question 3: *EDF Energy has told the Committee that its initial tests investigated over 50 radio-nuclides but only three radio-nuclides were detected. Can you confirm this is the case?*

EDF Energy also informed the Committee that Cefas has undertaken recent testing for radiation on sediment samples from the area to be dredged. The Committee does not wish to cast doubt on the reliability of Cefas’ work, but given the public concern on this matter, we believe that any steps that can be taken to reassure the public should be given serious consideration.

Question 4: *Would you be prepared to consider commissioning a third party to review the findings of those tests? I trust that you will, in any event, share with this Committee and make public the findings of the most recent tests from May 2017.*

The Assembly petition sets out concerns that only surface samples of sediment have been analysed and, as a consequence, radioactive content below the surface may not be detected. EDF Energy reassured the Committee that, in its earlier work, Cefas had analysed samples from beneath the surface (up to 4.8m). They stated that the analysis had not identified abnormal levels of radio-nuclides.

Question 5: *What is NRW’s view on this issue? Is NRW satisfied that no further analysis of samples from beneath the surface is necessary?*



3.Environmental impact

Section 69 of the Marine Act requires the licensing authority to have regard to the need to protect the environment.

The Assembly petition relating to Marine licence 12/45/ML requests that the licence should be suspended to ensure that a “full Environmental Impact Assessment, complete radiological analysis and core sampling are carried out”.

Question 6: *Has an Environmental Impact Assessment been undertaken in relation to this specific licence? If not, why? Is NRW satisfied that in looking at this application for a licence to dispose dredged material at sea, that a robust process was followed that gave sufficient consideration to the protection of the marine environment and protection of human health?*

You will also be aware of concerns about the lack of reliable data to inform any assessment of the impact of the disposal of sediment in the Cardiff Grounds site.

Question 7: *Is NRW satisfied it has sufficient data and information on the material, such as sediment samples at depth and testing for radioactivity, to assess in a reliable way the impact of the disposal of the material?*

4. Monitoring

Section 9.1 of Marine licence 12/45/ML states that “The Licence Holder must submit a proposal for a monitoring programme of the disposal site and immediate environs to Natural Resources Wales acting on behalf of the Licensing Authority for written approval at least 12 weeks before any disposal operation. The scheme will include details of pre, during and post disposal operation surveys, and any actions to be taken as a consequence of the survey findings. The purpose of the scheme will be to enable the avoidance of significant build-up of material and any consequent shallowing.”

We understand from EDF Energy that the monitoring plan was received by NRW in October 2016 and approved in November 2016. They also advised that new samples acquired in May 2017 and associated analysis of these were reported to NRW in September 2017.

Question 8: *Can you explain the process undertaken by NRW to scrutinise this latest analysis and in doing so, satisfy itself that the conditions of the licence continue to be met?*

5. Public perception

Throughout this letter I have referred to concerns expressed by members of the public about the potential impact of the disposal of sediment in the Cardiff Grounds site. During its presentation, EDF Energy sought to reassure the Committee that the public concern was unfounded.



If that is the case, the Committee believes that there is a considerable amount of work needed to translate that message to the public, both locally and more widely. This view appears to be shared by the Cabinet Secretary, who has informed the Petitions Committee that she would ask officials to “consider with NRW how they can communicate information on this licence as clearly and openly as possible to alleviate concerns further.”

Question 9: *Can you inform the Committee of any advice NRW received from the Cabinet Secretary or her officials on this issue and the actions you are taking in response?*

Question 10: *Are you satisfied that the public were consulted sufficiently during the process under Section 69 of the Marine Act?*

6. Licensing process

The Committee is aware that marine licensing is a function delegated to NRW on behalf of Welsh Ministers via the Marine Licensing (Delegation of Functions) (Wales) Order 2013.

Question 11: *Can you confirm that NRW is satisfied that the marine licensing process is robust, fit for purpose and that NRW has sufficient resources to administer it? Are there any aspects of the marine licensing process you believe could be improved, or any matters you would like to draw to this Committee’s attention?*

Copies of this letter will be sent to EDF Energy and Public Health Wales, who may wish to note its contents in relation to the public health concerns raised with Assembly Members. A copy will also be provided to the Chair of the Assembly’s Petitions Committee.

Yours sincerely,



Mike Hedges AM

Chair of Climate Change, Rural Affairs and Environment Committee

Cc: EDF Energy; Public Health Wales; Chair of the Assembly’s Petitions Committee.



Agenda Item 2.2

P-05-786 Save our Countryside – Revise TAN 1

This petition was submitted by Cllr Mike Priestley, having collected 706 signatures online.

Petition text:

Changes in 2015 to Technical Advice Note 1 (TAN1) have resulted in unachievable annual housing targets. This has taken planning decisions away from the local democratic planning process and undermined Adopted Local Development Plans (LDPs) across Wales.

We call on the National Assembly for Wales to urge the Welsh Government to reinstate within TAN1 the use of "past building rates methodology" alongside the "residual methodology". This will ensure that Councils are able to undertake intelligent and credible housing land supply needs assessments. Past housing delivery performance reflects economic conditions and local building industry capacity and resilience.

To ensure credible and deliverable land supply, and to balance the need for housing with the need to protect our environment and heritage, it is essential that economic conditions and local building industry capacity are factored into annual calculations of 5 Year Land Supply for Housing.

Changes to TAN1 have forced Local Councils to allow housing developments in excess of what is considered to be local demand. These developments are often large scale and have a detrimental effect on the green belt and the heritage of our County as urban and rural areas over expand. This in turn puts added demands on already stretched services such as GPs, Hospitals, Social Services and Schools.

The withdrawal in 2015 of the past building rates methodology is causing increasing numbers of Local Authorities to declare a 5 Year Land Supply shortfall. This, in turn, is forcing Local Councils, against their will and better judgement, to approve speculative development applications on locally sensitive Greenfield land, land unallocated within their LDPs and, where local approval to these speculative applications is not granted, local democratic decisions are being overturned on appeal, specifically due to the lack of a 5 Year Land Supply for Housing.

Additional information:

In 2014 Conwy Council had a 7+ Year Land Supply when its LDP was examined and approved by the Planning Inspector. Less than 12 months later the changes to TAN 1 reduced Conwy's Land Supply to less than 5 years. This has reduced with successive annual land supply calculations. In 2017, Conwy's land supply now stands at 3.1 years as a direct result of the changes to TAN1, and the Council is receiving speculative development applications for land unallocated within the LDP despite allocated land being available. If the past building rates methodology was still permitted, Conwy would today have an 8.5 year supply.

WG's guidance document TAN1 tells Local Councils how to work out their supply of housing land. All Councils should have enough land to meet the need for 5 years of house building. In the previous TAN1 there were two methods of working out how much land was needed:

1. The residual method based on the total housing need from an adopted Plan
2. The past build rates method, using the house building rates from the last 5 years to project forward for the next 5 years.

The Wellbeing and Future Generations Act requires us to balance our decisions and actions in terms of impact today and impact in the future. Surely, we should apply this thinking to land planning and land use? Current Welsh Government policy is forcing prime Greenfield land to be concreted over and forever become brownfield land. The imposition and restriction to the use of the "residual methodology" was fiercely contested at the consultation stage and beyond, but Local Councils' voices were ignored. Local Councils need to be able to:

- protect heritage and environment and sensitive Greenfield land use and exercise local discretion, judgement and control of where development is needed and where it is allowed.

Assembly Constituency and Region

- Aberconwy
- North Wales

Petition: P-05-786 Save our Countryside – Revise TAN 1

Y Pwyllgor Deisebau | 21 Tachwedd 2017
Petitions Committee | 21 November 2017

Research Briefing:

Petition number: P-05-786

Petition title: **Save our Countryside – Revise TAN 1**

Petition text:

Changes in 2015 to Technical Advice Note 1 (TAN1) have resulted in unachievable annual housing targets. This has taken planning decisions away from the local democratic planning process and undermined Adopted Local Development Plans (LDPs) across Wales.

We call on the National Assembly for Wales to urge the Welsh Government to reinstate within TAN1 the use of "past building rates methodology" alongside the "residual methodology". This will ensure that Councils are able to undertake intelligent and credible housing land supply needs assessments. Past housing delivery performance reflects economic conditions and local building industry capacity and resilience.

To ensure credible and deliverable land supply, and to balance the need for housing with the need to protect our environment and heritage, it is essential that economic conditions and local building industry capacity are factored into annual calculations of 5 Year Land Supply for Housing.

Changes to TAN1 have forced Local Councils to allow housing developments in excess of what is considered to be local demand. These developments are often large scale and have a detrimental effect on the green belt and the heritage of our County as urban and rural areas over expand. This in turn puts added demands on already stretched services such as GPs, Hospitals, Social Services and Schools.

The withdrawal in 2015 of the past building rates methodology is causing increasing numbers of Local Authorities to declare a 5 Year Land Supply shortfall. This, in turn, is forcing Local Councils, against their will and better judgement, to approve speculative development applications on locally sensitive Greenfield land, land unallocated within their

LDPs and, where local approval to these speculative applications is not granted, local democratic decisions are being overturned on appeal, specifically due to the lack of a 5 Year Land Supply for Housing.

In 2014 Conwy Council had a 7+ Year Land Supply when its LDP was examined and approved by the Planning Inspector. Less than 12 months later the changes to TAN 1 reduced Conwy's Land Supply to less than 5 years. This has reduced with successive annual land supply calculations. In 2017, Conwy's land supply now stands at 3.1 years as a direct result of the changes to TAN1, and the Council is receiving speculative development applications for land unallocated within the LDP despite allocated land being available. If the past building rates methodology was still permitted, Conwy would today have an 8.5 year supply.

WG's guidance document TAN1 tells Local Councils how to work out their supply of housing land. All Councils should have enough land to meet the need for 5 years of house building. In the previous TAN1 there were two methods of working out how much land was needed:

1. The residual method based on the total housing need from an adopted Plan
2. The past build rates method, using the house building rates from the last 5 years to project forward for the next 5 years.

The Wellbeing and Future Generations Act requires us to balance our decisions and actions in terms of impact today and impact in the future. Surely, we should apply this thinking to land planning and land use? Current Welsh Government policy is forcing prime Greenfield land to be concreted over and forever become brownfield land. The imposition and restriction to the use of the "residual methodology" was fiercely contested at the consultation stage and beyond, but Local Councils' voices were ignored. Local Councils need to be able to protect heritage and environment and sensitive Greenfield land use and exercise local discretion, judgement and control of where development is needed and where it is allowed.

Background

The Welsh Government's national planning policy for Wales is set out in [Planning Policy Wales \(PPW\)](#). PPW is supported by a number of [Technical Advice Notes](#) which provide more detailed guidance on particular aspects of planning policy. This petition is concerned with [Technical Advice Note \(TAN\) 1: Joint Housing Land Availability Studies](#).

PPW states:

9.2.2 Local planning authorities will need to have a clear understanding of the factors influencing **housing requirements** in their area over the plan period. The latest Welsh Government local authority

level Household Projections for Wales, alongside the latest Local Housing Market Assessment, will form part of the plan's evidence base together with other key issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the plan. ...

9.2.3 Local planning authorities must **ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing** judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types. For land to be regarded as genuinely available it must be a site included in a Joint Housing Land Availability Study. The Welsh Government will monitor development plans and their implementation to ensure that sufficient housing land is brought forward for development in each local planning authority and that economic development and related job opportunities are not unreasonably constrained.

PPW also states:

2.14.4 It is for the decision-maker, in the first instance, to determine through monitoring and review of the development plan whether policies in an adopted LDP are outdated for the purposes of determining a planning application. Where this is the case, local planning authorities should give the plan decreasing weight in favour of other material considerations such as national planning policy, including the presumption in favour of sustainable development

TAN 1 states:

6.2 The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study ... , the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.

The revised TAN 1 was published in 2015 and introduced a new method of calculating housing land supply – the ‘residual’ method. Prior to 2015 local planning authorities could use the alternative ‘past build rates’ method. The Welsh Government [consulted on the changes to TAN 1 in 2014](#).

Under the residual method, to meet the requirements for a five-year housing land supply, the quantity of land agreed to be genuinely available must be compared with the remaining housing requirement in the adopted LDP. TAN 1 shows the formula for this calculation on page 27. The ‘past build rates’ methodology is based on the past performance of the house-building industry.

The Welsh Government published a [Summary of Responses](#) to the 2014 consultation. Respondents were split on the question of making the residual method the only methodology allowed for calculating housing land supply – 21 (44%) in favour and 22 (46%) against. However, there was a marked difference in the opinions of businesses and local planning

authorities – all businesses were in favour (15), along with four (17%) local planning authorities; in contrast nineteen (79%) local planning authorities disagreed.

Welsh Government action

In her letter to the Committee the Cabinet Secretary for Environment and Rural Affairs, Lesley Griffiths AM, sets out the Welsh Government's policy position, and states:

Prior to the 2015 revision of TAN 1 Local Planning Authorities could use the alternative 'past build rates' methodology of calculating housing land supply, however its use was generally restricted to those Authorities without an adopted development plan. Being based on the past performance of the house-building industry, the methodology did not relate to the housing delivery required to meet the needs of local communities and by simply rolling forward past delivery rates, which in many cases were too low, reinforced housing affordability problems. In addition, given the significantly improved position regarding development plan coverage across Wales, use of the past build rates methodology was no longer considered appropriate.

The Cabinet Secretary goes on to say that local planning authorities can still use the past build rates method as a comparator, should they wish to do so, when assessing delivery against the housing requirements as part of their annual LDP monitoring process.

The Cabinet Secretary also states:

I recognise Local Planning Authorities without a five-year housing land supply may receive speculative planning applications for housing developments. All such applications should be determined in accordance with the relevant policies in the approved or adopted development plan for the area, including the principle of sustainable development. The lack of a five-year housing land supply may be one of the considerations in determining a planning application, however applications which do not meet the relevant policy requirements may be refused by the Authority.

National Assembly for Wales action

Written Assembly Questions

Janet Finch-Saunders AM tabled two written questions on 19 September 2017:

WAQ74200. What consideration will the Cabinet Secretary give to amending TAN 1 to allow for use of the past building rates method in calculating housing land supply?

WAQ74201. When will the Cabinet Secretary revise TAN 1 Section 7.5.1 to permit the consideration of alternative land supply methodologies?

The Cabinet Secretary responded on 25 September 2017:

As part of the revisions to TAN 1 in 2015, the use of the alternative methodology for calculating housing land supply, based on past build rates, was removed. This methodology was based on the past underperformance of the house-building industry and does not relate to delivery against the housing requirements established by Local Planning Authorities in their Local Development Plans to meet the needs of their communities.

Planning policy and guidance, including TAN 1, is kept under review.

Plenary

Janet Finch-Saunders AM had previously [questioned the Cabinet Secretary in Plenary](#) on 14 September 2016:

... The knock-on effects, of course, of the changes to the housing land availability calculation under the revised TAN 1 are now starting to come into play for residents in Conwy and in all authorities across Wales. In response to the TAN 1 consultation, local planning authorities generally disagreed with the sole use of the residual methodology for calculating housing land supply—a method that, according to the Welsh Local Government Association, lacks a degree of realism and can be distorted by build rates to produce unrealistic and unachievable results, whilst at the same time seeing the loss of many of our greenfield sites. Given such a position, Cabinet Secretary, will you look at this in the forthcoming October review of the local development plan for local authorities across Wales and actually put some more common sense into the process? Because, believe me, the sites that are coming forward now in Conwy will be devastating and there'll be huge losses to our greenfield sites.

The Cabinet Secretary responded:

I think the reason for having the revision of TAN 1, you've just absolutely said. I think that because sites weren't coming forward, that was why the technical advice note was revised and I think it's taken the cover off what was taking place before. So, I think it is bedding in now. It has set out a methodology for carrying out the review. That can be applied consistently across Wales, and I think that does provide local authorities with a key indicator for monitoring the delivery of housing to meet the requirements that are set out in their LDP.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-786
Ein cyf/Our ref LG/02302/17

David John Rowlands AM
Chair, Petitions Committee.
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

government.committee.business@wales.gsi.gov.uk

11 October 2017

Dear David

Thank you for your letter of 2 October regarding Petition P-05-786 from Cllr Mike Priestly concerning Technical Advice Note 1 (TAN 1).

Local Development Plans (LDPs) set out a Local Planning Authority's vision for their area, based on local evidence, and provide the means to influence future development. This includes establishing a housing requirement and allocating sites to meet this target based on what the plan is seeking to achieve, evidence from their Local Housing Market Assessments and taking account of the Welsh Government's Household Projections.

To be effective, an Authority's housing land supply needs to be based on meeting the housing requirement they have identified in their adopted LDP and be deliverable. This is set out in the Welsh Government's policy in *Planning Policy Wales* and is the basis of the 'residual' methodology set out in TAN 1. The aim is to ensure Local Planning Authorities maintain sufficient available and deliverable land to enable the provision of the housing their communities need in line with the LDP strategy they have identified. This has been the policy position since *Planning Policy Wales* was first published in 2002.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Lesley.Griffiths@llyw.cymru
Correspondence.Lesley.Griffiths@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Prior to the 2015 revision of TAN 1 Local Planning Authorities could use the alternative 'past build rates' methodology for calculating housing land supply, however its use was generally restricted to those Authorities without an adopted development plan. Being based on the past performance of the house-building industry, this methodology did not relate to the housing delivery required to meet the needs of local communities and by simply rolling forward past delivery rates, which in many cases were too low, reinforced housing affordability problems. In addition, given the significantly improved position regarding development plan coverage across Wales, use of the past build rates methodology was no longer considered appropriate. However, Local Planning Authorities can still use this methodology as a comparator, should they wish to do so, when assessing delivery against their housing requirements as part of their LDP Annual Monitoring Report (AMR). The AMR provides the opportunity for Local Planning Authorities to monitor delivery against their LDP targets, including the housing requirement and trajectory, and to consider what action may be required. Such action could include reviewing the LDP as a whole or in part and may require the allocation of alternative housing sites or the revision of the housing requirement, taking account of delivery by house-builders.

I recognise Local Planning Authorities without a five-year housing land supply may receive speculative planning applications for housing developments. All such applications should be determined in accordance with the relevant policies in the approved or adopted development plan for the area, including the principle of sustainable development. The lack of a five-year housing land supply may be one of the considerations in determining a planning application, however applications which do not meet the relevant policy requirements may be refused by the Authority.

In conclusion, calculating housing land supply under the methodology set out in TAN 1 is an integral part of preparing and monitoring an LDP. The monitoring of housing land supply under TAN 1 has highlighted a shortfall in 'deliverable' land. This has been borne out by research commissioned by the Welsh Government which demonstrates viability is a critical factor in sites coming forward for development. The relevant recommendations of the research which relate to national policy are under active consideration as part of the current reviews of *Planning Policy Wales* and *The Local Development Plan Manual*.

Lesley Griffiths AC/AM

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs

Agenda Item 3.1

P-04-526 Please make Senedd TV accessible to deaf people

Petition wording:

We call upon the National Assembly for Wales to provide subtitling and signed language access to televised debates and proceedings, to enable the 300,000 with hearing loss and deafness in Wales to follow the democratic processes hearing people already enjoy.

Petition raised by: Mervyn James

Date Petition first considered by Committee: 21 January 2014

Number of signatures: 25



Elin Jones AC, Llywydd

Cynulliad Cenedlaethol Cymru

Elin Jones AM, Presiding Officer

National Assembly for Wales

David J Rowlands AM
Chair, Petitions Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

Your ref:
Our ref: PO243/EJ/DT

9 November 2017

Dear David

Thank you for your letter of 7 August 2017 in which you asked whether the Commission would explore options for developing a plan to make BSL and/or subtitling available for other Assembly Questions (currently provided for FMQs) and proceedings within a suitable timeframe.

At a recent meeting, Commissioners considered the existing provision of BSL services and subtitling, as well as current plans to extend these services within the constraints of available resources and the technological limitations in providing accurate subtitling of live proceedings.

I thought it would be helpful for the Committee to summarise what is already provided, what changes are planned, and the constraints under which this work is taking place.

Yours sincerely

Elin Jones AM
Llywydd

Croesewir gohebiaeth yn Gymraeg neu Saesneg / We welcome correspondence in Welsh or English

Cynulliad Cenedlaethol Cymru

Bae Caerdydd, Caerdydd, CF99 1NA

Llywydd@cynulliad.cymru

www.cynulliad.cymru

0300 200 7403

National Assembly for Wales

Cardiff Bay, Cardiff, CF99 1NA

Llywydd@assembly.wales

www.assembly.wales

0300 200 7403

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What we currently provide and options

Record of Proceedings and committee transcripts

The transcripts of plenary proceedings provide an accessible resource that we publish in draft on a rolling basis. It starts to appear about an hour after the start of plenary and is updated every quarter of an hour. We publish these transcripts initially in the language spoken with a transcription of the simultaneous interpretation where Welsh is spoken. It also includes links to Members' biography pages.

The Record itself is published within 24 hours and includes links to the full voting results and detailed links to senedd.tv. Answers to Oral Questions not reached in plenary meetings are published within 24 hours. The bilingual final version, with all contributions given in both languages, is published within three working days.

We make transcripts of committee meetings available in draft form within three to five working days, with a final version published within 10 working days, which includes the Welsh to English interpretation broadcast during the meeting.

BSL

In April 2016, following S4C's decision to cut the programme 'Y Dydd yn y Cynulliad' which included BSL interpretation of First Minister's Questions, the Commission, recognising the need, agreed to take on the responsibility for operating and funding this service at a cost of £15,000 per year. We provide BSL interpretation for every First Minister's Questions session; this comes to around 5% of total public Assembly business, which matches Ofcom guidelines for broadcasters of 5% of total BSL output. At present, we are the only legislature in the UK that provides this regular service. We do this by recording FMQs live and then giving the interpreter time to watch the session before providing the interpretation. This has improved the accuracy and quality of the service, which interpreters and users have warmly welcomed. The signed sessions are on a dedicated area on senedd.tv (<http://www.senedd.tv/meeting/seneddextra>) and on our YouTube channel.

We have previously explored extending the provision of BSL interpretation – to include the wider plenary proceedings and to committees. However, the BSL interpreters have real concerns about their ability to accurately interpret live



discussions, given the pace and complexity of proceedings. Our parliamentary and technical language causes them further problems – we use terms for which there is no BSL equivalent and, again, there is the Welsh language challenge – not all interpreters are Welsh-speakers. As a result, to date the interpreters have not agreed to provide services in these areas.

We have looked at extending BSL interpretation to other Minister's Questions sessions. This would require more BSL interpreters to cover the longer hours (interpreters work for short spells on rotation) and we estimate this would add at up to £40,000 per year to the current cost, for which there would need to be additional budget provision.

Sub-titles

We have been actively looking at the introduction of sub-titling since 2014. However, the technology is challenging in terms of accuracy and keeping subtitles synchronised with proceedings, especially when more than one person is speaking. We also have the added challenge of bi-lingual proceedings and the technology available at present does not translate accurately enough to be reliable and effective. However, we continue to push the technology and in the coming months we will evaluate live transcription of Ministers' Statements and a full plenary session.

We are introducing a clipping and download tool for senedd.tv that will allow us to find, select and extract footage from meetings. We would then be able to subtitle these smaller clips accurately, and publish them on our YouTube channel.

What else are we planning to do?

Within Senedd.tv we are going to give BSL videos their own dedicated playlist that is easy to find.

We are going to tweet-out when FMQs became available in BSL on YouTube.

We have quite a number of signed videos that can be re-promoted regularly, especially on YourAssembly.

Outreach/Education do a lot of tailored outreach/education in BSL– we recently used video content from a session like this to promote the Youth Parliament consultation. It went down very well and we will endeavour to do more of this.



Elin Jones AC, Llywydd

Cynulliad Cenedlaethol Cymru

Elin Jones AM, Presiding Officer

National Assembly for Wales

Other things we do to make a difference

We fund BSL interpretation for the cross party group meetings; when a debate relating to deaf issues is scheduled we make interpretation available; we have funded BSL lessons for Assembly staff who meet the public; and hearing induction loops are installed throughout the building, including committee meeting rooms and public galleries.

Our efforts have been repeatedly recognised by the charity Action on Hearing Loss (AHL), which has accredited the National Assembly with the Louder than Words Charter Mark, and have won the Service Excellence category at the recent AHL Cymru Excellence Awards.

Agenda Item 3.2

P-04-408 Child and Adolescent Eating Disorder Service

Petition wording:

We call on the National Assembly for Wales to urge the Welsh Government to fund the Child and Adolescent Eating Disorder Service in Wales to the same degree as the Adult Eating Disorder Service in Wales.

It has come to my attention that there is a disparity in funding between Adult Services and Child and Adolescent Services as regards funding for Eating Disorder Treatment. At the present time Adult Eating Disorder Services receive £1 million per year from the Welsh Assembly, as well as 4 specialist trained provider groups.

Sadly research points to the fact that Eating Disorders, especially Anorexia Nervosa, are predominantly first experienced around puberty. Historically puberty was around 12–15, however, puberty is becoming younger and therefore statistics are beginning to show the prevalence of Anorexia Nervosa starting at younger ages is apparent. Bulimia Nervosa is generally a disease with an onset age of 18–25, however as with Anorexia this may differ from person to person. The fact that in both disorders, and indeed all diagnosable Eating Disorders, early intervention is the key to a quick recovery, therefore preventing long term financial implications for the WAG, makes this plea more pertinent.

I therefore implore the Assembly to consider this a priority for debate and to mend this disparity by giving equal finances and services to the Child and Adolescent Eating Disorder service in Wales as already given to Adult EDS.'

Petition raised by: Helen Missen

Date petition first considered by Committee: 17 July 2012

Number of signatures: 246

Vaughan Gething AC/AM
Ysgrifennydd y Cabinet dros Iechyd a Gwasanaethau
Cymdeithasol
Cabinet Secretary for Health and Social Services



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref VG/02740/17

David John Rowlands AM
Chair - Petitions Committee
National Assembly for Wales
Cardiff Bay
Cardiff Bay
CF99 1NA

government.committee.business@wales.gsi.gov.uk

6 November 2017

Dear David,

Thank you for your letter of 18 October on behalf of the Petitions Committee regarding Petition P-04-408 and the provision of Eating Disorder Services.

Eating disorders are debilitating long-term conditions which affect not only the individual but their family and friends. This is why ensuring services are able to react quickly and effectively to support the individual when they need it is a priority. To ensure this, in recent years we have invested £1million to establish adult treatment teams including £250,000 to improve provision for children and young people and most recently £500,000 recurrently from this year to strengthen the links between children's and adult services.

Our Together for Mental Health Delivery Plan 2016-2019 includes a commitment to consider reviewing the Eating Disorder Framework for Wales which was first published in 2009, in the light of new National Institute for Health and Clinical Excellence (NICE) guidance 'Eating disorders: recognition and treatment NICE guideline' [NG69] published in May 2017. The new guidance aims to improve care people by detailing the most effective treatments for anorexia nervosa, binge eating and bulimia nervosa.

My officials are currently in the process of discussing with health boards and others how best to take forward the review. I would expect the issues you raise to be considered as part of wider consideration on how services are currently delivered and what, if any changes are needed to ensure they are able to meet the best practice contained in the new NICE guidelines.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

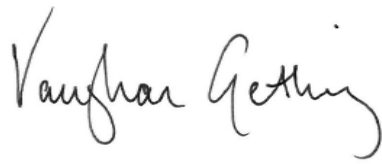
Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400
Gohebiaeth.Vaughan.Gething@llyw.cymru
Correspondence.Vaughan.Gething@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I hope this information is helpful.

Yours sincerely,

A handwritten signature in black ink, reading "Vaughan Gething". The signature is written in a cursive, flowing style.

Vaughan Gething AC/AM

Ysgrifennydd y Cabinet dros Iechyd a Gwasanaethau Cymdeithasol
Cabinet Secretary for Health and Social Services

P-04-408 Child and Adolescent Eating Disorder Service – Correspondence from the petitioner to the Chair, 08.11.17

Dear Mr Rowlands

Thank you, once again, for giving me the opportunity to respond to the recent letter received from Mr Vaughan.

I am at a loss as to how to keep telling you the same thing without boring you all to tears, but onward we shall go, until there is resolution to the primary request of this petition.

Mr Vaughan is correct in his assertion that 'eating disorders are debilitating illnesses', however they need not be 'long term' if treated effectively and with early intervention. It is well known that full recovery from an eating disorder can be, and should be expected.

The £1 million is exactly what this petition is all about, and whilst Mr Vaughan is seemingly applauding it, the truth is: the investment remains only for adult eating disorder services.

The £250,000 is only provided in South Wales, a fact that is beyond comprehension as Wales is a vast nation, and not just based in the south of the country. Unfortunately, Eating Disorders do not discriminate by geography.

The £500,000 provision is for the training and transition service, of which I sit on the committee to provide good use of the money and disseminate who should have the training, when and delivered by whom.

It is not for early intervention, which is still my fundamental cry through this petition.

The new NICE guidelines state:

1.2.1: People with eating disorders should be assessed and receive treatment at the earliest opportunity.

1.2.4: Although eating disorders can develop at any age, be aware that the risk is highest for young men and women between 13–17 years of age.

As Mr Vaughan also alludes to the refreshed framework for eating disorders I have provided it here for your interest, alongside the NICE guidelines (May 2017).

It may be of interest that I am on the committee for the integration of the NICE guidelines into Wales, plus am the carer that was used by Public Health Wales to speak at their service user days for the refresh document.

<https://www.nice.org.uk/guidance/ng69>

<http://gov.wales/docs/dhss/publications/160824eating-disorderen.pdf>

The stalling of the minister regarding further provision of funding specifically for early intervention in CAMHS is rather wearing. He fails to mention my specifics regarding the SPEED team in North Wales, and the fact that the outcome measures are looking good as far as treatment with a multi disciplinary approach to treating young people at the onset of the eating disorders is going. It may be prudent to obtain these figures from Dr Glaze and his team.

Thank you once again for your ongoing interest in seeing a resolution and further investment to early intervention in CAMHS.

As always, and Happy Christmas!

Helen Missen

Agenda Item 3.3

P-05-761 Demand Funding from the Welsh Government to Support Autism Spectrum Connections Cymru

This petition was submitted by Aled Thomas, having collected 148 signatures on an alternative e-petitions website.

Petition text:

We call for the Welsh Assembly Government to give funding to support Autism Spectrum Connections Cymru.

This charity is unique in Wales. Autism Spectrum Connections Cymru currently receives no government funding. It depends entirely on funding from sources that aren't necessarily able to permanently support it.

This unique open drop-in centre plays an important role in improving the lives of people living with autism in Wales.

We would like to seek reassurance from the Welsh Assembly Government that this charity will always remain open and fully funded.

Assembly Constituency and Region

- Cardiff South and Penarth
- South West Wales

RE- Petition P-05-761

29th October 2017

Dear Mr Rowlands

I am writing further to your correspondence dated 24th July 17, in which you included a copy of the petition submitted by Aled Thomas. We have now had a chance to consider this petition and also the attached response from Rebecca Evans AM.

We are pleased that the flexible support service we provide for more than 600 people with autism across South East Wales received the required level of support for this petition to have been considered.

Whilst we are very aware that Welsh Government cannot give the guarantee of permanent funding to any non-statutory organisation, I am equally mindful of the lack of transparency around the procurement process by which the £13m of funding allocated by the Welsh Government to develop an Integrated Autism Service (IAS) in Wales, was made, and its true impact to date.

ASCC's One Stop Shop Service (OSS), 21 High Street, which is based in Cardiff city centre, has been open since January 2015. It was developed over the two years preceding this and Government officials were aware of the plans to create this service which at the time met an identified need. The massive uptake of our services since provides ample evidence of its effectiveness in meeting need. WG officials were invited to the launch in January 2015 but did not reply to the invitation or attend, the impact of which was to both disappoint and concern us at a critical point in the charity's development.

We currently provide a range of services which benefit people with autism over the age of 16yrs across the whole of South East Wales region. These services include, Post Diagnostic groups run in partnership with Cardiff & Vale UHB (the only such service in Wales), Specialist Employment support, Specialist Benefits support, Anxiety Management groups, 1:1 problem solving and a range of individualised support. In addition, we run a range of activity/shared interest-based social opportunities both in the OSS and within the community. People registered with the service can access the support and the building facilities as and when they choose, with many people regularly dropping in as it represents

a “safe space” in the city centre. I have attached a copy of an OSS leaflet for your information.

Whilst we welcome the Welsh Government’s increased investment in autism in Wales, the development of their IAS has simply tried to duplicate many of the services which are currently provided by our charity. The impact has been to limit our ability to fundraise and support this existing, established and vital service for people with autism.

There was no consultation with the charity around the development of the IAS despite the high profile of the OSS service and the need to accurately and definitively identify gaps in existing provision. We are aware that other models, including the OSS run by our parent charity Autism Initiatives in Edinburgh, were visited by staff from the WLGA who travelled from Cardiff to Edinburgh for a 2 hour meeting in 2015. I had previously met with WG officials and Scottish Government officials at the Edinburgh OSS in May 2014 when we were developing the Cardiff OSS.

Between our chance meeting in Scotland May 2014 and a second meeting in August 15, there had been no communication or response from officials within the Department of Social Services, despite our several requests for a meeting with them. Eventually I met with WG Officials along with the Chief Executive of Autism Initiatives Group in August 2015. At this meeting we were informed by the Assistant Director for Social Services, with a junior colleague in attendance, that there was now an understanding that the model we had created in Wales works well and that they were keen to support this. At that time we were informed that there was limited resources available through the Autism Strategy and that an application to the Sustainable Social Services Fund would be welcomed.

Based upon their advice, a hastily prepared bid for this fund was submitted on 4th September 2015, outlining a plan to develop and improve access to services for people with autism across Wales, through the provision of flexible support staff and a single point of contact/access for people requiring information assistance and advice. At this time I met with Johanna Manikiza the ASD National Lead employed by the WLGA who informed me that she had submitted WLGA proposals to WG for a pilot Integrated Autism Service based on the model adopted by the Liverpool Asperger Team and that this would be trialed in two areas of Wales. No further consultation on the development of her proposal and service was sought by WG / WLGA.

We later became aware in April 2016 that plans for the pilot IAS had been scaled up to include a pan-Wales service which would receive £6m of WG funding. I met with Johanna Manikiza at this time and was informed that the WLGA/WG IAS was in fact going to mirror the services provided by the OSS and offer a comprehensive diagnostic service, with support for parents and adults with autism. In April 2017 it was announced that the IAS would receive a further £7m investment from WG.

I am aware that a sizable percentage of the £13m of funding has been allocated to support the work of the ASD National Coordinator and new Regional Development Team employed by the WLGA. My understanding is that this money supports seven job roles and also funds the hosting of the www.asdinfo.wales website, something which could have easily been provided far more cost-effectively by third sector organisations.

I have spoken to many public sector staff involved in the development of the Integrated Autism Services across SE Wales who have indicated that the service will not be able to meet its stated aims and will not be able to cope with the number of referrals going into each of the three services. Each have reflected how they really need the ongoing support of existing services such as the OSS to meet the needs of people with autism. We are aware of requests for funding made by public sector staff to be provided to the OSS to provide the support worker functions of the IAS, however these have been rebuffed out of hand.

In response to Rebecca Evans' letter in which she states that the role of the third sector is valued and that the IAS seeks to enhance and work in partnership with existing services, our experience does not support her statement.

We are aware that The Sustainable Social Services Grant, if it is continued, may be a possible source of future funding, however as this is not guaranteed, nor is it available until 2019/20 it does not offer any support to our charity at this time. It is clear that the IAS will lean heavily on the OSS moving forward and we are very open to working in partnership with them, however funding and support to do this has not been forthcoming from statutory sources.

We would therefore be interested to understand the procurement process which was utilised to select the WLGA as the lead partner, host of the regional

development team and the www.asdinfo.wales website, especially in view of their function as a non-statutory organisation.

It is now unclear what opportunities exist for third sector organisations seeking to bring their flexibility and expertise to the development of the Wales Autism Strategy, which of course originated from the work of a Welsh charity, no longer in existence. Additionally we are conscious that people with autism themselves do not appear to have been consulted in large enough numbers to have had a meaningful input into the development of the IAS, and we would therefore welcome any move by WG to work to be more inclusive in their efforts to seek feedback and advice from people who are best placed to identify the support which they require.

We have recently held a consultation in the OSS with Paul Davies AM in which a number of people with autism took the opportunity to give feedback on existing services and share their aspirations for the support that may be forthcoming as the result of the proposed Autism Bill.

We look forward to your response regarding the way in which £13m of public funding has been allocated and would welcome the opportunity to work collaboratively in partnership with the IAS moving forward with equality of opportunity for third sector partners regarding funding opportunities in the future.

Kind regards

Gareth Morgan

WHAT IS 21 HIGH STREET?



21 High Street is a flexible support service based in a 4 storey building in Cardiff city centre for the use of people aged 16 and over, who have a diagnosis of high functioning autism or Asperger syndrome.

21 High Street is a service delivered by the charity Autism Spectrum Connections Cymru (ASCC).

ABOUT ASCC

ASCC is a Welsh charity which provides specialist autism services. ASCC is part of the well respected Autism Initiatives group of charities.

We understand that each person's autism will impact upon them in unique ways and work in partnership with them and those close to them, to develop and achieve their own goals utilising a strength based model of support, shaped around each individual.



IS 21 HIGH STREET FREE TO USE?

The 21 High Street Team offer focused 1:1 support, housing, employment and benefits advice. They can also meet with you to discuss problem solving in a number of areas, as well as providing a variety of social opportunities throughout each month.

You can also access independent advocacy through 21 High Street.



HOW MUCH DOES IT COST?

The only cost to individuals is for certain social groups. For example if you attend a cinema trip you will pay for your own ticket and any refreshments you want. However, we always try our best to make as many of our social activities and opportunities free or as low cost as possible.

HOW DO I REGISTER?

To self-refer email: info@asc-cymru.org or call: 029 2022 8794. A member of staff will then arrange an initial meeting with you at 21 High Street.

THE PURPOSE OF THIS MEETING IS TO:

- 1 Tell you about the service in more detail
 - 2 Give you the opportunity to ask questions
 - 3 Complete a short 'about me' form which includes your contact details & information which will help us support you in the future.
- This meeting should take around 30 minutes to an hour.

YOU'LL BE ABLE TO:

- Visit 21 High Street during drop-in hours (check our website for up to date drop-in times).
- The building is a safe place where you can make use of the various facilities or just relax and meet other people.
- Access a variety of activity based social groups.
- Arrange 1:1 appointments with staff for specialist advice/ support.
- Receive a monthly newsletter keeping you up to date with our available services and one-off events.

WE WANT YOUR INPUT!

It's important that 21 High Street is a true reflection of what people with autism want to see, so if you have any ideas we'd love to hear them. Perhaps you've had some thoughts about a social group you would like to start up or what we can do to promote a positive image of autism to others, including employers.

Some of the people registered with 21 High Street are part of a Think Tank and help to influence and shape the direction of our service. If you'd like more information about the Think Tank please speak to a member of staff.

If you would like to work with us to support people with high functioning autism or Asperger syndrome please get in touch.

Autism Spectrum Connections Cymru

21 High Street, Cardiff CF10 1PT Telephone: 029 2022 8794 Email: info@asc-cymru.org

Follow us on social media for a quick way to stay up to date with our work and the wider autism community.

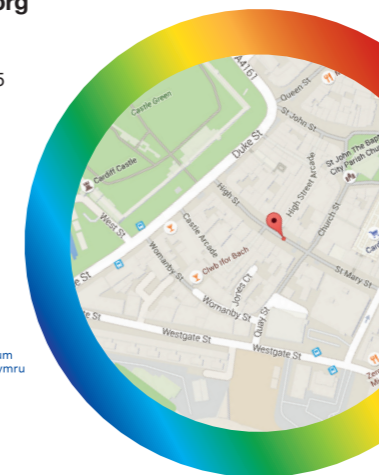
Twitter: @ASCCymru

Facebook: /ASCCymru

www.asc-cymru.org

Charity number 1158045

asc | autism spectrum connections cymru



AUTISM SPECTRUM CONNECTIONS CYMRU

DDIOGEL
EICH GWASANAETH
CYMDEITHASU
CYFLOGADWYDD
CYN AC AR ÔL DIAGNOSTIG
CYMORTH
GALW HEIBIO
GRWPIAU
GWEITHGAREDDAU
CREADIGRWYDD

BETH YW 21 HIGH STREET?

ALLA I DDEFNYDDIO 21 HIGH STREET AM DDIM?

SUT GALLA I GOFRESTRU?

HOFFEM GAEL EICH MEWNBWN!



AUTISM SPECTRUM CONNECTIONS CYMRU

SAFE
YOUR SERVICE
SOCIALISING
EMPLOYABILITY
PRE & POST DIAGNOSTIC
SUPPORT
DROP-IN
GROUPS
ACTIVITIES
CREATIVITY

Mae tîm 21 High Street yn cynnig cymorth unigol â ffocws a chyngor am dai, cyflogaeth a budd-daliadau. Hefyd, gallant gwrdd â chi i drafod datrys problemau mewn nifer o feysydd, yn ogystal â darparu amrywiaeth o gyfleoedd cymdeithasol bob mis.

Cewch wasanaeth eirioli annibynnol drwy 21 High Street hefyd.



FAINT YDY O?

Dim ond am rai grwpiau cymdeithasol penodol y bydd yn rhaid i'r unigolyn dalu. Er enghraifft, os byddwch yn mynd i'r sinema, byddwch yn talu am eich tocyn eich hun ac unrhyw luniaeth yr hoffech ei gael. Fodd bynnag, rydym bob amser yn ceisio cynnig cymaint o'n gweithgareddau a'n cyfleoedd cymdeithasol â phosibl am ddim neu am gost isel.

Er mwyn atgyfeirio eich hun, anfonwch e-bost at: info@asc-cymru.org neu ffoniwch: 02920 228 794. Wedyn, bydd aelod o staff yn cynnal cyfarfod cychwynnol â chi yn 21 High Street.

DIBEN Y CYFARFOD HWN YW:

Rhoi mwy o fanylion i chi am y gwasanaeth

1

Rhoi cyfle i chi ofyn cwestiynau

2

Cwblhau ffurflen fer 'amdana i', sy'n cynnwys eich manylion cyswllt a gwybodaeth a fydd yn ein helpu i roi cymorth i chi yn y dyfodol.

3

Dylai'r cyfarfod hwn bara tua 30 munud i awr.

4

BYDDWCH YN GALLU:

Ymweld â 21 High Street yn ystod oriau galw heibio (edrychwch ar ein gwefan i weld yr amseroedd galw heibio diweddaraf).

5

Mae'r adeilad yn fan diogel lle gallwch ddefnyddio'r cyfleusterau amrywiol neu ymlacio a chwrdd â phobl eraill.

6

Mynychu amrywiaeth o grwpiau cymdeithasol sy'n seiliedig ar weithgareddau.

7

Trefnu apwyntiadau unigol â staff i gael cyngor/cymorth penodol.

8

Derbyn cylchlythyr misol sy'n rhoi'r newyddion diweddaraf i chi am y gwasanaethau sydd ar gael a'n digwyddiadau unigol.

9

Mae'n bwysig bod 21 High Street yn adlewyrchu'r hyn yr hoffai pobl sydd ar y sbectrwm ei weld, felly os oes gennych unrhyw syniadau, byddai'n wych clywed amdanynt. Efallai eich bod wedi meddwl am grŵp cymdeithasol yr hoffech ei ddechrau neu'r hyn y gallwn ei wneud i hyrwyddo delwedd gadarnhaol ynglŷn ag awtistiaeth i eraill, gan gynnwys cyflogwyr.

Mae rhai o'r bobl sydd wedi'u cofrestru â 21 High Street yn rhan o Felin Drafod, ac maent yn helpu i ddylanwadu ar gyfeiriad ein gwasanaeth a'i lunio. Os hoffech fwy o wybodaeth am y Felin Drafod, siaradwch ag aelod o staff.

Cysylltwch â ni i drafod sut yr hoffech fod yn rhan o'r gwasanaeth.

Autism Spectrum Connections Cymru

21 High Street, Caerdydd, CF10 1PT Telephone: 029 2022 8794 Email: info@asc-cymru.org

Dilynwch ni ar y cyfryngau cymdeithasol i gael y newyddion diweddaraf am yr hyn sy'n digwydd yn 21 High Street a'r gymuned awtistiaeth ehangach.

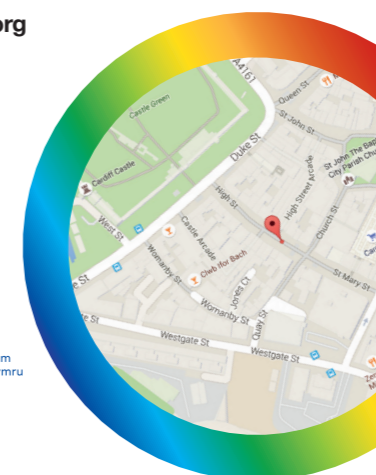
Twitter: @ASCCymru

Facebook: /ASCCymru

www.asc-cymru.org

Rhif elusen 1158045

asc | autism spectrum connections cymru



Mae 21 High Street yn adeilad pedwar llawr yng nghanol dinas Caerdydd ar gyfer pobl sy'n 16 oed a throsodd, sydd â diagnosis o awtistiaeth gweithredu lefel uchel neu syndrom Asperger.

Mae 21 High Street yn wasanaeth a ddarperir yn yr elusen Autism Spectrum Connections Cymru (ASCC).

GWYBODAETH AM ASCC

Mae ASCC yn elusen a lywodraethir yng Nghymru ac fe'i sefydlwyd er mwyn darparu gwasanaethau awtistiaeth penodol ar gyfer pobl sydd ag awtistiaeth yng Nghymru. Mae ASCC yn rhan o Grŵp Elusennau Mentrau Awtistiaeth sy'n hirsefydledig ac yn uchel ei barch. Rydym yn deall y bydd awtistiaeth unigolion yn effeithio arnynt mewn ffordd unigryw, ac rydym yn gweithio mewn partneriaeth â hwy a'r rheini sy'n agos atynt er mwyn datblygu eu nodau eu hunain, a'u cyflawni, gan ddefnyddio model cymorth yn seiliedig ar gryfder sydd wedi'i lunio ar gyfer yr unigolyn.



P-05-761 Demand Funding from the Welsh Government to Support Autism Spectrum Connections Cymru – Correspondence from the petitioner to the Committee, 12.11.17

Dear Petitions Committee.

I am writing a further response to my petition under the reference number, P-05-761.

Having read Autism Spectrum Connections Cymru (ASCC)'s response to my petition, I am concerned that the development of ASCC's One stop shop have been ignored and marginalised by Welsh Government officials.

I'm further concerned that there may be a bias towards proposals by the Welsh Local Government Association (WLGA). Who are the WLGA and what is their connection to the £13m proposed for the National Integrated Autism Service (NIAS)? Are they a private members organisation?

Is all of the £13m going to the development of the NIAS? Or is it all going to the WLGA and only some of it is going to NIAS? The Welsh Government should be able to tell me exactly where the £13m is going and how every penny is spent on improving the lives of people living with autism.

Please could you tell me what the WLGA is and what is their relation to the Welsh Government? Should public money be granted to the WLGA without any procurement? It doesn't seem to be an open and transparent organisation that are allowing for the best value for public money in Wales. Procurement ensures fairness and equal opportunities for suppliers within a competitive market.

As a person living with autism, it is unclear for me how the money is being spent exactly on ways which are going to genuinely improve my own life. I believe that ASCC should definitely be classed as a need for people with autism by the Welsh Government and the work done here should be taken into account when deciding where to allocate third sector funding grant schemes by the Welsh Government in the future.

Yours Sincerely,

Aled Thomas.

Agenda Item 3.4

P-05-763 Introduce updated stroke advice – B.E.F.A.S.T. – and help save lives and livelihoods

This petition was submitted by Phillip Easton, having collected 105 signatures online.

Petition text:

We the undersigned request the Welsh Assembly to review the stroke advice currently given to healthcare professionals and in other marketing literature. At the moment this follows FAST – Face, Arms, Speech, Time. Some parts of the brain affected by stroke don't deal with any of those functions, so adding Balance and Eyes to create BEFAST will cover much more.

My brain lesion indicating a cerebellar stroke was found incidentally during an MRI for a different reason. This explains the sudden vertigo I experienced over a year previously. Had this been recognised by the multiple medical professionals I saw I could have received stroke treatment immediately and the extent of brain damage may have been avoided. Had I known about it as a member of the public I would have been aware of the risks of my symptoms. Stanford University has been advising BEFAST for years: <http://scopeblog.stanford.edu/2014/05/02/be-fast-learn-to-recognize-the-signs-of-stroke/>

Additional information:

My personal story is that I live alone, and I suffered a sudden and intense bout of vertigo in early December 2015. I was in bed for three whole days and was unable to move to eat, drink, or anything else. Had I known this could have been a stroke I would have called an ambulance immediately. I recovered enough to work again, and about a week later I suffered another bout in public – an ambulance was called. This calmed down far quicker, but a paramedic was still with me for an hour before booking me an appointment with my doctor that evening. At this time I had a further episode as I was entering the hospital where my doctor was sited at the time. I was unable to work at all for at least a month after this. After several visits to the doctor over the next three months I was finally referred to ENT for vertigo as my symptoms weren't going away as hoped. In late January 2017 I was finally allowed an MRI for lingering ear pain and was checked for infection. As a consequence, evidence of a stroke was found – I was told this on 14th February 2017. More than 15 months after my first symptoms.

I am still unable to work full time hours, and am still undergoing tests with regards to the cause of the stroke. It's possible that the first incidences were TIAs and the full stroke that caused lasting damage was only the last one – after the paramedic saw me. We cannot know if I would definitely have been saved these issues if the condition was caught earlier – even if I'd just started taking daily aspirin at the first sign to thin my blood (a common procedure after suspected TIA). We do know that without that advice, I have definitely suffered brain damage.

Thank you for your attention in this matter.

Assembly Constituency and Region

- Cynon Valley
- South Wales Central

Cwestiynau am strôc? Questions about stroke?
Ffoniwch ein llinell gymorth neu ewch at y wefan:
Phone our helpline or visit our website:
0303 3033 100 / stroke.org.uk
(Ffôn testun / Textphone 18001 0303 3033 100)



David J Rowlands AM
Chair, Petitions Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

Greenmeadow Springs Business Park
Unit 8 Cae Gwyrd
Tongwynlais
Cardiff
CF15 7AB
Tel: 02920 524407

15 November 2017

Dear Mr Rowlands

Petition P-05-763 Introduce updated stroke advice - B.E.F.A.S.T. - and help save lives and livelihoods

Thank you for your letter dated 7 August 2017 regarding the petition submitted by Philip Easton and for your invitation to provide our views.

The Stroke Association has been an active proponent of the 'FAST' test for a number of years. The FAST test is:

- Face: look at the person's face and ask them to smile. Has their face fallen on one side?
- Arms: ask the person to raise both of their arms and keep them there. Are they unable to raise one arm?
- Speech: ask the person to tell you their name, or say 'hello'. Is their speech slurred?
- Time: if you spot any of these signs, always call 999.

The BEFAST test contains all of these elements, and as described in the petition, problems with eyes and balance.

Stroke is a medical emergency, but one which can vary significantly between different people experiencing a stroke. It can present in a number of different ways and this certainly can include problems with vision and balance. However, while we accept these

Gydai'n gilydd gallwn gencro strôc | Together we can conquer stroke

Prif Weithredwr Juliet Bouverie BA Hons (Oxon), DMS
Mae Cymdeithas Strôc yn Gwmni Cyfyngedig trwy Warrant a gofrestrwyd yng Nghymru a Lloegr (Rhif 61274).
Swyddfa gofrestredig: Stroke Association House, 240 City Road, Llundain EC1V 2PR.
Cofrestrwyd fel Elusen yng Nghymru a Lloegr (Rhif 211015) ac yn yr Alban (SC037789).
Cofrestrwyd hefyd yng Ngogledd Iwerddon (XT33805) Ymys Manaw (Rhif 945) a Jersey (NPO 369).

Chief Executive Juliet Bouverie BA Hons (Oxon), DMS
Stroke Association is a Company Limited by Guarantee, registered in England and Wales (No 61274).
Registered office: Stroke Association House, 240 City Road, London EC1V 2PR.
Registered as a Charity in England and Wales (No 211015) and in Scotland (SC037789).
Also registered in Northern Ireland (XT33805) Isle of Man (No 945) and Jersey (NPO 369).



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can be symptoms of a stroke we do not agree with the petitioner that FAST should be replaced by BEFAST for a number of reasons.

The FAST test is one which is evidence based and has been shown to be effective in increasing awareness among the public of the fact that stroke is a medical emergency requiring a 999 response. Our own research in Wales suggests 55% of people can correctly identify both what FAST stands for, and that they should call 999¹. Changing the message risks reducing awareness of the symptoms and correct response to a stroke. A study of the whole of the UK noted “Delays to seeking and receiving medical attention after major stroke in the UK fell strikingly in 2009, coinciding with the start of the FAST TV campaign”².

FAST has also been proven to be an effective test for identifying potential strokes. A 2003 study looked at the use of the FAST test by primary care doctors and in the emergency room. The study looked at 487 patients and found “paramedics using the Face Arm Speech Test achieved high levels of detection and diagnostic accuracy of stroke”³. Using a test with a high degree of accuracy is vital due to the large number of non-stroke referrals to stroke services (commonly referred to as stroke mimics). Research suggests anywhere between 5% and 33%⁴ of suspect stroke patients may be mimics, with a study of London HASUs suggesting a figure of a quarter of all stroke admissions⁵. Reducing the number of mimics will lower the pressure on existing stroke services.

There is limited evidence to suggest BEFAST would be a more effective test for stroke. One recent study did note 14% of ischemic strokes did not present with FAST symptoms⁶ but the evidence remains too limited to suggest it being appropriate to change FAST to BEFAST at present. It is important to note this study also confirms that 86% of ischemic strokes do present with FAST symptoms. The high number of strokes presenting with FAST symptoms makes this an effective test for identifying potential strokes.

¹ Research conducted for the Stroke Association by Beaufort Research. Fieldwork conducted in November 2016 and March 2017.

² Wolters et al, International Journal of Stroke, *Sustained impact of UK FAST-test public education on response to stroke: a population-based time-series study*, 8 April 2015, <http://onlinelibrary.wiley.com/doi/10.1111/ijis.12484/full> Retrieved 2 November 2017

³ Harbison et al, Stroke, *Diagnostic Accuracy of Stroke Referrals From Primary Care, Emergency Room Physicians, and Ambulance Staff Using the Face Arm Speech Test*, 1 January 2003, <http://stroke.ahajournals.org/content/34/1/71.long> Retrieved 2 November 2017

⁴ Edwards, MJ et al, British Medical Journal, *Stroke Mimics in the pre-hospital setting*, <http://emj.bmj.com/content/32/5/e8.2> Retrieved 18 July 2017

⁵ Ibid.

⁶ Aroor et al, Stroke, *BE-FAST (Balance, Eyes, Face, Arm, Speech, Time) Reducing the Proportion of Strokes Missed Using the FAST Mnemonic*, 12 January 2017, <http://stroke.ahajournals.org/content/48/2/479> Retrieved 2 November 2017

The FAST message is one which has been established with a high level of public awareness. Changing this message to BEFAST risks causing confusion among members of the public about what to do if they see these symptoms. This could reduce or delay the number of people seeking medical attention during a medical emergency.

The vast majority of strokes present with FAST test symptoms, which makes this an effective way of identifying potential strokes. In our own promotional materials, while we may concentrate on the FAST symptoms, we do provide information on the other potential symptoms of stroke, including vision and balance problems.

We would like to express our thanks to the petitioner for raising awareness of the symptoms of stroke and our thanks to the Committee for giving us the opportunity to give our views on the petition. The Stroke Association will continue to review evidence around how we can best communicate the risk factors, symptoms and effects of stroke.

Yours sincerely

Matt O'Grady
Stroke Association
Policy, Information and Campaigns Officer, Wales

P-05-763 Introduce updated stroke advice – B.E.F.A.S.T. – and help save lives and livelihoods – Correspondence from the petitioner to the Committee, 14.11.17

Dear Kayleigh,

Many thanks for your update, and the correspondence from Stroke Association.

According to their own figures*, around 80% of strokes are Ischemic in nature (up to 85% depending on which literature you read). Based on their argument in the received correspondence, this is a vast majority, and as such all strokes should be treated with clot-busting drugs or aspirin at the onset of symptoms. However, they are not, because this would make the situation far more life-threatening to the 20% who have haemorrhagic strokes as it would potentially cause a bleed to actually become worse.

Using some more of their statistics:

“1 in 5 strokes are fatal.” – that’s only 20% – should we bother to raise awareness at all?

“For every 1,000 patients who receive thrombolysis, a clot busting treatment, 80 will live more independently.” – that’s less than 1% so why even try thrombolysis?

“For every cancer patient living in the UK, £295 is spent each year on medical research, compared with just £22 a year for every stroke patient.” – maybe an increase in funding and awareness would help?

Out of the UK nations, Wales actually has the highest ratio of diagnosed stroke sufferers (3%)

However, this is only a response to the points made by Mr O’Grady, and not fully relevant to my petition.

The wording of my petition was to improve BEFAST understanding within the professional medical community as well as in other literature. I was seen by several professionals including doctors and a paramedic who was called out regarding sudden onset vertigo, which were most likely Transient Ischemic Attacks (TIAs) which are considered ‘mini-strokes’ or warning signs that an actual stroke could happen. It was the evening of the day I saw the paramedic (who offered me a trip to hospital but recommended against it as most likely a waste of time) that I finally suffered the stroke. This happened as I was actually walking into Mountain Ash hospital to see my GP who was based there at the time. Nobody in the hospital considered the sudden onset as I walked through the door, or the lasting symptoms whilst I was waiting for a lift home – whereas that afternoon they resolved far faster.

There is a section (4.9.2) in the 2016 National Clinical Guideline for Stroke*** regarding Balance in patients who have suffered stroke, but even though it’s recognised as a common after-effect, it’s apparently not considered as an important symptom by the Stroke Association despite their inclusion of a recent study extolling the benefits of the BEFAST

advice as evidence that as “only” 14.1% of ischemic strokes didn’t present any of the normal FAST symptoms it should not, in fact, be considered. The conclusion of that study even states “If validated in a prospective study, a revision of public educational programs may be warranted.”

Again, I am not necessarily suggesting a public release of BEFAST (though I do believe it would be effective and only improve recognition of more stroke sufferers rather than decrease the identification), but primarily better education of medical professionals. Had a different paramedic come to me with prior experience of my symptoms meaning stroke, I may have had a scan and preventative treatment that morning.

Section 3.4 of the Guideline states “Any person with the acute onset of a neurological syndrome with persisting symptoms and signs (i.e. suspected stroke) needs urgent diagnostic assessment to differentiate between acute stroke and other causes needing their own specific treatments. To maximise the potential benefit from revascularization treatments and the acute management of intracerebral haemorrhage, the Working Party has further reduced the recommended maximum time between admission and brain imaging for suspected stroke from 12 hours to ‘urgently and at most within 1 hour of arrival at hospital’.”

The Guideline also notes in Section 3.2 that “Any person with a fully resolved acute onset neurological syndrome that might be due to cerebrovascular disease needs urgent specialist assessment to establish the diagnosis and to determine whether the cause is vascular, given that about half have an alternative diagnosis.”

You may note it clearly states that alternative diagnoses are possible, and for this reason I believe that relevant tests should indeed be carried out first before submitting for the acute stroke tests. If balance is the issue there are various possible causes, which can be identified in the following methods:

Ear infection – easily noted with a visual inspection

BPPV – a type of vertigo caused by loosened calcium deposits in the ear canal, and can potentially be cured within minutes (or at least diagnosed) using the Epley Manoeuvre. Hearing tests can also be performed as a deeper ear infection may not be immediately obvious in the ear canal but could affect hearing.

I was showing no signs of an ear infection other than the vertigo (which as we know has multiple diagnoses), and the Epley Manoeuvre was never attempted. However, despite symptoms continuing for nearly a year (though to a lesser degree), my (first) ENT specialist refused me the scan I requested, still didn’t see any signs of infection, no problems in a hearing test, and didn’t suggest the Epley Manoeuvre. It was only the next specialist (who I was only able to see months later) who sent me for an MRI which revealed the stroke suffered.

In previous correspondence you have sent to me, you noted that a symposium of Stroke specialists was asked their opinion on the FAST advice given. The response was that they follow the recommendations made by NICE and have no problem with that. I actually had an appointment with my own specialist the week following that, and he discovered that it was my petition. It was my first appointment with him, and he didn't realise how young I was, or how long it had taken to be diagnosed – I remind you again that it was 15 months before diagnosis of a cerebellar stroke, as it affected only my balance. He was surprised I had suffered a stroke because of my physical condition and age. He explained the cerebellum deals with balance, and it's perfectly obvious to him that was the cause of my vertigo. However, due to my physical condition and age, it wouldn't have been his first thought.

This exactly what my GP said after diagnosis during follow-up treatment. 25% of diagnosed strokes are suffered by those under 65, but I wonder if that would be higher if diagnosis was more effective?

I do understand this is a slightly jumbled response, but I hope you have been able to make sense of it. My point is that I simply believe that medical professionals should consider stroke as a possibility when there are balance issues, and BEFAST should be recognised by them. Do the standard tests – ear and throat examination, Epley Manoeuvre, hearing test – and if they don't come up with anything, stroke is the next possibility. This should be recognised and then tested for as per the guidelines mentioned above. I have discussed this with all my doctors, and they do agree with me.

The importance of correct diagnosis is more important now even than when I submitted my petition. In July a new study highlights the “substantial long-term morbidity and mortality” risk**** of Stroke and TIA sufferers for up to five years from the incident date. Correct diagnosis and treatment at the soonest possible time can help much more in the long-term – therefore decreasing costs for the NHS in Wales.

For such a high ratio as 14% of *diagnosed* strokes that do not present with FAST symptoms, it is well worth educating NHS Wales staff to identify these correctly, before they turn into strokes that *do* display FAST symptoms which could have been prevented by earlier diagnosis.

In a recent article by Wales Online*****, The Stroke Association suggests that stroke survivors in Wales may increase to 100,000 – an increase of 50% on their current estimation – with spending potentially trebling in the next 18 years. This is currently living stroke survivors – though around 7,400 people in Wales have a diagnosed stroke each year*****, with 2,317 diagnosed stroke deaths in 2014 (ONS figures used). Over 30% of diagnosed strokes in Wales are deaths. Shouldn't we be doing as much as possible to prevent this?

There are multiple posters in my GP's surgery regarding Sepsis and Meningitis. One that always catches my attention goes as follows:

S – slurred speech

E – extreme shivering or muscle pain
P – passing no urine (in a day)
S – severe breathlessness
I – “I feel like I might die”
S – skin mottled or discoloured

It’s amazing that this is promoted by the Sepsis Trust with such a bizarre range of symptoms and no easy acronym, but the Stroke Association don’t trust doctors with two extra words which fit and are actually in the ‘extra symptoms’ advice of almost all stroke advice, which account for 14% of diagnosed strokes.

Finally, I want to reiterate the text of my petition:

“We the undersigned request the Welsh Assembly to review the stroke advice currently **given to healthcare professionals** and in other marketing literature.”

“Had this been recognised by the multiple medical professionals I saw I could have received stroke treatment immediately and the extent of brain damage may have been avoided.”

Throughout this response I have been careful to say ‘diagnosed strokes’ because I do wonder how many incidences of vertigo – especially in younger people – have been caused by stroke but remained undiagnosed.

Thank you for your attention. I am happy to discuss this further. I am sure I can also obtain a supporting signed letter from medical professionals given more than a week to respond.

Best regards,

Phillip Easton

Agenda Item 3.5

P-04-667 – A Roundabout for the A477/A4075 Junction

This petition was submitted by Pembroke Town Council, having collected 115 online signatures and 482 paper signatures.

Text of the Petition

We call on the National Assembly for Wales to urge the Welsh Government to replace the Fingerpost Junction on the A477/A4075 with a roundabout – The current road configuration has not resolved the problems on this dangerous stretch of road.

Assembly Constituency and Region

- Carmarthen West and South Pembrokeshire
- Mid and West Wales

Ken Skates AC/AM
Ysgrifennydd y Cabinet dros yr Economi a Thrafnidiaeth
Cabinet Secretary for Economy and Transport



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-667
Ein cyf/Our ref KS/03558/17

David John Rowlands AM
Chair - Petitions committee.

government.committee.business@wales.gsi.gov.uk

6 November 2017

Dear David,

Thank you for your letter of 5 October regarding petition P-04-667 A Roundabout for the A477/A4075 Junction.

Please find enclosed a copy of the RSA 4 document. I have passed the Town Council's comments to my officials so that they can be considered as part of the RSA 36 month review.

Yours ever,

Ken Skates AC/AM

Ysgrifennydd y Cabinet dros yr Economi a Thrafnidiaeth
Cabinet Secretary for Economy and Transport

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Ken.Skates@llyw.cymru
Correspondence.Ken.Skates@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

South Wales Trunk Road Agent

Managing and Improving
Motorways and Trunk Roads
through South Wales



Asiant Cefnffyrdd De Cymru

Rheoli a Gwella'r Traffyrdd
a'r Cefnffyrdd yn Ne
Cymru

A477 Nash Fingerpost Junction Improvements

Stage 4 (12 month) Road Safety Audit

October 2016

Final Report



**A477 Nash Fingerpost Junction
Improvements
Stage 4 (12 month) Road Safety Audit
Final Report**

Service Provider/Consultant Name: Atkins

Service Provider/Consultant Project Number: JR15-911/8002-890

T-WHIS Number: File Number:

	Name	Signature	Date
Author:	Rob Hunt		October 2016
Checked:	Francis Johns		
Reviewed:	Fraser Arnot		October 2016
Approved:	Rob Hunt		October 2016

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APPENDIX A: LIST OF DRAWINGS AND DOCUMENTS

APPENDIX B: SCHEME DRAWING

1 **Introduction**

1.1 **Commission and Terms of Reference**

Atkins Transportation has been commissioned by the South Wales Trunk Road Agent (SWTRA) on behalf of the Welsh Government to undertake a 12-month Stage 4 Road Safety Audit of the previously installed improvements at the A477 Nash Fingerpost junction.

The Audit Team Membership has been approved by the Project Sponsor, Darryn Hill of Welsh Government, and was as follows:

Rob Hunt	BEng (Hons), MSc (Eng), CEng, MICE, MCIHT Audit Team Leader Managing Consultant Atkins Transportation
Fraser Arnot	BSc (Hons), MCIHT, CMILT Audit Team Member Principal Consultant Atkins Transportation

Mike James of SWTRA also participated in the site visit. The views of Dyfed Powys Police were also sought as part of the Road Safety Audit process. Rob Hunt and Fraser Arnot both hold a Highways England-approved Certificate of Competency in Road Safety Auditing (gained via the TMS Consultancy route).

This Stage 4 Road Safety Audit has been conducted with reference to the procedures and scope set out in the Welsh Government's 'Design Manual for Roads and Bridges' (DMRB), Volume 5, Section 2, Parts 2 and 3, 'Road Safety Audit' Standard HD 19/15.

1.2 **Scope**

The Road Safety Audit Brief was provided by Jon Robinson of Atkins Transportation on an email dated 10th October 2016. Details of the information provided as part of the brief are included in Appendix A.

Following an initial analysis of the collision data a site visit was deemed to be required in accordance with HD 19/15 paragraph 2.50. The criterium contained in HD 19/15 that prompted this conclusion was "where higher than expected numbers of personal injury collisions have occurred since the scheme became operational (when compared to control data)".

The Road Safety Audit comprised a desktop review of the information provided in the Road Safety Audit Brief and a subsequent site visit, which was carried out by the Road Safety Audit team during early afternoon on Wednesday 12th October 2016. Weather conditions at the time of the audit were dry and bright;

the road surface was also dry. Mike James of SWTRA also participated in the site visit.

The Nash Fingerpost Junction Improvement scheme on the A477 was previously subject of the following RSAs:

- Stage 1/2 Road Safety Audit in March and April 2014; and
- Stage 3 Road Safety Audit in February 2015.

The team has examined and reported only on the road safety implications of measures as presented and has not specifically examined or verified the compliance of the designs to any other criteria.

2 **Scheme Details**

The Road Safety Audit Brief provides the following scheme description:

As a part of this scheme, the A477 Nash Fingerpost junction was upgraded to a wide single lane dualling (WSLD) layout. In addition, provision was made for a shared use path (SUP) in the eastbound verge. The footpath tied into a future scheme for shared use path provision along the A477 between Slade Cross and Milton.

The works for this scheme comprised:

- Excavation of existing land and construction of a new verge adjacent to the eastbound carriageway.
- Widening of existing central reserve.
- Full depth carriageway construction in the eastbound direction where the carriageway is widened.
- Resurfacing of carriageway.
- Provision of a SUP adjacent to the eastbound carriageway.
- Relocation of existing highway drainage in the form of a filter drainage system adjacent to the SUP.
- Reconstruction of existing culvert under farm access.
- Installation of replacement signage at the junction.
- Translocation of existing hedge-bank adjacent to the eastbound carriageway.

Construction of the scheme was completed in December 2014.

3 **Analysis of Collisions**

3.1 **Severity and General Characteristics**

Collision data for the A477 Nash Fingerpost Junction Improvements scheme extents for the pre-scheme ('Before') and post-scheme ('After') periods were provided as follows. These periods exclude the construction period.

- Before (48 months): 1st January 2010 to 31st December 2013.
- After (12 months): 1st January to 31st December 2015.

The Before data was used to assist with deliberations regarding the need for a site visit.

During the After period between 1st January and 31st December 2015, a total of 2 personal injury collisions were recorded within the extents of the scheme, both of which resulted in slight injuries. This gives a killed or seriously injured (KSI) index of 0.

The first recorded slight injury collision occurred during the middle of the day on a Thursday in April 2015. A right-turning agricultural vehicle emerging from the A4075 side road failed to give way to a westbound car on the A477. The collision record indicates that the point of impact upon both vehicles was the front but the record also indicates that there was no skidding involved and the westbound car left the carriageway to the nearside. The road surface was dry, the weather was dry and there were no special conditions recorded.

The second slight injury collision occurred on a Friday evening in July 2015 at approximately 8pm. A right-turning car emerged from the A4075 side road and was struck in the offside by a westbound car on the A477. The collision record indicates that a low sun was possibly dazzling the westbound A477 driver. It also indicates that the driver emerging from the side road was very likely to have failed to look properly and possibly failed to judge the other (A477 westbound) vehicle's speed. Neither vehicle left the carriageway but the westbound A477 vehicle was recorded as skidding. The carriageway was recorded as being dry, the weather was dry and there were no special conditions recorded.

The average annual collision frequency of two collisions at the A477 Nash Fingerpost Junction in the 12-month After period was higher than the value predicted in the COBA Manual which predicts a collision frequency of 0.8 collisions per year based on the Annual Average Daily Traffic (AADT) shown in Section 4 for the A477 and A4075, taken from the Department for Transport traffic count website for Pembrokeshire.

A comparison of the key characteristics of the collision records for the Before and After periods at the A477 Nash Fingerpost Junction is summarised in the table. Collision totals in the Before period have been averaged to show annual rates for comparison.

Characteristic	Before (48 months)	After (12 months)	Change
Fatal	1 (0.25 per year)	0 (0 per year)	-0.25 per year
Serious	1 (0.25 per year)	0 (0 per year)	-0.25 per year
Slight	2 (0.5 per year)	2 (2.0 per year)	+1.5 per year
Total	4 (1 per year)	2 (2 per year)	+1 per year
Wet road surface and hours of darkness	1 (0.25 per year)	0 (0 per year)	-0.25 per year
Vehicle skidded	1 (0.25 per year)	1 (1 per year)	+0.75 per year
Powered two-wheeler	2 (0.5 per year)	0 (0 per year)	-0.5 per year
Light goods vehicle	1 (0.25 per year)	0 (0 per year)	-0.25 per year
Turning right from A4075 and failing to give way	4 (1 per year)	2 (2 per year)	+1 per year

There has been an increase in the total number of collisions per year in the After period compared with the average for the three years in the Before period. In addition there has been an increase in the number of collisions involving a right turning vehicle emerging from the A4075 failing to give way to a westbound A477 vehicle. This is the most common collision type in the Before and After period; two collisions in the Before period involved motorcycles although none were involved in the two collisions in the After period.

4 Traffic Conditions

The available Annual Daily Traffic (AADT) flow for the route is shown in Table 2 below.

SITE	2013		2014		2015	
	AADT	%HGV	AADT	%HGV	AADT	%HGV
<i>A477 west of Nash Fingerpost Junction</i>	9033	6.1	9067	6.0	9165	6.2
<i>A477 east of Nash Fingerpost Junction</i>	12872	6.7	12935	6.6	13111	6.8
<i>A4075 south of Nash Fingerpost Junction</i>	3870	14.4	3993	14.7	4103	14.8

5 Review of Previously Raised Road Safety Audit Items

There are no outstanding items from the Stage 1 and 2 Road Safety Audit (April 2014).

The first item raised as part of the Stage 3 Road Safety Audit undertaken in February 2015 related to limited visibility to the give way markings for eastbound A477 users entering the right turn lane. This has been addressed by the introduction of a vertical Give Way traffic sign. Tyre marks on the surface of the right turn lane indicate there has been sudden braking, possibly created by queuing vehicles requiring other to stop earlier than expected. However, it is not clear if these tyre marks pre-date the introduction of the sign.

The second item raised concerns for westbound users failing to understand the alignment of the main carriageway immediately downstream of the side road. The problem appears to have been addressed through changes to the road studs.

The final item in the previous Stage 3 Road Safety Audit related to the western end of the shared use path; this issue has been resolved by the recent construction of the next section of shared use path to the west of the junction.

6 Conclusions

There has been an increase in the annual recorded personal injury collision rate but there has been a fall in the overall severity of these collisions. In the three-year Before period there was one fatal collision and one serious collision (both involving motorcycles) and none in the After period. In both the Before and After periods there were two slight injury collisions.

Both collisions recorded in the After period involved a vehicle turning right from the A4075 into the path of a westbound A477 which was also the most common collision type in the Before period. The police records indicate that driver error was likely to be responsible for both collisions, with one of the collisions also apparently involving the westbound A477 user being affected by driving towards a low evening sun. Only one of the Before collision records and none of the After collision records indicate that excessive speed was a factor.

The collision records do not directly indicate a problem with the changes to the junction layout. However, the layout has been reviewed with reference to the recorded collisions and the following items were noted:

- The junction is located at a section of the A477 where there is a combination of horizontal and vertical curvature ie westbound vehicles do not approach the junction in a straight line. It is possible that this can make it more difficult for users emerging from the A4075 to judge the speed of these vehicles, which is a problem that might be expected at a single lane dualling junction.
- Due to westbound users approaching the junction on a right hand bend, when a vehicle enters the left turn lane to leave the A477 towards the A4075 it can obscure other vehicles behind it. Whilst the following vehicle(s) may only be obscured for a short time, it is possible that some users emerging from the A4075 do not fully observe all of the approaching vehicles.
- There seems to have been very little change to the alignment and view to the right for users emerging from the A4075 and turning right when comparing the previous layout to the current layout. However, priority over users turning right into the A4075 has been clarified in accordance with the design standard TD 42/95 Design of Major/Minor Priority Junctions.

During the site visit several other points of interest were noted regarding driver behaviour at the junction:

- A car transporter accessing the Vauxhall garage in the direction of Milton was observed to undertake a complicated and non-standard U-turn manoeuvre including travelling the wrong direction through the exit onto the A4075 (see Appendix B) blocking the junction and creating potential conflicts with five different traffic movements at the junction. This led to queues of vehicles waiting to turn off the A477 in both directions. The manner in which the manoeuvre was carried out suggested this was regular practice.

- Several instances of an informal change of priority for right-turning vehicles were observed when users turning right from the A4075 indicated they were giving priority to users turning right from the A477.
- There are numerous different tyre marks on the carriageway, presumably created by sharp turning or heavy braking movements. Many of these marks are in areas where vehicle movements would be expected but a significant proportion are in areas and directions that are at odds with normal operation of the junction. This suggests that there are unpredictable vehicle movements occurring at the junction.

All of these items indicate that driver behaviour – and particularly unusual/unexpected actions – are likely to have an impact upon the operation of the junction.

The most common collision type at the junction has not changed and this is mirrored by the relatively minor changes to the alignment and layout of the section of the junction affecting this collision type.

7 Road Safety Audit Team Statement

We certify that this Road Safety Audit has been carried out in accordance with HD 19/15.

7.1 **Audit Team Membership**

Audit Team Leader

Rob Hunt
Managing Consultant
Atkins Transportation

Signed:



Date: October 2016

Audit Team Member

Fraser Arnot
Principal Consultant
Atkins Transportation

Signed:



Date: October 2016

Others Involved in the Road Safety Audit

Mike James
South Wales Trunk Road Agent

8 Acceptance

This part to be signed by the Welsh Government Project Sponsor.

In connection with the Stage 4 (12 month) Road Safety Audit prepared for the A477 Nash Fingerpost Junction Improvements Scheme, I acknowledge receipt of this report.

Signed:

Date:

Name:

Position:

APPENDIX A: LIST OF DRAWINGS AND DOCUMENTS

The Stage 4 (12 month) Road Safety Audit Brief included:

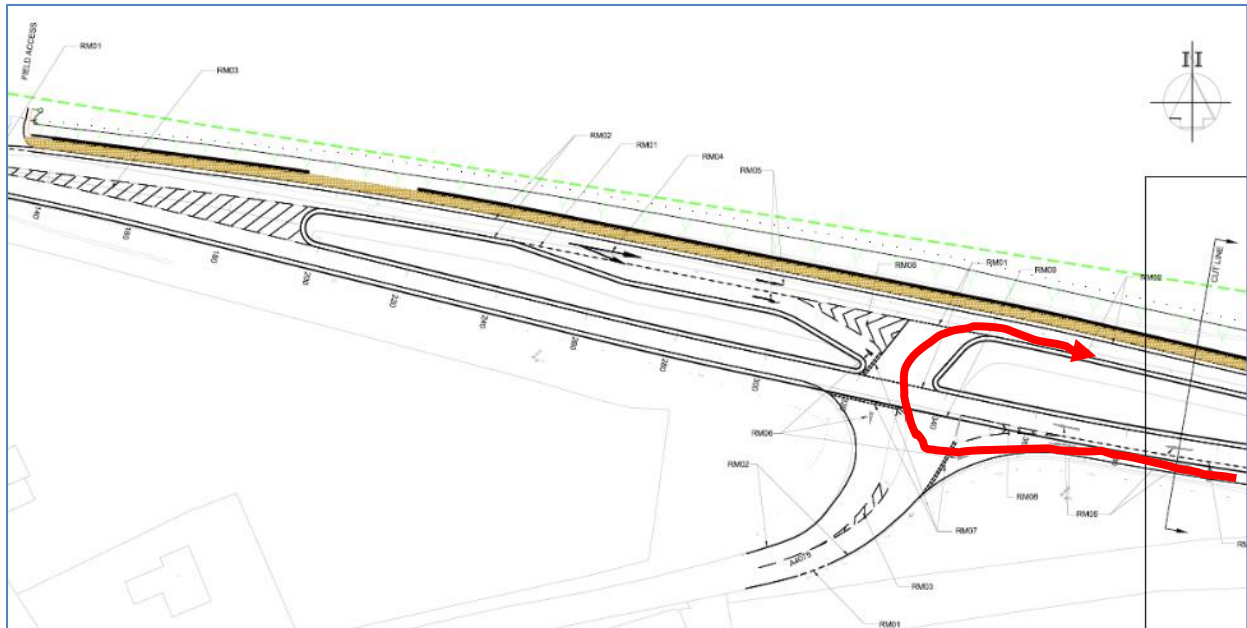
DOCUMENTS:

Email dated 10th October 2016
Stage 4a Road Safety Audit Brief
Brief

Jon Robinson to Hywel Davies
A477NFP.ATK.008.DO.001-RSA4

DRAWINGS:

A477NFP-ATK-001-DR-501 Rev A	Drainage Drawing
A477NFP-ATK-001-DR-601 Rev A	Earthworks Drawing
A477NFP-ATK-001-DR-701 Rev A	Pavement Drawing
A477NFP-ATK-001-DR-1101 Rev A	Kerbs and Footways Drawing
A477NFP-ATK-001-DR-1201 Rev A	Road Markings
A477NFP-ATK-001-DR-1202 Rev A	Signs Drawing

APPENDIX B: SCHEME DRAWING

Path of transporter vehicle observed by the Audit Team is shown by the red arrow

South Wales Trunk Road Agent
Asiant Cefnffyrdd De Cymru

Unit 12A, Llandarcy House
The Courtyard, D'Arcy Business Park
Llandarcy, Neath. SA10 6EJ

Pack Page 114
www.southwales-tra.gov.uk

Agenda Item 3.6

P-05-716 Free Train Transport for school pupils with Arriva Trains Wales

This petition was submitted by Elin Tuckwood, having collected 937 signatures on an alternative e-petition website

Text of the Petition

Here in the UK we are entitled to free education so surely we should be allowed free, safe transport to and from school? the answer to this is yes for many years Arriva trains Wales have been providing Treorchy Comprehensive pupils with Free train transport which is a huge benefit to those who live outside the catchment areas, however recently this has changed they have now called for all pupils to buy a train pass to get to and from school and these prices range from £19.95 to £32.90 per school term. For some parents with more than 1 child this can work out to be very costly and because these passes are provided through Arriva Trains Wales the school is unable to help parents with this funding. Arriva trains have stated that this is for safety precautions however children who have these designated train passes are in front of a "protective" metal barrier closer to the platform edge and the children that do not have these passes are in this small enclosed barrier space which actually causes more of a safety hazard due to overcrowding in such a small space. By being allowed free train transport once again every pupil will be able to have a fair chance to gain an education and will be able to go on to what they want to do in life we will all be treated as equal and money will not be a major concern for anyone.

Assembly Constituency and Region:

Rhondda

South Wales Central

David J. Rowlands AM,
Chair, Petitions Committee,
National Assembly for Wales,
Cardiff Bay,
CARDIFF.
CF99 1NA

Please ask for : Mainstream School Transport

My Ref : 101004259615//CN

Date : 11 October 2017

Dear Mr Rowlands,

Petition P-05-716 Free Train Transport for School Pupils with Arriva Trains Wales

Thank you for your letter of 5 October 2017, regarding the petition from Elin Tuckwood that is seeking the provision of free, safe transport following the withdrawal of the above provision in June 2016.

The criteria used by this Council to determine the eligibility to receive free school transport is based on walking distance, measured by the shortest, available walking route, with free transport being provided to secondary school learners whose home address is more than two miles from the nearest or catchment school. The efficient use of resources dictate the mode of transport provided and in this case, safe and stress free travel is solely provided by contracted school buses, which operate from Blaencwm, Blaenrhondda, Gelli, Maerdy, Tynewydd, Ynyshir and Ystrad.

The provision of free train transport to Treorchy Comprehensive School was a long standing arrangement between the school and the train operator, to which the Council has had no direct involvement. It was promoted by the school primarily for the benefit of learners who lived outside of the school's catchment area, who were not entitled to the Council's free school transport.

However in 2014, the Council did express concern to the school following the receipt of complaints from concerned parents that issues of overcrowding on the trains and the station platforms were possibly being exacerbated by some pupils, who were in receipt of free school transport on the Council's contracted services, choosing instead to use the train. The Council operates a strict "no pass no travel" policy on its contracted transport and it was therefore suggested that it might be appropriate for the school and the train operator to put in place some form of entitlement control for the arrangements that they had put in place.



I would also add that in May 2016, the Council's Integrated Transport Unit was approached by a number of parents, Councillors and the local MP, all of whom were attributing the Arriva Trains Wales announcement that it was replacing free train transport with a chargeable Educational Season Ticket to the Council's withdrawal of funding from school transport. However it was easy to see how this conclusion had been reached, as the train operator was claiming that "The increase in pupils travelling (by rail) is partly a consequence of the local authority reducing road transport subsidy to local families...." This statement was totally untrue. There had been no change in the Council's funding in this area, nor in its school transport provision, and although it had been under review during the spring / summer of 2015, the ongoing, unchanged provision was confirmed on 16 March 2016.

This provision, which continues to be predicated on one of the most generous eligibility criteria in the country, forms part of the largest school transport operation in Wales. Sufficient capacity is provided on the contracted school buses for the 415 pupils who live within the Treorchy Comprehensive School catchment area and who are two miles or more from school. The rail arrangements therefore remain a matter for the school and the train operator.

I trust the foregoing is of assistance in clarifying the Council's position.

Yours sincerely,

Chris Bradshaw
Chief Executive



Agenda Item 3.7

P-05-770 Reopen Crumlin Railway Station

This petition was submitted by Michael Davies, having collected 208 signatures online.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to reopen Crumlin railway station. We believe Crumlin could be a significant public transport hub. Its key location would provide the main multi-modal interchange point between the enhanced Ebbw line rail services and the main mid-valley Regional Bus Rapid Transport route. The site for the station has good access to the main highway network, a substantial car park and space for buses. Long distance walking and cycling routes are accessible from the site. We note that Crumlin has a street with the poorest air pollution outside London and that improving public transport links is necessary to improve public health. We urge the Welsh Government to assess the case for reopening a railway station in Crumlin and to consider adding it to the next priority list of proposals for new stations in Wales.

Assembly Constituency and Region

- Islwyn
- South Wales East



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05- 770
Ein cyf/Our ref KS/03559/17

David John Rowlands AM
Chair - Petitions committee.

government.committee.business@wales.gsi.gov.uk

25 October 2017

Dear

Thank you for your further email of 5 October regarding Petition P-05-770 to reopen Crumlin Railway Station.

I appreciate you providing the latest comments from the petitioner.

When Crumlin Station is taken through the Stage 2 assessment process we will consider the additional information provided by Councillor Mike Davies as part of that process.

My officials are open to receive further local views as the Stage 2 exercise progresses and when appropriate, will liaise with Councillor Davies.

Ken Skates AC/AM
Ysgrifennydd y Cabinet dros yr Economi a'r Seilwaith
Cabinet Secretary for Economy and Infrastructure

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400
Gohebiaeth.Ken.Skates@llyw.cymru
Correspondence.Ken.Skates@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Agenda Item 3.8

P-05-774 Pass Wide and Slow Wales

This petition was submitted by Jocelle Lovell, having collected 723 signatures online and 1,032 on paper – a total of 1,755 signatures.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to implement an annual ‘public education’ road safety campaign to educate all road users how to pass horses and riders safely, and one that highlights the dangers/consequences of not doing so. We are aware of, and support, a UK wide petition that is campaigning to make it law to pass horses wide and slow (<https://www.change.org/p/uk-govt-make-it-law-to-pass-by-a-horse-wide-and-slow-and-abide-by-our-hand-signals>), but would prefer to see education and prevention rather than prosecution after a serious or fatal incident had occurred. Welsh Government has the opportunity to capitalise on the materials and information already available from existing campaigns such as; the British Horse Society’s road safety campaign Dead Slow (<http://www.bhs.org.uk/safety-and-accidents/dead-slow>), whilst emphasising particular issues facing Welsh road users. These include the close links between urban and rural communities in Wales, and the popularity of Wales as a tourist destination. In more urban communities (e.g. the commuter belt around Cardiff), there is a volume of traffic using country lanes, either as a short cut or main access route. In other parts of Wales (e.g. Carmarthen and Pembrokeshire) there is an annual influx of holidaymakers with little experience of encountering horses on the roads. All we ask is that drivers, recognise horse riders as vulnerable road users, and be more considerate when passing horses. We feel the best approach to achieving this is by the Welsh Government taking a lead, in line with their commitment to 'Work with representatives of the horse riding community to understand their road safety concerns and facilitate engagement with other partners.' (Welsh Government Road Safety Framework (July 2013)).

Additional information:

The British Horse Society (BHS) estimates the economic value of the horse industries across the UK to be worth £7 billion, and to employ 220,000 – 270,000 people. This, alongside, the health and wellbeing benefits associated with horse riding make it an important part of Welsh life. But,

increasingly, if feels that the voice of equestrians is not being heard. Many equestrians would rather not ride on public highways, but as the availability of accessible bridleways varies across Wales, we often have little choice. Welsh Governments Road Safety Framework (July 2013) recognises that horses and their riders (as well as carriage drivers) are vulnerable on the road network, and that a collision between a horse and a vehicle can have life threatening consequences for the horse, rider and those in a vehicle. It also states that there is evidence to suggest that the number of road traffic collisions involving horses is underreported. As the number of new houses being built in rural/semi rural locations increases, it brings with it an increase in the volume of traffic, on country roads that are frequently used by farm machinery, horses and riders. Many drivers, new and experienced, are often unaware of the potential dangers of driving fast on these roads, and many do not know how to pass horses safely. Just because the legal speed limit on these roads is 60, does not mean it is safe to drive at that speed. Furthermore, evidence from the BHS (<http://www.bhs.org.uk/our-charity/press-centre/news/jan-to-jun-2016/riding-and-road-safety-campaign>) shows that there is an increase of incidents involving horses, riders and motor vehicles in June. Although the reasons for this increase remain unclear, there is a potential correlation with holidaymakers driving on unfamiliar roads in unfamiliar circumstances.

Assembly Constituency and Region

- Cardiff South and Penarth
- South Wales Central

Ken Skates AC/AM
Ysgrifennydd y Cabinet dros yr Economi a Thrafnidiaeth
Cabinet Secretary for Economy and Transport



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-774
Ein cyf/Our ref KS/03853/17

David John Rowlands AM
Chair - Petitions committee.

government.committee.business@wales.gsi.gov.uk

6 November 2017

Dear David,

Thank you for your letter of 18 October regarding P-05-774 Pass Wide And Slow Wales.

My Officials continue to have regular contact with the British Horse Society in Wales and will work with them to support their campaigns as appropriate.

Yours ever,

Ken Skates AC/AM

Ysgrifennydd y Cabinet dros yr Economi a Thrafnidiaeth
Cabinet Secretary for Economy and Transport

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Ken.Skates@llyw.cymru
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Briefing Note – British Horse Society

The safety of horses on the roads – The Dead Slow campaign

Response to Petition P-05-774 Pass Wide and Slow - Wales

Background

The British Horse Society is the largest equestrian charity in the UK. One of our charitable objectives is to promote and advance the education, training and safety of the public in all matters relating to the horse.

There are 2.7 million riders in the UK, 1.3 million ride regularly. Horse riders represent a significant group of vulnerable road users. Despite this horse riders have received little attention in terms of academic research and transport policy.

The British Horse Society launched a Horse Accidents website in November 2010. To October 2017 there have been 134 reports of road incidents involving horses in Wales reported to us. The incidents include any near miss or collision with a horse. This is the tip of the iceberg, as the vast majority of incidents go unreported.

Since the start of horseaccidents.org.uk there have been reports of 1 rider killed, 32 riders have been injured, 9 horses killed or euthanized because of their injuries. 30 horses have been injured.

80% of these incidents have been where the vehicle has passed too close or too fast to the horse.

In March 2016, the British Horse Society launched the Dead or Dead Slow campaign on national TV. This is a campaign to educate drivers and influence their behaviour on how to pass horses safely.

The four Dead Slow messages are:

When passing horses:

Slow down to a maximum of 15 m.p.h

Be patient, don't sound your horn or rev your engine.

When safe to do so, pass the horse wide and slow, at least a cars width.

Drive slowly away.

To date the British Horse Society has;

- Had meetings and interest from Welsh Assembly Members and Westminster MPs.
- Met with the National Police Chiefs Council Lead on Road Policing, as a result content from our Dead Slow campaign will be included in relevant NDORS Courses.
- Met with the Strategic Roads Policing Group for Wales.
- Involved with Operation Snap in Wales, and will be presenting at its launch in Cardiff in December.
- Presented at the Megadrive event in Cardiff in October.
- Formed a partnership with the Driving Instructors Association and IAM Roadsmart. (Dead Slow won the DIA- Driver Education Campaign of the Year 2106)
- Formed partnerships with other vulnerable road users (Cycling UK and the Motorcycle Industry)
- Trained the driver trainers for Ocado.com, DHL, Morrisons and Stagecoach.
- Met with the UK Governments DfT , 'Think' campaign team. The 'Think' logo has been used on the BHS' Dead or Dead Slow marketing materials and, on a joint awareness video showed on TV and in cinemas. Launched a video with the Think Campaign DfT.
- Worked with various Police Forces around the UK, specifically Operation Considerate in GMP, Operation Spartan in North Yorkshire and Op Snap in Wales to facilitate the submission of head-cam footage of vehicles passing too close or too fast when passing horses.
- Met with the DVSA to discuss increasing the hazard perception content (horses) of the driving test.
- Horse rider awareness through a series of rider responsibility events. The latest event in North Wales in October had over 60 riders attending.
- Publicity and awareness of the 'BHS Ride Safe' education programme.
- Driving awareness through a PR campaign and presentations to driving groups..

Objective

The British Horse Society aims to change driver's attitude and behaviour when passing horses on the road.

Drivers often have good intentions when passing horses but are unaware of what speed or at what distance they should pass the horse. They are unaware of how quick a horse can move. They are unaware that a horse is a flight animal and how it may react to a fast moving car. They are also unaware of how much damage a horse can do to a vehicle notwithstanding the injuries a horse may receive.

The British Horse Society does not believe legislation regarding obeying horse riders hand signals and giving an enforceable speed limit when passing horses is the answer. It would cause an already stretched police force greater enforcement challenges. This would also alienate many drivers who just need to be educated about horse's behaviour and the challenges horse riders face.

The British Horse Society would support a reduction in speed limits on specific rural roads where horses have to use the roads from 60 mph to 40 mph.

The British Horse Society actively campaigns to increase safe off road riding. We campaign for all new routes to be truly multi user and to include horse access.

To drastically reduce the number of horses and riders involved in road incidents we ask that:

Section 215 of the Highway Code is amended and strengthened.
Greater emphasis on driver education - how to pass horses safely.
Horse riders educated about their responsibilities on the road.
More safe off road access.

November 2017

Alan Hiscox. Director of Safety. British Horse Society.

Jan Roche. National Manager for Wales. British Horse Society.

P-05-774 Pass Wide and Slow – Correspondence from the petitioner to the Committee, 15.11.17

David John Rowlands AM

Chair – Petitions committee

14 November 2017

P-05-774 Pass Wide and Slow Wales (PWASW)

Dear David Rowlands,

Thank you for allowing us to respond to the communications you have received from both The British Horse Society (BHS) and Ken Skates Cabinet Minister for Economy and Transport.

PWASW endorses, supports and promotes the good work that has and is being done by the BHS, to change driver's attitudes and behaviour when passing horses on the roads. In particular we would welcome any moves towards:

- 1) Reducing the speed limit from 60mph to 40mph on rural roads that horses use;
- 2) Increasing the provision of off road riding and carriage driving;
- 3) Increasing driver awareness around horses, delivered through an annual education campaign that targets all ages;
- 4) Strengthen and amend section 215 of the Highway Code.

Even whilst all this good work has been taking place another, horse and rider, were hit by a car. Thankfully the rider (Bethan Williams aged 15) was unharmed but the same cannot be said for her horse. Bethan, tells her story below:

"I was returning from a ride on 22nd Oct, and whilst on Wick Road, Ewenny, I had stopped to talk to a friend who was walking. A car came down the hill very fast (but not speeding as the lane is national speed limit) and hit the rear end of my horse. I was thrown off and my friend had to jump in to a hedge to avoid being hit. The impact ultimately killed my horse due to severe tissue damage sustained. The driver stated that she did not see us due to the sun restricting her vision. The road where the incident happened is popular with horses, cyclists and walkers so my family and I feel that she simply should not have been going at such speed if her vision was impaired. I am constantly reminded of how lucky I am to be alive. Because, had I, fallen off the horse on to the road, I would have been struck by the car. This is a mental trauma that no one should have to suffer especially a child like myself"

Everybody has a right to use the public highways and when doing so to be safe whether that be, on foot, on horseback, driving a horse and carriage or cycling. Equally, we (vulnerable road users) have a responsibility to make ourselves as visible as possible to other road users. We do not believe that what has been done to date has had enough coverage to make a real difference, and we still believe that Welsh Government have a pivotal role to play in ensuring our safety.

Therefore we are calling on Welsh Government to utilise (or enable appropriate bodies, by making available the resources) the Dead Slow campaign materials, make them appropriate to Wales (bilingual) and run on an annual basis. Including; more mainstream media channels including TV primetime.

We maintain what we set out in the petition (supported by the BHS response) its about educating drivers. The BHS cannot do this alone, so we need to see more resources made available to ensure the message reaches audiences of all ages and at appropriate viewing times.

We are really encouraged by the work of the South and North Wales police forces and the GoSafe partnership in creating Operation SNAP making it easier for people to submit video footage of road incidents, and following its launch we will be promoting it to the riding community via social media.

Horse riding has so many positive benefits including:

- 1) Improving peoples mental, and physical health and wellbeing
- 2) Encourages people to spend more time outdoors and in the countryside
- 3) Contributes to the Welsh economy – the estimated annual cost of keeping a horse is £3,105.

The Welsh Governments own act ‘The Wellbeing of Future Generations’ (2015) sets out the need for public bodies to think in a more sustainable way; think about the long term, work better with people, communities and each other, to prevent problems, take a more joined-up approach. It will expect public bodies to take action to try and stop problems getting worse – or even stop them happening in the first place.

Unfortunately when it comes to horse rider and carriage driver safety the roads seem to be getting worse. Sian Vesey talks below about an incident involving her daughter and horse in 2011.

'My daughter and her friend were making their way back from pony club (accompanied by an adult) when a young inexperienced driver in a heavy goods type vehicle drove past too closely. The events that unfolded were horrific and resulted in the tragic loss of a much-loved pony. The aftermath was devastating for all involved and the pony suffered whilst the vet struggled to make her way through heavy traffic to get to the scene of the incident. Thankfully my daughter was uninjured, but the events of that day will stay with us and others involved forever'

PWASW believe that horse riding supports the following three aims of the act:

A healthier Wales – A society in which people's physical and mental wellbeing is maximised and in which choices and behaviours that benefit future health are understood;

A more equal Wales – A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances);

A Wales of vibrant culture and thriving Welsh language – A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

Therefore are calling for a joined up approach between public, private and third sector bodies to make the roads in Wales a safer place for horses and riders (along with other vulnerable road users).

Yours sincerely

Jocelle Lovell

Rachel Francis

Ulrike Smalley

Angela Baker

Agenda Item 3.9

P-05-775 Put an End to the Cross Border and Sub-contracting Taxi Licensing Loophole.

This petition was submitted by Taxi Drivers of Cardiff, having collected 390 signatures online.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government, in the context of its consultation into the reforms of the taxi licensing laws, to put a stop to the 'cross border' and 'sub-contracting' loophole in the law which means hundreds of out of town taxis and private hire vehicles descend on Cardiff to work Private Hire.

Additional information:

There are enough Cardiff licensed vehicles to cover the City without the need for these cars from as far afield as London, Merseyside, the Midlands etc. As well as from neighbouring authorities like Newport, the Vale and RCT etc.

There have even been vehicles not working on any platform, illegally plying for hire, hiding behind the fact so many 'alien' cabs are in the City.

Many of these vehicles have NO markings on them, making a mockery of the standards set by Cardiff County Council for vehicles licensed by themselves, including highly visible livery and local street knowledge. Alas it will be only matter of time before a vulnerable person jumps into a non licensed car with catastrophic results.

We urge the Welsh Government to ensure that the only Taxis and Private Hire vehicles allowed to work in Cardiff are those licensed by Cardiff County Council. This is to ensure public safety and to ensure that Cardiff isn't saturated with even more cars than what is needed which if allowed to continue will see even more congestion and pollution in our Capital. It will also give existing drivers licensed by Cardiff a chance to earn something approaching a living wage.

Assembly Constituency and Region

- Cardiff South and Penarth
- South Wales Central



Eich cyf/Your ref P-05-775
Ein cyf/Our ref KS/03844/17

David John Rowlands AM
Chair - Petitions committee.

government.committee.business@wales.gsi.gov.uk

6 November 2017

Dear David

Thank you for your further letter of 24 October regarding Petition P-05-775, calling on the National Assembly for Wales to urge the Welsh Government to put a stop to the 'cross border' and 'sub-contracting' loophole in the law which means hundreds of out of town taxis and private hire vehicles descend on Cardiff to work Private Hire.

I appreciate you providing the further information you have received from the taxi drivers of Cardiff in support of their petition. The examples depicted in the paper set out some of the practices that are taking place in Cardiff and are further evidence that reform of the law governing the licensing of taxis and private hire vehicles is overdue.

My officials are assessing the responses received during the public consultation that ended on 8 September and I will be publishing a summary outcome report by the end of December.

Yours ever,

Ken Skates AC/AM
Ysgrifennydd y Cabinet dros yr Economi a Thrafnidiaeth
Cabinet Secretary for Economy and Transport

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Since the initial meeting of the Petitions Committee we have received replies to enquiries concerning Intended Use Policy and Cross Border hiring from Rhondda Cynon Taf and Newport City Licensing Departments. Intended use is when a council asks an applicant where they intend to use their taxi, if they state that it's predominantly away from that licensing area the council in question would refuse the application.

The two Authorities in question are responsible for the highest number of cars working predominantly in Cardiff

Their replies highlight the urgent need to put a stop to Cross Border hiring.

Rhondda CynonTaf confirmed that they currently operate an Intended Use Policy and that they have recently undertaken a joint exercise with Cardiff County Council Licensing Officers.

The following is an extract from the email received from RCT

"I can confirm that Rhondda Cynon Taf County Borough Council currently operate an "Intended Use" policy which states that Hackney Carriages licensed with this Authority would be expected to trade primarily within the area of Rhondda Cynon Taf.

However, as a result of complaints concerning drivers of RCT licensed vehicles plying for hire in the area of Cardiff, Licensing Enforcement Officers have recently carried out joint enforcement exercises with their Cardiff counterparts.

Regarding instances where complaints have been received concerning a specific vehicle, enquiries have been made with the proprietor's insurance provider to bring this matter to their attention."

As can be seen from the email RCT Council acted on receipt of complaints received so have obviously accepted that there is a problem. Whilst they have informed Insurance Companies of the situation they do not appear to have taken any direct action to suspend or revoke licenses.

Latest information shows that 77 RCT Vehicles were licensed at a Cardiff address. Averaging out the annual cost of a drivers badge and taxi plate at £187 per car based on current RCT charges this results in income of £14,399 paid to RCT from cars registered to Cardiff addresses.

Newport City Council have informed us that they do not operate an Intended Use Policy in any form. This has obviously had a huge part to play in the unbelievable number of Newport cars working predominantly in Cardiff as it has created a free for all.

The following is an extract from the email received from Newport City Council Licensing :

"Afternoon,

Newport City Council does not currently have an 'Intended Use Policy', we view a 'Intended Use Policy' does not work in practice as we have multiple operators who complete work outside the borough, example of this would be airport contracts and school contracts, most of which are not completed in area. We understand that some boroughs have implemented this policy to prevent companies like Uber operating. In theory this could be implemented, in practice this would unfairly penalise and place unfair restrictions on operators.

Best Regards,

Mr Llyr Roberts

Swyddog Trwyddedu/ Licensing Officer

This response was extremely worrying for a number of reasons: They have not grasped the concept that if a journey were to start or finish inside their Licensing Area that wouldn't infringe any Intended Use Policy. Also of concern is that they have seen fit to actually name Uber and made vague accusations that other authorities have implemented Intended Use Policies to prevent Uber from operating. Surely there is no unfair penalty to any Bona Fide Operator whose business is based in Newport and whose cars operate predominantly within the area.

Maybe there is a clue in the fact that latest figures show 122 Newport Licensed cars registered to Cardiff postal addresses. That figure will significantly grow due to the fact that Newport are currently experiencing a huge amount of applications for licenses, so much so that due to the high demand the next available knowledge test to obtain a Newport license is the end of January 2018.

Using the current figures the income from a drivers badge and plate is £249 per car per annum. A total of £30,378 collected from Newport plated cars registered in Cardiff.

Therefore it can be seen that, as well as being a problem for Cardiff drivers who find their work being eroded by out of town cars, RCT and Newport Councils benefit financially to the detriment of Cardiff.

When adding Merthyr (at last count 15) and Transport for London (at last count 74) to those from RCT and Newport there are 288 "out of town" cars registered to Cardiff addresses. At current rates the cost of a drivers badge and taxi plate in Cardiff is £135. So Cardiff County Council are missing out on £38,880 that they would have collected had the cars been licensed in their home area.

These are figures from just four authorities, and where the license holder actually resides in Cardiff. There are, no doubt, many more drivers that actually live in the area that they are licensed yet travel to Cardiff to work. Equally there are other authorities cars that are frequently seen working in Cardiff, further depressing the earning potential of local drivers in what is already an area with severe vehicle overcapacity.

Other Councils are therefore reaping the financial benefits of licensing cars whilst not having to fund the regulation of the vehicles.

Cardiff on the other hand is losing a substantial sum of money and having to deal with the problems associated with large numbers of out of town cars.

As we stated in our first response we don't want this to be an 'anti-Uber' rant, we welcome the competition another operator brings to the City, it also offers local drivers more choice with another operator BUT there's no disguising the fact that it is Uber that primarily take advantage of the cross-border and sub-contracting loophole in the law. We brought this petition because of the legislation that allows Uber to work in the way they do.

TAXI DRIVERS of CARDIFF

P-05-778 Protect the Razor Clams on Llanfairfechan Beach

This petition was submitted by Vanessa L Dye, having collected 225 signatures online and 234 on paper – a total of 459 signatures.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to:

- commission a research study to ascertain the state of the health of the razor clam beds and their viability as a long term natural resource, and put in place a moratorium for fishing of razor clams until the research can report its findings;
- ratify a 'closed' season for the harvesting of razor clams aligned to the spawning season i.e. May to September;
- draw up regulations in addition to the minimum landing size of 10cm to include set quotas that individuals are allowed to take; and
- bring forward legislation and regulations to protect the razor clams on Llanfairfechan beach.

"The mass harvesting of razor clams on Llanfairfechan beach has been a matter of concern for many residents and conservationists for a number of years." (Ref: letter to Cabinet Secretary Lesley Griffiths AM from Janet Finch Saunders AM 28th July 2017.

Currently the only regulatory control on razor clams is that they must have a legal minimum landing size of 10cm, and there are checks relating to the control of clams ending in the food chain. Many residents are concerned about the apparent lack of procedures and/or regulations governing the taking of razor clams particularly in respect of designating a 'closed' season during spawning, quotas allowed, and the need for research evidence to be conducted on the razor clams to ascertain the impact on the local environment and ecosystem.

Since 2013 it has been noted by several sources that razor clams are being harvested in great numbers from Llanfairfechan beach. Evidence to support this claim has been documented on numerous occasions on social media. A recent request on the Llanfairfechan Noticeboard for any pictures or video footage of those gathering the razor clams clearly shows that there are large numbers of people involved in this activity. The gathering of the razor clams generally takes place after a high tide.

Additional information:

Just to provide some historic background about this issue. In 2013 the harvesting activity was brought to light by the Weekly News newspaper by Tom Davidson when it was noted that there was “A gang of more than 100 people harvesting huge amounts of razor clams.....” There were also concerns that illegal workers were being exploited and that the clams were being fished for commercial purposes. At the time, one resident said “they had seen similar scenes involving an increasing number of gatherers over the last few weeks. Residents are angry at the sheer number of harvesters with fears the local habitat could be damaged irreparably, with hundreds of clams taken off the beach regularly.” Whilst fears about the gatherers being used as part of modern slavery and the shellfish ending up in the food chain have been allayed by the ongoing efforts of the police and Food Standards Agency. The environmental consequences of this sustained and systematic removal of razor clams remains a major issue, which may impact on the other marine and bird life within the area, along with causing possible changes in the density of sand on the beach. There are some fears regarding the sand being unstable in places and people unfamiliar with the beach could easily get into difficulties e.g. some gatherers harvest the clams some distance away from the safety of the land. It has been quite disempowering and frustrating for ordinary citizens to watch the pillaging of an environmental resource and question why organisations who's remit is to protect the environment appear to be hamstrung because of the lack of appropriate procedures/laws. This is surprising given that Llanfairfechan beach is designated as a Special Scientific Interest (SSSI), Special Protection Area (SPA) and Special Area of Conservation (SAC). 2013. Surely there must be regulations within these bodies of knowledge to tap into as a source to protect this imbalance in such an ecosystem?

Assembly Constituency and Region

- Not provided

Lesley Griffiths AC/AM
Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-778
Ein cyf/Our ref LG/02476/17

David John Rowlands AM
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

government.committee.business@wales.gsi.gov.uk

29 October 2017

Dear David

Thank you for your letter of 18 October, regarding P-05-778, Protect the Razor Clams on Llanfairfechan Beach.

The Welsh Government have commissioned a study to investigate the biology and ecology of razor clams in Wales in order to determine the most effective inter tidal and at sea stock assessment techniques. This work will be completed by 31 March 2018 and its recommendations will be used to plan a stock assessment survey of razor clams in early spring 2018. I will forward the committee a copy of the report together with the plans for the stock assessment survey.

Following the closure of the fishery on 18 August 2017, the Welsh Government's Marine Enforcement Officers have been present at Llanfairfechan during every suitable tide for razor clam gathering. My officers have provided information and guidance to members of the public on the beach and have seen no razor clams removed from the beach.

Regards
Lesley

Lesley Griffiths AC/AM
Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Lesley.Griffiths@llyw.cymru
Correspondence.Lesley.Griffiths@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

P-05-778 Protect the razor clams on Llanfairfechan beach – Correspondence from the petitioner to the Committee, 9.11.17

Dear Kayleigh,

Thank you for the attachment. It is pleasing to note that some research is taking place in respect of the health and stock of the razor clams on Llanfairfechan beach. Currently there is a ban for harvesting the clams until 31st December this year. Will this ban be extended until the completion date of the survey? I would also question the statement that no clams were taken after the closure date (18th August) as is noted in the original 'supporting notes' sent to you prior to the petition committee's first meeting. There is evidence (On facebook – Llanfairfechan Noticeboard group) that clams were indeed taken after 18th August.

Many thanks once again

Yours sincerely,

Vanessa L Dye(Mrs)

P-04-628 Access to BSL for All

Petition wording

We call on the National Assembly for Wales to urge the Welsh Government to improve access to Education and services in British Sign Language to improve the quality of life for Deaf people of all ages.

Improve Access for families to learn BSL: When a child is diagnosed as being Deaf/hard of hearing parents should be offered free/subsidised BSL lessons (BSL level one costs approximately £300 per person). By using speech alone, Deaf children struggle/fail to develop communication skills missing important milestones. Learning other languages through BSL (English/Welsh) will improve the child's understanding and comprehension.

Introduce BSL on the National Curriculum: Deaf Children and young people who are taught BSL at an early age will have better access to their education and an improved wellbeing. BSL should be available in schools and taught by qualified Deaf teachers, for all to learn as this would achieve better access for all in society. We believe that BSL should be offered as a language for all learners as a qualification. GCSE Welsh (and other modern languages) are not always offered to Deaf students: this also needs to be improved.

Improving access to Education in BSL for Deaf Children and Young People: currently they have limited access to Education in BSL, and often experience under qualified support. There is a massive gap in the education of Deaf children, as many are wrongly treated as having a Learning Disability. This has a negative impact on their development in life, reducing independence with poor education, resulting in under-employment. They need adequately qualified Communication Support Workers available in school.

Making Services and resources accessible in BSL for Deaf young people: enabling BSL users to access information in their preferred language via digital resources to services such as Education, Health care, Social Services and public transport, giving them equality to access as an equivalent to Welsh Language access.

Organisation: Deffo!

Lead petitioner: Cathie Robins-Talbot

First considered by the Committee:

Number of signatures: 502 online signatures. 660 paper signatures . total
=1162 signatures

Ein Cyf /Our Ref:
Dyddiad /Date:
Llinell uniongyrchol/Direct line:
Ebost/Email:

ST/ British Sign Language
7th November 2017
02920 468600



David J Rowlands AM
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Rowlands,

P-04-628 To improve access to Education and services in British Sign Language

Many thanks for your recent inquiry regarding improved access to education and services in British Sign Language to improve the quality of life for deaf people of all ages and apologies for the time taken to respond. As you know, the WLGA does not hold information on this issue centrally but we have liaised with all 22 local authorities in Wales and sought their views.

Our understanding is that there is a significant amount of support provided by authorities to deaf children and young people but as always there are funding and capacity issues. The lead teachers of the deaf meet on a regular basis, across the regions and also nationally, to share best practice and promote consistency. The Association of Directors of Education ADEW also has a subgroup for Sensory Impairment Services which includes the service leads from all local authorities across Wales and authorities work with the British Association of Teachers of the Deaf (BATOD) through BATOD Wales. In many areas there are also very effective links with the National Deaf Children Society Cymru who can offer family sign language training sessions designed specifically for families with deaf children under five. This is relevant as BSL classes that lead to accreditation tend to focus on adult themed vocabulary and not what is needed for a child. These fora might be better placed to help the Petitions Committee with its inquiry and provide further information about provision. I am happy to provide further contact details if required.

As indicated, I am also aware that there are capacity issues and funding challenges for authorities. The ideal would be to deliver the curriculum and social opportunities using BSL as the medium of teaching, learning and interaction. This would require subject specialists who use and teach through BSL and a much wider deaf peer group and deaf role models to support social and emotional development. Very few authorities are in a position to deliver this level of service. As a consequence, some authorities support requests from deaf young people and their families for specialist residential placements at for example the Exeter Academy for the Deaf; Mary

Steve Thomas CBE
Prif Weithredwr
Chief Executive

Cymdeithas Llywodraeth
Leol Cymru
Tŷ Llywodraeth Leol
Rhodfa Drake
CAERDYDD CF10 4LG
Ffôn: 029 2046 8600

Welsh Local Government
Association
Local Government House
Drake Walk
CARDIFF CF10 4LG
Tel: 029 2046 8600

wlga.cymru
wlga.wales

@WelshLGA

Croesawn ohebiaeth yn y Gymraeg a'r Saesneg a byddwn yn ymateb i ohebiaeth yn yr un iaith.

Ni fydd defnyddio'r naill iaith na'r llall yn arwain at oedi.

We welcome correspondence in Welsh and English and will respond to correspondence in the same language.
Use of either language will not lead to a delay.

Hare School; and Hamilton Lodge Brighton. There are again resource implications to this provision and it means children and young people being educated away from their locality.

Other issues of concern raised with us include, access to BSL tutors and funding to support training and competency levels for staff. It takes at least three years to take a member of staff to BSL Level 3, which is the level NDCS would recommend staff working with children who have BSL as a first language require in a school setting. It is argued therefore that there needs to be a long term approach to developing staff skills. It's very difficult to advertise and quickly source a teaching assistant with Level 3 BSL. As a consequence, services tend to look to develop their own capacity internally. The number of qualified BSL tutors able to provide training appears to be problematic at a UK level.

Another concern relates to the importance of using language in a social context is the same for BSL users. If a child is the only BSL or sign user in a school and the only other person who signs is the adult teaching assistant then, it is a challenge to support effective inclusion in all aspects of school life. Providing peer sign language clubs and groups in these contexts is vital, but finding people who can provide them in schools can be difficult. Developing the awareness of BSL thorough afterschool clubs also supports the status of BSL as a language in its own right.

Some authorities have suggested that a specialist school for the Deaf within Wales might be considered to meet the needs of this group of learners and that although this approach might not seem very inclusive, it might be the only way of delivering the curriculum effectively through BSL.

Yours sincerely



Steve Thomas CBE
Chief Executive



The voice for Youth Deaf Youth in Wales

Deffo!
c/o Swansea Deaf Centre
Neath Road
Hafod,
Phone: 01792 641786
Mobile: 0779407576
E-mail: deffocymru@gmail.com
Web site
www.swanseadeafcentre.org.uk
Deffocymru@gmail.com

15th November 2017

Dear Mr Rowlands,

Subject: Response to the letter issued from the WLGA

We were greatly disappointed having watched the most recent Petitions meeting that was held last week. We have watched all of the meetings that have taken place (we have had them translated them into BSL for us to access) discussing the petition submitted by Deffo! The petition was submitted back in 2015 by a group of young people, coming together as Deffo! keen to make a big difference to Deaf Children and Young People's experience in the Education system.

Since Deffo! was formed in 2006, we have had four meetings with the Minister for Education, two with Jayne Hutt and two with Jane Davidson. During the period since we have submitted the petition, there have been two elections, two different Ministers that have met with us and now a third in post, a lot of discussion and evidence gathering sessions from Deffo! and Alun Davies, and now a report from the WLGA. We now hope that the WLGA are able to move the actions forward.

Huw Lewis has made many responses (yet never met with us), whereas Alun Davies has met with us and parents here in Swansea and other locations, on two occasions. The Children's Commissioners' annual report also highlighted that Deaf children are being failed in education and has called on the Welsh Government to do something about it. The Children's Commissioner has met with a number of Deaf families to hear their concerns.

We are aware that there are capacity and funding issues and this is a constant battle that is faced by parents who want their children to receive a good educational service in BSL, but there are a lack of placements and not enough provision.

The letter from WLGA mentions BATOD and the National Deaf Children's Society. Deffo! would like to know what the views of BATOD are on BSL being taught in schools, as many members / Teachers of Deaf Children only have a minimum of Level 1 BSL themselves. The NDCS are providing training sessions in Family Sign Language and it may be true that some vocabulary is different for babies and small children however, the parents need to be in advance of their children's language learning to be able to maintain, develop and also stretch their children's communication and language development.

Talking Hands Charity, based in Swansea, is supporting their families and Deaf young people by helping to fund accredited BSL classes that are being run at the local Deaf centre. They have had a great number of parents, grand parents and young people taking up the offer of support and learning the language gaining recognised accreditation for their achievements. The Deaf Centre themselves have also tried to access funding streams to support families on low incomes / unemployed, to access financial aid to help fund these Nationally Accredited BSL Courses. One place on the course starts from £300 but the funding has been rejected as they have been told that money for adult education lies with lifelong learning? These parents and family members need the financial backing now to enable them, especially parents, to communicate more effectively with their own children.

It is positive that the WLGA are looking at this and they have even made the suggestion that the only way to resolve this is to establish a school dedicated to the education of Deaf Children. This, even if it happens is going to take time, so we would strongly urge the Minister for Education to put BSL on the National Curriculum for all children to learn it from primary age through to College. It would also be useful if Welsh Universities would follow in the footsteps of UCL London in accepting BSL as a modern foreign language, to raise awareness and encourage access to the language.

We agree with the need to implement a long term strategy to encourage Deaf people to come forward to train as teachers / tutors and would like to extend that further and encourage schools to employ Deaf people in roles that will provide mentoring and positive role modeling for Deaf children.

There are clubs for Deaf children young people and families, but support is needed to enable access to these, as transport is one of the biggest issues that prevents the open access of these clubs. Training is also required for the staff to develop their skills, to enable quality services to be delivered and maintained.

We welcome the WLGA's report which in a way sounds depressing but on the other hand raises the very real problematic issues that this petition is highlighting. Big organisations have their roles, but it is vital that the small clubs and groups *already offering support*, mentors and role models to the families also need to be recognised for the work and contribution that they are already doing.

We thank you for the opportunity to respond and look forward to the next Petitions Committee sitting to see where we go next .

On Behalf of Deffo!

Regards
Cathie Robins - Talbot

Agenda Item 4

P-05-736 To Make Mental Health Services More Accessible.

This petition was submitted by Laura Williams, which collected 73 signatures.

Text of the Petition

To make mental health services more accessible the Government should ensure that no-one who approaches a mental health service should be turned away without help. Anyone who goes to their GP or any other health care professional who is experiencing a mental health problem should be automatically referred to the crisis team who should act immediately. The onus should not be on the individual to contact the Crisis Team on their own. There should also always be a one to one therapy option, rather than group therapy.

Many people will know I haven't had an easy time with life or with mental illness; I suffer with depression, anxiety, PTSD and OCD. Recently, I've hit rock bottom and have screamed for help but have been let down by mental health services who I thought would help, instead they have let me down majorly.

I want my experience to help others around Wales and to get the help they need.

Assembly constituency and Region.

- Cardiff West
- South Wales Central

Document is Restricted

Agenda Item 7

P-04-564 The Restoration of Inpatient Beds, Minor Injuries Cover and X-Ray Unit to the Ffestiniog Memorial Hospital

Petition wording:

Until the Health Minister has had time to consider Prof Marcus Longley's recommendations on rural healthcare in Wales – a study that was commissioned by the Minister himself in January of this year – we, the undersigned, call on the National Assembly of Wales to urge the Welsh Labour Government to delay decision on Betsi Cadwaladr University Health Board's Business Case aimed at downgrading our Memorial Hospital to a mere 'Memorial Centre'.

Petition raised by: Geraint Vaughn Jones

Date Petition first considered by Committee: 17 June 2014

Number of signatures : 2,754

Document is Restricted