

Agenda – Petitions Committee

Meeting Venue:

Committee Room 3 – Senedd

HYBRID

Meeting date: 10 October 2022

Meeting time: 14.00

For further information contact:

Gareth Price – Committee Clerk

0300 200 6565

Petitions@senedd.wales

1 Introductions, apologies, substitutions and declarations of interest

(Pages 1 – 34)

2 New Petitions

2.1 P-06-1232 Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved

(Pages 35 – 46)

2.2 P-06-1286 To ensure treatment and screening for cancer continues during COVID19

(Pages 47 – 52)

2.3 P-06-1289 Agree 105 day occupancy, not 182 days, to distinguish holiday let businesses from second homes

(Pages 53 – 72)

https://www.wta.org.uk/uploads/8/3/7/1/83716138/ukh.wta.pasc_boe_1500_080422f.pdf

2.4 P-06-1290 Enable Welsh residents to access an NHS "Right to Choose" diagnosis pathway for ADHD

(Pages 73 – 79)

2.5 P-06-1292 Make Welsh public sector organisations report scope 3 emissions and include them in net zero targets

(Pages 80 – 87)

2.6 P-06-1293 Provide funding for universal access to Fracture Liaison Services (FLS)

(Pages 88 – 93)



2.7 P-06-1294 Don't leave metastatic breast cancer patients in Wales behind
(Pages 94 – 100)

<https://www.mbcwales.co.uk/open-letter>

2.8 P-06-1295 Hold a public poll on the reduction of the default speed limit
BEFORE it comes in to force
(Pages 101 – 109)

3 Updates to previous petitions

3.1 P-06-1163 Extend the postgraduate STEMM bursary to all MSc students in
Wales
(Pages 110 – 111)

3.2 P-06-1218 Notify all 18 year olds who have been under social care the right
to request their personal information
(Pages 112 – 114)

3.3 P-06-1228 Give secondary teachers a bonus for marking and standardizing
summer 2021 official assessments
(Pages 115 – 120)

3.4 P-06-1242 Improve Endometriosis Healthcare in Wales
(Pages 121 – 129)

3.5 P-06-1262 Welsh Government to hold a public inquiry into decisions taken
by them before & during the pandemic
(Pages 130 – 132)

3.6 P-06-1269 Don't let the plan run out for dying people in Wales
(Pages 133 – 137)

3.7 P-06-1271 Acquire the land from Network Rail on which ATR884 runs as a
permissive path and arrange maintenance
(Pages 138 – 140)

3.8 P-06-1272 Ban the use of 'no pet clauses' in tenancy agreements in Wales
(Pages 141 – 146)

3.9 P-06-1274 Stop the removal of the Rapid Response Vehicle for Monmouth
(Pages 147 – 162)

- 4 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting

Document is Restricted

P-06-1232: Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR21/1626-1

Petition Number: P-06-1232

Petition title: Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved

Text of petition:

There are many intensive poultry units in Wales. Powys has the unfortunate reputation of being one of the IPU hot spots. There have been 147 IPU applications granted by PCC. IPUs bring with them many issues including pollution of rivers and land, smell, ammonia, traffic, 24x7 noise and light. To many, the practice of intensive poultry production is cruel and unnecessary.

Despite many villages being blighted by these units there is still nothing being done to stop them. We need our politicians to act.

Another small village in Powys is the latest in a long line to be threatened by the building of an intensive poultry unit. This is a rural area, the roads are walked regularly by the people of the village and visitors. The landscape is stunning, there is no light pollution and the silence is, wonderfully, deafening. The River Cain runs through the Village and close to the site feeds into the River Severn.



Despite many villages being blighted by these units there is still nothing being done to stop them. We need our politicians to act. So, this petition is about getting the politicians to legislate; they have promised this for years; they accept this is a serious issue but still the legislation is missing.

A TAN (Technical Advice Note) regarding IPUs was promised in 2019. Lesley Griffiths, the Agriculture Minister has stated that something must be done, particularly with regard to the smaller units. But still nothing.

1. Background

Previous petition

This petition is similar to a previous petition considered by your predecessor committee: [P-05-815 Control Rapidly Expanding Intensive Poultry Industry in Wales](#). The Committee closed that petition on 27 July 2020 with this conclusion:

The Committee considered further correspondence and noted that work is ongoing to review and, where opportunities are identified, strengthen planning requirements around intensive agriculture. The Committee agreed to note the serious concerns expressed by the petitioners throughout this process but concluded that, in light of the responses received from the Minister, Natural Resources Wales and the petitioners, there is little further that it could achieve at this time. The Committee agreed to close the petition and to write to the Climate Change, Environment and Rural Affairs Committee to ask if they can continue to monitor developments as part of their work into land use and biodiversity.

Regulating intensive poultry units

There are two principle aspects to regulating new poultry units:

- the planning system, which is the responsibility of the Local Planning Authority (LPA); and
- the environmental permitting system, which is the responsibility of Natural Resources Wales (NRW).

Broadly speaking, new units require planning permission and, above certain thresholds, also require an Environmental Impact Assessment (EIA). An environmental permit is also required above a certain threshold.

Further detail on planning permission and environmental permit process for poultry units can be found in the [Senedd Research briefing](#) provided to your predecessor committee.

In 2018 [the Welsh Government wrote to LPAs](#) reminding them of “the need to fully consider the effects of intensive agricultural development when determining planning applications.” The letter noted:

- Large intensive agricultural units usually require planning permission so LPAs should include appropriate policies in their Local Development Plans. This will enable them to properly consider planning applications for this type of development.
- Intensive agricultural units, particularly pig and poultry farms, can affect the local population and sensitive habitats. This is largely through pollutants including: ammonia; nutrients from manure, litter and slurry; effluent discharges; dust; odour; and noise.
- Particular care should be exercised when considering developments that would bring livestock units within close proximity to sensitive land uses such as homes, schools, hospitals, office development or sensitive environmental areas.
- While an individual intensive livestock development may be acceptable, the cumulative impacts resulting from similar developments nearby should also be taken into account

NRW has published [guidance for ammonia assessments](#) for developments that require planning permission or an environmental permit.

Poultry units are also subject to regulation relating to animal and human health disease risk, and animal welfare.

2. Welsh Government action

The Welsh Government established the Town and Country Planning Intensive Agriculture Working Group in 2019. At the outset the group comprised planning officers from LPAs, representatives from farming unions, environmental groups, Public Health Wales, NRW and Welsh Government policy teams.

The group was initially focused on developing planning guidance for intensive agriculture developments in the form of a new Technical Advice Note (TAN).

The Minister for Climate Change, Julie James, wrote to you about this petition on 13 July 2022. The Minister's letter explains the work of the working group was interrupted by the pandemic.

NRW's subsequent announcement about the performance of river Special Areas of Conservation (SACs) against tighter phosphorus targets means the work on the agricultural planning impacts has been refocused to solving the immediate phosphorus issue. The phosphorus issue is currently preventing a "great many" new homes, including affordable homes, from coming forward.

There are two river SACs in Powys: the rivers Wye and Usk.

However, the Minister's letter commits to developing the TAN on agricultural development with a view to publishing a draft for consultation in the autumn. The Minister also says she hasn't ruled out a "block on new poultry development" but stresses she'll be guided by the evidence.

River Pollution Summit

The First Minister convened a summit to discuss phosphorus pollution of Welsh rivers on 18 July, the opening day of the Royal Welsh Show.

The summit brought together regulators, water companies, developers, local government, farming unions, academia and environmental bodies to discuss a strategic and joined-up approach to improving the situation. Eight actions were agreed:

- 1.** More funding for Nutrient Management Boards (£415k for 2022-23 and an unspecified amount for 2023-24 and 2024-25) and a review of the Boards' governance arrangements (see action 8 below).
- 2.** Develop a regulatory approach to enable nature-based solutions to mitigate phosphorus loading and reduce environmental impact.
- 3.** Implement short-term interventions, drawing on financial support from developers, Welsh Government and others.
- 4.** Develop an all-Wales nutrient calculator to support planning decisions.

5. Agree a 'menu' of potential mitigating actions and interventions, to inform Nutrient Management Board decisions on measures to reduce pollution.
6. Explore an approach to 'catchment consenting' to broaden the range of mitigation measures available to reduce pollution in SAC rivers.
7. Assess the potential for nutrient offsetting.
8. A long-term roadmap supported by an action plan for Welsh SAC rivers, to be developed in the autumn. The outcome of the review of Nutrient Management Board governance arrangements will be included in the action plan.

A [technical information and evidence pack](#) was published to coincide with the summit.

The Welsh Government aims to reconvene the summit in early 2023.

3. Welsh Parliament action

As noted above your [predecessor committee considered a similar petition](#) in the Fifth Senedd.

Two Committees of the current Senedd have recently considered aspects of freshwater pollution:

- Economy, Trade and Rural Affairs Committee [inquiry into the agricultural pollution regulations](#); and
- Climate Change, Environment and Infrastructure Committee [inquiry into water quality and sewage discharges](#).
-

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.

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1232
Ein cyf/Our ref JJ/12201/21

Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

13 July 2022

Dear Jack Sargeant MS,

Petition P-06-1232 Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved

Thank you for your letter of 24 November 2021 to Lesley Griffiths MS, Minister for Rural Affairs and North Wales and Trefnydd regarding intensive poultry units. Your letter has been passed to me to reply as it refers to the production of planning guidance which falls within my portfolio.

Strong rural economies are essential in creating and sustaining vibrant rural places and communities. This is why Planning Policy Wales supports rural business diversification. Such diversification, however, is not at any cost, and national planning policy makes clear sustainable locations are required where there is no detrimental impact on the environment and local amenity.

Prior to the pandemic we reminded local planning authorities of the care needed when planning for intensive livestock development. Intensive agricultural units particularly pig and poultry farms, can affect both sensitive habitats and the local population. This is largely through the release of pollutants, including: ammonia; nutrients from manure, litter and slurry; effluent discharges; dust; odour; and noise.

Agriculture has largely operated outside the town and country planning system, but as agricultural developments have become more intensive, they are being dealt with more frequently by planning authorities. The increasing number of poultry units in Powys is an example where issues of cumulative effects and the carrying capacity of local areas arise.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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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.

The Town and Country Planning Intensive Agriculture Working Group was set up to see if the planning system was looking at those impact in the best way possible. The pandemic interrupted the work of the group but guidance, such as Natural Resources Wales's (NRW) update to their ammonia assessment methodology, has been available to help local planning authorities determine applications.

NRW's subsequent announcement in relation to the performance of river Special Areas of Conservation (SACs) against tighter phosphorus targets has meant the work looking at all the agricultural planning impacts in the round has been refocused to solving the immediate phosphorus issue. The habitats regulations require a high degree of certainty that development will not damage the integrity of the river SACs. Consequently, a great many new homes, including affordable homes, are being prevented from coming forward.

There is no one answer to the phosphorus issue so work is needed on a catchment basis to identify the appropriate local solutions. The source of phosphorus varies in proportion across the different catchments with either agriculture or waste water treatment works being the largest contributors. On the rivers Usk and Wye (in Wales), modelling work undertaken by Dwr Cymru Welsh Water shows rural land use to be the largest source accounting respectively for 67% and 72% of total orthophosphate load.

I am still working towards a Technical Advice Note on Agricultural Development, something the Working Group was contributing to. Work will continue to prepare a draft document over the summer, with a view to public consultation in the autumn. In the meantime, I have not ruled out a block on new poultry development but will be guided by the evidence. The recently published RePhoKUs Project Report on the River Wye catchment, for example, is something I am looking at closely to identify what further action is required.

I will be attending the upcoming Royal Welsh Show with the First Minister and the Minister for Rural Affairs and North Wales and Trefnydd for a summit to look at next steps to address the phosphorus emissions. The event will bring together the key stakeholders from the agriculture, development and water sectors together with regulators to identify the practical solutions needed to protect our rivers while allowing appropriate development to proceed. Also attending will be the chairs of the nutrient management boards we have established who will lead on identifying and delivering the appropriate local solutions. All parties are expected to compromise and play a full part in addressing this challenging issue.

The summit and further work being undertaken both nationally and by nutrient management boards will continue to look at the impacts from poultry units so that, in the longer term, decisions about need and location are taken in a fully informed way. This work will include considering whether further regulation of intensive poultry units, from pollution control and planning perspectives, is desirable.

Yours sincerely,



Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

P-06-1232 Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved, Correspondence – Petitioner to Committee, 01.09.22

Good afternoon

Thanks for this information and the news that the issues raised will be considered. I would like noted that there were 5,920 signatures of support. I have included the words of the petition on page 4 for information and reference.

The petition asks for the following outcomes:

1. A moratorium on any poultry units in Powys, and across Wales until the publication of a specific technical advice note as identified.
2. That appropriate, proper and considered guidance is consulted upon and published in the form of a TAN, as stated by Lesley Griffiths in 2019. Action was also promised early 2018. This TAN should ensure planning authorities cannot ignore the local and environmental issues caused by these developments; and must be cognisant of local and national policies, TANs and DMs, including Well Being and local people, not just those working in agriculture.
3. We ask for essential regulation and guidance for planning authorities. The use of delegated powers, which denies the public a voice, should also be addressed.
4. We would also ask that all information pertaining to an application, including those under permitted development, should be available to the public. Powys have a policy of not publishing comments on their planning portal, and indeed, misleading the public by stating there are no comments. Surely this is outside the rules and processes; using GDPR as a reason/excuse is unacceptable and inaccurate. In fact, their behaviour puts them in breach of GDPR.

To answer the questions you pose:

1. **What are your thoughts on the attached document?**

- a. The document does not address the issues raised. It also lacks detail and timelines.
- b. It seems that the Minister for Climate Change is working on a TAN for Agriculture development. Is this accurate?
- c. Is there 'joined up thinking' between the departments?
- d. There is no comment from the Minister for Agriculture. Why not?
- e. River pollution is only part of the problem.

2. **Does it adequately address the issues that you raised?**

I'm afraid not. It repeats information already published. There have been no actions and there seems to be no willingness to act. The issues are not limited to rivers.

a. This communication is from Julie James, the Climate Minister; she talks of agriculture operating outside the town and country planning system, but as agricultural developments have become more intensive and that they are being now being dealt with more frequently by planning authorities. The concern here is, as mentioned in the petition, that there is no guidance for planning offices to deal with units of less than 40,000 birds. The lack of guidance means that the environment, including rivers and aquifers, can be irreparably damaged by these farming practices. We also know that Powys Planning continue granting permissions for bird rearing developments despite significant public objections, examples below:

1. Two years ago a change.org petitions called for Powys County Council to action an immediate moratorium on planning permissions for new or extended poultry units in the county until the full environmental - and community - impacts of those we already have can be assessed and reduced. This was rejected by PCC. There were over 80,000 signatures.
2. CPRW¹. comment that in Powys in the past 5 years there have been
 - a) 156 applications (not counting withdrawn applications)
 - b) 139 applications have been approved and one refusal
 - c) 7 were approved in June 2020
 - d) 23 approvals were voted through by the Planning Committee. 116 were decided by a Planning Officer under “delegated powers”.
 - e) Of the 156 applications in the past five years, there have been 5 refusals but 4 have been resubmitted. One of these has been refused again on highways grounds: one has been approved: 2 are waiting.
 - f) Altogether, there are 21 awaiting determination.
3. In an open letter² to PCC the residents of a number of villages affected by the units requested they:
 1. Implement a moratorium in respect of all current and future IPU and other intensive factory farm applications until you are able to accurately take stock of the current situation.
 2. Undertake a comprehensive environmental survey to ascertain if current air and water quality in parts of Powys with a concentration of IPUs are near, or already beyond, saturation point.
 3. Properly assess the human health considerations to residents posed by the already large number of factory farms present in Powys (based on actual studies rather than desk-based predictions).
 4. Provide details of how Powys CC takes into account the provisions of the ‘ Well-being of Future Generations (Wales) Act 2015’ when determining applications.

¹ <http://ecotipus.co.uk/cprw-update-powys-county-council-poultry-planning-frenzy>

² <http://ecotipus.co.uk/open-letter-from-residents-to-powys-council>

5. Cease determination of all IPU applications until the new Intensive farming TAN is in place to properly guide planning officers in their decision-making process.

b. It seems that the Town and Country Planning Intensive Agriculture Working Group has moved away from the focus initially stated of "the planning system looking at those impact in the best way possible." and are now focussing on river pollution. The impact of these units is not limited to rivers and aquifers. The following must also be considered:

- the impact on local amenities
- the health and well being of individuals affected by these developments
- impacts of ammonia emissions and the resulting damage to ecosystems
- air pollution affecting health
- foul odours and heavy traffic on narrow rural lanes
- light pollution
- noise pollution
- the impacts of industrial-scale development on rural landscapes

Development Management guidance clearly states areas for consideration. Strategic Policies clearly state the rules. As examples, please reference DM1, 2, 3 & 4 and SP7. The development of these units in Powys seem to be exempt from the examples above.

Please view <http://www.brecon-and-radnor-cprw.wales/wp-content/uploads/2019/07/IPU-ALLdataV4-Master-20190707-3-Counties-FINAL-2.0-20190711.pdf> to see the location and number of units of units in Powys and surrounding counties.

There is more than sufficient evidence that Powys Planning do not take into account the comments of local people and businesses. They are obtuse and not helpful when enquiries are made. They do not enforce restrictions they impose. Although anecdotal, they have also stated that they do not take into account the views of community councils who are the representatives of the local communities.

3. Do you have further questions in response?

In addition to the questions posed throughout I would ask why has no action been taken and seemingly, little progress made. Covid is not a good enough reason. People continued to work throughout the pandemic.

4. Is there anything additional that you would like the Committee to know at this stage, either in response to this document or as an update to the Committee.

This is a critical issue for many who live in Wales. Action has been promised for a number of years, during which time planning for the units continues to be granted. There are many other communications and conversations with the Senedd and the various parties around this issue but still no action. The damage to the local amenities, landscape and lives continues. These are severe issues in Powys.

The text of the petition as published at <https://petitions.senedd.wales/petitions/244997>

“There are many intensive poultry units in Wales. Powys has the unfortunate reputation of being one of the IPU hot spots. There have been 147 IPU applications granted by PCC. IPU's bring with them many issues including pollution of rivers and land, smell, ammonia, traffic, 24x7 noise and light. To many, the practice of intensive poultry production is cruel and unnecessary.

Despite many villages being blighted by these units there is still nothing being done to stop them. We need our politicians to act.

More details

Another small village in Powys is the latest in a long line to be threatened by the building of an intensive poultry unit. This is a rural area, the roads are walked regularly by the people of the village and visitors. The landscape is stunning, there is no light pollution and the silence is, wonderfully, deafening. The River Cain runs through the Village and close to the site feeds into the River Severn.

Despite many villages being blighted by these units there is still nothing being done to stop them. We need our politicians to act. So, this petition is about getting the politicians to legislate; they have promised this for years; they accept this is a serious issue but still the legislation is missing.

A TAN (Technical Advice Note) regarding IPU's was promised in 2019. Lesley Griffiths, the Agriculture Minister has stated that something must be done, particularly with regard to the smaller units. But still nothing.”

P-06-1232 Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved, Correspondence –Third Party to Committee, 18.05.22

Hello Petitions Team

I wanted to get in touch with the petitions committee at the Senedd to complain about the petition which is ending on the 18th May (today). Regarding stopping the proliferation or intensive poultry units (IPUs). The petition started by Gill Marshall, Chairman of Llanfechain Community Council was notified to the local people by next door app then a website created by my neighbours in Llanfechain called LAIPU (chicken). Gill Marshall and the people who started the website are involved in air bnb and holiday lets. The actions of a few have divided the community and have been very hurtful and upsetting to myself, as a long standing neighbourly feud gets played out against my pre planning consultation for a chicken enterprise at [REDACTED], [REDACTED] which I own and my family have farmed since [REDACTED]. I was looking to diversify and keep the farm alive for my [REDACTED], but incomers to the village have sought to ruin the running of [REDACTED], causing confrontation and malice.

I hope you will consider my complain as a hard working farmer.

Kind Regards

To ensure treatment and screening for cancer continues during COVID-19

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR22/3327/1

Petition Number: P-06-1286

Petition title: To ensure treatment and screening for cancer continues during COVID-19.

Text of petition:

To ensure all people struggling with cancer receive timely treatment and have equal chances of fighting cancer wherever they live in Wales. It is also essential to support families who have family members with cancer.

We want this petition to go far and to reach families who are struggling and to provide people with resources and facilities.

1. Background

Early diagnosis and rapid treatment are key to increasing the chance of cancer survival.

Some national screening programmes were paused in the early stages of the pandemic. COVID also impacted on the delivery of services, causing some delays for further diagnostic tests and treatments. In addition, there is evidence that



some people chose to defer seeking diagnosis and treatment. These factors have contributed to a backlog in cancer cases.

Research has shown significant reductions in cancer diagnoses in Wales during the pandemic, for example, there were over a thousand fewer new cases of bowel, breast and lung cancers diagnosed in Wales in 2020, compared to 2019.

According to stakeholders such as Target Ovarian Cancer, the pandemic has had a drastic impact on urgent referrals for suspected cancer from GPs and treatment waiting times.

Evidence suggests that many of the people now coming into the system are being diagnosed with cancers that have progressed to a later stage - with worse outcomes as a result.

A new suspected cancer pathway target was introduced on 1 December 2020. However, the latest waiting times data (June 2022) shows that **just 54 per cent of patients received their first treatment within 62 days** of being suspected of having cancer, well below the target of 75 per cent.

The Senedd's Health and Social Care Committee's recent inquiry on the impact of the waiting times backlog on people in Wales (April 2022), included a specific recommendation relating to cancer:

Recommendation 3. The Minister for Health and Social Services should work with NHS Wales and third sector organisations to develop and deliver a national campaign within the next 12 months to raise awareness of cancer symptoms, and to encourage people to access health services if they have any concerns. The campaign should also encourage people to take up invitations to participate in cancer screening programmes.

The Welsh Government accepted this recommendation, stating:

The Wales Cancer Network are working through a proposal which it will take to the Wales Cancer Alliance, and the Cancer Awareness Campaign Group to develop a campaign which will cover both raise awareness of cancer symptoms and encourage people to access health services if they have any concerns or symptoms of cancer. The campaign will also focus on the importance that screening plays in early diagnosis and outcome and will encourage people to take up invitations for cancer screening

programmes. This proposal will be presented to the Cancer Network Board in September 2022

2. Welsh Government response

The Welsh Government's response to the petition notes that cancer care was identified as an essential service that needed to be protected as much as possible from disruption during the pandemic. It highlights the new funding it made available to the NHS to support services; train new staff, including cancer care specialists; and invest in new equipment used in the diagnosis and treatment of cancer.

However, it acknowledges that while the pandemic was escalating, the capacity to deliver some cancer treatments was disrupted and many patients chose to defer treatment at this time. "This is likely to have an impact on cancer outcomes".

The Minister for Health and Social Services says she has "made recovery in cancer services a planning priority for the NHS". This has been supplemented by actions for cancer services in its [Programme for Transforming and Modernising Planned Care](#) (April 2022). The programme notes:

It is estimated that about 4,500 fewer people were diagnosed and treated for cancer than we might have experienced based on previous years. However, people are now presenting with suspected cancer at a higher rate than we have ever experienced.

The [Welsh Government's quality statement for cancer](#) outlines its broader approach to improving cancer services.

The Minister says NHS services have introduced a number of changes to pathways to speed them up and there are "nationally agreed pathways for most cancer types that all NHS bodies should seek to deliver". The response sets out further actions taken including funding to organise patient pathways; new digital software to assist operational managers for cancer to manage and track patient waiting lists; and the development of new training to support all the staff involved in delivering cancer pathways. The Minister concludes:

I am confident that this combination of focus, effort and support that is being brought to bear will make a significant difference to the delivery of cancer services in the future.

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.



Eich cyf/Your ref P-06-1286
Ein cyf/Our ref EM/02175/22

Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
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CF99 1SN

7 July 2022

Dear Jack,

Thank you for your letter of 31 May on behalf of the petition committee regarding ensuring treatment and screening for cancer continues during COVID19.

As a Government, we have done all that we can to protect the NHS from the impact of this global pandemic. Very early on we agreed upon the essential services that needed to be protected from as much disruption as possible. This of course included cancer care. The Chief Executive of NHS Wales at the time gave significant focus to protecting cancer services through his work with the health boards in Wales. I and my predecessor, made significant new funding available to the NHS to support services and more broadly we are investing hundreds of millions of pounds in training new staff, including specialists in cancer care, and in new equipment used in the diagnosis and treatment of cancer.

However, it is unfortunately the case that while the pandemic was escalating the capacity to deliver some cancer treatments was disrupted and many patients chose to defer treatment at this time. This is likely to have an impact on cancer outcomes.

I have made recovery in cancer services a planning priority for the NHS. This means health boards and trust planning must focus on recovery in cancer services. This has been supplemented by actions for cancer services in our Programme for Transforming and Modernising Planned Care, which was published in April and can be found at: [Transforming and modernising planned care and reducing waiting lists | GOV.WALES](#)

We know that to improve cancer outcomes we must ensure there is earlier detection and access to diagnostic investigation, rapid treatment on standardised pathways of care, better workforce planning and capacity, more integrated care enabled by the introduction of a new

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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.

cancer information system, the reconfiguration of fragile clinical services, and crucially better centralised support in terms of data and programme expertise.

We are encouraging people to come forward with possible symptoms of cancer, working through our national diagnostic programmes to improve timely access to imaging and endoscopic investigations, and providing national leadership and focus on increasing cancer treatment activity.

NHS services have introduced a number of changes to pathways to speed them up and we have set out nationally agreed pathways for most cancer types that all NHS bodies should seek to deliver. Additional staff have been funded in health boards to organise patient pathways that cross multiple teams between the referral, diagnostic, treatment and follow up stages. Programme support teams have been deployed to health boards to support them to reorganise their service to deliver the national pathways. New digital software is being deployed to assist operational managers for cancer to manage and track patient waiting lists. New training is being developed to support all the people involved in delivering cancer pathways to better understand how such complex pathways, spanning multiple teams, should work administratively.

I am confident that this combination of focus, effort and support that is being brought to bear will make a significant difference to the delivery of cancer services in the future. Our broader approach to improving quality in cancer services can be found at:

<https://gov.wales/quality-statement-cancer-html>

I hope this information is helpful.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. E. Morgan'.

Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

Petition: holiday lets and business rates

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR22/3596-9

Petition Number: P-06-1289

Petition title: Agree 105 day occupancy, not 182 days, to distinguish holiday let businesses from second homes.

Text of petition: As part of its tax policy to limit the number of second homes, Welsh Government wishes to better distinguish between legitimate furnished holiday lets and second homes. The draft Order, despite contrary advice from its own consultation, raises the level of occupancy required for business status from 70 to 182. This is unachievable for most FHLs, which will either close or be reclassified as second homes as a result. We propose a threshold of 105 days, a 50% rise, in line with HMRC definitions.

Wales Tourism Alliance, UK Hospitality Cymru and the Professional Association of Self Caterers have gathered evidence from c.1500 small Welsh businesses to show the damaging unintended consequences to Welsh livelihoods and communities of a 182 day threshold. It indicates that it will not achieve its policy intention of limiting second homes, but that it will reduce the number of local Welsh businesses. The report and supporting body of evidence supporting this petition can be found at https://www.pascuk.co.uk/wp-content/uploads/2022/04/UKH.WTA_PASC-BoE-1500-080422.docx. The draft Order is the Non-Domestic Rating (Definition of Domestic Property) (Wales) Order 2022



1. Background

The *Non-Domestic Rating (Amendment of Definition of Domestic Property) (Wales) Order 2022* (the Order) was laid before the Senedd on 24 May 2022. It came into force on 14 June 2022 and will have practical effect from 1 April 2023.

The Order amends section 66 of the *Local Government Finance Act 1988 (the 1988 Act)*, which defines domestic property for the purposes of Part 3 (non-domestic rating) of that Act. Section 66(2BB) of the 1988 Act sets out when buildings, or self-contained parts of buildings, that are let commercially for short-periods as self-catering accommodation are not to be considered domestic property.

The Order increases the number of days that a property must have been let to be classified as non-domestic from at least 70 days to at least 182 days in the 12 months prior to assessment. The Order also increases the number of days a property must have been made available for letting (in the previous year) and intended to be available for letting (in the following year) from 140 days or more to 252 days or more. Self-catering properties that do not meet the new criteria will be classified as domestic and will be liable for council tax, including any applicable premium. The Order contains transitional provisions so any property assessed prior to 1 April 2023 will be subject to the existing criteria.

2. Welsh Government action

Changing the definition of domestic property is part of a wider series of legislative and policy changes relating to the impact of second homes and short-term lettings that have been made since the start of the Sixth Senedd. The Welsh Government's **three-pronged approach** to address the impact of second homes focuses on **support** for local people; the **regulatory framework** (including the planning system); and also ensuring property owners make a **fairer contribution** through local and national taxation systems. Additionally, a **Welsh Language Communities Housing Plan** has been consulted on in order to support and protect Welsh-speaking communities.

In its response to the [consultation](#) on the changes to the definition of domestic property, the Welsh Government said:

The Welsh Government recognises the differing views of stakeholders and remains of the view that to operate as non-domestic, self-catering properties shall be required to be used for business purposes for the majority of the year.

3. Welsh Parliament action

On [6 July 2022](#), the Senedd debated a motion tabled in the name of Tom Giffard MS (Conservative) to annul the *Non-Domestic Rating (Amendment of Definition of Domestic Property) (Wales) Order 2022*. In the debate, Mr Giffard said the increases in the thresholds would “...have a hugely damaging impact on the businesses being able to operate within Wales and damage our economy, with many businesses that will simply just be forced to close.” He also highlighted concerns about the changes from within the sector.

For Plaid, Mabon ap Gwynfor MS said:

...we shouldn't look at the 182-day policy in isolation; this policy of 182 days is part of a broader package—in this case specifically, the announcement on Monday on the establishment of a new statutory licensing system for holiday lets.

Responding for the Welsh Government, Minister for Finance and Local Government Rebecca Evans MS said that:

I do recognise that the stronger criteria might be challenging for some operators, but it's important to recognise that there is evidence that average occupancy of self-catering properties exceeded 50 per cent over the three years prior to the pandemic. So, many operators in all parts of Wales are already meeting the new criteria. And I think it is reasonable to expect businesses to adopt an operating model that maximises the use of their property and the benefit that it brings to local communities.

The motion to annul the Order was [rejected](#) by 35 votes to 14.

In June 2022, the Senedd's Local Government and Housing Committee published a series of recommendations following its [inquiry into second homes](#). The Committee noted that the increased letting requirements for self-catering

accommodation go further than many of the respondents to the Welsh Government's own consultation suggested.

Another petition, *Allow exemptions to the 182-day occupancy rule to reduce harm to real Welsh self-catering businesses*, is collecting signatures until 28 December 2022.

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.



Eich cyf/Your ref: P-06-1289
Ein cyf/Our ref: RE-00538-22

Jack Sargeant MS
Chair – Petitions Committee
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11 July 2022

Dear Jack,

Thank you for your letter in relation to a petition to change the recently increased letting criteria used to classify self-catering properties for local tax purposes. I am responding as local taxation policy falls within my portfolio. Thank you for the opportunity to provide my views before the Petitions Committee considers the matter.

Views on the policy behind these plans were invited as part of a 12-week [consultation](#) which looked at local taxes for second homes and self-catering accommodation. The consultation was open from 25 August to 17 November 2021 and received almost 1,000 responses. A summary of responses was published on 1 March.

The views conveyed in response to the consultation, including those from respondents representing the wider tourism industry, clearly support a change to the criteria for self-catering accommodation to be classified as non-domestic. Respondents were of the view that the majority of genuine holiday accommodation businesses would be able to satisfy increased letting thresholds, and a wide range of possible alternatives was suggested. The most common specific suggestion was 105 days actually let, but many respondents suggested higher figures. Some respondents were of the view that all properties providing living accommodation should be classified as domestic and liable for council tax, or suggested letting criteria so high that they would have the same effect.

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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.

The Welsh Government is not duty bound to accept the most common specific response to a consultation. The new thresholds take account of the responses to the recent consultation, and factors such as the operation of the current thresholds and the thresholds applied for other purposes. The Welsh Government is of the view that properties let out as self-catering accommodation on an infrequent basis should be liable for council tax. The increased letting criteria will ensure that self-catering properties are classed as non-domestic only if they are being used for business purposes for the majority of the year. This will provide a clearer demonstration that the properties concerned are being let regularly and are making a substantial contribution to the local economy.

I, therefore, announced an increase to the number of days, within any 12-month period, that a self-catering property is required to be made available to let, from 140 to 252 days, and actually let, from 70 to 182 days. A [technical consultation](#) on the draft Non-Domestic Rating (Amendment of Definition of Domestic Property) (Wales) Order 2022 ran from 1 March to 12 April 2022. The consultation sought views on the clarity and practical application of the draft legislation. A summary of responses has been published.

The technical consultation received 499 responses. The vast majority were from self-catering property owners and representative bodies who stated that the criteria of 182 days actually let is too high. The response to the technical consultation was, therefore, very sector-specific, capturing only part of the broader set of stakeholders which responded to the previous policy consultation. This is generally expected for technical consultations, which mainly attract responses from stakeholders for whom the relevant legislation will be directly applicable.

On 24 May 2022, I [confirmed](#) that the Welsh Government has made the legislation as drafted and consulted upon. The legislation was subject to a motion to annul, which was debated in the Senedd on 6 July 2022. The Senedd voted against the motion, confirming support for the changes. Any further debate could only replicate that which has already taken place.

The legislation came into force on 14 June 2022 and will have practical effect from 1 April 2023. I recognise the strength of feeling among self-catering operators and I have listened to the representations from individual businesses and industry representative bodies. There is limited evidence available in relation to some of these considerations and the additional information provided by the sector has been welcomed. This has been taken into account in completing the Explanatory Memorandum and Regulatory Impact Assessment, which makes use of the available evidence and is [published](#) alongside the legislation.

The Welsh Government recognises that some businesses do not currently meet the increased criteria for days actually let, and that they consider it may be difficult to do so. There is, however, evidence that average occupancy of self-catering properties exceeded 50% over the three years prior to the pandemic. Many operators, in all parts of Wales, are already meeting the new criteria. We also consider it reasonable to expect genuine businesses to adopt a flexible operating model which maximises occupancy and economic contribution for as much of the year as possible.

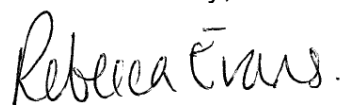
If properties are not occupied for the majority of the year, then they will make a more direct economic contribution to the communities in which they own property, through council tax.

I consider that our changes will help to strike the right balance between capacity within the self-catering tourism sector, and the economic benefits that brings, and supporting viable communities of local residents to live and work in these areas. The occupancy challenge should be considered in the context of the wider package of measures which form our three-pronged approach to tackling the impact of second homes and holiday lets on communities in parts of Wales. Where second home owners let out their homes on an occasional and casual basis, they enter into direct competition with these same genuine businesses. We know that businesses providing self-catering accommodation share our concerns about the number and quality of casual operators entering the sector, and support proposals for a statutory registration scheme.

Our local taxation changes form part of the Welsh Government's three-pronged approach to tackling the issues that can arise from large numbers of second homes in communities and to helping people to live affordably in their local areas. As part of the Co-operation Agreement, we are taking immediate action. The approach comprises a package of measures to provide support, make improvements to the regulatory framework, and ensure people make a fair contribution through the local and devolved tax systems.

The package includes the consideration of a range of options for enabling empty and underused properties to be brought back into use, increasing the availability of affordable housing and driving up standards. The Welsh Government is also working closely with the tourism sector to develop a system for the registration of tourist accommodation to ensure a level playing field for tourism businesses, provide clarity and assurance for visitors, and improve our understanding of the tourism offer.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The signature is written in a cursive style with a large initial 'R'.

Rebecca Evans AS/MS

Y Gweinidog Cyllid a Llywodraeth Leol
Minister for Finance and Local Government

P-06-1289 Agree 105 day occupancy, not 182 days, to distinguish holiday let businesses from second homes, Correspondence – Petitioner to Committee, 01.09.22

Thank you for letting us see the Minister's response.

We have received a similar response from the Minister in the past and consider it to be partial and incomplete.

In particular, the source of the WG evidence of the average occupancy is undisclosed. It is also disputed, as data collected from within the **professional** self catering sector suggest the figure was nearer 34% as of 2019: They calculate that this legislation and the various cost of living crisis will mean a figure of 16% going forward. This is not disclosed in the Minister's reply.

You can find this detail in the body of evidence referred to in the petition, but I have attached it for convenience.

I attach an emailed letter from the Minister which covers some issues not referred to in the reply you have received, and which draw out inadequacies in the approach to making this legislation. I would be very grateful if the Chair and Members would consider its contents before deciding on whether a further debate is appropriate as these have not been discussed in the Chamber. In particular, we draw your attention to the government's own lack of impact assessment and the admission in the EM that their own evidence was contradictory.

We repeat that only 9 of the nearly 1000 responses to the main consultation suggested a 182-day occupancy threshold. We also ask Members to note that the sector was agreed on properties being **available** for well over 6 months in order to qualify as "a business": it is the ability of those *outside the honeypot areas* to hit the **occupancy** threshold which has so disheartened them.

The picture is especially volatile for the reasons which are affecting us all at the moment. The professional sector is also facing pressure from the casually let second home and the growth in speculative purchases fuelled by the covid staycation boom. There is some evidence that some of the latter are now going back on the market as that bubble has burst. **Visit Wales's own data in June showing 32% businesses have experienced cancelled bookings.**

Thank you again for your interest in this issue, the effects of which will be felt in local supply chains every bit as much as self-catering property owners themselves.

Suzy Davies
Chair Wales Tourism Alliance



Ein cyf/Our ref: RE-00633-22

Suzy Davies
Chair, Wales Tourism Alliance

suzy@wta.org.uk

11 August 2022

Dear Suzy,

Thank you for your further letter in relation to the classification of self-catering accommodation for local tax purposes.

There was a cross-over in the exchange of our most recent letters. You will now have received my reply of 28 July 2022, which followed your previous letter and your meeting with my officials. The recent exchanges we have had in relation to the Welsh Government's policy position on this matter have been comprehensive and I will not repeat that detail here.

You have asked a number of specific questions, which I have answered the annex to this letter. Some related questions have been grouped to answer.

In addition, our published [guidance](#) on non-domestic rates for self-catering properties has recently been updated, to reflect the changes that will take practical effect from 1 April 2023 and to include frequently asked questions from operators.

Yours sincerely,

Rebecca Evans AS/MS
Y Gweinidog Cyllid a Llywodraeth Leol
Minister for Finance and Local Government

ANNEX – RESPONSES TO QUESTIONS

- 1. Second home proliferation is a problem which, according to the Brooks report, affects 22 wards out of 852; this has likely increased somewhat during the pandemic. Even so, unlike proposals for council tax and tourism tax, which allow discretionary tax-raising powers to the local authorities most affected by second homes, this is all-Wales legislation.**

How is this a reasonable and proportionate response to a serious but localised problem?

The Explanatory Memorandum and Regulatory Impact Assessment (RIA) for the Non-Domestic Rating (Amendment of Definition of Domestic Property) Order 2022 sets out the purpose and intended effect of the legislation, placing it in the context of the wider package of measures the Welsh Government is delivering through the three-pronged approach. The rationale for the approach has also been the subject of our recent exchanges of correspondence. The Order differs from other aspects of the approach, in that it provides for the underlying definition of property as domestic or non-domestic for local tax purposes, rather than dealing with the local application of specific powers.

An effective policy response to this complex and multi-faceted issue requires a combination of Wales-wide and locally-delivered interventions. The national and more localised aspects of our local taxation changes are complementary and should not be considered in isolation from each other, or from the wider set of measures, in delivering the overall policy objective.

- 2. The EM states that it has limited evidence on which to draw to support the 182-day threshold as being effective, and no economic impact assessment has been done.**

The Explanatory Memorandum confirms the evidence that Welsh Government has itself gathered is contradictory as to trends identifying demand for self-catering, the VOA stating that the trend from the 2019 high watermark was already heading downwards before the cost of living crisis hit.

The following extract summarises how limited Welsh Government’s knowledge base is:

“Even if previous occupancy related to the new thresholds were known with confidence, it would not reveal how many of those would be able to increase their letting activity so that they do meet the new criteria by the time they take effect. This makes it difficult to estimate accurately the potential costs and benefits of this option”.

Noting that Welsh Government had no idea how many businesses would transfer from NDR to council tax, but not disputing the policy aim, how did you

(a) assess the risks and benefits of this particular piece of legislation, particularly as it was introduced so swiftly and with such limited evidence collected by Welsh Government;

(b) assess the chances of it fulfilling the policy aim, albeit as part of a suite of policies coming forward;

(c) assess whether there would be a material risk to the policy aim were this particular change be removed from that suite of policies;

(d) assess whether the order in which these and other proposed changes were introduced might be more or less effective in achieving the policy aim;

(e) assess whether or not Regulatory Impact Assessments (RIAs) properly accounted for the effect on business of proposed legislation (para 13. Ministers' Business Scheme, s.75 GOWA 2006);

The RIA sets out that, in the context of the wider policy aims, there is a limit to the available evidence in relation to any option – including doing nothing. The available evidence has been included in the RIA, which considers the potential costs, benefits and disadvantages of the options. This includes direct references to the potential impacts on self-catering businesses.

The Welsh Government's three-pronged approach is based on a recognition that a range of measures is necessary to fulfil the policy aim. The Explanatory Memorandum acknowledges that the policy should be viewed as part of a wider programme of measures if its full intent is to be achieved.

Whilst it is not possible to assess the level of risk to the full policy intent if this measure were not adopted, not increasing the occupancy thresholds for self-catering accommodation would dilute or undermine the effectiveness of the other measures. This point is addressed in the RIA under the benefits of the policy, where it is clarified that it could increase the effectiveness of the council tax premium as a discretionary lever for local authorities, by ensuring that a transfer from the council tax to the non-domestic rating list is out of reach of second home owners who wish to retain their property primarily for their own private use. The importance of this policy, within the package of measures, is also reflected in the broad support for increasing thresholds that the original policy consultation received.

The Welsh Government is developing the wider suite of measures at pace. The need for a lead-in for the local taxation changes taking practical effect is exemplified by your later comments in relation to the period of notice afforded to property owners. That is, in part, why this aspect of the wider package of measures is among the first to be progressed and will help to ensure that alignment with the implementation of the other measures being developed is as close as possible.

(f) assess how much extra income this would make for each council in order to calculate whether the change was worth it (three examples of 'typical' businesses gives no indication of how many there are of each type); and

As stated in the RIA, as it is not known how many properties might transfer between the non-domestic rating and council tax lists and it is not possible to estimate the overall implications for the local tax-base. The primary aim of the policy is not, however, to increase local tax revenue or provide financial savings to the Welsh Government, but to ensure property owners are making a fair contribution and to maximise the use of property, for the benefit of local communities. The examples provided are intended to assist property owners in considering the potential local tax implications of moving between property classifications, not to inform an estimate of overall implications. In determining whether to apply a council tax premium and at what level, each local authority needs to make an assessment of the potential impacts.

(g) establish how many properties currently in use as both professional holiday lets and second homes are actually suitable as permanent dwellings?

As stated in the RIA, the VOA has matched self-catering properties currently listed for NDR to a previous council tax band using standard data techniques and achieved an overall match rate of over 80%. With further work, the match rate could have been increased. The vast majority of self-catering properties have, therefore, previously been classified as domestic accommodation and liable for council tax.

The Welsh Government recognises that not all self-catering properties could be used as permanent dwellings. I have announced, and clarified in our recent exchanges, the work we are doing to explore further exceptions from the council tax premium and to update the relevant guidance for local authorities on the use of their discretion to reduce liability, where properties are not suitable as permanent dwellings.

3. The Explanatory Memorandum refers to sector-specific evidence from WTA, UK Hospitality and the Professional Association of Self Caterers, uncontaminated by casual lets of second homes. Regrettably, the explanatory memorandum is misleading, stating that 499 responses were received to the technical consultation

That was not an insubstantial body of detailed evidence. Even so, they were a just a sample of the 1500 responses from professional businesses. These were collected in record time once the sector knew about the 182-day decision, but it was not possible to anonymise them all by the closing date of the technical consultation. The offer was made to you to submit them once anonymised, if you wanted to see them. No such request was made.

Why did the Explanatory Memorandum not disclose

(a) that more than 499 responses were offered to Welsh Government, but that 1000+ were not requested;

The statement in the Explanatory Memorandum relates to the number of formal responses to the technical consultation. This is a standard component of any such document. In my statement of 24 May 2022, I expressed my gratitude to the sector for providing additional

information you gathered from your members. I, and other Ministers, had sight of this information and I noted that the same themes were reflected in the formal responses to the technical consultation. I have assured you that the information provided by the sector has been considered and I have clarified the further steps the Welsh Government is taking, having listened to the representations from the sector and taking account of the views of other stakeholders, and the wider policy objectives in the context of the impact on communities.

(b) while 34% of the sector's respondents were able to reach the 182-day threshold at the high point of 2019 (which is different from the average figure presented by Welsh Government) ... they went on to say that only 16% would achieve that going forward;

The RIA included reference to the 34% of the sector's respondents who reported they have previously let their property for 182 days. The scale of this estimate could be validated by the Welsh Government as broadly similar estimates are available from other sources and also included. Future occupancy cannot, however, be predicted with accuracy and this is explained in the RIA.

As mentioned previously, one of the aims of our wider policy approach is to shift behaviours and increase the usage of properties for the benefit of communities. Another is that property owners should make a fair contribution to their local communities. We recognise that some self-catering operators may not attain the new thresholds. Our policy position is that properties should be classed as non-domestic only if they are used for business purposes for the majority of the year. If they are let on a less frequent basis, they will be liable for council tax. Self-catering operators who meet the thresholds will make a contribution through the higher economic activity they bring. Operators who are below the thresholds will be treated as second home owners and will make their contribution through council tax, in the same way as those who do not meet the current thresholds.

(c) the locations of the businesses on which Welsh Government relied for their evidence and the locations of those relied upon by the sector's evidence (this is material if the high-achieving businesses are in areas of high demand/second homes);

The Welsh Government did not rely on examples from particular locations as this might prove to be unintentionally disclosive. Those provided in Table 2 of the RIA are not real properties but illustrations, as is noted. The notional locations were chosen to illustrate a range of local authority decisions which might apply in relation to the use of a council tax premium. It would not be possible to present all the possible permutations. The examples used do not reflect a reliance on evidence from specific areas.

(d) any of the reasons given in either Welsh Government evidence and the sector's evidence as to why the new threshold was unattainable for some businesses;

I take a different view from the premise suggested by this question. The key challenge raised by the sector related to seasonal and geographical variations in the possible levels of demand. This issue is explored in the RIA. Representations we have received from operators of multi-unit clusters, suggesting that some manage the occupancy levels for their

properties in order to avoid their businesses from generating revenue which exceeds the VAT threshold, are also considered. Other common themes from the sector's objections to the policy related to the impact of increased local tax liability and barriers to the use of some types of property for domestic purposes, if they did not meet the occupancy threshold, rather than the reasons why it is considered unattainable. These themes are also included in the RIA.

(e) that the technical consultation was the only opportunity for views on the 182-day threshold to be shared. The original policy consultation sought views on changes to the occupancy and availability thresholds but that it might be as high as 182 days was not mentioned; and

The original policy consultation sought views on whether the letting criteria should be changed and did not suggest a specific alternative. It is usual to ask open questions in a consultation of this nature. A wide range of specific suggestions was received, the most common of which was 105 days actually let. However, many respondents suggested higher figures. Some respondents were of the view that all properties providing living accommodation should be classified as domestic and liable for council tax, or suggested letting criteria so high that they would have the same effect.

The Welsh Government was not duty bound to consult further on decisions taken following the consultation, but I did decide to hold the further technical consultation on the draft legislation to change the letting criteria. As noted above, a large number of views were provided by stakeholders, both within and outside of that technical consultation. I also met sector representatives during the technical consultation period, as did my officials.

(f) how it had complied with its Para 16, Welsh Ministers' Business Scheme (supra) obligation to, as part of the policy formulation process, consider whether there was scope for exemptions or special provisions to reduce or eliminate any adverse impact on the business sector or the business sector's employees. NB: The exemption referred to in the EM relates to council tax premiums, not exemption from the 182-day threshold.

As noted in my statement of 24 May 2022, I have listened to the representations on behalf of the self-catering sector and taken action as a result. The thresholds provide a common definition as to whether a property is treated as domestic or non-domestic for local tax purposes. It is important that there is a consistent definition for determining whether a property falls within the council tax system or the non-domestic rating system. Other aspects of the local taxation system determine the actual liability for council tax or non-domestic rates and take account of a range of factors. However, creating exemptions from the basic definition could introduce unintended avenues for avoidance. The exceptions I am exploring in relation to council tax premiums are directly relevant, as they are part of the same local taxation system in which self-catering properties are already classified as domestic or non-domestic according to their use.

4. The initial consultation sought approval for raising the current availability and occupancy thresholds from the current 140 and 70 days respectively. Of the respondents who supported a rise, less than 1% of them suggested a 182-day

occupancy threshold. The majority supported 105 days occupancy and 210 days availability (exceeding your challenge, declared later, to be open-for-trade for 6 months or more)

**As the explanatory memorandum says, the government is not bound to accept the most common response to a consultation. A point the LCJ Committee brought out in its report, I suspect, because it prompts these further questions:
Why**

(a) was a suggestion which pleased just nine respondents out of the 900+ responses one of the three options put to you;

(b) did you not ask for the majority view of those who supported change to also be put to you as an option (105/210 days);

(c) did you not ask for a 140 day option to be brought forward for your consideration as this is the average occupancy rate across the UK, and adopted in Scotland for similar policy purposes;

As noted in the RIA in relation to Option 2 (increase the letting criteria), other options for increased letting thresholds were considered, including 210 days available to let and 105 days actually let. The reason why lower thresholds were not pursued is also outlined. It is also acknowledged that an alternative option for increased thresholds would have similar advantages and disadvantages, but the costs and benefits would vary and the impact on the self-catering sector would be less pronounced.

(d) did you not, under the terms of the Welsh Minister's Business Scheme (supra), engage with the sector once you had formed a view that 182 days was an appropriate threshold;

As noted above, I held the further technical consultation on the draft legislation, received a large number of views from stakeholders and met sector representatives (including the Wales Tourism Alliance) during that period. I am aware that other Ministers and/or their officials have also engaged with the sector. The Welsh Government has responded to a large volume of correspondence received from the self-catering sector, providing clarification on a range of matters related to our local taxation changes.

(e) was there no acknowledgement of the additional demands that the requirement to consult with business places on social partners, the representative bodies in this instance. "Therefore, in addition to ensuring that reasonable expectations are placed on social partners in the engagement process, the Welsh Ministers will assist the social partners' ability to engage by providing resources to facilitate engagement." (Welsh Ministers' Business Scheme, supra). No resources were offered;

A large volume of responses was received to both consultations, within the time available. The provision of resources to support representative bodies in responding to a consultation is not routine and no such support was requested. The Welsh Government has invested

considerable time and resources in providing timely responses to queries and requests from sector representatives, during and after the consultation processes.

(f) did you not ask how many other small businesses in the NDR system are asked to be open - and busy - in the same way as opposed to how the VOA carries out business evaluations; and

Properties that are used for purposes other than the provision of living accommodation are not classified in the same way within the local taxation system. The wider tax-base does not have the same relevance to the policy aims. Most properties used for business and other non-domestic purposes can be readily identified as non-domestic and classified as such for local tax purposes. Particular issues arise in the case of self-catering accommodation as many of the properties in question could also be used as permanent living accommodation, and thus classified as domestic property and liable for council tax. Therefore, there is a need for a specific definition to distinguish between these uses for local tax purposes.

(g) did you assert that the application of a non-identified competition filter determined that the risk of significant detrimental impact on competition was low at the same time as stating “It is not possible to predict the number of businesses which may be impacted and how they might respond”?

The reasoning is clarified in the relevant section of the RIA.

5. The EM is says that there is no specific equalities impact, stating that it is not clear that women, particularly with caring responsibilities (and retired people) would be less able to let their property for more of the year than others and that there is no “sound evidence available in this regard”. This shows a clear lack of understanding about how rural families participate in the economy and no appetite for seeking evidence, leading to an unsubstantiated assumption. The sector managed to get a small amount of evidence together at short notice, sufficient to suggest that Welsh Government should have explored this further.

What work did the self-declared feminist, pro-caring Welsh Government, with a commitment to gender budgeting, carry out to determine the impact of this policy on women?

The Welsh Government considered available evidence, which was found to be very limited, as data held from surveys and administrative sources do not include personal characteristics of the operators. The survey conducted by the sector is referred to in the RIA even though its robustness cannot be validated by the Welsh Government. The RIA recognises that there is a lack of sound evidence in relation to the possible impacts on particular groups, but makes no assumptions in this regard.

6. A warning that legislation is coming is different from legislation being made. Anything can happen, and I understand that there was a delay laying the Order in order for the late evidence to be considered.

Why, when it was clear that the Order would be delayed, was it not amended to ensure that it only affected assessments carried out after the anniversary the law was made, rather than the arbitrary date of April 1st? That way, the relevant 12 months to be taken into account by the VOA would be in the post legislation period instead of partly within it and partly retrospective? Anyone assessed between 1 April 2023 and 25 May 2023 will be asked to apply a new law to a period which predates its coming into force.

The statement on the three-pronged approach by the Minister for Climate Change in July 2021 set out the reasons for urgency and pace in addressing the issues affecting the availability and affordability of housing and the impact of large numbers of second homes and holiday lets on communities. This was followed by the initial policy consultation on potential changes to the local taxes over the summer of 2021, which set out the case for change. On 2 March 2022, more than 12 months before the changes take practical effect, I announced the outcome of our consultation on local taxes for second homes and self-catering accommodation. During the consultation period and subsequently, I have had discussions with stakeholders, responded to debates on the subject in the Senedd and answered questions from Members. Throughout this period, I have been clear about the Welsh Government's decision and the timing of changes. I recognise the importance of clarity and certainty for businesses in relation to the timing of changes.

The implementation date of 1 April 2023 has been selected for a number of reasons. It is the start of a new operating (financial) year for businesses and other stakeholders in the system. The date also coincides with the coming into effect of the latest non-domestic rates revaluation, ensuring that all self-catering properties in Wales have been assessed on the basis on the current letting thresholds in readiness for the new rating list being compiled and providing consistency in how they have been defined ahead of the new thresholds being applied. I am not aware of representations from the sector suggesting that operators do not make their properties available to let during April and May. It is occupancy outside of the spring and summer seasons which has been raised as a challenge.

In the context of the wider policy approach, it is also important to ensure that closely related interventions are aligned, particularly the two arms of the local taxation system. Local authorities will set any council tax premium on a financial year basis and the Welsh Government has been clear that the timings of these related policy changes within the local taxation system would align.

7. Finally

(a) What is the appeals process for businesses, especially those who will fall on different sides of the 182-threshold from year to year?

There are established routes of appeal for owners who consider that their property has been incorrectly classified or valued. An operator wishing to make an appeal should first [contact](#) the VOA. If agreement between the ratepayer and the VOA cannot be reached, the appeal may be considered by the Valuation Tribunal for Wales.

(b) Will the threshold be averaged out where there is more than one unit on-site?

The criteria apply to each individual unit of self-catering property rated separately by the VOA and this approach is not changing. If an operator has more than one unit of property at the same location or within very close proximity to each other and used for the same or connected businesses, as now it will still be possible to take an average for the number of days actually let, if some units are let for at least 182 days and others are not.

(c) Why was no formal review period built into the Order to ensure that the impact of the legislation is addressed within a process which allowed for revocation should the monitoring and evaluation work reveal detriment/no benefit?

It is not routine practice to build a formal review period into legislation. Our plans for post-implementation review are noted in the RIA. My officials are preparing to monitor the impact of the changes following implementation, from 1 April 2023. Our Service Level Agreement with the VOA includes a requirement to monitor and report to the Welsh Government on movements between the non-domestic rating and council tax lists.

In my statement of 24 May, I clarified that the Welsh Government will keep all policy levers under review, as we continue to progress the package of measures. However, I recognise the importance of clarity and certainty for businesses and consider it would not be helpful to suggest that the Welsh Government is likely to revise thresholds again in the short-term

Enable Welsh residents to access an NHS "Right to Choose" diagnosis pathway for ADHD

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR22/3596-3

Petition Number: [P-06-1290](#)

Petition title: Enable Welsh residents to access an NHS "Right to Choose" diagnosis pathway for ADHD

Text of petition:

Unlike England, there is currently no "Right to Choose" in Wales to enable individuals to select the hospital or service they would like to have their NHS treatment. The Right to Choose within mental health services in England has been in place since 2018 allowing adults seeking an assessment for ADHD the opportunity to choose an alternative provider should they decide the waiting time for their NHS assessment is too long. Welsh residents are being discriminated against for being in Wales.



1. Background

Patient choice

In England, patients have the right to choose which hospital they're referred to by their GP. This also applies to Welsh residents in border areas who are registered with an English GP. This legal right lets patients choose from any English hospital offering a suitable treatment that meets NHS standards and costs. The ADHD.UK website provides further information about right to choose in England in relation to ADHD assessments.

The Welsh NHS does not operate a system of patient choice but looks to provide services close to a patient's home where possible. Patients registered with a GP in Wales do not have a statutory right to choose which hospital they're referred to. This extends to English residents with a Welsh GP. In Wales, patients are usually only referred outside their area if the treatment they require is not available where they live.

About ADHD

ADHD is a neurodevelopmental condition (i.e. present from birth). It affects around 1 in 20 people, although prevalence may be higher due to under-diagnosis or misdiagnosis. It commonly co-occurs with other neurodevelopmental conditions such as autism.

Undiagnosed/unsupported ADHD can result in worse physical and mental health outcomes for those affected. Children with neurodevelopmental conditions such as ADHD experience high rates of school exclusion, educational failure, family breakdown, and substance misuse.

Many children and young people face long waits (often years) for assessment and diagnosis. Some families resort to paying privately for assessment. The long waiting times may also be a particular issue for young people approaching the age of transition to adult services, where thresholds for support may be higher.

2. Welsh Government action

An all-Wales neurodevelopmental service workstream was launched in 2015/16 under the Together for Children and Young People (T4CYP) programme.

Multidisciplinary neurodevelopmental teams were established, and a neurodevelopment diagnostic assessment pathway was published. This set out six standards and aimed to develop a consistent approach to assessment across Wales.

In November 2019, the T4CYP programme was extended until 2022 with a refocused remit. Neurodevelopmental services was one of three key areas, with an objective to “further support health boards to implement the pathway and standards, and to support the development of a whole system response for children and young people with ND conditions”. TC4CYP ended in March 2022, although some legacy work is continuing until September 2022. This includes consideration of the findings of a demand and capacity review of all-age neurodevelopmental services. A summary report of the demand and capacity review was published in July 2022.

Responsibility for neurodevelopmental services recently moved to Julie Morgan as Deputy Minister for Social Services (it previously sat with Lynne Neagle as Deputy Minister for Mental Health and Wellbeing). In a statement on 6 July 2022, the Deputy Minister for Social Services acknowledged that neurodevelopmental services are under pressure, exacerbated by the pandemic. She said:

Increased awareness of autism and other neurodevelopmental conditions has led to rising demand for assessment and support, which has unfortunately led to longer waiting times and gaps in provision, which need to be addressed urgently.

The Deputy Minister’s letter to the Petitions Committee about this petition refers to her 6 July statement and delivery of a new neurodevelopment improvement programme, backed by £12million to improve waiting times, services and support for families.

As health boards are responsible for delivering services such as ADHD assessments, the Improvement Plan will examine how health boards are currently delivering their services, including the response to private diagnosis. (...)

I will be monitoring delivery of the programme closely and a new Ministerial Advisory Group on neurodevelopmental conditions has been established. This group will provide me with advice on progress, emerging areas of best practice, funding options and any other matters that may be of value to neurodivergent individuals in Wales.

3. Welsh Parliament action

The Health and Social Care Committee's April 2022 report - [Waiting well? The impact of the waiting times backlog on people in Wales](#) - made two recommendations in relation to neurodevelopmental services. These are set out below, along with the [Welsh Government's response](#) to these recommendations:

Committee recommendation 5. When she shares the findings of the neurodevelopmental services capacity and demand review with us, the Minister for Health and Social Services should also set out how and when any recommendations made by the review will be implemented and how their impact will be monitored.

Welsh Government response: (...) We are considering the action needed and will shortly be making a further statement confirming the urgent support we will be providing to reduce the immediate pressures on assessment services. Over the remainder of this term, we will work in partnership with practitioners and those seeking support to develop sustainable services which provide timely access and can provide much needed pre and post assessment care, through a person-centred holistic approach.

Committee recommendation 6. The Minister for Health and Social Services should provide an update in autumn 2022 on what action has been taken to identify and address any differences in the length of time taken in Wales to diagnose females and males with neurodevelopmental conditions such as autism.

Welsh Government response: Collecting accurate and informative data is key, the current waiting time target is not fit for purpose and does not provide us with the intelligence we need to plan and deliver neurodevelopmental condition services, and this includes the need to be able to disaggregate assessment data by gender. As part of the improvements, we will be making we will re-design the data collection so that it provides valuable information which can help us to identify how well services are delivering and whether there are any inequalities in assessment.

Neurodivergence (this includes neurodevelopment conditions such as ADHD and autism) is also a key theme in the Health and Social Care Committee's current [mental health inequalities inquiry](#).

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.

Julie Morgan AS/MS
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1290
Ein cyf/Our ref JMSS/00909/22

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

15 August 2022

Dear Jack,

Thank you for your letter of 3 August on behalf of the Petitions Committee about Petition P-06-1290 Enable Welsh residents to access an NHS "Right to Choose" diagnosis pathway for Attention Deficit Hyperactivity Disorder (ADHD) assessment.

The health service is a devolved area of policy and the Welsh government can do things differently from England, like the offer of free prescriptions. We do not have an equivalent scheme to the "right to choose" in Wales.

Neurodevelopmental conditions, including ADHD has only recently become part of my portfolio but I am already aware of the increasing demand and long waiting times for assessment and diagnosis. Therefore, on 6 July I made a commitment to deliver a new Neurodevelopment Improvement Programme, backed by £12million to improve waiting times, services and support for families.

As health boards are responsible for delivering services such as ADHD assessments, the Improvement Plan will examine how health boards are currently delivering their services, including the response to private diagnosis, which you raised in your letter.

I meet regularly with parents of children with ADHD and from listening to their experiences I understand the struggles that they are facing. This is another reason why I provided additional investment into services to include much-needed additional advice and support.

I will be monitoring delivery of the programme closely and a new Ministerial Advisory Group on neurodevelopmental conditions has been established. This group will provide me with advice on progress, emerging areas of best practice, funding options and any other matters that may be of value to neurodivergent individuals in Wales.

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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.

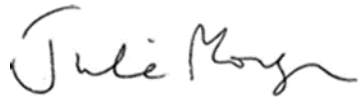
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Back Page 78

My officials are currently working with the ADHD Foundation and Parents Voices in Wales to look at opportunities to develop and pilot new neurodevelopmental support services in Wales.

I hope my response provides some reassurance that we are working towards an improved neurodevelopmental service.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Julie Morgan'.

Julie Morgan AS/MS

Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services

Public sector Scope 3 emissions

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR22/3596

Petition Number: P-06-1292

Petition title: Make Welsh public sector organisations report scope 3 emissions and include them in net zero targets

Text of petition:

Include all emissions associated with public sector investments in Welsh government decarbonisation targets and make reporting investment emissions (scope 3) mandatory for all Welsh public sector organisations. Local authorities are aiming for net zero by 2030 while investing in companies that plan to extract fossil fuels for decades. Welsh public sector organisations are not currently required to report on emissions associated with investments! This is a loophole that needs closing.

A brief explanation of scope 3.

Scope 1 – direct emissions from sources owned or controlled by a public sector organisation.

Scope 2 – indirect emissions from purchased electricity, steam, heat, and cooling.

Scope 3 – all other emissions associated with an organisation's activities. Including investments in fossil fuel companies.

Including some scope 3 emissions within the operational boundary but excluding investments is inconsistent with achieving true net zero by 2030



and undermines the Government's decarbonisation efforts. See page 14, table 3 here.

https://gov.wales/sites/default/files/publications/2021-05/welsh-public-sector-net-zero-reporting-guide_1.pdf

By including pensions and investments in government targets the public sector will have the flexibility to decide for themselves what to do about these indirect scope 3 emissions without simply ignoring them.

1. Background

Greenhouse gas emissions are categorised into three groups or 'Scopes' by the most widely-used international accounting tool, the [Greenhouse Gas \(GHG\) Protocol](#). Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating and cooling consumed by an organisation. Scope 3 includes all other indirect emissions that occur from an organisation's activity. This includes purchased goods and services, business travel, waste disposal, transportation and distribution, investments and leased assets.

Wales has a legislative target to achieve [net-zero emissions by 2050](#). In October 2021 the Welsh Government published its [Net Zero Wales plan](#). This statutory emissions reduction plan contains 123 government policies and proposals for the next five years to achieve a reduction in greenhouse gas emissions across all sectors, and looks ahead to the net zero by 2050 target. It includes the ambition of achieving a collective net zero public sector by 2030, covering over 780 public sector organisations in Wales.

The Welsh Government's [Welsh Public Sector Net Zero Reporting Guide](#) (updated in July 2022) aims to help the **public sector in Wales to estimate its net carbon footprint, including direct and indirect emissions.**

Table 3 on page 16 outlines Scope 3 emissions sources for the public sector in Wales:

- Purchased goods and services;
- Fuel and energy related upstream activities;

- Upstream transportation and distribution;
- Waste generated in operations;
- Business travel;
- Employee commuting;
- Upstream leased assets;
- Downstream leased assets*;
- Downstream transportation and distribution*;
- Processing of sold products*;
- End-of-life of sold products*;
- (Franchises); and
- (Investments).

Sources in **brackets** are excluded from Welsh public sector reporting. Sources **marked with *** have been partially excluded from Welsh Public Sector reporting and the guide advises organisations should consult the relevant sections of the guidance for further instruction.

2. Welsh Government action

The Minister for Climate Change, Julie James MS, response to this petition states reporting of emissions by public authorities although well supported, is currently not mandatory but strongly encouraged, for example through its Welsh Public Sector Net Zero Reporting Guide.

It outlines the operational boundary and development of the reporting guide for the new public sector reporting process was developed collaboratively during a workshop of public body representatives.

It states in the first instance, the aim is to focus on the emissions directly under the operational control of the public sector, including Scope 1 and 2, and most of Scope 3. The initial results were collated and shared as a report earlier this year, Public Sector Net Zero data and recommendations.

The Minister goes on to say:

The public sector does not have direct operational control of many of the key decisions regarding to pensions and investments. I understand there are 8 main funds across local government which have pooled most of their investments, and the pool has introduced a climate change / decarbonisation statement. The Minister for Finance and Local Government has written to and met with the chairs of these pools to encourage them to go further and faster, with some success and committed to work with the public sector to agree a strategy to decarbonise pensions by 2030, thus bringing them into line with current public sector net-zero targets.

3. Welsh Parliament action

The specific issue of Scope 3 emissions has not been considered in the Senedd. However, on 25 May 2022 the Senedd debated a motion put forward by Jack Sargeant MS, on decarbonising public sector pensions. The motion, which was agreed, proposed the Senedd:

1. Notes:

- a) that the Welsh Government was the first in the world to declare a climate emergency, recognising the serious threat climate change poses;
- b) that public sector pension schemes continue to invest in fossil fuels and, for many years, campaigners have urged schemes to disinvest;
- c) that the Welsh pension partnership moved quickly to withdraw investment from Russian holdings and has previously divested from coal, thus demonstrating that it is possible for pension funds to make these decisions;
- d) that Members of the Senedd took the initiative to divest their own pension funds from fossil fuels;
- e) that if public sector pension schemes in Wales disinvest, Wales would be the first nation in the world to achieve this, demonstrating to fund providers the need to create fossil fuel free investment products.

2. Calls on the Welsh Government to work with the public sector to agree a strategy to decarbonise pensions by 2030, thus bringing them into line with current public sector net-zero targets

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.

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JJ/01722/22

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

18 August 2022

Dear Jack Sargeant MS,

Thank you for your letter of 3 August 2022.

Reporting by public authorities although well supported, is currently not mandatory but strongly encouraged, for example through our [Welsh Public Sector Net Zero Reporting Guide](#).

Last year, a wide range of bodies, including local authorities, worked on supplying the relevant data to help Welsh Government establish the carbon footprint of the public sector in Wales and will continue to do so this year.

The operational boundary for this new public sector reporting process was developed collaboratively during a workshop of public body representatives when developing the current reporting guide and the process continues to be developed with widespread stakeholder input and lessons learned.

In the first instance, the aim is to focus on the emissions directly under the operational control of the public sector, which meant including Scope 1 and 2, and most of Scope 3. The initial results were collated and shared as a report earlier this year [Public Sector Net Zero data and recommendations | GOV.WALES](#).

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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.

The public sector does not have direct operational control of many of the key decisions regarding to pensions and investments. I understand there are 8 main funds across local government which have pooled most of their investments, and the pool has introduced a climate change / decarbonisation statement. The Minister for Finance and Local Government has written to and met with the chairs of these pools to encourage them to go further and faster, with some success and committed to work with the public sector to agree a strategy to decarbonise pensions by 2030, thus bringing them into line with current public sector net-zero targets. This is supported by the motion agreed by the Senedd on May 24th to work with the public sector to agree a strategy to decarbonise pensions by 2030.

Yours sincerely,

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive, flowing style.

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

P-06-1292 Make Welsh public sector organisations report scope 3 emissions and include them in net zero targets, Correspondence – Petitioner to Committee, 06.09.22

I have a couple of questions I would like to ask before the petition is considered by the committee.

Understanding the carbon footprint of the public sector is vital in efforts to decarbonise. By setting the operational boundary where it is and excluding scope 3 investment emissions you can never actually know the true footprint or know when the public sector reaches true net zero.

It is not net zero if you ignore an entire category of emissions!

Despite much talk of decarbonisation do any of the Welsh local authority pension funds or sub funds within the Welsh pension partnership report on their scope 3 investment emissions yet?

If not how will the pension fund trustees know when they have decarbonised?

You say the Minister for finance and local government has had some success in encouraging the managers of the sub funds within the WPP to decarbonise.

How was that success measured if they don't report scope 3?

It is great to hear that the Welsh government wants to work with local authorities to create a strategy for local authority pension fund decarbonisation.

By making measuring and reporting of investment emissions mandatory the data would be available for all stakeholders to judge the success of that strategy.

The climate emergency is accelerating as we rapidly burn through our remaining carbon budget.

The finance sector is funding the destruction of the future people will retire into. We need to act now.

Redrawing that operational boundary is a concrete action that could be taken now rather than just encouraging funds to do the right thing without any consistent way of measuring it.

Kind regards

Dylan Clarke

Provide funding for universal access to Fracture Liaison Services

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR22/3596-6

Petition Number: P-06-1293

Petition title: Provide funding for universal access to Fracture Liaison Services.

Text of petition: The Welsh Government should commit to 100% coverage of quality-assured Fracture Liaison Services (FLS). FLS is the world-standard for treating osteoporosis and preventing fractures, yet access is a postcode lottery. This means thousands of people living on the wrong side of a catchment line will suffer life-changing spinal and hip fractures. The Welsh Government can transform the picture through a clear strategic direction from the top, backed with modest funding for FLS and sensible incentives.

Fractures (broken bones) caused by osteoporosis are one of the most serious threats to living well in later life. Left untreated, osteoporosis threatens our freedom, dignity, quality of life and independence. With an early diagnosis and the right treatment, people with osteoporosis can live well, thanks to safe, effective, medication that is highly affordable for the NHS. But missed opportunities for diagnosis and early intervention mean that thousands of people across Wales are missing out on the bone-strengthening medication they need. In a recent FOI request, the Royal Osteoporosis Society (ROS) found that only 4 out of 7 Health Boards could confirm they had a FLS (and not all of these cover the whole population). The ROS estimates that scaling up FLS provision for the whole of Wales would cost around £2 million per year. Over the next five years, this would save the NHS and social care around



£25 million, prevent over 1,200 hip fractures, and release over 34,000 acute bed days.

1. Background

The Royal Osteoporosis Society (ROS) states that osteoporosis affects men and women and leads to fragile bones, which can then lead to ‘fragility fractures’. These broken bones occur after low trauma, such as a minor bump or fall that would not normally cause a bone to break. These fractures are the consequence of low bone density and structural deterioration of bone tissue.

The ROS also states that many fragility fractures could be prevented by timely interventions to reduce fracture risk. A **Fracture Liaison Service** (FLS) systematically identifies, treats and refers to appropriate services all eligible patients aged over 50 within a local population who have suffered a fragility fracture, with the aim of reducing their risk of subsequent fractures.

An FLS is centred around a dedicated co-ordinator (often a Clinical Nurse Specialist) who works to pre-agreed protocols to case-find and then assess patients who have had a fracture. The service may be based in any healthcare setting, either in hospital or out of hospital, and requires support from a medically qualified practitioner (typically a hospital doctor or a GP with expertise in osteoporosis and fragility fracture prevention).

2. Welsh Government action

In a letter to the Petitions Committee on 2 September 2022, the Minister for Health and Social Services states that the Welsh Government recognises the valuable role that FLS have in providing early intervention, easy access to osteoporosis care and in reducing the risk of further fractures.

The Minister notes that Dr Inder Singh, the National Clinical Lead for Falls and Frailty for Wales, has prioritised this work within the National Falls and Frailty Fracture Audit Programme Strategic Group. Following the Fracture Liaison Service Database Annual Report, undertaken by the Royal College of Physicians and published in January 2022, Dr Singh initiated a review of FLS across Wales and

identified a FLS audit lead within each health board. The review provided a clear understanding of current services across Wales and helped to outline the variation in access and range of services provided that the petitioner refers to.

To support this area of work, a new national FLS Development & Quality Assurance Group has been established, consisting of a wide range of key stakeholders including the FLS audit leads. The inaugural meeting was held on 20 July 2022 and focused on the results of the national audit, improving and supporting the delivery of care across Wales and reducing the risk of subsequent fractures for patients with a recent fragility fracture. The Welsh Government is said to be working closely with the ROS and obtaining patient voices to ensure it is clear on the impact these services, or the lack of equitable access to these services, can have on the population.

The Minister confirms that the Welsh Government is in the process of organising a national conference to celebrate World Osteoporosis Day and ensure health boards in Wales are committed to driving forward FLS across Wales.

The Minister goes on to say that the Welsh Government is committed to supporting the effectiveness in osteoporosis care delivery in its existing services and working to develop those areas which do not currently have services in place.

Health boards are responsible for providing services for their population and the Minister highlights that it is appropriate that funding is made available via their resources. It is noted that the Welsh Government will work with health boards to increase the importance of FLS within their services and will continue to pay close attention to progress made.

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.



Eich cyf/Your ref P-06-1293
Ein cyf/Our ref EM/02911/22

Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

2 September 2022

Dear Jack,

Thank you for your letter of 3 August on behalf of the Petitions Committee regarding Petition P-06-1293 to provide funding for universal access to Fracture Liaison Services (FLS).

The Welsh Government recognises the valuable role that FLS have in providing early intervention, easy access to osteoporosis care and in reducing the risk of further fractures.

Dr Inder Singh, the National Clinical Lead for Falls and Frailty for Wales, has prioritised this work within the National Falls and Frailty Fracture Audit Programme Strategic Group. Following the Fracture Liaison Service Database Annual Report (www.rcplondon.ac.uk/projects/outputs/fls-database-annual-report-2022), undertaken by the Royal College of Physicians and published in January 2022, Dr Singh initiated a review of FLS across Wales and identified a FLS audit lead within each health board. The review provided a clear understanding of current services across Wales and helped to outline the variation in access and range of services provided that the committee refers to.

To support this important area of work, a new national FLS Development & Quality Assurance Group has been established, consisting of a wide range of key stakeholders including the FLS audit leads. The inaugural meeting was held on 20 July 2022 and focussed on the results of the national audit, improving and supporting the delivery of care across Wales and reducing the risk of subsequent fractures for patients with a recent fragility fracture. We are working closely with the Royal Osteoporosis Society and obtaining patient voices to ensure we are clear on the impact these services, or the lack of equitable access to these services, can have on the population.

To further promote the importance of bone health and osteoporosis, the Welsh Government is in the process of organising a national conference to celebrate World Osteoporosis Day

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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.

and ensure health boards in Wales are committed to driving forward fracture liaison services across Wales.

We are committed to supporting the effectiveness in osteoporosis care delivery in our existing services and working to develop those areas, which do not currently have services in place.

Health boards are responsible for providing services for their population and as such it is appropriate that funding is made available via their resources. We will work with health boards to increase the importance of fracture liaison services within their services and continue to pay close attention to progress made.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. E. Morgan'.

Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

P-06-1293 Provide funding for universal access to Fracture Liaison Services (FLS)

Thank you for informing me that my petition will be considered by the Petitions Committee on the 19 September and for the document which you attached.

I would be grateful if you will consider my views as follows:

With variation in access to quality FLS across Wales and within individual Health Boards – How will the Welsh Government standardise secondary fracture prevention across Wales, ensuring that all Health Boards prioritise commissioning of quality FLS, that are fully funded and resourced to meet the need of their population?

Many thanks

Yours sincerely

Delyth Evans MBE

Don't leave metastatic breast cancer patients in Wales behind

Y Pwyllgor Deisebau | 10 Hydref 2022
Petitions Committee | 10 October 2022

Reference: SR22-3596-7

Petition Number: P-06-1294

Petition title: Don't leave metastatic breast cancer patients in Wales behind

Text of petition: People living with metastatic breast cancer (MBC) in Wales are being badly let down by the system. Currently, Wales has just one dedicated secondary breast cancer clinical nurse specialist (CNS), a situation that leaves potentially hundreds of people without adequate support. We need to know how many people are living with MBC to improve services. And we want improve quality of life outcomes by raising awareness of MBC red flag symptoms.

We are calling for:

1. Every person with Metastatic breast cancer (MBC) in Wales to have access to a dedicated secondary breast cancer clinical nurse specialist.
2. A collection of data of those living and being treated for MBC in Wales.

The Committee has not yet received a response from the Welsh Government to this petition.



1. Background

There are several different types of breast cancer, which develop in different parts of the breast. In a small proportion of women, breast cancer is discovered after it's spread to other parts of the body (the cancer originated in breast tissue, then spread to other parts of the body). This is known as metastatic breast cancer (it is also referred to as secondary cancer or advanced breast cancer). It is essentially stage 4 breast cancer.

Symptoms of metastatic breast cancer

The petitioner wants to raise awareness of the symptoms of metastatic breast cancer, which may be different to early-stage breast cancer symptoms. Sometimes, there are no symptoms at all. Breast cancer most commonly spreads to the bones, brain, liver or lungs. Some of the signs that breast cancer has spread include:

- Bone pain or bone fractures due to tumour cells spreading to the bones or spinal cord
- Headaches or dizziness when cancer has spread to the brain
- Shortness of breath, chest pain and coughing caused by lung cancer
- Jaundice, nausea and swelling of the feet and hands if the cancer has spread to the liver

Treatment options for metastatic breast cancer

Treatments for metastatic breast cancer are designed to shrink tumours and slow their growth, help ease symptoms and improve quality of life. Rather than having only one treatment, most patients undergo several treatments combined to help fight the cancer. The petitioner wants "every person with metastatic breast cancer in Wales to have access to a dedicated secondary breast cancer clinical nurse specialist" to help them through their treatment.

The cancer and research charity 'Breast Cancer Now' say that:

While metastatic breast cancer cannot be cured, treatments can help control forms of the disease for some time and relieve symptoms to help people live well for as long as possible.

Data collection

Breast Cancer Now estimate that there are 35,000 people living with metastatic breast cancer in the UK. In around 5% of women, breast cancer has already spread by the time it is diagnosed.

In October 2021, NHS Wales said it would participate in the first ever **National Metastatic Breast Cancer Audit** run by the Healthcare Quality Improvement Partnership (HQIP). The Audit should provide, for the first time, accurate figures around the number of people in England and Wales living with metastatic breast cancer.

Breast Cancer Now called for the Audit in its 2019 report which revealed the devastating reality of living with incurable breast cancer in the UK, with many people experiencing delays in diagnosis, struggling to access support from a specialist nurse and life-changing treatments.

The charity called on UK Governments to collect data on metastatic breast cancer to improve diagnosis, treatment, and support. It is expected that the first insights from the Audit will be delivered in 2023 and that it will run for a minimum of three years.

2. Welsh Government action

The Welsh Government published its quality statement for cancer in May 2022, which describes what good quality cancer services should look like. An NHS-led cancer action plan is due to be published sometime this autumn.

A Welsh Government spokesperson is quoted in a June 2022 Wales online article stating:

We are committed to improving cancer services and outcomes in Wales, including for people with metastatic cancer. Our new cancer information system will enable better service planning for people with metastatic cancer and we are also introducing a national clinical audit that will benchmark the quality of services provided to people with metastatic breast cancer. We will work with the NHS in Wales to reinforce the need for patients to be given information on signs that their cancer has returned and will give further consideration to the role of nurses specialising in metastatic cancer.

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.

P-06-1294 Don't leave metastatic breast cancer patients in Wales behind – An open letter from the patients of Metastatic Breast Cancer in Wales and those personally and closely supporting those with Metastatic Breast Cancer in Wales.

To the minister of health and social services

My name is Tassia Haines and I am a constituent of Aberavon. Unfortunately, I have been living with metastatic breast cancer (MBC) for over two years even though I am just thirty years old. I am receiving treatment from two health boards and have met people undergoing treatment from all over Wales, and regretfully I must inform you, Wales is failing when it comes to meeting the needs of MBC patients, according to us - The people dying from the disease and the close people supporting those with MBC.

The failures surrounding MBC stems from the insufficient implementation of previous cancer delivery plans and the more recent cancer quality statement which, not only preserves Wales as the only UK nation to not have a cancer strategy but neglects to exhibit accountability and therefore improvement when it comes to a jarring decline in best practice and patient care. Namely, combined efforts of the Welsh Government and the Welsh Breast Cancer Group have been ineffective in protecting patients from the inconsistent care received between health boards. Furthermore, there is still no data to show us how many people are living with MBC in Wales, despite the importance of this being raised and promises to rectify this in 2019. As a consequence, progression of care in this field has moved backwards, as we cannot measure the impact of interventions as people living with MBC remain an unrecognised/unknown group in terms of data.

Imagine having the knowledge that you are not only slowly dying but are also having elements of your identity and life robbed by this invisible, vastly misunderstood disease?

Can you comprehend what it is like to navigate your final months/years between disability, pain and death? and in my case be too sick to pursue a career and have a family, but is not sick enough to die, just yet? Now consider the feeling of impending dread as you realise the system you supported your whole life withheld the knowledge from you that could have potentially prevented this from happening and is also making you face your end alone?

Respectfully, you as Health Minister and our government have indirectly become the architects of this dystopian nightmare as the creators of this fractured framework. By not recognizing the importance of access to an MBC clinical nurse specialist (CNS) to every patient with MBC you have denied them a consistent partner who will be with them through their terrifying decline from a healthy, pain free life. An MBC CNS is more than a role; they are our familiar face between all the differing doctors, they are our voice when we are overwhelmed, they are our guides, our translators, the guardians of our dignity and most of all, they are our friends who will hold our hands through our end-of life care.

There must be some element of consistency and accountability centrally to allow health boards to do the best they can.

To help begin the urgent development of MBC care we propose three steps that must improve and be implemented:

1. Diagnosing MBC

1.a. Patients recovering from primary BC must be informed of the red flag symptoms of MBC.

1.b. They must all be made aware and have a direct line of communication to their BC teams when red flag symptoms do arise.

1.c. GPs must be made aware of the red flag symptoms of MBC especially when a patient has already had BC.

2. Data

2.a. We must have a central system to store data of those living with MBC, this enables us:

- To enable the needs of people with MBC to be identified and addressed
- To measure the effectiveness of interventions
- To inform financial and clinical investment where it is most needed

3. Workforce

3.a Pay health professionals appropriately for their over time. They need to feel more valued to be able to make best practice more sustainable.

3.b. Every person suffering from MBC MUST have access to a CNS whose workload is focused only on those suffering from MBC. Their role would ensure they:

- Act as the main point of consistent contact between differing health professionals for the patient (Surgeon, Radiographers, treatment nurses, pharmacists, oncologists, etc)
- Be there to analyse the holistic needs of each individual patient and refer accordingly (Therapies, counselling, benefits, etc)
- Work alongside Oncologists in designing personalised health plans and to deliver these to the patients and to act as the patient's representative within MDT meetings due to the specific individuals wishes and needs.

Please note this list is not exhaustive of an MBC CNS job specification.

As a unit of all those involved in those closely supporting and living with MBC. It is us - the patients and caregivers who wish to sign this letter in support for urgent change. We call upon you as Health Minister to help make the central changes we

need brought forward by this letter to bring back best practice within MBC and meet the needs of patient care.

Due to the lack of data of those living with MBC and their needs in Wales we feel this letter is an important step forward to represent our issues and desires for change.

Yours sincerely

The patients of Metastatic Breast Cancer in Wales and those personally and closely supporting those with Metastatic Breast Cancer in Wales.

P-06-1295 Hold a public poll on the reduction of the default speed limit before it comes in to force

Y Pwyllgor Deisebau | 10 October 2022
Petitions Committee | 10 Hydref 2022

Reference: SR22/3596-10

Petition Number: P-06-1295

Petition title: Hold a public poll on the reduction of the default speed limit BEFORE it comes in to force

Text of petition:

I think that the Welsh Government must hold a public poll on this change as it will affect everyone! There is no proven evidence that it will save lives or reduce pollution. There is evidence to support it increasing the amount of emissions being put into the air as cars are not designed to be driven at this speed! Motorists are always being targeted and it's about time pedestrians are hit with some accountability! People in Wales are living in a democracy, hold a public poll on this proposal.

They have already surveyed a large group on this and the majority voted against it!

Their only evidence is theory and hearsay. They have absolutely no proof to support their claims that 20mph will save lives. What it will do is force cars to stop start more and ultimately build up emissions in a concentrated area. I



can only imagine they based this false evidence on their motorway report on reducing to 50mph - IT DOES NOT WORK!!!!

The Welsh Government should be doing more to educate pedestrians to cross only at designated crossings and put up barriers along the edge pavements to prevent them from walking out into the road anywhere they want!

Us motorists are getting more and more frustrated at being easy prey. As for cyclists, with this rule in place they will be riding faster than cars. I have seen this already in the trial areas.

Give us a say on this immediately!

1. Background

In 2019 the Welsh Government set up a task and finish group to consider whether 20mph should become the default speed limit in residential areas. The Welsh Government accepted the group's recommendations, including that the default speed limit on restricted roads (those in residential areas with a system of street lighting placed no more than 200 yards apart) should be reduced from 30mph to 20mph.

Following public consultation and a pilot scheme across 8 communities, the Welsh Government laid the Restricted Roads (20 mph Speed Limit) (Wales) Order 2022 in June. The draft Order was passed by the Senedd in July and is due to come into force in September 2023.

While the default limit on restricted roads will become 20mph, highway authorities (local authorities for local roads and the Welsh Ministers for trunk roads/motorways) can use Traffic Regulation Orders (TROs) to change the limit where appropriate.

Senedd Research has published an article that explores the introduction of 20mph limits in Wales in more detail.

Impact of 20mph limits

Evidence on the impact of 20mph limits on issues like casualty rates, air quality and greenhouse gas emissions has often been described as mixed.

In 2018 the Welsh Government published [a study on the state of the evidence for 20mph limits](#) on road safety, active travel and air pollution. Also in 2018 the UK Government Department for Transport [published research on the effectiveness of these limits](#). The UK Government Research found that:

...there is insufficient evidence to conclude that there has been a significant change in collisions and casualties following the introduction of 20mph limits in residential areas...

[Recent research](#) from road safety charity [IAM RoadSmart](#) found support in the UK for reducing the speed limit on all urban roads from 30mph to 20mph has increased in recent years. However its Director of Policy and Research [suggests a blanket introduction of a 20mph limit isn't necessarily the best route](#), stating that:

Each situation needs to be decided on a case-by-case basis, with local considerations and consultation playing an important role.

The distinction between a 20mph limit and zone is also important when considering available evidence. [Research from Queen's University](#) found that while there was clear evidence 20mph zones with traffic calming measures reduced the frequency and severity of collisions and casualties, there was a lack of evidence on the effectiveness of 20mph limits enforced only by signage.

The Welsh Government's task and finish group found 'overwhelming evidence' over more than two decades that lower speeds result in fewer and less severe collisions. The risk of being killed, it says, is almost five times higher in a collision between a car and pedestrian at 31mph (50km/h) compared to the same type of collision at 18.6mph (30km/h).

[Its report](#) summarised that:

Enabling a much wider take up of 20mph limits is expected to achieve significant road safety benefits, particularly in deprived neighbourhoods. In the longer term, reductions in the perception of road danger is expected to lead to more walking and cycling which will improve public health and replace some short car journeys...More walking and cycling is also likely to lead to greater social cohesion which brings further societal

and health benefits. Lower speeds will lead to reductions in traffic noise, while impacts on air quality will be neutral at worst and journey time increases will be slight...

The Welsh Government has published [a list of FAQs](#) relating to the introduction of 20mph limits which includes information on pollution and road safety. It has also [developed a framework](#) to measure the effects of the reduced limit in the pilot scheme areas.

2. Welsh Government action

The petitioner calls on the Welsh Government to hold a public poll before the 20mph default limit comes into force. In November 2020 the Welsh Government undertook [a national survey](#) which found strong support for the plans (81%), especially among parents.

[Formal consultation](#) was also undertaken in 2021. Just over 6000 responses were received, although on this occasion only 47% of respondents were in favour of reducing the speed limit while 53% were against.

In his letter to the Chair dated 6 September, the Deputy Minister for Climate Change details the survey and consultation exercise outlined above. He also refers to evidence taken into account by the Welsh Government in relation to road casualties and pollution.

3. Welsh Parliament action

In July 2020 the Senedd [debated the introduction of default 20mph speed limits](#) with 45 of 53 Members [voting in favour of the motion](#).

As outlined, the Welsh Government laid the [Restricted Roads \(20 mph Speed Limit\) \(Wales\) Order 2022](#) in June 2022. The draft Order was [passed by the Senedd](#) in July 2022 and is due to come into force in September 2023.

In April you [considered a petition](#) calling on the Welsh Government to stop the introduction of the 20mph limit. At that time you agreed to close the petition due to the ability of local authorities to change the limit on roads where 20mph would not be appropriate.

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.



Ein cyf/Our ref LW/01672/22

Jack Sargeant MS
Chair - Petitions committee

6 September 2022

Dear Jack,

Thank you for your letter of 4 August regarding Petition P-06-1295 Hold a public poll on the reduction of the default speed limit BEFORE it comes in to force.

On 12 July the Welsh Senedd approved the legislation to lower the default national speed limit on residential roads and busy pedestrian streets from 30mph to 20mph.

The new legislation will not apply a blanket speed limit on all roads, it will simply make the default limit 20mph, leaving local authorities, who know their area best, to engage with the local community to decide which roads should remain at 30mph.

I am under no illusions that this is a huge behavioural change. Seven local authorities are currently taking part in the initial rollout of the 20mph settlement areas. The purpose of the phase 1 settlements is to use this as opportunity to learn lessons to shape the national rollout and to gather long term data.

A [Traffic Orders and 20mph public attitudes survey](#) was conducted among a representative sample of the public in late 2020. Four in five Welsh adults (80%) said they would support a speed limit of 20 mph in the area in which they lived, compared to one in five (20%) who would not. A [12-week public consultation on the default 20mph speed limit](#) was also carried out during 2021. The consultation results are quite different from the findings of the public opinion survey. The difference is likely to be the result of the different sampling approaches for each exercise – the sample for the public consultation was self-selecting, while the opinion survey sample was structured to be representative of the general population, thus minimising self-selection bias.

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The petition suggests that the only evidence available is 'theory and hearsay' however we would refer Members of the Petitions Committee to the substantial evidence base amassed over the previous 25 years on the benefits of 20mph. There is overwhelming evidence that lower speeds result in fewer collisions and a reduced severity of injuries; and consistent evidence that casualties are reduced when 20mph limits are introduced. For example, Scottish Local Authorities participated in a successful 20mph Speed Reduction Initiative during the late 1990's and I have attached a copy of the research findings for reference. Briefly, that study found that there was a considerable drop in the number of recorded accidents per year after the introduction of the trial 20mph scheme, and also a significant reduction in severity, with serious or fatal accidents reduced from 20% to 14% of the total.

At the present time, on average 80 people a year die on Welsh roads, 80 families whose lives will never be the same again. The Royal Society for the Prevention of Accidents (RoSPA) states that 45% of pedestrians get killed when struck by a car going at 30mph or less but only 5% when going at 20mph or less. The risk of being killed is almost 5 times higher in collisions between a car and a pedestrian at 31mph compared to the same type of collisions at 18.6mph. See chart 7 on page 8 for more information: [Reported road casualties: 2020 | GOV.WALES](#).

The petition also contains a statement about pedestrians and I would refer Members of the Petitions Committee to the [update to The Highway Code](#) made in January 2022. Cutting the number of deaths and injuries that occur on our roads every day is a responsibility we all share and knowing and applying the rules contained in The Highway Code could significantly reduce road casualties. The 'hierarchy of road users' is a concept that places those road users most at risk in the event of a collision at the top of the hierarchy and pedestrians may use any part of the road and use cycle tracks as well as the pavement, unless there are signs prohibiting pedestrians.

In addition, there is a strong evidence base that 20mph will have no negative impacts on air quality, with small improvements observed in various studies across the UK. For example, the Petitions Committee may wish to view a recent assessment of [air pollution levels in Richmond upon Thames](#), following the implementation of a 20mph scheme in late 2019 and early 2020. This showed encouraging early signs that lower speed limits may contribute to lower pollution levels. An [explanatory memorandum](#) was also published in June 2022, when the Restricted Roads (20 mph Speed Limit) (Wales) Order 2022 was laid. Public health Advisors have similarly informed Welsh Government that 'scientific research has shown that lower speed limits can reduce pollution where there is smoother driving behaviour. Emissions of nitrogen oxides (NOx) are 2 to 4 times higher under hard acceleration than under constant speed; therefore underlying that more acceleration, so to 30mph, will pollute more than accelerating to 20mph and then driving more steadily'. Finally, while not all of the available evidence suggests that 20mph limits decrease all forms of air pollution, it is generally accepted that they do not increase air pollution relative to 30mph limits (Archer et al, 2008; Journard et al, 1995; TEAG, 2013).

Further information regarding the introduction of 20mph limits can be found on our website at:

[Introducing 20mph speed limits | GOV.WALES](#)

[Introducing 20mph speed limits: frequently asked questions | GOV.WALES](#)

May I also refer Members of the Petitions Committee to our [Wales Transport Strategy](#). Climate Change is the greatest challenge we face and the Welsh Government and Senedd have committed to taking it seriously - making decisions that will not always be comfortable or easy, but are required for the future generations of Wales. The strategy has modal shift at its heart and changing the default speed limit from 30mph to 20mph will play an integral part. We are investing in active travel and are targeting 45 percent of all trips to occur by public transport, cycling or walking by 2040. This modal shift will in turn help reduce emissions by reducing the number of vehicles on the road especially those making shorter trips which could be made on foot or bike. As with any cultural change we know it takes time to win hearts and minds and inevitably we will face some challenge, but I am confident that if we all work together we can make the necessary changes that will benefit us now and in the future.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lee', is positioned above the printed name and title.

Lee Waters AS/MS

Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change

P-06-1295 Hold a public poll on the reduction of the default speed limit BEFORE it comes in to force, Correspondence – Petitioner to Committee, 22.09.22

I still do not agree with the findings. I understand the need to cut speed around schools and extreme built up areas but it being the defacto default is not appropriate. I stand by my comment of it being theory and hearsay. Similarly to the 'findings' on the 50mph reduction on motorways. In theory driving at 50mph will reduce emissions but when the M4 is constantly congested no matter what time of day it is, these findings are useless.

All of this being said, you hit the nail on the head, it is a massive change and therefore MUJST be put to the public for a formal vote and not decided by less than 100 people in CARDIFF! you mention your 'test' areas, yet several of them have already reverted as it is not working and is causing too many issues. You also mention that you want 45% of all journeys to be made by foot, bike or bus, yet most of Wales is rural and does not have the public transport links to accomodate this. I for one will NEVER commute to work on a bike or by foot as it is way too far away, it would increase my commute time by over double. Public transport is not viable for me either as I am not on a bus route or near a train station without driving there.

Please discuss this in your meetings, however the Welsh population HAS THE RIGHT TO DECIDE THIS NOT YOU AS ITS US THAT ELECT YOU! You work for the people not the other way around!

Regards
Mark

Agenda Item 3.1

P-06-1163 Extend the postgraduate STEMM bursary to all MSc students in Wales

This petition was submitted by Rachel Wrathall, having collected a total of 88 signatures.

Text of Petition:

In June 2019 Welsh Government announced a bursary scheme to increase the number of Welsh graduates who remained or returned to Wales to undertake a master's degree in Science, Technology, Engineering, Mathematics or Medicine (also known as 'STEMM' subjects). This funding currently only extends to traditional Universities, excluding students who choose a STEMM Masters through alternative providers. This excludes some students, who need more flexibility in STEMM subject matter or course delivery.

Additional Information:

The Diamond review recommended that efforts are made "to enable students to study in the mode that best supports their circumstances". (The Review of Higher Education Funding and Student Finance Arrangements in Wales, 2016).

Currently students studying for STEMM Masters at the Centre for Alternative Technology (CAT) School of the Environment in Machynlleth are excluded from Welsh Government's STEMM bursary funding. The courses provided at CAT have a specific sustainability focus, which aligns with Welsh Government efforts to change the course of Wales onto a more sustainable path (e.g. through principles outlined in the Well-being of Future Generations (Wales) Act 2015).

Teaching at CAT is flexible, and unlike traditional universities, enables students to study a taught Masters whilst continuing work/caring responsibilities.

We believe that the exclusion of STEMM students at organisations like CAT from STEMM bursary funding is counter to the STEMM bursary policy aims.

Senedd Constituency and Region

- Vale of Glamorgan
- South Wales Central

Agenda Item 3.2

P-06-1218 Notify all 18 year olds who have been under social care the right to request their personal information

This petition was submitted by Victoria Pritchard, having collected a total of 260 signatures.

Text of Petition:

Everyone who has been in the care of social services should be told of their right to request their personal information by social services when they turn 18. Reviewing papers years and years after the event can have a significant detrimental effect on a person's well being and families.

Every person has human rights and should be informed about the right to view their file.

Additional Information:

Because I was so passionate about helping other children I chose to study youth & community work degree and during a discussion with my lecturer, as they knew I had been in care during previous conversations, they asked if I had asked for my data protection file which I had no idea what it was or what they were referring too. They told me what to do, I followed the procedure and was handed the file. The man looked at me with empathy as he had read it. I was a bit shocked and confused by the empathy he was showing me. I went home with this file quite interested at this point to have a read especially due to the man's expression on his face knowing he had read the file also, low and behold I had no idea what was ahead of me, I was exposed to all the childhood trauma and neglect that I had experienced and it was such a shock to me that I had to be seen by a psychiatrist due to revisiting past trauma. I'm not blaming social services for the way my parents treated me that's not their fault.

Senedd Constituency and Region

- Carmarthen East and Dinefwr
- Mid and West Wales

Julie Morgan AS/MS
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref: P-06-1218
Ein cyf/Our ref: JMSS/00641/22

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
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1 July 2022

Dear Jack,

Thank you for your letter of 27 May concerning the petition (P-06-1218) to 'Notify all 18-year-olds who have been under social care the right to request their personal information'.

As requested, please find attached a copy of my letter to local authority Heads of Children's Services, asking that Personal Advisers and Leaving Care teams offer assistance to care leavers so they are able to access their case files.

Yours sincerely,

Julie Morgan AS/MS
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services

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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.

Julie Morgan AS/MS
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref: P-06-1218
Ein cyf/Our ref: JMSS/00641/22

Local Authority Heads of Children's Services
CC Directors of Social Services; Care Inspectorate Wales

1 July 2022

Dear Colleagues,

The Petitions Committee in the Senedd have been considering a petition ([P-06-1218](#)) to 'Notify all 18 year olds who have been under social care the right to request their personal information'.

Our Part 6 Code under the Social Services and Well Being (Wales) Act 2014, sets out that local authority Personal Advisers must offer assistance to care leavers, so they are able to have easy access to their case files. As part of local authorities' corporate parenting responsibilities, it is important there is transparency for young people about their time in care and I would be grateful if local authorities could liaise with their Leaving Care Managers and Personal Advisers to ensure the requirements in the Code are carried out.

I know that Leaving Care Teams take their responsibility for supporting care leavers seriously and I hope you have found my letter helpful.

Yours sincerely,

Julie Morgan AS/MS
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services

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Back Page 114
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 3.3

P-06-1228 Give secondary teachers a bonus for marking and standardizing summer 2021 official assessments

This petition was submitted by Lisa M Williams, having collected a total of 1,252 signatures.

Text of Petition:

As a result of the pandemic, teachers in Wales are responsible for marking, standardizing and moderating GCSE, AS and A2 assessments instead of examination boards. This is in addition to their usual teaching timetable and marking the work of other learners. Some teachers have only been released for one hour to carry out the work and, inevitably, it has had to be completed after working hours and on weekends. KS4 and 5 teachers in Wales deserve a bonus for their efforts, just like teachers in Scotland.

Additional Information:

<https://www.thenational.scot/news/19094405.nicola-sturgeon-update-400-payment-secondary-school-teachers-lecturers/>.

Senedd Constituency and Region

- Cynon Valley
- South Wales Central

Jeremy Miles AS/MS
Gweinidog y Gymraeg ac Addysg
Minister for Education and Welsh Language



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JMEWL/01566/22

Jack Sargeant MS
Chair - Petitions committee
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28 July 2022

Dear Jack,

Thank you for your letter of 13 July in which you bring to my attention the Qualifications Wales Report (*Perceptions and experiences of grading in summer 2021*), in the context of Petition P-06-1228: Give secondary teachers a bonus for marking and standardizing summer 2021 official assessments.

As I noted in my letter of 18 November, I was extremely grateful for the hard work and dedication of all teachers and lecturers across Wales whose collective efforts were vital in supporting the delivery of centre-determined grades. I continue to be grateful for their commitment throughout the summer 2022 series, in particular the guidance and support they have provided to our learners in preparations for their examinations.

As Qualifications Wales has confirmed, their '*Perceptions and experiences of grading in summer 2021*' report was commissioned to consider the perceptions and experiences of teachers, lecturers and heads of centre who were involved in marking or overseeing grading decisions but did not explore the subject of remuneration, which was the focus of the petition.

The report highlighted several positive outcomes and whilst I am aware that there were some areas that could have been improved, I was pleased to note that nearly all participants felt clear on their roles and responsibilities throughout the grading process and were confident in their abilities to deliver them. An important contributing factor to this being that most participants were aware of, and had attended, training on the grading process provided by their own centres. It was encouraging to see that around half of the participants were aware of and had attended training provided by WJEC and that overall, they felt that the training provided by WJEC and Qualifications Wales was clear and helpful. I was especially pleased that this included unconscious bias and standardisation.

I do acknowledge that the Report includes a line referring to "some participants felt that teachers should have been recompensed for additional work/time spent on the CDG

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Correspondence.Jeremy.Miles@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.

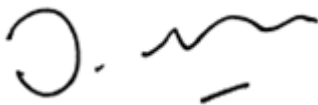
process". It might be helpful if I recap the approach taken in Wales, as detailed within my letter of 18 November.

In recognition of the enhanced role of schools and colleges in delivering grades last summer, WJEC reduced its fees by 42% which released a further £8 million to schools and colleges. In addition to this, and recognising the extensive work of teachers and lecturers, the Welsh Government contributed an additional £1.6 million to enable an overall reduction to 2021 WJEC fees of 50%. This released an additional £9.6million of funding for schools and colleges, with the flexibility to utilise that funding to best meet their local needs and circumstances.

As I noted in my previous reply, in contrast to the arrangements elsewhere in the UK, Wales' CDG model and the appeals process in particular, were intentionally designed to enable teachers and lecturers to undertake the vast majority of their role during term time. This was a conscious effort to preserve the summer holidays which we recognise is an important opportunity for Wales' education profession to take a well-earned rest and period of reflection and preparation before the next academic year .

Thank you again for sharing this report and for the update in respect of petition P-06-1228.

Yours sincerely

A handwritten signature in black ink, consisting of a stylized 'J' followed by a wavy line and a short horizontal stroke.

Jeremy Miles AS/MS
Gweinidog y Gymraeg ac Addysg
Minister for Education and Welsh Language

P-06-1228 Talu bonws i athrawon uwchradd am farcio a safoni asesiadau swyddogol haf 2021, Gohebiaeth – Deisebydd at y Pwyllgor, 20.09.22

Ymateb i lythyr y Gweinidog y Gymraeg ac Addysg (28.7.22) Deiseb P-06-1228

- *"..bron pob cyfranogwr yn teimlo bod eu rolau a'u cyfrifoldebau yn eglur drwy gydol y broses raddio a'u bod yn hyderus yn eu gallu i'w cyflawni.."*
Wrth gwrs bod hwn yn wir achos pobl broffesiynol ydyn ni sydd eisiau y gorau i'n dysgwyr. Roedd dyletswydd arnom i sicrhau bod ein rolau a'n cyfrifoldebau yn eglur a'n bod yn hyderus yn ein gallu i'w cyflawni er mwyn sicrhau llwyddiant haeddianol i'n disgyblion ond roedd hyn ar draul ein hiechyd corfforol a meddyliol a'n bywyd teuluol, wrth i ni orfod neilltuo cyfnodau beichus ychwanegol er mwyn cyrraedd y nodau yma. Awgryma'r Gweinidog bod popeth yn fêl i gyd.
- *"tua 50% yn hapus ar y cyfan bod yr hyfforddiant a ddarparwyd gan CBAC a Chymwysterau cymru yn glir ac yn ddefnyddiol"...*
Beth am y 50% arall a oedd yn anfodlon felly? Oni ddylai'r canran fod yn llawer uwch - dylai addysgwyr ddangos ffydd a bodlonrwydd yn y cyrff proffesiynol sydd i fod i arwain y ffordd? Ydy'r Gweinidog wir yn ymfalchïo yn y canran israddol yma? Neu a ydyw ond yn ceisio crafu unrhyw ffigyrau pitw i osod spin cadarnhaol ar y sefyllfa?
- Sentiment nawddoglyd oedd i'r Gweinidog deimlo ei fod yn gorfod *"ail-esbonio'r dull a ddefnyddiwyd yng Nghymru"*. Ni welodd athrawon a darlithwyr Cymru geiniog o'r £19.2 miliwn a neilltuwyd yn y cyfnod hwn ar gyfer y broses raddio. A oedd yr arian yma wedi cael ei wario yn y ffordd gywir/orau? A'r staff a wnaeth yr holl waith yn derbyn dim, dim hyd yn oed yn nhermau 'amser' er mwyn cwblhau y gwaith.
- *"cynlluniwyd y model yn fwriadol i alluogi i athrawon a darlithwyr i ymgymryd â'r rhan fwyaf o'u rôl yn ystod y tymor."*
Sylwch ar y defnydd o'r *'rhan fwyaf'*, sy'n golygu BOD staff WEDI gorfod aberthu rhywfaint o'u hamser gwyliau tu allan i oriau'r tymor.
"Roedd hon yn ymdrech ymwybodol i gadw gwyliau'r haf yn glir".
Ymdrech efallai ond nid garanti llwyr. A beth am y gwyliau Pasg a Sulgwyn (heb sôn am benwythnosau di-ri) pan gollodd staff amser prin gyda'u teuluoedd, o ganlyniad i'r broses raddio? Roedd cryn dipyn o staff yn gorfod gweithio hefyd yn ystod y gwyliau haf hwnnw yn ymateb i apeliadau graddio gan ddisgyblion a rhieni.

Nid yw ymateb Gweinidog y Gymraeg ac Addysg yn ddigonol. Mae'n glir ei fod yn ochri gyda Chymwysterau Cymru a CBAC. Roedden ni fel corff o athrawon a darlithwyr yng Nghymru yn credu y byddai Llywodraeth Cymru Sosialaidd yn cefnogi ei gweithle addysg fel Llywodraeth yr Alban. Ynghyd â'r broses raddio erchyll, a gorfod wyneb heriau Covid, y Cwricwlwm i Gymru a'r Ddeddf ADY newydd i gyd ar yr un pryd, rydyn ni yn gyflym yn colli ffydd. Byddai iawndal/bonws cyfwerth ag un yr Alban yn mynd cam tuag at adfer ein hyder.

By virtue of paragraph(s) vi of Standing Order 17.42

Document is Restricted

Agenda Item 3.4

P-06-1242 Improve Endometriosis Healthcare in Wales

This petition was submitted by Beth Hales, having collected a total of 5,895 signatures.

Text of Petition:

Endometriosis devastates the lives of women and their families living in Wales with 1 in 10 suffering with the condition.

The cause of endometriosis is unknown, there is no cure, the average diagnosis time is currently 8.5 years and there's a 6 year waiting list for treatment on the NHS.

The demonstrable lack of understanding of the condition is detrimentally impacting society at all levels. Funding therefore needs to be prioritised to ensure equality of healthcare in Wales.

Additional Information:

A report commissioned by the Welsh Government in 2018 highlighted how big a problem we're facing with resources being wasted and harm currently being caused to individuals suffering with Endometriosis. Despite the findings showing impacts on healthcare, education, economic, financial and social levels within society, most recommendations haven't been adopted, and in many areas things have instead worsened for sufferers of Endometriosis.

(Below is the link to this Government report – Endometriosis care in Wales: Provision, care pathway, workforce planning and quality and outcome measures.

<https://gov.wales/sites/default/files/publications/2019-03/endometriosis-care-in-wales-provision-care-pathway-workforce-planning-and-quality-and-outcome-measures.pdf>).

Please sign this petition to help raise awareness of Endometriosis and encourage the Welsh Government to allocate the appropriate level of funding for this condition so we can take steps towards achieving equality of healthcare in Wales.

Senedd Constituency and Region

- Cardiff South and Penarth
- South Wales Central



Eich cyf/Your ref P-06-1242
Ein cyf/Our ref EM/02198/22

Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

14 July 2022

Dear Jack,

Thank you for your letter of 7 June on behalf of the petition committee regarding Petition P-06-1242 Improve Endometriosis Healthcare in Wales.

As you will be aware, I have outlined a two-pronged approach to delivering improved outcomes and ensure women are getting the best possible care and support to stay healthy over the course of their lives.

In respect of your first point, Welsh Government has developed a Women's Health Quality Statement that will enable us to provide a strategic overview of our expectations for the provision of women's health services across Wales. Health boards and trusts are responsible for planning and delivery of women's health services in line with professional standards and the quality attributes set out within the Women's Health Quality Statement.

As a response to the principles set out within the quality statement, NHS Wales will produce a Women's Health Plan that sets out how it will determine the appropriate provision required to meet the needs of their local populations including ensuring suitable tertiary care is in place to support conditions such as endometriosis and menopause. Where tertiary services are provided, I expect suitable conversations to take place on a regional basis to ensure appropriate funding arrangements exist and to enable pathways that provide equitable provision across the whole of Wales.

In relation to your second point, my officials are supporting the NHS in the development of the Women's Health Plan. I have been clear that the Plan must have significant input from services users to ensure women's voices are heard plainly and their concerns reflected.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

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

Gohebiaeth.Eluned.Morgan@llyw.cymru
Correspondence.Eluned.Morgan@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.

The Women's Health Wales Coalition are a key stakeholder group and I met with them recently to discuss how we could work together to ensure women's voices resonate clearly through the quality statement and the plan. My officials meet regularly with the Coalition to ensure a suitable level of engagement with stakeholders in the development of these documents. Work on the development of the Plan is underway and there will be a process of engagement and ongoing consultation with the Coalition and wider stakeholders to ensure the plan is co-produced and responds to the needs of all women who access our health services.

Regarding your third point, the Women's Health Implementation Group (WHIG) has funded specialist endometriosis nurses and pelvic health and wellbeing coordinators in each health board in Wales. These posts are making a significant contribution in ensuring women are supported throughout diagnosis and treatment and are signposted to appropriate services to help manage their conditions. WHIG has committed to funding these posts for 3 years with the aim of developing improved pathways for women with endometriosis and pelvic health conditions to be applied consistently across Wales, but this is a time limited commitment. I expect health boards to consider the work and benefits these resources are providing to women and the service and put in place permanent measures as part of their obligations to provide high quality service provision. I expect NHS Wales to consider this in their work on the development of the Women's Health Plan.

With regard to your point on whether endometriosis will be included in the Quality, Assurance & Improvement Framework for Primary Care, the Quality Assurance and Improvement Framework is being reviewed as part of a tripartite process with health boards and the BMA. The review aims to refocus the Framework in line with proposed changes to Healthcare Standards, moving from a target driven approach to cycles of Quality Improvement projects. A broad range of QI projects will be developed, focusing on areas of priority for improvement in patient care, where general practice can have the greatest impact.

I hope this information is helpful.

Yours sincerely,



Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services



Ymchwil Iechyd
a Gofal Cymru
Health and Care
Research Wales



Llywodraeth Cymru
Welsh Government

Is-adran Ymchwil a Datblygu
Research and Development Division

Jack Sargeant MS
Chair Petitions Committee
Senedd Cymru
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

August 2022

Dear Mr Sargent,

Thank you for your letter dated 7th June.

As you may already be aware, the Welsh Government's Research and Development Division (RDD) leads on strategy, policy and funding for health and care research in Wales. It fulfils this responsibility through Health and Care Research Wales which has a remit to stimulate research excellence, build capacity and capability, and support research delivery in translational and applied research.

We are currently preparing to support the Welsh Government's agenda on Women's Health, therefore your letter is very timely as we consider where the key evidence gaps across a range of issues are, inclusive of endometriosis.

This is over and above existing programmes which we support, for instance we make funding contributions to an agreed set of NIHR (England) run funding schemes which also offer opportunities for researchers with an interest in endometriosis. I am also pleased to inform you that we are in the process of making a PhD award in relation to endometriosis.

You specifically note that there are data gaps in the system which could affect the quality of research into endometriosis. I understand that endometriosis is not an easy diagnosis and could well be under-diagnosed as women need to have sufficient symptoms to consult on this condition and there are other conditions caused by the same symptoms.



BUDDSODDWYR | INVESTORS
MEWN POBL | IN PEOPLE

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Gwefan • Website:
<https://healthandcareresearchwales.org>

Whilst Health and Care Research Wales do not have responsibility for the quality of the data in NHS digital systems, there may be opportunities to explore utilising our SAIL DATABANK team in Swansea University to identify the symptom and diagnosis codes and produce the likelihood of symptoms resulting in a diagnosis, and symptom/diagnostic prevalence.

As this piece of work would be very exploratory, it would require a clear steer from members of the Women's Implementation Health Group on the scope of what is included and whether this might provide anything meaningful over and above what is already available.

I am also aware that colleagues in the School of Psychology in Cardiff University have a strong interest in the diagnosis of endometriosis and are supporting Endometriosis Cymru in this area, therefore this may be a more fruitful research area to progress.

Thank you for bringing these issues to our attention.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Walshe', written in a cursive style.

Professor Kieran Walshe

Director of Health and Care Research Wales

P-06-1242 Improve Endometriosis Healthcare in Wales, Correspondence – Petitioner to Committee, 05.09.22

Many thanks for sending on the latest correspondence regarding my petition, and thank you to everyone for the help they've given with raising awareness of endometriosis through the interview and blog that was put together recently.

I appreciate the ongoing correspondence between Jack Sargeant and Eluned Morgan on this matter, and in regards to the Health Minister's latest letter my thoughts are as follows:

- The Women's Health Quality Statement that was announced is fantastic progress for the various health issues and inequalities that we face. To ensure that the much needed change is delivered for patients in Wales and that tangible progress can be monitored, I would ask that the Committee keep my petition open and on their agenda whilst the Plan is being developed and rolled out;
- The Health Minister has said that *"the Plan must have significant input from service users to ensure women's voices are heard plainly and their concerns reflected"*. I would therefore like to offer my help to the Health Minister regarding engagement opportunities, as I completely agree that it's imperative that patient voices are heard as much as possible during the development of the plan;
- The Health Minister advises that the Women's Health Plan will ensure *"suitable tertiary care is in place to support conditions such as endometriosis"*. One of the questions that I've raised from the start of my petition is regarding the reduction of tertiary care in Cardiff & Vale HB and the lack of tertiary care across the rest of Wales. I therefore still have to ask, what should patients do in the meantime whilst they can't access tertiary care? Why can't the consultant who previously retired (leaving only two endometriosis specialist consultants for the whole of Wales) be replaced whilst the Health Plan is being developed to help address the urgent issue of lack of tertiary care in Wales? Where has the funding gone that was used for his salary? And where are the endometriosis nurses currently signposting the patients who urgently need tertiary care when the waitlists just keep rising?
- I completely concur with the Health Minister's praise of the appointment of the endometriosis nurses. When I was diagnosed, endometriosis nurses weren't in-situ and so I received minimal information and support about the disease and I definitely wasn't signposted to other appropriate services. It was therefore only thanks to the privileged position I'm in of being able to access private healthcare through my work, that meant I was able to seek support to help manage my condition day to day via a private pelvic physio and private mental health support. Even with that, I'm still in pain every day and it's an on-going struggle both physically and mentally (and it's 1 in 10 that have this same chronic illness, but definitely not 1 in 10 who can access private healthcare). I therefore sincerely hope that the WHIG extend the funding of these posts beyond the initial 3 years as it's SO important that progress doesn't end with the endometriosis nurses, and also that we don't see progress eroded at the end of 3 years. Otherwise patients will be back to having nowhere to turn. This is another reason why I ask the Committee to keep the Petition open and help all of us

with endometriosis ensure that the delivery of positive and tangible progress is ongoing;

- Finally, with regard to your point on whether endometriosis will be included in the Quality, Assurance & Improvement Framework for Primary Care, it's not clear whether the Health Minister has answered the question and there's definitely no guarantee that menstrual and gynaecological health conditions will be included. Therefore can the Health Minister offer assurances on this? And how far can patients feed into the process of deciding what might constitute future quality improvement projects?

Please also see below commentary regarding the latest correspondence from the charity Fair Treatment for the Women of Wales, who I volunteer with as one of their endometriosis champions:

Letter from Health Minister to Petitions Committee

1. **Reference to the Welsh Government's Women's Health Quality Statement** - We would be pleased if the QS made some reference to the #WomensHealthWales Coalition's document, at least as a citation, as it clearly evidences the collaborative and co-productive approach taken by the WG team with third sector partners and patient representatives;
2. **Health boards and trusts are responsible for planning and delivery of women's health services in line with professional standards and the quality attributes set out within the Women's Health Quality Statement** - It would be useful for patients to have some sense of how the WG proposes oversight of this activity, both to ensure standards are met equitably across Wales and that third sector / service-users are involved in design and evaluation of services;
3. **Where tertiary services are provided, I expect suitable conversations to take place on a regional basis to ensure appropriate funding arrangements exist and to enable pathways that provide equitable provision across the whole of Wales** - Historically, this has proved problematic due to block funding arrangements in Wales. We would like to see the Welsh Health Specialised Services Committee (WHSSC) playing an active part in these conversations and for national clinical leads and patient advocates to be invited to discuss with them the existing challenges and possible solutions;
4. **Work on the development of the Plan is underway and there will be a process of engagement and ongoing consultation with the Coalition and wider stakeholders to ensure the plan is co-produced and responds to the needs of all women who access our health services** - Beyond the planning stages, we would like to see patient involvement / co-production made a key part of decision-making within implementation groups, and service design / evaluation within each health board. Part of reporting measures should include the degree to which this is taking place. This kind of activity also needs adequate support and resourcing so we would welcome some sense of what plans are in place to provide that sort of sustainability.

Letter from HCRW to Petitions Committee

1. ***We are currently preparing to support the Welsh Government's agenda on Women's Health, therefore your letter is very timely as we consider where the key evidence gaps across a range of issues are, inclusive of endometriosis*** - Can HCRW give some idea of when we might expect to see this reflected in published research priorities / calls? Is HCRW able to provide some sense of the funding that might be attached to women's health-related research projects? Also, can HCRW give some assurances regarding establishing criteria for the co-production of both research topics and project design?
2. ***I am also aware that colleagues in the School of Psychology in Cardiff University have a strong interest in the diagnosis of endometriosis and are supporting Endometriosis Cymru*** - FTWW is pleased to have long collaborated and supported their work on endometriosis. However, longer-term and larger-scale funding is needed to bring some elements of the work to fruition and, indeed, to ensure that they are utilised effectively across Wales, such as digitising the Endometriosis Cymru symptom tracker tool. Might the latter be something with which HCRW could support, or would this be more the remit of Health Education & Improvement Wales?

Please let me know if you require anything further prior to the Petitions Committee meeting on the 19th September.

Best wishes,

Beth Hales

Agenda Item 3.5

P-06-1262 Welsh Government to hold a public inquiry into decisions taken by them before & during the pandemic

This petition was submitted by Anna-Louise Marsh-Rees, having collected a total of 2,116 signatures.

Text of Petition:

Many loved-ones acquired Covid-19 in hospitals & care homes in Wales. PPE was lacking, staff not tested unless symptomatic, ventilation poor, Covid patients put on non-Covid wards. Many sent home without being retested; spreading infection in the community & subsequently dying. Many had DNRs placed without consultation. Communication was poor or non-existent. Lessons most definitely have not been learnt. Decisions taken in Wales which affected the people of Wales should be scrutinised in Wales.

Additional Information:

As the First Minister has clearly pointed out throughout the pandemic, decisions regarding the Covid-19 rules in Wales have been made in Wales. He has been keen to highlight the often-significant differences of those rules between England and Wales.

A Wales -specific inquiry would provide an independent review to investigate if deaths in Wales could have been prevented.

The Welsh Government deserve to be properly scrutinised – not a footnote in a UK Government inquiry.

Senedd Constituency and Region

- Monmouth
- South Wales East



Eich cyf/Your ref P-06-1262
Ein cyf/Our ref FM -/00394/22

Jack Sargeant MS
Chair
Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN
Petitions@Senedd.Wales

22nd July 2022

Dear Jack,

I am writing in response to your letter on 27 May in relation to a petition from the Covid-19 Bereaved Families for Justice (Cymru) calling for a Wales-only public inquiry into the pandemic.

I understand many people – including members of the group – have strong feelings about the public inquiry, and I have had an opportunity to discuss these with members of the group on a number of occasions.

I have set out my reasons in Plenary about why I believe the best way to scrutinise decisions made in Wales during the pandemic is by being part of a UK-wide inquiry. There has been no further action since that time which would persuade me that this decision should be reconsidered.

I have been involved at the relevant stages as the UK-wide inquiry has been set up; most recently, the Welsh Government has been consulted about the terms of reference put forward by Baroness Hallett following the public consultation which she led. I was pleased to see a good response to this consultation.

It is important to recognise that Ministers commission and agree the terms of reference for a public inquiry, before the inquiry itself is undertaken independently by the appointed chair. The inquiry, once formally set up, will be wholly independent of government. The chair will decide how the inquiry is run and the nature of its reports. The terms of reference are broad and will enable proper scrutiny of events and decisions made in Wales.

Bae Caerdydd • Cardiff Bay
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Correspondence.Mark.Drakeford@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.

It remains important that the inquiry will be visible in Wales and that the inquiry team should come to Wales to take evidence. I am encouraged that the inquiry team held its first consultation events in Wales; that the Covid-19 Bereaved Families for Justice Cymru group has met the chair and the inquiry team and that people from organisations across Wales were invited to sector-based consultation events. The inquiry has also been taking the Welsh language into account in its work.

In January, the Minister for Health and Social Services provided £4.54m over two years to support health boards and the NHS Delivery Unit to take forward an important and complex programme of investigative work into cases of hospital-acquired Covid-19. This work started on 1 April and, to date, more than 3,000 investigations have commenced.

The establishment of the Scottish inquiry was a manifesto commitment by the Scottish National Party. There is no indication a separate inquiry will be taking place in Northern Ireland at this time.

A handwritten signature in black ink that reads "Mark Drakeford". The signature is written in a cursive style with a large initial 'M'.

MARK DRAKEFORD

Agenda Item 3.6

P-06-1269 Don't let the plan run out for dying people in Wales

This petition was submitted by Marie Curie & MNDA, having collected a total of 2,195 signatures.

Text of Petition:

Every year, thousands of people die in Wales having missed out on palliative and end of life care.

The end of life care plan for Wales was working towards fixing this, but in March it'll come to an end. Right now, there's no new plan ready to take its place.

We urgently need a timeline, funding and staff to deliver a new plan.

Don't let the plan run out with no replacement. Please sign today and help us make sure families in Wales aren't left in the lurch.

Additional Information:

We are grateful for Welsh Government's prioritisation of palliative and end of life care (EOLC) in the Programme for Government 2021-2026, but more must be done to ensure we see appropriate action.

The clinical governance structures of health and social care systems in Wales will soon be undergoing reorganisation. In March 2021, Welsh Government launched proposals for a new clinical framework and a new NHS Wales Executive; the clinical framework includes plans to develop a dedicated EOLC Programme and an EOLC Quality Statement. These new arrangements are set to replace the current End of Life Care Delivery Plan, which comes to an end 31 March 2022.

An EOLC Programme is welcome news, but poorly resourced infrastructure and limited programme personnel, combined with the pandemic, has impacted the ability to deliver the new programme at pace. With the end of March fast approaching and no EOLC Programme in sight, Wales looks to be without an EOLC plan for the first time in a decade.

Senedd Constituency and Region

- Cardiff Central
- South Wales Central



Eich cyf/Your ref P-06-1269
Ein cyf/Our ref EM/01934/22

Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
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CF99 1SN
Government.Committee.Business@gov.wales

2 August 2022

Dear Jack,

Thank you for your letter dated 10 May 2022 seeking a response to the proposed outcomes put forward by the petitioners for an End of Life Care Programme. Please accept my apologies for the delay in responding.

I have responded to each of the main proposed outcomes below.

An increase in EOLC programme personnel within government and supporting NHS organisations, in line with other condition and disease areas. We would encourage the appointment of a full time Senior Programme Lead for the EOLC Programme

There are three Welsh Government staff with part of their roles dedicated to supporting the end of life care agenda. The Deputy Chief Medical Officer also provides oversight and direction to the programme.

We have also recently doubled the number of sessions that Dr Idris Baker, the national clinical lead for end of life care is able to provide, increasing the time he is able to spend supporting the national programme to two days per week.

In addition, the NHS Collaborative is strengthening the team that it has supporting the end of life care agenda with a new appointment to provide increased programme manager support, a new senior project support post and national nursing and AHP leads. A full-time bereavement lead will also be recruited.

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Correspondence.Eluned.Morgan@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.

Ringfenced funding for the development and delivery of the End of Life Care Programme for the next three years.

Welsh Government continues to provide over £10.5m to ensure that anyone requiring palliative and end of life care in Wales has equitable access to the best possible care and support. There are no plans to reduce this funding in the next three years.

We have delivered on our Programme for Government commitment to review voluntary hospice funding and have made an additional £2.2m available to Welsh hospices from 2022-23 on a recurrent basis. This is in addition to the £8.4m that we continue to invest every year to support specialist palliative care services across Wales.

Work on Phase 2 of the funding review including statutory and voluntary, specialist and generalist and the full age spectrum of children and adults is now underway. This phase will consider the models of provision, any geographical variation and an understanding of the value delivered by these services.

I have also recently agreed to maintain the £2m per annum that supports end of life care delivery in Wales for the remainder of the current Parliamentary term.

Publication of a rolling, three-year implementation/action plan for PEOLC in Wales. This will follow on from the publication of the Quality Statement due in Summer 2022.

Welsh Government does not plan to update Major Health Conditions Delivery Plans. These plans are being superseded by Quality Statements which set out our policy intent and what good services look like. They describe the outcomes and standards we expect to see in high quality, patient focussed services.

Health boards and trusts will be expected to set out how they will take forward quality statements through their integrated medium term plans (IMTPs). The various national programmes, networks and implementation groups will support the NHS organisations to do so through the development of enabling plans. This will include the work programme of the new National Programme Board for End of Life Care, which may take the form of an implementation or action plan.

I hope this information is helpful.

Yours sincerely,



Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

Don't let the plan run out for dying people in Wales

Marie Curie & Motor Neurone Disease Association: Briefing for Petitions Committee, September 2022

RE: Marie Curie Cymru and MND Association have decided to request that the Petitions Committee defer discussion on this petition until later in the term.

We are grateful to the Petitions Committee for their ongoing support of Marie Curie Cymru and MND Association's petition on End of Life Care. This has opened a direct communication channel with the Minister for Health and Social Services, and positive steps forward have been made since the launch of the petition in March 2022. We welcome the Minister's response and are delighted with the progress she has outlined, particularly around increased personnel within the NHS Collaborative and more clarity around the potential role of an implementation/action plan.

However, although we welcome the positive developments over recent months, we are still concerned about the implementation of the End of Life Care Programme.

As the Petitions Committee may know, there are currently delays around the development of the new NHS Executive and a lack of clarity on its objectives. The proposed NHS Executive and the End of Life Care Programme are inextricably linked, and we believe that the stalled End of Life Care Programme is not due to a lack of urgency to act, but the ongoing delays around the NHS Executive. We understand that this issue is much wider than just palliative and end of life care, and many other condition-specific implementation groups and networks are working in similar challenging contexts.

Marie Curie continue to work as part of the End of Life Care Board and we have confidence that all efforts are being made to ensure progress on the End of Life Care Programme, despite delays around the NHS Executive. However, we are unsure how the uncertain external environment and new NHS governance arrangements will impact this eagerness to act over the next few months. We would therefore like to ask the Petitions Committee to revisit this petition, along with the Minister's recent response, later on in the term.

The primary objective of this petition was to see tangible progress on implementing the End of Life Care Programme, including the development of an implementation/action plan. Our hope is that in a few months' time, the function of the NHS Executive will be clearer, and the environment will have allowed progress to be made on the End of Life Care Programme and on our petition's key objectives.

Clarifying the role of Welsh Government staff working on end of life care

In the meantime, we would appreciate if the Petitions Committee could seek to clarify some information with regards to the "three Welsh Government staff with part of their roles dedicated to supporting the end of life care agenda", as mentioned in the Minister's response.

- Given the commitment in the Programme for Government 2021-2026 to prioritise end of life care, we would like to understand how much time each Welsh Government staff member gives to the end of life care agenda.
- In addition, considering the recent increased capacity for end of life care in the NHS Collaborative, are we likely to see a corresponding increase in capacity within Welsh Government to allow for quicker implementation of the End of Life Care Programme?

Agenda Item 3.7

P-06-1271 Acquire the land from Network Rail on which ATR884 runs as a permissive path and arrange maintenance

This petition was submitted by Rosanne Stirman, having collected a total of 330 signatures.

Text of Petition:

Locally known as the Garw Valley Community Route this path has not been maintained for the last 8 years. It is a vital link out of a cul de sac valley and representations to the Local Authority and other bodies remain undetermined. There is a Single A Road out of the valley and the Community Route is the only other form of access and egress.

Senedd Constituency and Region

- Ogmere
- South Wales West

Lee Waters AS/MS
Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1271
Ein cyf/Our ref LW/01515/22

Jack Sargeant MS
Chair - Petitions committee

23 August 2022

Dear Jack,

Thank you for your further letter of 13 July regarding Petition P-06-1271 *Acquire the land from Network Rail on which ATR884 runs as a permissive path and arrange maintenance.*

My officials have now had the opportunity to raise this matter with Bridgend County Borough Council's (BCBC) who advised they have had detailed discussions with Network Rail regarding ownership of this land and future liabilities. As this is a matter for Network Rail and BCBC I would like to acknowledge and welcome that both parties, are working constructively together to resolve this matter.

BCBC have confirmed they understand that in principle, Network Rail are happy to transfer ownership of the land to BCBC. However, this is dependent upon the resolution of detailed legal issues.

In the meantime, BCBC are in the process of commissioning consultants to carry out feasibility studies this financial year using budget allocated from the Welsh Government's Active Travel Fund. The feasibility study will establish what work is needed to bring the route up to required standards, as well as detailed costings.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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Correspondence.Lee.Waters@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.

BCBC have advised they have arranged a meeting with various stakeholders including Sarah Murphy, MS for Bridgend, local members and Sustrans to discuss issues relating to the route.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lee', is centered within a light grey, textured rectangular box.

Lee Waters AS/MS
Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change

Agenda Item 3.8

P-06-1272 Ban the use of 'no pet clauses' in tenancy agreements in Wales

This petition was submitted by Sam Swash, having collected a total of 857 signatures.

Text of Petition:

The number of people privately renting is increasing year-on-year – currently many are prohibited from keeping pets because of clauses in their tenancy agreements.

The benefits of pet ownership should not be exclusive to homeowners. Those who rent should be equally as entitled to keep a pet as those who own.

Additional Information:

According to the Dog's Trust, the single biggest reason for dogs being handed in to rehoming centres is because of a change of circumstances, such as being unable to live in a rented property with a pet. These clauses also stop large numbers of people coming forward to rehome pets; effectively prohibited from doing so by being a tenant. This means both tenants and pets suffer.

In January 2021, the UK Government introduced a new Model Tenancy Agreement which prohibited landlords from issuing blanket 'no pet' bans. Consent for pets is now the default position. In Wales, there is no such reference and therefore Welsh tenants are less likely to be able to keep a pet than their UK counterparts.

Senedd Constituency and Region

- Alyn and Deeside
- North Wales

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1272
Ein cyf/Our ref JJ/01547/22

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
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CF99 1SN
Government.Committee.Business@gov.wales

05 August 2022

Dear Jack,

Thank you for your letter of 14 July about pets in private rented properties.

We have published guidance which makes it clear to landlords that new contracts under the Renting Homes (Wales) Act 2016 must conform with the Consumer Rights Act 2015 regarding fairness of terms. It is also stated that any pet clause as an additional term in the contract should allow a contract-holder to ask for permission to keep a pet, and the landlord would not be allowed to unreasonably refuse the request ([Renting homes: frequently asked questions \(landlords\) | GOV.WALES](#)).

I will ask my officials to ensure that all guidance is in one easily identified area of the website for landlords and tenants, explaining what people's rights and responsibilities are in terms of keeping pets in rental properties in Wales. We will ensure that it includes advice on how to challenge a contract term which unfairly disallows pets, or a decision by a landlord which seems unreasonable where a tenant has requested to keep pets. We will also include details of organisations who can offer advice and support in these situations.

The Consumer Rights Act 2015 deals with private contracts, including Assured Shorthold Tenancies. The term "reasonable" is a generic legal term which allows for all sorts of factors to be considered. In terms of pets, these factors may include the type of property, the type of pet, the tenant's individual circumstances, and any mitigating factors that the landlord may consider appropriate. Within our guidance pages, we can explore the potential to provide scenarios that may or may not be reasonable, but we must be very careful that we are not issuing advice which could be viewed as interpreting the law.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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Gohebiaeth.Julie.James@llyw.cymru
Correspondence.Julie.James@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 also want to see an end to property adverts which specify no pets as a blanket term. Advertising legislation remains a reserved function. The UK Government have announced their plans to legislate to allow tenants more rights in terms of being able to keep pets in a rental property. I would, of course, very much welcome a UK Government decision to legislate to ban property adverts which specify no pets as a rule across the UK. My officials will continue to engage with UK Government officials to establish exactly what their plans are for property advertisements more widely, including their proposals to ban discrimination against tenants on benefits, or “No DSS” as it is more commonly known.

Yours sincerely,

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive, flowing style.

Julie James AS/MS

Y Gweinidog Newid Hinsawdd
Minister for Climate Change

Petition P-06-1272 – Ban the use of ‘no pet clauses’ in tenancy agreements in Wales

Response from petitioner, Sam Swash, to Minister for Climate Change’s letter to Jack Sargeant MS, Chair of the Petitions Committee 06.09.22

Dear Petitions Committee,

Thank you for giving me the opportunity to respond to the letter from Julie James MS, Minister for Climate Change.

Summary

Unfortunately, the Minister continues to display a level of intransigence and unawareness as to the realities of no pet clauses in Wales that is incomprehensible.

The Minister’s letter makes two points that can be summarised as follows:

- That the legislation requires terms within contracts to be reasonable, and that this applies to pets in rented properties, and
- That the Minister and the Welsh Government more broadly considers that it is reasonable to allow pets in rented accommodation as set out in the guidance

The Minister also sets out options for tenants who wish to challenge a refusal to allow a pet.

However, the letter utterly disregards the failure of the present measures which it references. If they worked, this petition would not have been presented to the Senedd. The largest cause of homelessness is the ending of a private sector tenancy. When a private sector tenancy ends for a tenant with a pet, it is, at present, nigh on impossible for them to find alternative accommodation in the private rented sector. Since this petition has gone live, I have been contacted by signatories living in Wales who are contemplating moving to England, such are the difficulties they face in trying to rent a home with a pet in Wales.

The Consumer Rights Act 2015 that the Minister references can only be relied upon by those who have already taken out a contract, which the Minister acknowledges by referring to “contract-holder[s]” in her reply. The reality of the situation is, as soon as a prospective tenant tells a letting agent or a landlord that they have a pet, they are immediately dismissed. Providing ‘advice’ on how to ‘challenge a contract term that unfairly disallows pets’ is of no use to people who are immediately deemed unworthy of a tenancy and are therefore never in a position to view, negotiate or sign a ‘contract’ in the first place. Similarly, allowing “contract holders” the right to “request a pet” is only useful for those people who are already tenants in a property. It does absolutely nothing for people looking to rent with a pet - the people being roundly dismissed before even viewing a property on the basis of their pet ownership.

The Minister implicitly acknowledges these issues in the final paragraph of her letter in which she says: *“I also want to see an end to property adverts which specify no pets as a blanket term. Advertising legislation remains a reserved function. The UK Government have announced their plans to legislate to allow tenants more rights in terms of being able to keep pets in a rental property. I would, of course, welcome a UK Government decision to legislate to ban property adverts which specify no pets as a rule across the UK.”*

The inadequacy of this section is hard to overstate, for two reasons:

- A ban on advertising no pet clauses, which the Minister says she wants, would be a default side effect of banning the clauses. The UK Government has not acted to ban adverts in Wales stating that a tenancy deposit will not be protected in an assured shorthold tenancy, and yet such adverts do not exist because the Welsh Government have banned such an action. If the Welsh Government had chosen not to require deposit protection, but to instead ask the UK Government to ban adverts saying a deposit would not be protected, then Welsh tenants would still be waiting for their deposits to be protected
- A ban on advertising no pet clauses would not ban the clauses themselves, only their advertisement. If the UK Government does bring forward a ban, as the Minister says she hopes, this will not increase at all the number of properties available for tenants with pets. All it will do is require them to spend even more time sending out requests and enquiries to landlords who would not let them a property anyway. A ban on advertising clauses that remain legal to include in a contract would be actively counter-productive to the rights of tenants with pets

Banning no pet clauses in Wales has cross-party support in the Senedd and, as evidenced by the number of signatories to the petition, has popular support across Wales. Fundamentally, this issue comes down to whether the Welsh Government believes tenants deserve the same rights and dignities as home-owners, or whether they should continue to live as second-class citizens with punitive restrictions imposed upon them at the sole benefit of a small private landlord class.

Conclusion

In essence, the vast majority of the response provided is predicated on the Minister’s assumption that contracts have been shown to a prospective tenant. Above, I have outlined why such a position fundamentally misunderstands the reality of the situation.

While the Minister has declined to ban no pet clauses as the petition asks, and has not committed to producing any new statutory guidance, she has generously agreed to move some existing guidance from one part of the Welsh Government’s website to another. This moving some existing non-statutory guidance from one part of the Welsh Government’s website to another is a major step forward for tenants’ rights in Wales, and will surely be celebrated as one of the great successes of this Senedd term.

When this petition was created, thousands of tenants were faced with constant rejection by prospective landlords who include blanket no pet clauses in tenancies. However, we are certain that the moment that some existing non-statutory guidance is moved from one part of the Welsh Government's website to another, landlords across Wales will drop their no pet clauses en masse. In some parts of Wales, 63% of landlords ban pets¹. However, once landlords hear that the Minister has made moving some non-statutory guidance from one part of the Welsh Government's website to another a priority for her officials, we fully expect this figure to drop to 0%. After all, we are certain that most landlords were banning pets explicitly because they had very strong feelings about the layout of non-statutory guidance on the Welsh Government's website.

We know that by taking such bold and decisive action to move some existing non-statutory guidance from one part of the Welsh Government's website to another, the Minister will incur the angry wrath of powerful vested interests who much preferred the non-statutory guidance be kept in its present location on the website. However, we would urge the Minister to stand strong against such criticism. Given the ambitious nature of the proposals to move some existing non-statutory guidance from one part of the Welsh Government's website to another, we anticipate that this issue will become one of the most discussed topics in Welsh politics. It is likely that those in the anti-move-some-non-statutory-guidance-from-one-part-of-the-Welsh-Government's-website-to-another lobby will throw around accusations that the decision to move the guidance is an act of 'Stalinism' or 'Maoism'. However, we would point out that whilst Stalin and Mao were both undeniably significant historical figures, nothing they achieved comes close to the scale of moving some existing non-statutory guidance from one part of the Welsh Government's website to another.

We wonder if the Petitions Committee would be willing to give the petitioners some guidance; is it possible or appropriate to append a suggestion to this petition that the day that some existing non-statutory guidance is moved from one part of the Welsh Government's website to another could be commemorated as an annual public holiday in Wales, or would it be better to start a new petition to mark this day forevermore? We feel very strongly that the outpouring of gratitude from tenants across Wales at the Ministers' decision to move some non-statutory guidance from one part of the Welsh Government's website to another will require such an action.

¹ <https://www.housebeautiful.com/uk/lifestyle/property/a27184065/landlords-letting-agents-renting-pets-allowed>

Agenda Item 3.9

P-06-1274 Stop the removal of the Rapid Response Vehicle for Monmouth

This petition was submitted by Lorraine Allman, having collected 103 signatures online and 3,208 signatures on paper, a total of 3,311 signatures.

Text of Petition:

The Welsh Ambulance Service NHS Trust are considering cutting the Rapid Response Vehicle (RRV) based at Monmouth ambulance station, leaving just ONE ambulance for the area. This will result in an increase in response times. RRVs were introduced because they can reach critical, isolated, sick, and injured patients quickly, easing pain, suffering, and saving lives. This hasn't changed, and with an increasing population in the area, we need more resources not less.

Additional Information:

The Census data for the area shows a year-on-year increase in population figures in the Monmouth Area.

Data under the Freedom of Information Act to find out how many times the RRV has been used each year has been requested, but we expect that it is in use daily based on community information. My own personal story is a family member suffered a spontaneous blood on the brain 3 years ago in Monmouth. The RRV was first on the scene, and there is no doubt that without it, they wouldn't be alive today.

In March 2012, Stuart Fletcher the then Chair of the Ambulance Trust said in a statement "I believe that they provide a very rapid response which allows immediate life saving first aid to be applied until the arrival of the ambulance."

With the recent downgrading of healthcare services in Monmouthshire such as the A&E services at Nevill Hall, Abergavenny now operating as a minor injuries unit only, we cannot allow any further deterioration of emergency resources in the area.

Senedd Constituency and Region

- Monmouth
- South Wales East



Swyddfa'r Prif Weithredwr a'r Cadeirydd

Chair and Chief Executive's Office

Our Ref: JK97/et

27 July 2022

Jack Sargeant MS
Chair
Petitions Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

Sent via email:- petitions@senedd.wales

Dear Mr Sargeant

Re: Petition P-06- 1274: Stop the Removal of the Rapid Response Vehicle for Monmouth

Many thanks for your correspondence in relation to the above matter. As you will know, we have met with members of the campaign group, led by Lorraine Allman, and have recently provided to them the enclosed briefing, which outlines our response to some of the petitioners' core questions.

As you might expect, there are some core facets to the roster review which, while they might feel counter intuitive, are very much borne out in the extensive modelling we have undertaken. These are explained in further detail in the briefing enclosed but, in summary, there are three main issues which we have to reflect in our planning:

- Everything we do is on a health board level. We don't do any modelling at a locality level as we are not commissioned on a locality or county basis
- Demand is generally low per head of population in the Monmouthshire area which will have been factored into the modelling

- All of our modelling is done via a very sophisticated independent/external simulation model. This takes information on where demand occurs, what road journeys are like, how long ambulances stay at scene, how often the patients have to be conveyed
- This model is used to determine the best mix of hours and locations to get the best performance for the health board population within the resources that are available to us. There is more information about this in the accompanying document.

Our core aim is to improve response times for patients across Wales. Our commissioners, the seven health boards in Wales, supported our 2019 Demand and Capacity Review, one of the outputs of which was the roster review, and are fully supportive of its implementation. Indeed, we are coming under pressure to deliver on it. Similarly, the Minister for Health and Social Services is fully briefed.


We, and our commissioners, scrutinise our performance with forensic interest, and we will, of course, be keeping an eye on performance as new rosters are rolled out across Wales. This process will begin in September and take a few months to fully complete.

We have afforded petitioners the opportunity to visit our clinical contact centre at Vantage Point House, Cwmbran, to understand more about how resources are dispatched and allocated. Similarly, we have offered an opportunity for petitioners to see a demonstration of our modelling software, so that they can see at first hand the level of sophistication it uses. We await their response to these offers.

We do realise that petitioners have the very best interests of their community at heart, and I have reassured them, as I have a number of politicians across Wales, that our sole focus is on delivering improvement, rather than detriment, for our patients.

In summary, I hope the information we have provided is helpful, but I remain happy to discuss any matters where you feel further clarity is required.

Yours sincerely



Jason Killens
Chief Executive

Enc.

Cc: Rachel Marsh, Executive Director of Strategy, Planning and Performance
Estelle Hitchon, Director of Partnerships and Engagement

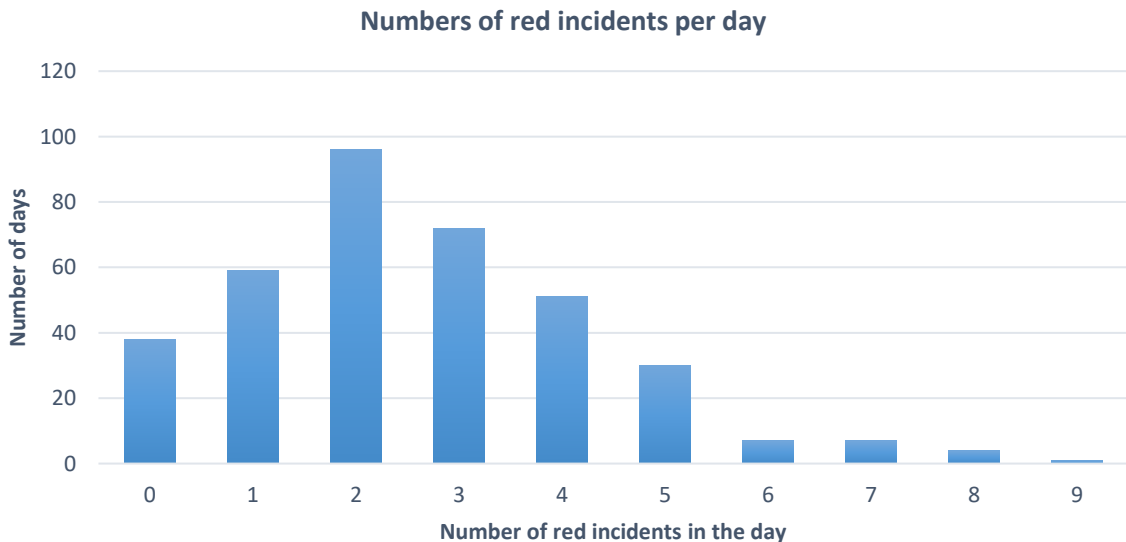
Monmouthshire

What is considered to be a low level of RED calls?

The Welsh Ambulance Service does not use a rigidly defined measure of what constitutes a low level of red calls. The table below provides a snapshot of demand per 10,000 population for each locality within the Aneurin Bevan Health Board area. This shows that Monmouthshire has the lowest level of demand per 10,000 population.

2021 Data	Red Incidents	Total Incidents	2021 Population <small>(new census data)</small>	Red per 10,000	Total per 10,000
Monmouth	965	13,214	93,000	104	1,421
Blaenau Gwent	1,029	11,743	66,900	154	1,755
Caerphilly	2,381	25,584	175,900	135	1,454
Newport	2,187	23,942	159,600	137	1,500
Torfaen	1,207	18,382	92,300	131	1,992
Whole Aneurin Bevan	7,769	92,865	587,700	132	1,580

The graph below shows the number of red calls per day across the Monmouthshire area. This indicates that in 2021 there were 38 days with no red calls, 59 days with 1 red call and 96 days with 2 red calls.



The modelling that the Trust undertakes, whether that be with ORH or Optima (our external and independent operational and simulation modelling providers), uses this historical demand data to determine the best number, type and location of responding vehicles. This will take account of both the need to respond as quickly as possible but also the need to make sure that each vehicle is utilised as efficiently as possible thus offering the best value for local communities.

On reflection and review of the data for Monmouthshire from WAST, ABUHB, and QOF presented today, can you confirm that all of this data has been included in the original (ORH) and subsequent (Optima) modelling? If not, (for example the QOF data you confirmed has not been), please advise why not?

In 2019, an independent Emergency Medical Service Demand & Capacity Review was undertaken by ORH. The Review was undertaken on behalf of WAST and the Emergency Ambulance Services Committee (EASC) which represents the seven health boards in Wales. EASC commissions ambulance services across Wales and commissions the Trust to deliver levels of performance/patient safety (and report on them) at a health board level. The Review outcomes and recommendations are therefore based at a health board level.

A key element of the review was a consideration of how 999 demand may change over a 5 year period. ORH used 3 statistical techniques for forecasting patient demand including:

- Projecting forward the average demand trend seen in historical data from 2012 to 2018 (this gave an overall annual demand increase projection of 2.1% across Wales)
- Holt Winters statistically seasonally adjusted time series projection (this gave an overall annual demand increase projection of 2.3% across Wales)
- Analysis of demand by age and gender forecasted forward using ONS predictions of population changes in each health board area (this gave an overall annual demand increase projection of 2.5% across Wales)

The Trust in collaboration with the Chief Ambulance Services Commissioner agreed that the middle forecast would be used i.e. a 2.3% increase in demand per year. It is noted that this forecast demand increase is greater than the projected national population increase, and is reflecting therefore the increasing morbidity of the populations across Wales.

There are detailed disease registers which are used to support the Quality Assurance and Improvement Framework (previously QOF) which provide information on rates of certain disease types in each health board / locality / GP practice. This data cannot be used to predict 999 demand, as there is no link that we are aware of which provides a direct correlation between the numbers of people with dementia for example and the number of 999 calls that they will generate.

We are confident that the use of demand trends over time is the best way to forecast future demand. The methodology we have used is similar in nature to that used across the UK and internationally when forecasting/modelling ambulance activity, capacity and performance.

One other important point to note is that the Trust continues to update its modelling where it sees changes to demand that were not forecast in the 2019 review. As an example, we have recently seen significant increases across Wales in the number and proportion of red calls and we have therefore updated our modelling and agreed consequent increases in resources with our commissioners as a result.

How are the required vehicle numbers and types identified to meet the forecast demand?

The demand and capacity review undertaken by ORH in 2019 identified the optimum shift patterns and rosters to be implemented at the end of 2 years growth in staff numbers i.e. in 2021. Commissioners have provided resources to support 263 WTE additional front line staff over the last 2 years.

In order to be able to determine the best use of this staff resource, ORH built a powerful simulation model of the service. This is a computer representation of a real life system and its behaviour. ORH have created a virtual replica of the Welsh Ambulance Service.

ORH built the model by taking a large download of data from the Trust's Health Informatics function. This included patient incident demand data for seven years, actual average road speeds for the Trust's different ambulances, rosters and other information e.g. expected hospital handover delays. Once the model was built, ORH tested it to ensure that when the simulation model was run, it delivered the same level of performance as real-life. Once they were satisfied that the model was a true replica of real life, they were then able to make changes to the model, for example increasing demand, and identify the impact of these changes on ambulance response times. They can also use the model to identify the optimum hours of operation and locations of each vehicle type to maximise performance (response times). The embedded link below links to a video on the ORH website which explains in some more detail how this type of simulation model works.

[Emergency Medical Services – ORH \(orhltd.com\)](http://orhltd.com)

Based on this very sophisticated model, ORH have not recommended that a Cymru Hugh Acuity Response Unit (CHARU) be based in Monmouth. In looking ahead another three years, and including a further three years of demand increases, ORH would still not recommend a CHARU in that location.

It should be noted that the absence of the physical CHARU in an area does not mean that area will not receive the service. All WAST resources are deployed dynamically and the closest resource to any emergency will always be deployed, even if this is coming from out of county. That is, and always has been, the case.

If there are a low-level of RED calls in the area, and the RRVs can't take those seriously ill (assumed category RED) patients to hospital, why invest in more EAs?

Emergency ambulances (EAs) can respond to a wider patient incident range than an RRV (now CHARU) and they are a conveying resource i.e. they can take patients to hospital. RRVs (now CHARU) primarily focus on RED (immediately life threatening incidents), which accounts for 10% of total patient demand. The rationale for investing in CHARU is that with enhanced paramedical skills (beyond those of a standard paramedic deployed today) and an often faster response than an EA, CHARU practitioners can help keep the sickest patients alive and/or stable prior to conveyance by a supporting emergency ambulance. With their focus exclusively on the sickest patients and enhanced skills, it is anticipated survival rates and therefore outcomes will improve.

The bulk of the Trust's patient demand is in the Amber (serious, but not immediately life threatening) category which accounts for 72% of patient demand. The bulk of patient safety incidents occur in the Amber category and therefore we need to optimise conveying resource for this category of patient, many of whom are very unwell and need hospital care.

How many EAs will be available to serve Monmouth?

Monmouth station will have one 24/7 (or 168 hours) EA. Monmouth forms part of the Aneurin Bevan North locality, which also includes Aberbeeg (Abertillery), Abergavenny and Tredegar. These stations will see 245 hours, 168 hours and 168 hours EAs respectively.

A 24/7 ambulance resource equates to 168 hours per week. For the Aneurin Bevan health board the planned level of EAs will change from 2,577 (current) to 3,136 hours per week. The RRV (now CHARU) will change from 2,091 to 826 and Unscheduled Care Service ambulance resource from 512 to 519.

It is important to note that the Trust has historically had insufficient funding to recruit the number of staff required to fill the rosters, so the 2,577 hours referenced above in the current rosters needs to be treated with a degree of caution. For Aneurin Bevan, the EMS Demand & Capacity Review identified a gap of 53.58 FTEs or 23%. The Trust has now been funded to close this gap. As a result of the additional modelling undertaken and referenced above, the Trust requires a further 18.24 FTEs to fully deliver the CHARU resource in Aneurin Bevan which will boost the FTE uplift to 30%. The Trust has recently been provided with around two thirds of the resource required, with recruitment having commenced in the last couple of weeks.

The Monmouth RRV itself was largely staffed via colleagues choosing to cover it via overtime, rather than with that particular roster line being permanently filled, and in 21/22, only 53% of the RRV hours were produced.

Monmouth will see an increase of 5.4 WTE:-

- -2.2 Paramedics
- +6.9 Emergency Medical Technicians (EMTs)
- +0.6 Ambulance Care Assistants

We appreciate this is a dynamic service once the vehicles are on the road, but to start with which bases will they be at for serving Monmouthshire?

There are three stations in Monmouthshire: Abergavenny, Chepstow and Monmouth. The following table shows the planned new rosters for each station.

	EA	CHARU	UCS
Abergavenny	168	0	74
Chepstow	168	0	0
Monmouth	168	0	0

Note: where 168 hours = 1 x 24/7 ambulance resource.

We appreciate the initial extra numbers of staff are now in place?

The staff required for the Monmouth station in the re-rostered position are now in place i.e. for the 24/7 EA. We are currently recruiting additional technicians across Aneurin Bevan.

Can you please confirm how many emergency care staff vacancies there are currently in Gwent?

Aneurin Bevan: There is a requirement for 290.58 FTEs to fill the new rosters (this excludes CHARUs), and current actual in post is 267.52 FTEs.

Is the plan to put the additional EAs in place before removing the RRVs?

Yes, the plan is to turn on the new roster keys for Aneurin Bevan at the same time. The exact date is not yet scheduled, but there will be a phased go live across Wales through September, October and November this year.

On two separate occasions (as shown in the presentation), the WAST Annual Performance Report 2020/21 stated that the decision to prioritise EAs over RRVs was one of the key reasons for a

negative impact on response times. Removing the RRVs surely means further negative impact on both RED and AMBER performance times. Do you agree? If not, could you please explain why not? Can you confirm you are still planning to replace all 23 of the RRVs as part of your 2022/2023 Vehicle Replacements Plan (see below)? In which areas will the replacement vehicles be based? Why, if RRVs are not seen as crucial to the planned changes, is the Trust continuing to invest in them?

During the pandemic period the Trust made a tactical decision on a number of occasions to prioritise EAs over RRVs i.e. conveying resource, linked to reduced workforce availability caused by CoVID-19.

The decision to prioritise EAs over RRVs during the pandemic was a clinical/patient safety decision.

The roster keys being used in the current roster review will see a shift in emphasis with a plan to produce more EAs, linked to patient safety, because the bulk of patient safety incidents occur in the “Amber tail” (long waits in the Amber tail distribution curve) and require a conveying resource. The RRVs are being removed pan-Wales, but are being replaced by the CHARUs. CHARUs provide a higher level of clinical skill and clinical leadership for high acuity patient incidents and will deliver improved clinical outcomes for these patients, as well as being a responding resource. Whilst there will be fewer CHARUs than RRVs, the modelling undertaken indicates that there will be sufficient vehicles (EAs and CHARUs) to deliver the Red 8 minute 65% target for every Health Board in Wales. EAs make a contribution to Red performance, but also deliver improved response times for Amber patients.

Whilst much of the discussion on the RRV / CHARU has centred on the impact that this will have on performance, it is important to note that one of the key factors affecting response times is the level of handover lost hours. The current levels are extreme and we have had information to suggest that Wales is an international outlier. In the 2019 EMS Demand & Capacity Review, the Trust used December 2018 handover levels (considered high at the time) – 6,038 pan Wales – in April 2022 the Trust lost 23,832 hours. These levels mean the Trust is losing approximately 30% of its conveying capacity. Conscious of these extreme losses, the Trust has undertaken some recent additional modelling to test out whether, in this new environment, we should proceed with the new rosters, and this continues to confirm that proceeding with the new rosters will produce improved response times compared with the current rosters.

The Trust made the decision to continue to replace its RRV fleet because it was anticipating the new CHARU resource type being built into the roster review project. CHARUs will use the same rapid ambulance car type as RRVs.

Other Points in Slides

The slides refer to rurality. As part of the roster review, the Trust undertook a rural impact assessment using Welsh Government’s definition of rurality which included Monmouthshire. The impact assessment noted the increase in FTEs, but also the proposed reduction in planned roster lines, in particular, the RRVs. The Trust decided to proceed with the roster keys as is, on the basis of the modelling set out above, in particular, the low level of demand and potentially very low levels of utilisation.

Economics: a single crewed RRV will cost less than a double crewed EA; however, RRVs (and the CHARUs that replace them) provide a rapid response to high acuity patients. Most Red calls require back up from a conveying resource. The roster keys are based on modelling on what is required from a patient safety perspective as the starting point rather than any financial constraint

July 2022.



Save the Monmouth RRV Community Campaign

Mr Jason Killens, Chief Executive

Welsh Ambulance Services NHS Trust
Tŷ Vantage Point
Vantage Point House
Tŷ Coch Way
Cwmbran NP44 7HF

15th August 2022

Dear Jason,

Thank you for your letter of 11th July outlining answers to the questions we sent over following our meeting with you back in May. Our apologies for the delay in responding due to Lorraine (who is immune suppressed) being poorly with Covid.

We very much appreciate your detailed response, but as you might expect, we do have further questions to ask, and issues of concern to raise.

Regarding the offer to attend the Clinical Contact Centre in Cwmbran, we did indicate previously we would very much welcome the opportunity to do this. If you could advise on a suitable day and time, we can get something in the diary.

The detail of our further questions and issues are as follows:

MODELLING

We completely understand that the modelling undertaken is both extensive and sophisticated, however like any system, it is only as good as the data that has been entered. It remains our belief that there is a fundamental flaw in the data being used in the system, specifically by ignoring QUAIF and ABUHB information about demographics and serious illnesses at a local level.

You state on page 2 paragraph 7 that *“the data cannot be used to predict 999 demands, as there is no link that we are aware of which provides a direct correlation between the numbers of people with dementia for example and the number of 999 calls that they will generate.”*

We wish to refer you to the following directly from the BMJ:

Atrial fibrillation is the most common sustained cardiac arrhythmia, accounting for approximately 35% of hospital admissions for cardiac arrhythmias.^{6,7} Hence, it is the most common form of cardiac arrhythmia emergency physicians manage. <https://pmj.bmj.com/content/79/932/313>

Dementia – Whilst the dementia itself isn't necessary the reason for an emergency call, people with this are more likely to call due to a fall or comorbidities/frailties as detailed:

Calls to people with dementia were more likely to be due to injury following a fall. In the overall sample, one or more comorbidities were reported on the PCR in over 80% of cases. Rates of hospital conveyance for older people may be related to comorbidities, frailty, and complex needs, rather than dementia.
<https://bmjopen.bmj.com/content/8/7/e022549>

Regarding **Cancer**, you will see from very recent (2022) research by UCL the following:

Patients' cancers were discovered in emergency situations 37% of the time in England, 37.4 percent of the time in Wales and 38.5% of the time in Scotland. More than a third of cancers in the UK are discovered after patients are rushed to hospital, one of the highest rates in comparable high-income countries, finds a new study led by UCL researchers. <https://www.ucl.ac.uk/news/2022/apr/third-uk-cancer-patients-diagnosed-emergencies>

Further, as detailed in *Paramedic Practice* – “The ambulance service is increasingly being called to patients suffering from cancer who are near the end of their lives.” <https://www.paramedicpractice.com/features/article/managing-common-end-of-life-cancer-presentations-according-to-the-evidence>

All of the above, we believe, shows clear evidence for why this data needs to be considered as part of the data analysis to inform future demand.

DEMAND TRENDS OVER TIME

You indicate your confidence in the use of demand trends over time as the best way to forecast future demand, and that the methodology used is similar in nature to that used across the UK when forecasting/modelling ambulance activity, capacity, and performance. We have looked into several of the Ambulance Trusts who have also received support from the same company (ORH) as WAST in relation to forecasting demand and feel that the evidence shows the contrary – all three Ambulance Trusts detailed below are failing to hit their response targets as follows:

- **East Midlands Ambulance Service** - *During 2021/2022, EMAS lost 125,500 hours to pre-hospital handover delays (compared to 59,759 hours lost during 2020/2021), equating to 10,458 12-hour vehicle shifts – an average of 29 shifts a day* (taken from their Annual Report).

East Midlands Ambulance Service is facing an unprecedented crisis in dealing with emergencies, with some response times reaching up to four times longer than targets. July 2022 article <https://thelincolnite.co.uk/2022/07/waiting-times-for-ambulances-in-lincolnshire-quadruple-over-targets/>

East Midlands Ambulance Service (EMAS) did not hit any of its response time targets last month, even soaring over four times longer in some cases.

East Midlands among slowest in the country - <https://www.chad.co.uk/health/emergency-ambulance-responses-in-east-midlands-amongst-slowest-in-the-country-40765> February 2019

*15th July 2022 - EMAS' plea comes after NHS data revealed **NONE** of the England's ambulance services hit crucial response time targets in June. It took East Midlands medics nearly ten minutes instead of seven to reach patients with life-threatening conditions. The mean response time for category two incidents, such as strokes, was 71 minutes – way below the 18-minute target.* <https://www.northamptonchron.co.uk/health/east-midlands-ambulance-wait-times-are-rising-and-bosses-warn-things-could-get-even-worse-during-this-weekends-heatwave-3769345>

- **South Western Ambulance Service** – *9th May 2022* <https://www.dorsetecho.co.uk/news/20123442.south-west-longest-ambulance-waiting-times-country/> *South west has longest ambulance waiting times in country. A Parliamentary Question tabled by the Liberal Democrats has uncovered that people living in the region who suffer a heart attack will wait more than 20 minutes longer for an ambulance than the national average.*

It shows that the southwest has the longest ambulance waiting times in the country for emergency calls - a typical response will take nearly 15 minutes longer than in the northwest, the second worst performing region.

- **Northeast Ambulance Service - 15th July 2022**

<https://www.thenorthernecho.co.uk/news/20280262.north-east-ambulance-response-times-fall-nhs-standard/>

*NHS standards require all ambulance trusts to respond to Category 2 calls in 18 minutes on average, and respond to 90 per cent within 40 minutes. But NEAS said its response time in the case of Mr Morris was 50 minutes, while the average Category 2 response time during June was 44 minutes – **more than twice the NHS standard.***

That is up from 38 minutes 52 seconds the month before, but slightly lower than the 44 minutes 49 seconds recorded in April, when the ambulance service recorded its longest Category 2 response times since at least 2018-19.

In June (2022), nine out of ten Category 2 calls were responded to in less than 1 hr 32 minutes, more than double the target time and up from 1 hr 20 minutes in May.

Unlike yourself, this data and reports do not fill us with confidence that this way of demand forecasting is working well elsewhere, not even taking into the account the fact that as explained above, we feel the data itself being used is fundamentally flawed.

RED CALLS

Thank you for clarifying as to how red calls have been considered. It is clear from the information you sent over that this appears to be a comparison between County Boroughs within the Local Health Board area. Taking the number of red incidents occurring as a percentage of total incidents, we can see that in 2021 Caerphilly topped this with 9.3% red incidents (25,584 total, 2,381 red). Monmouth came in 4th highest at 7.3% - just 1.83% below the second highest of Blaenau Gwent. The lowest level of Red calls was in fact in Torfaen at 6.56% of incidents as a whole from their area being classified Red.

Comparing data for Torfaen to Monmouthshire (below), it's not difficult to see why we have the concerns we do in relation to the geographical spread of the area, and how resources under the new roster review will be able to cover this, not least within the response time targets set given the transfer time of at least 30-40 minutes from Monmouth to The Grange, compared to 20 minutes from Blaenavon, one of the furthest points North in Torfaen.

ABUHB Region	Area	Population (2018)	Ambulance Stns
Torfaen	126km ²	93,049	2
Monmouthshire	860km ²	94,142	2

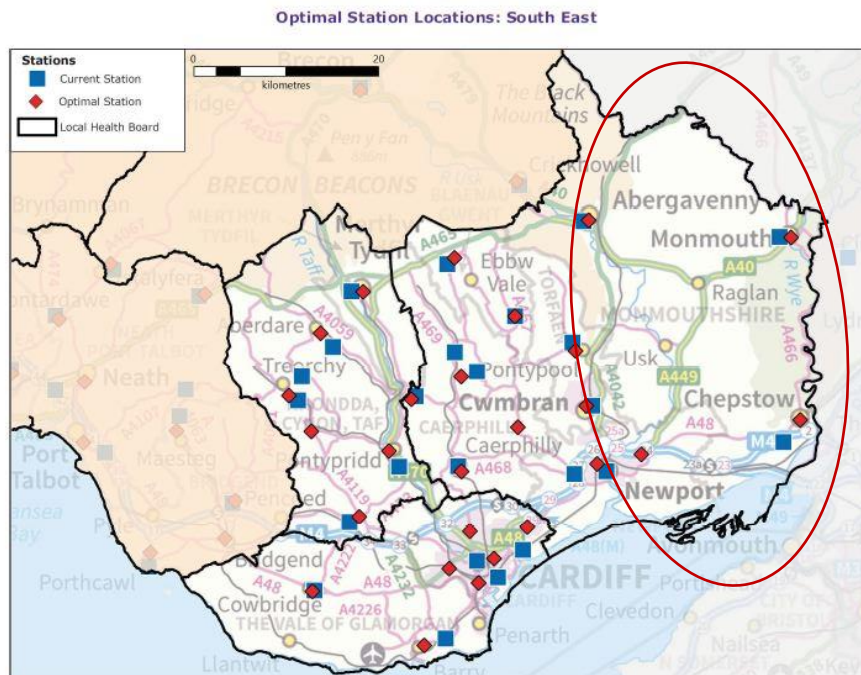
There are currently 9 RRVs (soon to be CHARUs) allocated to the ABUHB regionⁱ. **Could you please confirm the number that will be present for ABUHB if the new roster review is implemented, and where they will be based?**

Whilst the graph included in your response indicates there were 38 days in 2021 for the Monmouthshire area where no red calls were received, this means there were **327 days in the year (90% of the time) where there was at least one red call in the area.** In fact, the data shows 153 days where between 3 and 5 red calls were received, and over 20 days receiving between 6 and 9 red calls.

COVERAGE

Give the significant reduction in RRV (CHARU) hours across the ABUHB area as a whole - from 2,091 to 826 – the UCS in Monmouth to be zero, and the planned roster to have just one EA available 24/7, we simply cannot see how when a red call is received in this area on any one of the 327 days outlined above, we can be assured of a sufficiently rapid response to deal with these, in addition to how a CHARU (previously RRV) vehicle from outside the area will be able to attend as a minimum 1,749ⁱⁱ emergency incidents that were attended by the Monmouth RRV alone in 2020/21.

We show once more the visual map of Optimal Stations for Southeast Wales to demonstrate the vast expanse of geographical area to be covered.



RESPONSE TIMES/CONVEYANCING

We acknowledge that this is a complex issue, with a priority on response times given the significant loss of hours due to handover times, however despite our continued presentation of the WAST data showing that **48% of incidents attended by RRVs do not require a forward visit to hospital**, we simply cannot understand why this data is not being acknowledged as a key mechanism to release EAs to attend other incidents, and indeed reduce the amount of time waiting for handover at A&E.

Your comment that "Most Red calls require back up from a conveying resource" is simply untrue, as we have showed you from WAST data analysis that nearly half of all incidents attended by RRVs do NOT require a forward visit to hospital. **When will you acknowledge this crucial statistic?**

A final note on Modelling. We notice that on 25th June 2020 'An empirical investigation of forecasting methods for ambulance calls - a case study'ⁱⁱⁱ was published detailing a comparative study of four efficient forecasting procedures, highlighting one in particular to allow robust forecasting to allow sound decision to be made for capacity and staffing levels. The report states:

“The results of this study are of utmost value to WAST as it provides the best techniques to be used for different time frames. The current forecasting models used in WAST is based on averaging the three previous annual figures while matching the day of the week. Matching the day for this year is achieved by taking away today’s date from 364. This is repeated for two more years, and the average is computed in Excel.

*Results showed that ARIMA is the best forecasting method for weekly and monthly prediction of demand compared to the other three algorithms and the **long-term demand is best predicted using the SSA method.**”*

Could you please confirm that this research was taken into account, and that you are indeed following the recommendations made when forecasting shorter and longer-term demand predictions?

We acknowledge the huge amount of work and responsibility you have, however would ask that to ensure a fair position for us in these discussions that a reply is received within 10 working days of the date of this letter to allow continued discussion prior to your proposed implementation date.

As stated at the start of this response, and previously, we are looking forward to attending the Clinical Centre in Cwmbran, and wait to hear regarding a suitable date and time.

Yours sincerely,

Lorraine Allman

Lorraine Allman and Terry Kirton

ⁱ <http://www.wales.nhs.uk/sitesplus/documents/1134/NHS-Amber-Report-ENG-LR.PDF>

ⁱⁱ Total incidents attended by Monmouth RRV 2020/21, data from WAST FoI request

ⁱⁱⁱ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8567893/>

**P-06-1274 Stop the removal of the Rapid Response Vehicle for Monmouth,
Correspondence – Petitioner to Committee, 01.09.22**

Thank you so much for keeping us in touch with this, and we are pleased there has now been a response back from WAST and you are considering the petition on Monday 19th September 2022.

Just to be clear, we had already accepted the offer to attend the Clinical Contact Centre in Cwmbran when it was first offered at our meeting with Mr Killens in May, following the presentation of the petition at the Senedd. We have now, finally, been able to secure a date to do this on 30th September at 13:00hrs. This is much later than we would have liked, given the plans WAST have for implementation of the new rosters, but we will definitely be attending on that day.

Regarding the other issues Mr Killens covers in his letter and his responses to our questions, please find attached our response back to this which we sent on 15th August 2022. As you will see, we believe there to be fundamental flaws in the data used for the modelling, and have provided further data (from WAST and other sources e.g. ABUHB, QUAIF, BMJ etc.) on why we believe this cannot go ahead and will put the health and lives of the Monmouthshire community at risk.

Although we are a non-political, community group, we have the full support of every political party in the County. They have invited Mr Killens and/or his Executives to attend a Scrutiny committee on 27th September at 10am, and we are providing support to them for that, although they have yet to hear back that anyone from WAST will be in attendance.

I hope the above and our attached response provides you with the information you need, but please do not hesitate to contact me if you need anything-else.

Diolch yn fawr a Cofion cynnes,

Lorraine