

Agenda – Petitions Committee

Meeting Venue:

Committee Room 1 – Senedd

Meeting date: 17 October 2017

Meeting time: 09.00

For further information contact:

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Cynulliad
Cenedlaethol
Cymru

National
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Agenda Item 2.1

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

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

Petition text:

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

Additional information:

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

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

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

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

Assembly Constituency and Region

- Cardiff South and Penarth
- South Wales Central

Petition – P-05-775 Put an end to the Cross Border and Sub-contracting Taxi Licensing loophole

Y Pwyllgor Deisebau | 17 Hydref 2017
Petitions Committee | 17 October 2017

Research Briefing:

Petition number: P-05-775

Petition title: Put an end to the Cross Border and Sub-contracting Taxi Licensing loophole

Petition text:

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

There are enough Cardiff licensed vehicles to cover the City without the need for these cars from as far afield as London, Merseyside, the Midlands etc. As well as from neighboring authorities like Newport, the Vale and RCT etc. There have even been vehicles not working on any platform, illegally plying for hire, hiding behind the fact so many 'alien' cabs are in the City.

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

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

Background

Although the term “taxi” is commonly used to describe both taxis and private hire vehicles (PHVs), they are licensed differently within a “two tier” system of regulation. In 2014, the Law

Commission published a [final report on proposed reforms to taxi and PHV services](#) which summarised differences as follows:

Taxis can pick passengers up at ranks and be hailed. In legal terms, these activities are currently referred to as “plying for hire” and only taxis can engage with passengers in these ways. Private hire vehicles, on the other hand, can only be pre-booked through a licensed operator, and are not allowed to “ply for hire”.

Local authorities are responsible for licensing taxis and PHVs in Wales.

In its report, the Law Commission described arrangements which existed at that time for cross-border working, explaining that in England and Wales PHV could pick up passengers outside the area in which they hold a licence. However, drivers, vehicles and operators had to be licensed in the same area and operators could only invite and accept bookings within that licensing area. Sub-contracting could only take place between firms licensed in the same area. The Law Commission argued that “this hampers them expanding their business to have offices in neighbouring areas, and is increasingly difficult to police given the rise in internet bookings”.

Consequently, as part of wider proposals for reform of the industry, the Law Commission recommended:

freeing up cross-border working for private hire services. Operators should no longer be limited to using drivers and vehicles from their own licensing area; nor should they be restricted to only inviting or accepting bookings within that licensing area. Under our recommended regulatory framework, licensing district boundaries lose much of their importance in relation to private hire vehicles. Although local authorities will continue to administer licences applied for in their area, they will do so on the basis of national standards, which they will have no discretion to vary. Once licensed, providers will be able to work across England and Wales and subject to enforcement action by officers of any licensing authority.

Subsequently, section 11 of the UK [Deregulation Act 2015](#) allowed a PHV operator to sub-contract a booking to another operator who is licensed in a different licensing district. A [Local Government Association \(LGA\) publication on the Act](#) commented (emphasis added):

The LGA strongly opposed the clause [which became section 11] on the grounds that it had been brought forward **without the accompanying safeguards deemed necessary by the Law Commission’s review of taxi licensing**.

Currently licensing arrangements for taxi and PHVs is not devolved. However, the *Wales Act 2017* devolves licensing to the Assembly. The relevant provisions are expected to commence early next year.

Welsh Government action

In anticipation of devolution, the Welsh Government launched a consultation on [taxi and private hire vehicle licensing in Wales](#) in June 2017. The consultation closed on 8 September. As the Cabinet Secretary’s letter to the Chair on this petition indicates, the purpose of the

consultation was to consider the Law Commission's proposals. Key areas identified include proposals which would:

- Introduce national standards for all taxis and private hire vehicles with the power for local licensing authorities to set additional standards where appropriate;
- Make it easier for providers of taxis and private hire services to work across local authority boundaries while also giving licensing officers new enforcement powers to deal with vehicles and drivers licensed in different areas; and
- Retain the ability of local licensing authorities to limit the number of taxis working in their licensing area.

National Assembly for Wales action

The issue of cross-border working was briefly discussed in your disabled access to public transport inquiry. On [4 April 2017 \(PDF 286KB\)](#) the Chair of the Licensed Private Hire Car Association commented in oral evidence:

I would suggest that the cross-border issue is more prevalent than it's ever been because of technology enabling people to do things outside of their own area. I think there is a problem with that. Certainly, in London, where lots of people are licensed, drivers are popping up all over the place. I think the legislation doesn't need to be protectionist, but it does need to take account of local provision. Local provision, including disabled provision, will be harmed if people from outside that don't meet the regime's standards and requirements come into an area. It devalues it. I think the Secretary of State and, obviously, the devolved powers like yourselves and, indeed, people like the Greater London Authority, do need to get to grips with this. I think the cross-border issue is a particularly interesting aspect for you guys to look at.

On 23 May 2017 the Cabinet Secretary for Economy and Infrastructure, Ken Skates, made a [Plenary statement on the consultation](#). In this he noted (emphasis added):

The piecemeal evolution of the regulation of taxi and private hire services has resulted in a complex and fragmented licensing system. The relationship between taxi and private hire services, commonly known as mini cabs, requiring pre-booking, is not clearly defined. The balance struck between national and local rules lacks an overarching rationale, **resulting in duplication, inconsistencies and considerable difficulties in cross-authority enforcement.**

He continued (emphasis added):

I am keen to make it easier for providers to work across local authority borders, but with the appropriate arrangements in place to ensure that licensing officers have enforcement powers to deal with vehicles and drivers licensed in different areas. We have a responsibility to ensure that there is clarity of understanding and clear roles and responsibilities within the licensing regime to ensure that the quality of service, universally available, is achieved and maintained. Above all, we have a duty to ensure that the licensing arrangement in Wales safeguards the public and prevents the exploitation of the professional drivers that are delivering these very important services across our communities.

When asked specifically about cross-border working and English drivers working in Wales, an issue explicitly identified in this petition, the Cabinet Secretary reiterated the need to have “appropriate arrangements in place to ensure that licensing officers have enforcement powers to deal with vehicles and drivers licensed in different areas”.

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



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-775
Ein cyf/Our ref KS/03015/17

David John Rowlands AM
Chair - Petitions committee.

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

8 September 2017

Dear

David,

Thank you for your letter of 10 August regarding Petition P-05-775, calling on the National Assembly for Wales to urge the Welsh Government to put a stop to the 'cross border' and 'sub-contracting' loophole in the law which means hundreds of out of town taxis and private hire vehicles descend on Cardiff to work Private Hire.

The petition submitted by the taxi drivers of Cardiff highlights the weakness of the current licensing regime that regulates the taxi and private hire vehicle sector in Britain. Recent advances in digital technology and smart phone media has rendered the distinction between taxi and private hire vehicles as being less relevant to the market and the customer. Additionally, the inability of local licensing authorities to take enforcement action against drivers operating out of their licensing areas has apparently led to vehicle overcapacity in some areas, seriously depressing the earning potential of some drivers.

On the 23 May, I made an oral statement in the National Assembly for Wales stating that I believe that the outdated legislative framework has become too extensive in some respects, imposing unnecessary burdens on business and artificially restricting the range of services available to consumers; and insufficiently comprehensive in other ways, undermining the fundamental goal of protecting not only the travelling public, but safeguarding drivers from exploitation that is becoming more common place.

The enactment of the Wales Act 2017, and its expected commencement early next year will for the first time, bring the licensing of taxis and private hire vehicles within the legislative competence of the National Assembly for Wales. It is on this basis that I am considering afresh the significant work undertaken by the Law Commission for England and Wales for the reform of the licensing of taxis and private hire vehicles.

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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.

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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 consultation I started on 12 June is a first step in my ambition to work with the industry, local licensing authorities and users to develop arrangements that may be introduced in Wales to ensure that taxis and private hire vehicles continue to contribute to our ambitions for a connected and sustainable society.

On that basis, I welcome the petition that has been registered by the taxi community in Cardiff.

A handwritten signature in cursive script that reads "Yours ever, Ken".

Ken Skates AC/AM

Ysgrifennydd y Cabinet dros yr Economi a'r Seilwaith
Cabinet Secretary for Economy and Infrastructure



We don't want this to be an 'anti-Uber' rant but there's no disguising the fact that it is Uber that primarily take advantage of the cross-border and sub-contracting loophole in the law. We brought this petition because of the legislation that allows Uber to work in the way they do.

We're sure that these laws were brought in with the best of intentions and would probably work well in rural areas where taxis are more scarce.

As in other major cities, the laws do not work in Cardiff!

There are currently 2271 Hackney carriage/Private Hire drivers licensed by Cardiff County Council, it works out at one licensed driver per 150 people in the City. There is absolutely no need for any more taxis in Cardiff.

The knock on effect of these laws has seen a proliferation of 'out of town' cars from as far afield as Sefton in Merseyside, Rochdale, London, Gloucester, Bristol as well as neighbouring authorities – RCT, Newport, Merthyr, the Vale etc. They literally do come from all corners of this country to work in Cardiff.

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

Many of these vehicles have NO markings on them making a mockery of the high standards fought for over many years including highly visible livery and local street knowledge. Alas it will be only matter of time before a vulnerable person jumps into a non licensed car with catastrophic results.

Local enforcement officers are powerless to check these out of town mini cab and drivers credentials. Relying on the Police is also a non starter – they just pass the buck saying it's the responsibility of the local enforcement team.

Another worry is these cars pay insurance for hire and reward (presuming they have it) at a rate based on the area they are licensed in. What if a major claim was made for an incident in Cardiff where they were predominantly operating? Would there be an issue of paying out if the cab was meant to be working in a quiet rural location and was on a far lower insurance premium?

Another issue is that when a Hackney Carriage licensed outside Cardiff, working in the City for Uber, illegally ply for hire. The insurance is then invalid. We have actual examples of RCT Hackney cabs illegally plying for hire in Cardiff.

One driver actually picked up at the National Express coach station – without being booked – and went to London whilst not being insured.

A second driver was plying for hire outside student accommodation in Cardiff – offering to take passengers without pre-booking. Once again uninsured if he picks up.

As this is now an issue Nationally where cabs working on these types of modern apps are travelling miles to operate as they cannot make a living in their licensing areas because of the greed of the operators signing up as many cars as possible despite limited demand.

As the Rotherham cases and others have shown the law needs to be tightened not loosened as the last Governments two hastily added clauses to the Deregulation bill unfortunately did.

Also a Sat nav is no substitute for local knowledge and indeed is distracting specially in an Urban situation where pedestrians, cyclists and other road users need the cab drivers 100 percent attention. As you are aware many postings have been on line of cars from out of areas travelling along pavements, one way streets in wrong direction and even up steps where the driver has not been paying attention.

The law needs to be changed, so every journey either starts OR finishes in the area the vehicle AND driver is licensed and not miles away, this will ensure the local officers have the resources to ensure the safety of the passenger and the general public.

TAXI DRIVERS of CARDIFF

Agenda Item 2.2

P-05-777 Application of the Automatic Fire Suppression Systems Legislation within the current Building Regulations for Wales.

This petition was submitted by Nick Harding, having collected 62 signatures online.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to review and amend the current implementation of the Fire Sprinkler Regulations, within the current Building Regulations, that came into force in January 1st 2016 (Wales).

The review to amend should specifically take into consideration how the regulation has been integrated into the current Building Regulations with regards to projects that fall within the "Material Change of Use" category (Regulation 5) and the requirement to retrofit Automatic Fire Suppression Systems. The review should primarily take into consideration what is actually achieved when 2 properties are amalgamated into 1 given that:-

- 1) Where 2 dwellings become 1 the actual building process should be deemed no different from what would be considered as an Extension to a dwelling. Under the current Building regulations Extensions do not require an automated fire suppression system to be installed regardless of size.
- 2) The requirement is to install an automatic fire suppression system into the building as a whole and not just the developed part.
- 3) The Regulation does not take into account any substantial fire reduction measures already taking place as a result of the building project, such as reducing the number of kitchens within a property (70 – 80% of all domestic fires start within kitchens – Firesafe.org.uk).
- 4) The current costs for "Retrofitted" automatic fire suppression systems make the requirement not cost effective, a fact backed up by every commissioned and independent study undertaken thus far. (Collected costs and quotations range from £5000 to over £10000 depending on flow availability, number of heads actuating and tank plus infrastructure requirements).
- 5) The Legislation has been implemented without sufficient infrastructure being in place. Within the whole of Wales there are only 7 registered BAFSA companies. This is highly likely to lead to non-competitive pricing.

Additional information:

The review should also look at the wider implications of how this Legislation has been implemented now that it has been in place for some time.

Considerations should include:

1) Maintenance of the Systems – The Legislation does not include anything for any ongoing maintenance requirements once the system has been installed. The Welsh Assembly's approach to this is to provide the public with a "Leaflet" which is supposed to provide information to the home owner regarding the maintenance requirements of the system; however this falls short of what would be achieved if it was part of the legislation to ensure ongoing maintenance of the system. However the knock on effect of this is to further burden homeowners with higher home owning and running costs, with ongoing maintenance costs estimated at over £2000 per year.

2) Legionella Risk (due to lack of maintenance) – It is widely thought that in general sprinkler systems are not a source of Legionella (FPA RC63), however as Wales is the 1st country in the world to legislate Domestic Sprinkler Systems as a requirement for all new build and converted homes we believe that more investigation is required especially as the regulation negated to include the maintenance of the system. We believe that as systems age and are not maintained due to costs, Legionella risk will become more prevalent putting the public at a higher risk of infection.

3) Costs – Due to the tight margins for House Builders and Developers, some have now stopped or will be stopping House building in certain areas of Wales (Persimmon & Redrow) as a direct result of this Legislation.

4) Cost Benefit Analysis – During the initial investigation it was estimated that the system would cost £1500 – £2500 per household. In reality the cost are between £5000 and £10000 per installation. Additional equipment is often required because Dwr Cymru cannot guarantee minimum water flow and pressure.

Assembly Constituency and Region

- Bridgend
- South Wales West

Petition: P-05-777 Application of the Automatic Fire Suppression Systems Legislation within the current Building Regulations for Wales

Y Pwyllgor Deisebau | 17 Hydref 2017
Petitions Committee | 17 October 2017

Research Briefing:

Petition number: P-05-777

Petition title: **Application of the Automatic Fire Suppression Systems Legislation within the current Building Regulations for Wales**

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to review and amend the current implementation of the Fire Sprinkler Regulations, within the current Building Regulations, that came into force in January 1st 2016 (Wales).

The review to amend should specifically take into consideration how the regulation has been integrated into the current Building Regulations with regards to projects that fall within the "Material Change of Use" category (Regulation 5) and the requirement to retrofit Automatic Fire Suppression Systems. The review should primarily take into consideration what is actually achieved when 2 properties are amalgamated into 1 given that:-

- 1) Where 2 dwellings become 1 the actual building process should be deemed no different from what would be considered as an Extension to a dwelling. Under the current Building regulations Extensions do not require an automated fire suppression system to be installed regardless of size.
- 2) The requirement is to install an automatic fire suppression system into the building as a whole and not just the developed part.
- 3) The Regulation does not take into account any substantial fire reduction measures already taking place as a result of the building project, such as reducing the number of kitchens within a property (70 – 80% of all domestic fires start within kitchens – Firesafe.org.uk).
- 4) The current costs for "Retrofitted" automatic fire suppression systems make the requirement not cost effective, a fact backed up by every commissioned and independent study undertaken thus far. (Collected costs and quotations range from £5000 to over £10000 depending on flow

availability, number of heads actuating and tank plus infrastructure requirements).

- 5) The Legislation has been implemented without sufficient infrastructure being in place. Within the whole of Wales there are only 7 registered BAFSA companies. This is highly likely to lead to non-competitive pricing.

The review should also look at the wider implications of how this Legislation has been implemented now that it has been in place for some time. Considerations should include:

- 1) Maintenance of the Systems – The Legislation does not include anything for any ongoing maintenance requirements once the system has been installed. The Welsh Assembly's [sic] approach to this is to provide the public with a "Leaflet" which is supposed to provide information to the home owner regarding the maintenance requirements of the system; however this falls short of what would be achieved if it was part of the legislation to ensure ongoing maintenance of the system. However the knock on effect of this is to further burden homeowners with higher home owning and running costs, with ongoing maintenance costs estimated at over £2000 per year.
- 2) Legionella Risk (due to lack of maintenance) – It is widely thought that in general sprinkler systems are not a source of Legionella (FPA RC63), however as Wales is the 1st country in the world to legislate Domestic Sprinkler Systems as a requirement for all new build and converted homes we believe that more investigation is required especially as the regulation negated to include the maintenance of the system. We believe that as systems age and are not maintained due to costs, Legionella risk will become more prevalent putting the public at a higher risk of infection.
- 3) Costs – Due to the tight margins for House Builders and Developers, some have now stopped or will be stopping House building in certain areas of Wales (Persimmon & Redrow) as a direct result of this Legislation.
- 4) Cost Benefit Analysis – During the initial investigation it was estimated that the system would cost £1500 – £2500 per household. In reality the cost are between £5000 and £10000 per installation. Additional equipment is often required because Dwr Cymru cannot guarantee minimum water flow and pressure.

Background

The *Building Regulations &c. (Amendment No. 3) and Domestic Fire Safety (Wales) Regulations 2013* require automatic fire suppression systems (i.e. fire sprinklers) to be installed in new and converted residential properties in Wales. This requirement was introduced, subject to transitional provisions, in two stages on 30 April 2014 and 1 January 2016. There is no requirement to install sprinklers in existing housing undergoing refurbishment, unless such refurbishment involves the creation of one or more new residences.

Prior to the introduction of this legislation, sprinklers had only been required in new high rise residential buildings over 30 metres in height. This requirement was in place from 2007 and applied in both England and Wales.

Practical guidance on how to comply with the requirement for fire sprinklers can be found in the Building Regulations [Approved Document Part B \(Fire Safety\)](#).

Welsh Government action

Lesley Griffiths AM, the Cabinet Secretary for Environment and Rural Affairs, wrote to the Committee on 5 September 2017. Her letter addresses the issues raised in the petition:

Material change of use

The petition questions the requirement to install sprinklers where two existing residences are amalgamated, for the following reasons:

- The process should be deemed no different to adding an extension to an existing residence (sprinklers are not required to be installed in this scenario);
- The requirement is for sprinklers to be installed to the whole building, not just the developed part;
- The requirement does not take into account other fire reduction measures introduced as a result of the building work, for example reducing the number of kitchens;
- The costs of ‘retrofitting’ sprinklers is prohibitive, ranging from £5,000 to £10,000; and
- There are only seven British Automatic Fire Sprinkler Association (BAFSA) registered businesses in Wales, which is ‘highly likely’ to lead to non-competitive pricing.

The Cabinet Secretary’s letter confirms that the amalgamation of two existing residences would constitute a material change of use, and would therefore require the installation of sprinklers. The letter also describes the legislative process which brought about the requirement.

The *Domestic Fire Safety (Wales) Measure 2011*, which sets out the requirements for sprinklers, states:

- (2) ... this Measure applies to building work in Wales which comprises or includes—
- (a) constructing a building for use as a residence, or a number of residences,
 - (b) converting a building, or part of a building, to use as a residence, or a number of residences,
 - (c) subdividing one or more existing residences so as to create one or more new residences, or
 - (d) **amalgamating existing residences so as to create a new residence or new residences.** [Research Service emphasis]

On the costs associated with installing sprinklers where two existing residences are amalgamated, the Cabinet Secretary's letter states:

The costs of installing sprinklers included within the regulatory impact assessment represented a broad average of expected costs which have been largely supported by the pilot study final report. We do however accept costs of installing fire suppression systems in small scale developments and those involving refurbishment are likely to be higher, including where two or more dwellings are being altered into one (and conversely).

The pilot study report can be found on the Welsh Government website: [Welsh Government Sprinkler Pilot Study Final Report](#).

Overall cost of installing sprinklers

The petition states that, due to tight margins, some house builders (it names Persimmon and Redrow) have stopped building in some parts of Wales as a direct result of the requirement for sprinklers.

It also states that the actual costs of installing sprinklers is considerably higher than originally estimated (£5,000 to £10,000 versus £1,500 to £2,500), noting that additional equipment is often required because Dŵr Cymru does not guarantee minimum water flow and pressure.

The Cabinet Secretary's letter states:

... it is difficult to assess costs as each property will differ in relation to the building design, sprinkler design, availability of a suitable water supply and location of contractor. In relation to the water supply where there is sufficient flow and pressure then a main fed system is the most cost effective. Where a pump is required to enhance the mains flow and pressure then the costs will increase.

Maintenance of sprinkler systems

The petition highlights that there is no requirement for ongoing maintenance once the sprinklers have been installed, resulting in the requirement for sprinklers falling short of what would otherwise be achieved. However, it also states that the effect of such a requirement would be to place a further burden of £2,000 per year maintenance costs on homeowners.

The Cabinet Secretary's letter states:

In relation to the maintenance of a fire suppression system, this would be the responsibility of the homeowner or person responsible for the property, there are no continuing control requirements in relation to the building regulations following certification of the completion of the building work.

Legionella

The petition states that there will be increased risk of infection from Legionella as sprinkler systems age and are not maintained. It calls for more investigation into this area, given that

Wales is the first country to legislate to require sprinklers in all new and converted residential properties.

The Cabinet Secretary's letter states:

In relation to legionella, this spreads via infected aerosolised water. To be aerosolised, water droplets need to [be] a certain size, far smaller than the droplets of water that a[re] sprayed from fire sprinkler systems. In addition, aerosolised water would only be likely if the sprinklers were activated, in which case exposure is unlikely as occupants would be leaving the area due to a fire situation. While there is a risk of legionella, that risk is low or negligible when considering fire sprinkler systems.

Legionnaire's disease

The [NHS Choice website](#) states that:

Legionnaires' disease is caused by Legionella bacteria infecting the lungs. It is usually caught by breathing in small droplets of contaminated water. The infection is not contagious and cannot be spread directly from person to person.

Legionella bacteria are usually found (often in harmlessly low numbers) in sources of water, such as ponds, rivers and lakes. However, the bacteria can rapidly multiply if they find their way into artificial water supply systems, such as air conditioning systems.

Large buildings, such as hotels, hospitals, museums and office blocks, are more vulnerable to Legionella contamination because they have larger, more complex water supply systems in which the bacteria can quickly spread.

National Assembly for Wales action

Recent discussion on sprinklers in the Assembly has focused on fire safety in high rise buildings following the Grenfell tower fire in London in June, rather than on the specific issues raised in the petition.

The Equality, Local Government and Communities Committee is currently undertaking an [inquiry into fire safety in high rise buildings](#). The Committee took evidence from a number of stakeholders on [13 July](#), and from both the Cabinet Secretary for Environment and Rural Affairs and the Cabinet Secretary for Communities and Children (Carl Sargeant) on [27 September](#).

The Climate Change, Environment and Rural Affairs Committee undertook general scrutiny of the Cabinet Secretary for Environment and Rural Affairs on [20 July](#).

During these sessions the Cabinet Secretaries stated that any review of the Building Regulations, within the broader context of fire safety, would take place once the work of the expert groups established following the Grenfell fire have run their course.

The [Independent Review of Building Regulations and Fire Safety](#), established by the UK Government, is due to submit an interim report in autumn 2017 and a final report in spring 2018.

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-05-777
Ein cyf/Our ref LG/01959/17

David John Rowlands AM
Chair - Petitions Committee
National Assembly for Wales
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government.committee.business@wales.gsi.gov.uk

5 September 2017

Dear David

Thank you for your letter of 17 August, regarding petition P-05-777 Application of the Automatic Fire Suppression Systems Legislation within the current Building Regulations for Wales.

The petition requests a review of the current legislation for fire suppression systems in Wales in regard to projects which constitute a 'material change of use' for the purposes of the Building Regulations. The petition also requests that any review should look at the wider implications of the legislation such as the costs, maintenance of systems and legionella risk.

Statutory Instrument 2013 No. 2730 (W. 264), The Building Regulations &c. (Amendment No. 3) and Domestic Fire Safety (Wales) Regulations 2013, requiring the installation of fire suppression systems in residences where building work is being undertaken, amended the Building Regulations and were made following the National Assembly for Wales (Legislative Competence) (Housing) (Fire Safety) Order 2010 and the Domestic Fire Safety (Wales) Measure 2011.

The specific requirement to instal an automatic fire suppression system, contained in regulation 37A(3) of the Building Regulations 2010, applies where building work consists either of the erection of certain buildings (including dwelling houses and flats) or a material change of use of such buildings. There will be a material change of use where a building, which contains at least one dwelling, after the change of use contains a greater or lesser number of dwellings than it did previously (regulation 5 (g), applied by regulation 37A(2)).

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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 legislative process commenced in 2007 with the Legislative Competence Order (which enabled the National Assembly to make the Measure), this stated the term 'new residences' would include those residences created as a result of amalgamation of a greater number of existing residences into one. This requirement was consistent throughout the legislative process.

The scrutiny committee of the Legislative Competence Order, in its report laid on the 11 June 2008, concluded the proposed order be amended to remove the interpretation provisions for the terms 'new residential premises' and appropriate interpretation provisions should be considered as part of any future Measure(s).

However, the Member in charge did not agree with this recommendation. The committee then concluded the term 'new residential premises' as currently provided for in the proposed Order was sufficiently clearly drawn and were therefore content with this term and its interpretation. The interpretation was as follows:

'the term "new residential premises" means not only new build housing, but also premises which are converted to residential use and existing residential premises which are subdivided or amalgamated into one or more new residences.'

Following the scrutiny by the National Assembly for Wales and pre-legislative scrutiny by both Houses of Parliament, a revised Order, *The National Assembly for Wales (Legislative Competence) (Housing) (Fire Safety) Order 2010* subsequently received Royal Assent on 12 April 2010 and came into force the following day.

Following the Legislative Competence Order, the proposed Domestic Fire Safety (Wales) Measure was introduced to the National Assembly for Wales on 8 July 2010 and set out requirements for fire suppression systems, the requirements were clearly laid out namely:

The provision of automatic fire suppression systems in new residential premises

In this matter "new residential premises" means—

- (a) premises newly constructed for residential use;*
- (b) premises newly converted to residential use;*
- (c) premises converted to use as one or more new residences by subdivision of one or more existing residences; and*
- (d) premises converted to use as one or more new residences by amalgamation of one or more existing residences.*

Following Royal Approval of the Domestic Fire Safety (Wales) Measure in April 2011, a public consultation was undertaken in March 2013 on implementing the legislation. The consultation included the integration of the Measure requirements into the Building Regulations. Following the public consultation the requirements were incorporated into the building regulations through the Building Regulations &c. (Amendment No. 3) and Domestic Fire Safety (Wales) Regulations 2013, made on the 22 October 2013.

In relation to costs relating to the sprinkler installations, in a written statement by John Griffiths AM Minister for Environment and Sustainable Development on the 30 May 2012 he stated "The study indicates the cost benefit case is less strong for regulating all new domestic properties but the Welsh Government believes care is required when considering any policy which has the potential to protect life".

The costs of installing sprinklers included within the regulatory impact assessment represented a broad average of expected costs which have been largely supported by the pilot study final report. We do however accept costs of installing fire suppression systems in small scale developments and those involving refurbishment are likely to be higher, including where two or more dwellings are being altered into one (and conversely).

The Welsh Government has undertaken a pilot study of residential sprinklers in new housing as this was the area where we expect there to be bulk of activity. The overall aim of the project was to undertake a specified research relating to the learning experiences, solutions to issues and the processes concerning the design and installation costs of systems in housing in Wales. The pilot study included 175 installations in twelve local authority areas. The pilot study commenced in June 2014 and was completed in August 2016.

The link to the final report can be accessed at:

<http://gov.wales/topics/planning/buildingregs/publications/welsh-government-sprinkler-pilot-study-final-report/?lang=en>

In relation to the overall cost of a sprinkler installation it is difficult to assess costs as each property will differ in relation to the building design, sprinkler design, availability of a suitable water supply and location of contractor. In relation to the water supply where there is sufficient flow and pressure then a main fed system is the most cost effective. Where a pump is required to enhance the mains flow and pressure then the costs will increase.

In relation to the maintenance of a fire suppression system, this would be the responsibility of the homeowner or person responsible for the property, there are no continuing control requirements in relation to the building regulations following certification of the completion of the building work.

In relation to legionella, this spreads via infected aerosolised water. To be aerosolised, water droplets need to a certain size, far smaller than the droplets of water that a sprayed from fire sprinkler systems. In addition, aerosolised water would only be likely if the sprinklers were activated, in which case exposure is unlikely as occupants would be leaving the area due to a fire situation. While there is a risk of legionella, that risk is low or negligible when considering fire sprinkler systems.

Regards



Lesley Griffiths AC/AM

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

P-05-777 Application of the Automatic Fire Suppression Systems Legislation within the current Building Regulations for Wales – Correspondence from the Petitioner to the Committee, 11.10.17

Dear Petitions Committee,

Firstly many thanks for giving me the opportunity to express my beliefs within a forum whereby hopefully impartial, democratic and open decisions can be made.

As many within the Senedd will be aware, I am pushing for an urgent review into the implementation and impacts of the new Fire Suppression legislation within the current Building regulations. After many meetings with my local AM and unsuccessful attempts to obtain satisfactory answers to my questions by Leslie Griffiths and her team I am hopeful that this process will finally put closure to my plight.

Background

To make things clear and for the purpose of understanding, this whole process came about as a result of my building project requirements and the requirement to retrofit a Fire suppression System not only to the area where the main work is being done but also to the dwelling that is not being modified. This seemed unfair as people who do the same via extensions have no requirement to do this. The details of the building work are below:-

- 2 properties that are linked to each other (semi-detached) but do not form part of any other link or terrace.
- They are both modern builds, circa 1996
- The aim is to create 2 openings (1 downstairs and 1 upstairs),
- Remove the existing kitchen from my current dwelling and create a new kitchen in the dwelling next door.
- Create 1 master bedroom instead of the 2 bedrooms in the upstairs of the dwelling next door.
- There are no other major modifications to my existing dwelling other than the 2 openings required for access, so from a bricks and mortar perspective this is no different to building an extension.

Analysis and findings of the new Fire Suppression Legislation

As a result of my requirement to comply with the new Legislation, and my dis-agreement with it, I took it upon myself to conduct an investigation into how and why this Legislation came into force.

The fact that everyone I have consulted with could not believe that it would be applicable to my project, not only compounded my interest but has driven me to gain a better

understating and knowledge of Fire risk by going so far as to even studying for a NEBOSH Certificate in Fire Safety.

As a result of this, conducting over a year of extensive and thorough examination into the Legislative concept, Building Regulations, amendments, meeting transcripts, consultations, pilot studies, fire statistics and BRE Reports it is clear that this legislation has been poorly implemented with very little thought for its impact, both financially and economically. This is now backed up by recent reports that “Loop Holes” have been exploited by builders seeking to avoid the installation of automatic fire suppression systems due to cost.

Wales Fire Facts & Statistics: –

- In 2016–17 the number of fires attended by Welsh Fire and Rescue Authorities reduced by 11% compared with 2015–17.
- In 2016–17 there were 19 fatal casualties from fires in Wales – 0.00006% of the population (
- In 2016–17 there were 621 non-fatal casualties from fires in Wales – 0.002% of the population
- 3 in 10 dwelling fires in Wales in 2016–17, no smoke alarm were installed – This indicates that 30% of all dwelling fires were in buildings built before 1991 / 92.
- 66% of all dwelling fires start as a result of cooking, when including appliances it is estimated that over 80% of all domestic fires start in the kitchen.
- In 2015/16 there were **5 Sprinkler system related failures** which resulted in Fire Service attendance, these were deemed false alarms. ***Note** – it is interesting to see that in the 2016/17 fire statistics this detail has now been amalgamated and placed under “other” along with general system failures so there are no definitive number for this. My belief is this is to hide the true statistic of sprinkler system failures.

Legislative Facts & Statistics: –

- There is no reduction in insurance premiums as a result of fitting a Sprinkler System to a dwelling.
- It is not yet clear if people will actually prefer to buy houses with these systems installed as no census has been conducted. It would be embarrassing for the government if it does turn out that the general public actively avoid houses with these systems in.
- Dwr Cymru does not and cannot guarantee the minimum flow rate (80L/Minute at 2 heads) for the installation of Sprinklers. There is no future requirement to ensure that they can even for new builds, this only leaves 1 option – Pump & Tank.

- All Sprinkler Systems **must** under regulation include a Non-Return valve to prevent water migrating back into the water supply network; these Non-Return valves should have annual maintenance and testing as a minimum to ensure correct functionality and guarantee of performance. Households may be liable for issues arising from such failures.
- Domestic Fire suppression systems have no requirement for electrical backup, therefore if there is an interruption to electrical supply the system may fail to operate even if a Pump & Tank system is installed.
- There is **NO** legislative requirement to maintain the Sprinkler system once installed.
- Legionella – Even though there are no documented fatalities from Sprinkler Systems, I believe Lesley Griffiths’ refusal to recognise this is a real evident risk and danger should be made public and that the following advice taken from ACOP L8 (Approved Code of Practice) which forms part of HSE guidance should be issued:
 - Legionella is active and multiplies between 20°C and 45°C (the average house temperature is 22°C)
 - Legionella can be contracted by exposure to airborne droplets, these can be created from but not exclusive to hot and cold water outlets; atomisers; wet air conditioning plant; and whirlpool or hydrotherapy baths.
 - It is recommended that a full Risk Assessment be carried out to identify any potential risks.
 - A competent person should routinely check, inspect and clean the system, in accordance with the risk assessment.
 - You must identify ‘sentinel’ outlets (furthest and closest to each tank or cylinder) for monthly checking of the distribution temperatures. You should also check cold water tank temperatures at least every six months
 - Stagnant water favours Legionella growth. To reduce the risk you should remove dead legs/dead ends in pipe-work, flush out infrequently used outlets (including showerheads and taps) at least weekly and clean and de-scale shower heads and hoses at least quarterly. Cold-water storage tanks should be cleaned periodically and water should be drained from hot water cylinders to check for debris or signs of corrosion.
 - Legionella can be evident on or around tank connections which show signs of corrosion, this is particularly prevalent in outside installations and these connections should be checked and kept dry.
 - There is also a potential hazard with regard to firefighting systems, in that legionella could develop in water supplies for water mist, sprinkler, drencher and hose reel installations together with site firefighting ring mains (Taken from the Fire Protection Authorities RC63)
- Costs of retrofit Sprinkler install collated to date :-
 - Quotation 1 [REDACTED] – £9210 Inclusive of Pump & Tank
 - Quotation 2 [REDACTED] – £6684 inclusive of Pump & Tank

- Quotation 3 [REDACTED] – £5052 Inclusive of Pump & Tank
- Quotation 4 [REDACTED] – £6720 Mist System
- Cost of pipework upgrade (25mm to 32mm) by Dwr Cymru – £4500 (This may mitigate a Pump & Tank)
- There are only 7 FIRAS registered companies in the whole of Wales.
- 2 major housing developers (Redrow & Persimmon) have withdrawn from building in certain parts of Wales due to this very piece of legislation.
- As the legislation has only been in force since January 2016 with most building applications submitted before this, the true extent of this legislative impact both financially and economically will not be felt until at least 2018/2019.
- The only buildings exempt from this legislation are Listed / Graded buildings, i.e. ones at most risk.
- There have been 2 Senedd commissioned BRE Reports on Fire Sprinklers (2012 & 2016), both reports are conclusive in the fact that Sprinkler Systems are **NOT** cost effective for fire prevention in retrofit circumstance.

Questions:

Given the statistics above, I would like to pose the following questions to the Assembly.

- I would like the Assembly to explain how an existing dwelling with 2 properties and 2 kitchens poses less of a fire risk than 1 dwelling with 1 property and 1 kitchen?
- I would like to ask the Assembly to justify the cost of retrofitting a Sprinkler system? Given that: – the prices they quoted to deliver the measure were financially flawed (£1200–£2000 this is for a Flat, maybe 3 heads. Typical houses require upwards of 10), the combined risk factor is less than 0.003% (Fatal and Injury combined), and that both of the commissioned reports clearly state that retrofits are not financially viable and should not be put in place.
- I would like the Assembly to explain and justify how and why they allowed the implementation of a piece of significant legislation that was evidently based on the documented (*Legislation Committee No1 notes section 164 – 170) emotion of an Assembly member (Ann Jones)? – Clearly any legislation that is based on emotion is flawed as the person with emotional attachment to that legislation is not able give a completely unbiased justification.
- I would like to the Assembly to explain why during the investigative and feasibility phases of the process the committee made promises of acquisition and provision of further detail regarding types and ages of homes that caused Fire deaths and injuries but none was ever provided? This detail would have given a more focused

approach as to where and what building projects had the most impact on Fire death and injury prevention.

- I would like the Assembly to explain why they explicitly chose not include regulatory requirements to maintain the Sprinkler Systems which would ensure the prevention of Legionella and other potential water borne fatal diseases? Given that whilst there is no current data to support any cases of Domestic Sprinkler System born Legionella, it has to be taken into consideration that there is also very little data to provide evidence that Domestic Sprinklers **CAN** cause water borne diseases. After all in industry Sprinkler Systems are heavily maintained pieces of equipment for this very reason.
- I would like to ask the Assembly to publicly state that they will be held responsible for any health issues arising from the non-implementation of maintenance of Fire Sprinklers as a result of the Legislation. Given that evidence does support that non-maintained Sprinkler Systems will fail and is likely to harbour Legionella ([cdc.gov/legionella](https://www.cdc.gov/legionella) CS267416-A 07/18/2016).
- I would like to ask the Assembly to review the current legislation given all of the facts that has come to light, particularly retrofits, cost effectiveness, and fit for purpose. Bear in mind that the infrastructure is flawed i.e. Water Supply, and the lack of legislated maintenance of these systems needs to be addressed.
- My last question to the Assembly is this, IF anyone (including Anne Jones, Lesley Griffiths and Carl Sargent) believe that this piece of legislation is fit for purpose absolutely necessary, regardless of home improvements and legislation when are they spending the 10K and having **their** houses retrofitted with Sprinklers?

Summary:

Given all of the evidence it is clear to me that Sprinkler System Retrofits are not a financially viable way to reduce Fire deaths within domestic properties, in fact it's questionable whether Sprinkler Systems in all non-multi-occupancy domestic dwellings are viable at all regardless of size, which is backed up by all BRE reports. Given that these systems are very high maintenance items I find it extremely difficult to accept that the Assembly would actively implement such a law that was not backed up by strict and stringent maintenance requirements, a leaflet after installation / sign off does not cut it. It is worth noting that whilst the building industry may be financially focussed it also has a good handle on what people look for in their products, ignoring house builders and their comments will only squeeze the already poor levels of available housing within Wales.

Throughout this whole process I have decided to stop my building work mainly in protest, I have had many conversations with many of the AM's and industry professionals and not one can tell me the difference between what I am doing and someone building an extension. The money that was to be spent locally on businesses and companies to complete the work will not be spent as a result of this legislation, I find it disappointing that professional people, such as Fire and industry specialists make statements like "Retrofitting works, it only costs £1500 to £2000". Retrofitting is a minimum of £6000 and this is the number that should be publicised.

Finally, this piece of legislation needs to be handled separately within the Building regulations and not shoe-horned in where it only partially fits, that way there would be scope to allow building projects that, as part of the building work, reduce fire risk significantly enough **NOT** to install a Sprinkler System.

Nick Harding

Agenda Item 2.3

P-05-779 Compulsory scanning of domestic pets for microchips by councils

This petition was submitted by #CatsMatter Campaign, having collected 910 signatures online.

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to introduce a policy to implement the compulsory scanning of domestic pets by councils.

Vets and shelters will scan pets found but there is no requirement from councils. The microchip system can only be fully effective if animals that have been microchipped are scanned and this is vital for the owners who have to endure the mental torment of never knowing and continuing searches for weeks/months when a family pet goes missing.

Currently there is no policy in place for councils to scan cats & dogs found by the street cleaning teams within councils. When a pet is missing it is devastating for their owners. But sometimes, when a cat goes missing, its owners may never find out if they are lost or have been killed in a road accident. There is no closure for the owners and their feelings of loss may go on and on.

Additional information:

At present, the Welsh councils who do not scan are Gwynedd, Anglesey, Cardiff, Newport, Blaenau Gwent and Neath Port Talbot. The remaining councils do currently scan. However, these councils admit they only scan when they deem the animal in a state to be so. This only partly eases pet owners grief as still many will never find out. Most animals involved in road collisions do sustain major injury which should not be used as an excuse to barricade the moral duties of letting the owners know. All domestic animals should be scanned, regardless of state, and the owners notified. Whilst it is considered the unfortunate upset or distress the street clean may endure when scanning animals found in a bad way, the fact is they will handle these animals regardless of our proposed policy. They will handle these cases on a regular basis at present. Although we appreciate the upsetting nature, the proposed policy does not encourage this any further than it currently is and the heartache would not be consistent with the owners who love and know

these animals personally and morally have a right to know what has happened.

Assembly Constituency and Region

- Not residing in Wales

Petition: Compulsory scanning of domestic pets for microchips by councils

Y Pwyllgor Deisebau | 17 Mis Hydref 2017

Petitions Committee | 17 October 2017

Research Briefing:

Petition number: [P-05-0779](#)

Petition title: **Compulsory scanning of domestic pets for microchips by councils**

Text of petition:

We call on the National Assembly for Wales to urge the Welsh Government to introduce a policy to implement the compulsory scanning of domestic pets by councils.

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At present, the Welsh councils who do not scan are Gwynedd, Anglesey, Cardiff, Newport, Blaenau Gwent and Neath Port Talbot. The remaining councils do currently scan. However, these councils admit they only scan when they deem the animal in a state to be so. This only partly eases pet owners grief as still many will never find out. Most animals involved in road collisions do sustain major injury which should not be used as an excuse to barricade the moral duties of letting the owners know. All domestic animals should be scanned, regardless of state, and the owners notified. Whilst it is considered the unfortunate upset or distress the street cleaner may endure when scanning animals found in a bad way, the fact is they will handle these animals regardless of our proposed policy. They will handle these cases on a regular basis at present. Although we appreciate the upsetting nature, the

proposed policy does not encourage this any further than it currently is and the heartache would not be consistent with the owners who love and know these animals personally and morally have a right to know what has happened.

Background

Microchipping

Many pets can be microchipped including cats, dogs, rabbits and horses. The microchip is a small electronic chip that is inserted under the skin of the animal, which can be read by a scanner. The procedure creates an individual ID for each chip, these ID number along with the owners details are then stored on a database. If a pet is found without its owner, it can be scanned to see if it has a microchip and if so, the owner can then be notified.

It is only compulsory for dogs to be microchipped. The *Microchipping of Dogs (Wales) Regulations 2015*, made under Section 12 of the *Animal Welfare Act 2006*, came into force on 6 April 2016. The regulations make it compulsory for dogs aged eight weeks and over to be microchipped¹. Failure to comply with the regulations carries a fine of up to £500.

Relevant highways legislation

In England and Wales, under Section 170 of the *Road Traffic Act 1988* a car accident with the following animals must be reported to the police:

- dogs;
- horses;
- cattle;
- pigs;
- goats;
- sheep;
- donkeys; and
- mules.

Section 89 of the *Environmental Protection Act 1990* places a duty on local authorities to keep highways clear of litter and refuse. Each local authority also has a duty to ensure that the highway is (as far as is practicable) kept clean. As such, pet carcasses can be recovered from highways.

¹ The regulations exempt certified working dogs as defined under section 6(3) of the *Animal Welfare Act 2006* and dogs whose health would be significantly compromised if they were to be microchipped.

Animal welfare in Wales

The *Government of Wales Act 2006* (Part 1 of Schedule 7) provides competence for the National Assembly to enact primary animal welfare legislation, subject to meeting the statutory tests set out in the Act. This situation remains unchanged under the *Wales Act 2017*.

Furthermore, the *Animal Welfare Act 2006* as the principal piece of animal welfare legislation in Wales, gives Welsh Ministers a range of powers, for example:

- section 12, – making regulations to promote animal welfare;
- section 13 – licensing or registration of activities involving animals; and
- section 16 – making of codes of practice.

Survey of local authorities

Prior to submitting this petition, the petitioners #CatsMatter surveyed Welsh local authorities to identify those that have a policy where street cleaning teams scan pet carcasses for microchips, and notify owners. The petition indicates that six authorities do not do so. Since the petition has gone online, the petitioners have again been in contact with local authorities and as of September 2017, the following five authorities do not scan pet carcasses:

- Gwynedd;
- Anglesey;
- Cardiff;
- Newport; and
- Blaenau Gwent.

Petition for ‘Harvey’s Law’ in England

On 23 November 2013 a dog named Harvey was killed on the M62 after running away from its owners who were on holiday at the time. Harvey was microchipped and had a dog collar on. Whilst the owners contacted the Highways Agency on numerous occasions over a period of 13 weeks to ascertain if they had recovered Harvey, they were informed that there were no records of any dog fatalities occurring. However, following a publicity campaign, a highway officer who recovered the dog following a report from the driver who collided with it, was able to notify the family. Following this a [petition entitled ‘Harvey’s Law’](#) was submitted to the House of Commons. This asked for legislation to require the Highways Authority (a body that operates in England) to scan all domestic animals retrieved from the highways and to circulate the log to the police and dog wardens.

No legislation was introduced. The petition received the following [response](#):

The government does understand how important pets are and regrets that, sadly, a number of them are killed or injured on our roads each year.

The Highways Agency is an Executive Agency of the Department for Transport (DfT), and is responsible for operating, maintaining and improving the strategic road network in England on behalf of the Secretary of State for Transport. The Agency's role in maintaining and improving the network is delivered through a large and complex supply chain through a number and variety of contracts. The Agency also sets and maintains technical standards for roads and structures which contractors are required to adhere to and which are referred to by many local and other national authorities for the roads that they manage.

These standards are set down in the Network Management Manual (NMM). The NMM generally describes the processes for the management of the maintenance service including the interface between the Highways Agency, its service providers and other stakeholders. A link to the NMM is here:

http://www.dft.gov.uk/ha/standards/nmm_rwsc/docs/nmm_part_7a.pdf

Section 7.17 of the NMM describes processes that must be followed when canine remains are found on the network, although it does recognise that it is impossible to guarantee that remains can be fully identified due to the high speed nature of the Agency's roads.

Due to the nature of the processes already in place, the Government has no plans to enforce adherence to the NMM through legislation.

Following the online petition and a subsequent [debate](#) in March 2015, the then Transport Minister Mr Hayes confirmed that he would write to local highways authorities in England to draw their attention to this government position.

National Assembly for Wales action

This matter has not been considered before either in Plenary or by any Assembly Committee.

Welsh Government action

Response to petition

The letter from the Cabinet Secretary for Environment and Rural Affairs to the Chair of the Petitions Committee, 19 September 2017, states:

[A local authority is] an independent statutory authority and is democratically accountable to its community for the decisions it makes. It is of course important that each Local Authority makes the most efficient use of the resources available to it. However, it is also the case that each authority is responsible for managing its own affairs.

It is important that in determining how local resources are allocated and spent on delivering its responsibilities, each authority should engage meaningfully with its communities. We would encourage that people raise directly with Local Authorities any concerns they have with regard to the compulsory scanning of microchips for domestic pets. Contact details are available on the Council's

website. They may also wish to contact their local councillor, who as their elected representative is able to raise concerns with the Council on their behalf.

In relation to dogs, the Cabinet Secretary advises:

I understand the concerns about dogs being found dead. A recent Local Authority survey revealed the majority of respondents routinely scan dog carcasses found on trunk roads and notify the owners where possible.

The Welsh Government introduced legislation, which came into effect in April 2016, requiring the compulsory microchipping of dogs in Wales. The issue of compulsory scanning was considered in the formulation of the microchipping regulations but given the considerations above, we saw no need to set down that Local Authorities compulsorily scan dogs.

Previous action

In response to [RSPCA Cymru correspondence regarding Harvey's Law in Wales](#), the then Deputy Minister for Food and Farming responded 21 April 2015, advising that:

Local Authorities across Wales currently fulfil our duty to recover dogs and cats that are killed on the trunk road and motorway network. In the majority of cases they attempt to contact the owners. This is often done as a result of scanning or enquiries.

However, I am aware that this practice does vary throughout Wales and I have therefore asked my officials to making the scanning of information on ID tags and collars and the owner notification process more consistent than it is at present.

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



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-779
Ein cyf/Our ref LG/02016/17

David John Rowlands AM
Chair - Petitions committee.
National Assembly for Wales
Cardiff Bay
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19 September 2017

Dear David

Thank you for your letter of 25 August regarding a petition on compulsory scanning of domestic pet microchips by Local Authorities.

I understand the concerns about dogs being found dead. A recent Local Authority survey revealed that the majority of respondents routinely scan dog carcasses found on trunk roads and notify the owners where possible.

The Welsh Government introduced legislation, which came in to effect in April 2016, requiring the compulsory microchipping of dogs in Wales. The issue of compulsory scanning was considered in the formulation of the microchipping regulations but given the considerations above, we saw no need to set down that Local Authorities compulsorily scan dogs.

Local Authorities are an independent statutory authority and is democratically accountable to its community for the decisions its makes. It is of course important that each Local Authority makes the most efficient use of the resources available to it. However, it is also the case that each authority is responsible for managing its own financial affairs.

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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.

It is important that in determining how local resources are allocated and spent on delivering its responsibilities, each authority should engage meaningfully with its communities. We would encourage that people raise directly with Local Authorities any concerns they have with regard to the compulsory scanning of microchips for domestic pets. Contact details are available on the Council's website. They may also wish to contact their local councillor, who as their elected representative is able to raise concerns with the Council on their behalf.

Regards
Lesley

Lesley Griffiths AC/AM

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

**P-05-779 Compulsory scanning of domestic pets for microchips by councils
- Correspondence from the Petitioner to the Committee, 04.10.17**

Dear Assembly

I have just picked up your email, and am responding straight away so as not to miss the deadline. I would greatly appreciate if you could let me know this submission is of sound standard to yourself and has been accepted.

We understand the issue surrounding the scanning of dogs and many dog wardens will now scan dogs found, however not all. Our focus argument is surrounding cats as there currently is not requirement councils scan them either. Although many councils adopt the approach, we have found many of which will selectively scan, for many reasons which is why we feel the system should be looked at and, if a council's waste contract does require employees to scan, they should be doing. As the body who speaks to people on a daily basis we have had numerous reports where cats have essentially slipped through the net where councils have said this was an accident, but it is happening time and time again. A council who claims to scan should not be leading residents to believe they are scanning all cats found when as little as 1 in 10 may be being checked. This is a UK wide issue but we are hoping Wales can set the example and understand this is an issue for people.

We have an official campaign and under this we contacted all the councils data direct ourselves. As a result of this we concluded the data we did. We do try and stay in contact with all councils on this issue and I can confirm that, since this petition went live there has been a change. Neath Port Talbot have now began trialling microchip readers during the day and, if successful, they hope to introduce it to their nightly service also. Powys council technically currently do not scan, however we have been working with them and did not include them in the list due to them agreeing they would introduce scanners if we were able to help with the donation of them. We work closely with charities such as Cats Protection and PDSA and our friends at Cats Protection were very happy donate the scanners to Powys so that is successfully in progress now and should be being rolled out any day now.

Although there are now just 5 councils who do not scan domestic pets found in a lot of cases, all around the UK, we have found that there are flaws in the system where many cats are falling through the net due to various reasons and there is no real order to this procedure. Not all councils of course, but many. Many of these have been documented in the media, one of which included a lady who was so distraught a council who did claim to scan, sent her cat direct to the landfill site without scanning him, she went to the landfill site to search herself which is just

heart breaking. It is such a cheap policy to impose. Scanners can come as cheap as just £5 and refrigerators can be purchased very cheap. An example is Carmarthenshire who, since we contacted them, they voluntarily opted to introduce microchip readers. They actually purchased a second hand refrigerator at minimal cost, and this is perfectly acceptable to pet owners. The rest of the process is simply what councils do with the bodies currently so we do strongly feel it is such a cost effective and simple law to introduce, plus we are in a position to try and help in any way we can should the Assembly require us to which will help get this implemented without any extra burden to councils, and of course see it be successful. We would also like to add that we feel, should Wales make it a mandatory requirement, it could place even less stress on local councils if the requirement is for new waste contracts only. So it would not be over night but with all new contracts so councils could quite easily phase it. We do ask that if the restraints to you considering this is financial, please do opt to work with us on that and we can help where possible. Our larger partners such as Cats Protection and PDSA would also be willing to help where possible and, should we need to, we will include them in talks to find a solution which works best for yourselves and of course us, the charities, striving to achieve this result. If you agreed this apply to new waste contracts only, we will have good time to work with those councils to help make it as less a burden on them as possible and of course help make a success of it.

Both cats and dogs are regarded as family members in contemporary time and owners do need that closure should the worst ever happen. We have had reports of people walking the streets calling their pet for weeks/months when a simple phone call from the council could give them that closure. It is very distressing for us to speak to people greatly affected by this when they find out the council simply disposed of their beloved pet like a bag of general waste, and did not have the decency to at least notify them. We have also had reports of people going to their local landfill site searching for the body themselves which is gravely unnecessary and heart breaking. This is already part of the work local authorities do, and we require no new overhaul of the current system. The councils currently store and dispose of them after a period of time. We just ask they scan those brought in before they freeze the bodies, and simply notify the owner either themselves or via an external source, which we can also arrange to be set up if need be. We just want a little fairness and compassion installing and, unfortunately, this will only come as a result of legislation being in place.

We are extremely happy to speak further in regards to this and welcome you to meet us on the 10th when we will be appearing at the Assembly.

Kind regards

Mandy

Agenda Item 2.4

P-05-780 Reopen Carno Station

This petition was submitted by Carno Station Action Group, having collected 877 signatures on paper.

Petition text:

We, the undersigned, welcome the development of a Business Case for the re-opening of Carno station, following Carno Station Action Group's petition to the Assembly 10 years ago. We note that the revised Business Case demonstrates a ratio of benefits to costs of 1.65 and that the stopping of most trains at Carno is compatible with the existing enhanced timetable. Carno is a relatively remote community on the longest stretch of railway without an intermediate station in the whole of Wales and a station here would open up dramatically improved, sustainable access to jobs and services. We therefore call on the National Assembly for Wales to urge the Welsh Government to reopen Carno station within a 5 year timescale.

Assembly Constituency and Region

- Montgomeryshire
- Mid and West Wales

Petition – Reopen Carno Station

Y Pwyllgor Deisebau | 17 Hydref 2017
Petitions Committee | 17 October 2017

Research Briefing:

Petition number: P-05-780

Petition title: Reopen Carno Station

Petition text: We, the undersigned, welcome the development of a Business Case for the re-opening of Carno station, following Carno Station Action Group's petition to the Assembly 10 years ago. We note that the revised Business Case demonstrates a ratio of benefits to costs of 1.65 and that the stopping of most trains at Carno is compatible with the existing enhanced timetable. Carno is a relatively remote community on the longest stretch of railway without an intermediate station in the whole of Wales and a station here would open up dramatically improved, sustainable access to jobs and services. We therefore call on the National Assembly for Wales to urge the Welsh Government to reopen Carno station within a 5 year timescale.

Background

The former Carno railway station in Powys, on the Cambrian Line between Shrewsbury and Aberystwyth, closed in the 1960s. Carno Station Action Group was established in 2002 as a sub-committee of Carno Community Council to campaign for the station to be reopened. The history of the campaign is summarised on the [group's website](#).

Rail infrastructure investment is not devolved and the main statutory powers and duties rest with the Secretary of State for Transport. However, the Welsh Government has powers under the *Railways Act 2005* ('the 2005 Act') to invest in rail infrastructure, including stations.

The Cabinet Secretary's letter to the Chair regarding this petition highlights the fact that "the Welsh Government receives no funding from the UK Government for new rail infrastructure through its core block grant".

Welsh Government action

The Welsh Government's [National Transport Finance Plan](#) (NTFP) commits to "develop assessment criteria and, using those criteria, a prioritised list of new station proposals for

further consideration [in relation to securing funding from the rail industry]”. Carno station is listed in the NTFP as a station that will be assessed as part of this process (NTFP Reference RI10).

The Cabinet Secretary for Economy and Infrastructure [wrote to all Assembly Members on 26 April 2017](#) (PDF 229KB) to provide an update on:

- the Welsh Government’s three-stage approach for prioritising proposals for new railway stations in Wales; and
- A prioritised list of stations which will be taken forward for further assessment under stages 2 and 3.

Following a question to the First Minister on the [process for assessing proposals for new railway stations](#) on 16 May 2017, the Cabinet Secretary wrote to all Assembly Members [with a further update](#) on the 6 June 2017 which stated:

The regional stations identified for further [stage 2] assessment were the ones that scored the highest across all the...criteria tested.

While Carno station was not included on the Cabinet Secretary’s prioritised list, Bow Street Station in Ceredigion was due to progress. However, in July 2017 the [Department for Transport \(DfT\) announced](#) nearly £4 million towards the development of Bow Street.

The Cabinet Secretary’s letter to the Chair on this petition says:

In Mid Wales, Bow Street was due to be progressed under this process. However, with the success of the bid for development funding (under the Department for Transport’s New Station Fund), it will no longer be taken forward under the assessment process..... This development has allowed me to include Carno in the current round of stage 2 assessment. This involves obtaining information from Network Rail on deliverability and operational considerations on the prioritised stations. In addition, a standard assessment model is being run to assess the anticipated demand at the proposed stations.

I have asked my officials to engage with the Carno Station Action Group as this stage 2 process progresses.

National Assembly for Wales action

As the petition suggests, a previous petition calling for Carno Station to be reopened was considered in 2007 by the Petitions Committee in the Third Assembly.

As part of that Committee’s consideration the petition was referred to the then Enterprise and Learning Committee, which undertook a short inquiry. While not expressly recommending that the station be reopened, the Committee asked that the Welsh Government “provide support to the Carno Station Action Group in developing and submitting a formal business case for such a station”. The response from the then Deputy First Minister and Minister for the Economy and Transport, Ieuan Wyn Jones, considered that the issue was best taken forward through TraCC, the then Mid-Wales Regional Transport Consortium.

In closing that petition, the then Chair of the Committee wrote to the petitioners in December 2007 to say:

The Committee agreed with the response from the Minister that the best way forward for the community would be:

- future working with TRaCC (Trafnidiaeth Canolbarth Cymru) to ensure that that the business case for the station would meet technical criteria; and
- inclusion as a priority in the forthcoming regional transport plan.

The proposal to reopen the station was raised periodically through the Fourth Assembly before the submission of this petition in the current Assembly.

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



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref Petition P-05-780
Ein cyf/Our ref KS/03254/17

David John Rowlands AM
Chair - Petitions committee.

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

1 October 2017

Dear

I am writing in regards to the Petition P-05-780 to Reopen Carno Station.

Despite the Commission on Devolution in Wales recommending devolution of funding for rail infrastructure, the powers, funding and responsibility for the development of rail infrastructure in Wales is reserved to the UK Government.

The Welsh Government currently receives no funding from the UK Government for new rail infrastructure through its core block grant. In recent years, the UK Government has allocated only around one and a half per cent of total spending on rail enhancements in Wales.

The UK Government continues to refuse to transfer the responsibility for delivery in this area.

In light of its responsibilities for the funding rail infrastructure, the UK Government periodically issues a competitive bidding process for the development of new rail stations. Bids for funding can be proposed by a number of bodies including the Welsh Government, local authorities and private developers.

The Secretary of State for Transport, based upon the advice from the Department of Transport, determines those projects for which it wishes to fund for development, against a set of award criteria. The Welsh Government has no role in the award of that funding. In general terms the award of funding will be made for those projects that demonstrate the most robust business case for investment. Proposals for stations that do not have such an outline business case or demonstrate a relatively weak business case will be at a disadvantage in such a competitive bidding process.

The development of a robust business case to support a proposal for a new rail station can be both lengthy and expensive.

We have therefore developed a methodology to accelerate the development work that is needed to establish a project pipeline so that, when UK funding opportunities occur, there are Welsh projects at an appropriate stage of development that can be submitted for consideration and stand the best possible chance to secure funding.

Proposals for 46 new stations have come forward from a range of sources including the National Transport Finance Plan (2015). A methodology has been developed for assessing proposals for new railway stations which can be applied in a cost effective and proportionate way, and follows a three-stage approach.

The three stages are:

- Stage 1 – An initial sift of the stations identified using the Welsh Transport Appraisal Guidance (WelTAG) criteria and consideration of the Well-being and Future Generations (Wales) Act 2015 goals.
- Stage 2 – Application of a standard assessment model to assess the anticipated demand, a preliminary assessment of the strength of the financial and economic case for a new station and advice from Network Rail on deliverability and operational considerations. This stage will be done using a combination of in-house resources and external technical assistance.
- Stage 3 – Development and assessment of the highest priorities including a WelTAG Stage One Report, business case and Network Rail's Governance for Railway Investment Projects (GRIP) process.

Stage 1 of the process involved an initial sift of potential proposals across the whole of Wales to prioritise further work and better manage the process and match to the available resource. Stations prioritised from the Stage 1 assessment will be taken forward to Stage 2. Prioritising station proposals through this process means that the more costly work on producing detailed cost estimates for a new station and timetable modelling is carried out in a focussed manner.

This is however an on-going and iterative process, focussing firstly on the first 12 stations that are able to demonstrate the strongest viable business case and that we consider to be in the strongest position to compete for funding calls by the UK government.

We have adopted a regional approach to ensure that all parts of Wales will have an opportunity to benefit in the event of funding becoming available for new stations.

In Mid Wales, Bow Street was due to be progressed under this process. However, with the success of the bid for development funding for Bow Street (under the Department for Transport's New Station Fund), it will no longer be taken forward under the assessment process described above. This development has allowed me to include Carno in the current round of stage 2 assessment. This involves obtaining information from Network Rail on deliverability and operational considerations on the prioritised stations. In addition, a standard assessment model is being run to assess the anticipated demand at the proposed stations.

I have asked my officials to engage the Carno Station Action Group as this Stage 2 process progresses. For your information, I have attached the letter which I will send to Carno Station Action Group on this matter.

While this work by the Welsh Government does not guarantee funding will be made available for new station proposals, it will ensure that those with the best chance of succeeding are best placed to access funding from the UK Government.

Yours ever,



Ken Skates AC/AM

Ysgrifennydd y Cabinet dros yr Economi a'r Seilwaith
Cabinet Secretary for Economy and Infrastructure

Enc: Letter to Carno Station Action Group

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



Llywodraeth Cymru
Welsh Government

Cllr Jeremy Barnes

C/o Cyngor Cymuned Carno Community Council,
3, Tanyllyn
Carno
Caersws
Powys
SY17 5LH

| October 2017

Dear

I am writing about the process for prioritising new stations in Wales.

As you may be aware, Bow Street has been awarded funding under the Department for Transport's New Stations Fund. As a result of this successful outcome, the station will no longer be progressed under the New Stations Assessment Programme.

My officials have developed a staged approach to taking forward development of the business case for all 46 identified stations across Wales and we have taken a regional approach to ensure that the regional context is fully reflected in the process.

With the success of the bid for development funding for Bow Street, I have decided to include Carno in the current round of stage 2 assessment. This assessment involves obtaining information from Network Rail on deliverability and operational considerations on the prioritised stations. In addition, a standard assessment model is being run to assess the anticipated demand at the proposed stations. I have asked my officials to engage the Carno Station Action Group in this Stage 2 process.

Yours ever,

Ken Skates AC/AM

Ysgrifennydd y Cabinet dros yr Economi a'r Seilwaith
Cabinet Secretary for Economy and Infrastructure

CARNO STATION ACTION GROUP

BACKGROUND TO 2017 PETITION TO NATIONAL ASSEMBLY FOR WALES

The 2017 petition

We, the undersigned, welcome the development of a Business Case for the re-opening of Carno station, following Carno Station Action Group's petition to the Assembly 10 years ago. We note that the revised Business Case demonstrates a ratio of benefits to costs of 1.65 and that the stopping of most trains at Carno is compatible with the existing enhanced timetable. Carno is a relatively remote community on the longest stretch of railway without an intermediate station in the whole of Wales and a station here would open up dramatically improved, sustainable access to jobs and services. We therefore call on the Welsh Government to commit to the re-opening of Carno station within 5 years.

The outcome of the first petition – call for a business case

Carno Station Action Group submitted its first petition for station re-opening 10 years ago. It was well received by the Petitions Committee of the National Assembly, who referred it to the Enterprise and Learning Committee for detailed consideration. They held a hearing in Carno at which all the major stakeholders gave evidence and, based on what they heard, they recommended the development of a formal business case and asked "that the Minister's officials provide support to the Carno Station Action Group in developing and submitting a formal business case for such a station".

The Minister replied that it was for the Regional Transport Consortium, TraCC, to develop the business case, and at the subsequent Scrutiny of the Minister, the WG Head of Rail said "we told TraCC that it should lead the process" of developing the business case.

There was initially **no progress** in delivering the business case because WG failed to provide TraCC with the necessary funding. Frustrated at this, a delegation travelled from Carno to the Assembly in June 2009 to meet with members of the Enterprise and Learning Committee, other AMs and WG officers. This resulted in a WG commitment to fund a Stage 2 WelTAG appraisal of Carno station, which would include the necessary business case.

The Business Case

TraCC commissioned Capita Symonds to carry out the WelTAG appraisal, which was completed in May 2011. It concluded that the Benefit Cost Ratio would be between 0.46 and 1.15, depending on the number of through passengers lost because of the increased journey time.

Carno Station Action Group were dissatisfied with the Capita Symonds' business case because

- the range of Benefit Cost Ratios was unhelpfully large
- the assumed station operating costs were unrealistically high
- the capital cost included a large component for the unnecessary raising of the station car park.

The group raised these issues with Edwina Hart and as a result she arranged for the group to work with the WG Transport Economist to agree the revisions that needed to be made to the Capita Symonds' business case, particularly regarding the number of through passengers lost. These revisions resulted in an agreed Benefit Cost Ratio of 1.65.

2015 National Transport Plan

Despite the Welsh Government's track record of opening on average one new station per year, the group was shocked to discover that the 2015 NTP envisaged no new stations to be opened in the period 2015 – 2020, meaning that the considerable effort expended on developing a business case was to no avail.

WG prioritisation of new station proposals

In May 2017, Ken Skates announced the results of Stage 1 of a new prioritisation process for new stations in which a dozen stations – not including Carno - were selected for more detailed appraisal. This new prioritisation process completely cuts across the established practice whereby projects which have gained wide public and political support go through the WelTAG appraisal process, enabling government to make an informed decision on whether to proceed or not. Carno station has a WelTAG, but is no nearer go-ahead than 10 years ago.

The Stage 1 prioritisation process selected four out of five candidate stations in North Wales to go forward to Stage 2 appraisal, but only one out of four in Mid Wales (Bow Street). However, now that DfT funding has been granted for Bow Street there is no need for it to receive any further appraisal. Accordingly, after pressure from Carno Station Action Group and cross party lobbying from a number of AMs, Ken Skates has now decided that Carno should go forward to Stage 2 in its place, albeit some five months after the original stage 1 list was announced.

Discontinuation of Welsh Government Funding for new stations

The Welsh Government has achieved commendable successes in expanding access to the rail network, both through the re-opening of closed lines and through opening new stations on existing lines, with 12 new stations opening between 2005 and 2015 – more than one per year on average.

However in 2015 there was a step change in Welsh Government policy, with the 2015 draft National Transport Plan (NTP) emphasising that responsibility for rail infrastructure in Wales was non-devolved and making it clear that, following the funding of the new Ebbw Vale parkway station, WG funding of new railway stations would cease.

The WG "New Rail Stations Prioritisation – Stage 1 Assessment Report" states that "From time to time the UK Government makes funding available for new stations through specific funding calls." Up until now there have been two £20 million tranches of Department of Transport New Stations Fund in 2013 and 2016, each of which has funded five new stations.

Current prospects for the re-opening of Carno station in the next five years

As things stand, the chances of *any* new station being opened in Wales in the next five years is virtually nil because Wales has benefitted disproportionately from the New Stations Fund so far, winning one of the five new stations in England and Wales in each tranche (Pye Corner and Bow Street respectively), despite only having 5% of the population. In addition, there is no certainty that another tranche of the New Stations Fund will be forthcoming.

Access to the rail network

Travel by rail has been growing rapidly in recent years as evidenced by surveys carried out by the Shrewsbury Aberystwyth Railway Liaison Committee since an enhanced hourly timetable was introduced in early 2016. This benefits everybody, as it helps reduce CO2 emissions, road congestion, road accidents and severance of communities. However, in some areas the scope for modal shift to rail is limited, as the lack of a nearby railway

station prevents people from accessing the rail network. In order to remedy this, it is essential that the Welsh Government continues to devote the same proportion of its transport expenditure to opening new railway stations as did up until 2015.

Sustainability

The Welsh Government has a legal duty to promote sustainability and its previous achievements in funding the opening of 12 stations in 10 years was fully consistent with this legal duty. The Welsh Government's discontinuation of funding for new stations is at odds with its sustainability objectives.

Funding

Our 2007 petition for the re-opening of Carno station was well received by the National Assembly. As a result, the business case recommended by the Enterprise and Learning Committee was eventually delivered and demonstrated a good case for re-opening the station. Nevertheless, we seem no nearer to a Welsh Government decision to proceed with the station than in 2007.

After a ten year wait, an expectation that Carno station will re-open within five years – as called for by our 2017 petition - is entirely reasonable. But if decisions about re-opening stations in Wales are left to the lottery of the New Stations Fund administered by the Department of Transport in Westminster, there is very little chance that Carno station, or any other station in Wales, will be re-opened in the next five years. The Welsh Government therefore needs to take back control and allocate its own budget for new stations as it did prior to 2015.

THE CASE FOR RE-OPENING

The case for re-opening has been set out in detail in many documents, including the WelTAG appraisal. However, the following is a very brief summary:

The principal benefit of the station would be to transform the accessibility of jobs in centres such as Aberystwyth, Shrewsbury, Telford and beyond. This is seen as of crucial importance to the vitality of the community since the closure of the Laura Ashley factory.

Other important benefits are that the station would

- promote sustainable travel and reduce car use
- provide a step-change in mobility for non car-owners, thereby promoting social inclusion
- enable the nascent Green Tourism industry in Carno to take off
- be an essential component of the proposed Laura Ashley Centre and Exhibition in Carno
- facilitate the development of Carno Community Centre as an All-Wales conference centre, close to the geographic centre of Wales

It goes without saying that the re-opening of Carno Station would fit perfectly with the Welsh Government's duty to promote sustainable development, as it would take Carno a major step along the road to becoming a sustainable community.

Agenda Item 3.1

P-05-762 Move the Welsh Assembly out of Cardiff

This petition was submitted by Royston Jones, having collected 53 signatures online.

Petition text:

We the undersigned call for the National Assembly be moved from Cardiff to Aberystwyth to begin 'rebalancing' the national life and economy of Wales.

Additional information:

Cardiff is prospering, and growing at an exponential rate, while most parts of Wales stagnate, which makes it clear that the current Cardiff/Wales model of economic development does not work for eighty per cent of the country.

Cardiff getting the lion's share of investment and jobs impacts adversely on the rest of the country, and while this trend was observable in earlier decades it has gained greater momentum and become even more damaging for the national good since the National Assembly for Wales first sat in 1999.

Worse, there is growing evidence of corruption; the kind of corruption that is inevitable when those with political influence and control of the public purse regularly meet, in social and other contexts, those seeking to take advantage of such contacts.

We believe that in the short term the easiest way to remedy this unsustainable and growing imbalance, and the increasing threat of corruption, is to move the Welsh Assembly and its assorted departments and agencies out of Cardiff.

Aberystwyth would be an ideal and central location for the Assembly and its support staff, other agencies could be located around the country, for in the era of the internet and video conferencing civil servants and others do not need to work next door to each other.

The benefits accruing to some of the more neglected parts of Wales would soon make up for the initial costs involved in the relocations. To continue with the current arrangement is to condemn Wales to a future as a city state,

with all benefits accruing to Cardiff. This is not the future we want for our country.

Assembly Constituency and Region

- Dwyfor Meirionnydd
- Mid and West Wales

P-04-522 Asbestos in Schools

Petition wording:

We call on the National Assembly for Wales to urge the Welsh Government to put measures in place to ensure that parents and guardians of children across Wales can easily access information about the presence and management of asbestos in all school buildings.

Given the health risks associated with the presence of asbestos in public buildings, we believe parents and guardians across Wales have the right;

- to know if asbestos is located in their school;
- to know whether, where asbestos is present, it is being managed in line with the Control of Asbestos Regulations 2012;
- to access that information easily online

Petition raised by: Cenric Clement-Evans

Date Petition first considered by Committee: 10 December 2013

Number of signatures: 448

P-04-522 Asbestos in Schools – Correspondence from the Petitioner to the Clerking Team, 02.10.17

Annwyl Kayleigh,

I do apologise for the lateness of my response. This has been due to an overwhelming pressure of work.

I am grateful that the Cabinet Secretary takes the issue of asbestos in our schools seriously. However it remains a considerable disappointment that Welsh Government will not accept despite clear statements from UK Government that it has responsibility for policy relating to asbestos in schools in Wales.

I am grateful for the indication as to the fact that her officials are in the process of organising a Working Group in Wales where key stakeholders are invited to the meeting.

As the committee is aware I have in previous correspondence made suggestions as to those might contribute, including trade union representatives including those from the teaching unions, and those from other school workers, the local authorities, asbestos consultants, and asbestos support groups. The previous Chair of the committee suggested Governors Wales with which I agree and I would also suggest that there be a representative from the Cross Party Group on Asbestos.

It would be helpful to know when such a meeting is proposed and at what stage the arrangements have reached. It might also be helpful for the Chair of the CPG on Asbestos Dawn Bowden AM to be kept informed of developments. There was discussion of the issue at the latest meeting of the CPG in September.

The decision to remind local authorities of their duties is of course welcome as is the request for confirmation that there is an asbestos plan. However this fails to address the need to determine whether the assessment is suitable and sufficient in accordance with the Control of Asbestos Regulations. What assurances are being sought by the Cabinet Secretary as to the fitness of the assessments?

“Identification of the presence of asbestos

5. An employer must not undertake work in demolition, maintenance or any other work which exposes or is liable to expose employees of that employer to asbestos in respect of any premises unless either—

(a) that employer has carried out a suitable and sufficient assessment as to whether asbestos, what type of asbestos, contained in what material and in what condition is present or is liable to be present in those premises; or

(b) if there is doubt as to whether asbestos is present in those premises, that employer—

(i) assumes that asbestos is present, and that it is not chrysotile alone, and

(ii) observes the applicable provisions of these Regulations.

Assessment of work which exposes employees to asbestos

6.—(1) An employer must not carry out work which is liable to expose employees of that

employer to asbestos unless that employer has—

(a) made a suitable and sufficient assessment of the risk created by that exposure to the

health of those employees and of the steps that need to be taken to meet the requirements of these Regulations;

(b) recorded the significant findings of that risk assessment as soon as is practicable after the risk assessment is made; and

(c) implemented the steps referred to in sub-paragraph (a)."

I would ask how it is intended that the responses received by the Cabinet Secretary are to be shared and what it is planned to do with the information.

The Cabinet Secretary refers to "support in the form of clear guidance with this responsibility".

Is she aware that whilst the updated DfE Guidance (which has input from and is supported by the Joint Union Asbestos Committee)

<https://www.gov.uk/government/publications/asbestos-management-in-schools-2> were published in March 2015 and last updated in February 2017, on the face of it Welsh Government Guidance has not been updated since 28th May 2014

<http://gov.wales/topics/educationandskills/publications/guidance/asbestos-management-in-schools/?lang=en>

If the guidance is to be updated I would ask for the Modern Governors' Learning Module to be considered as valuable resource to be referred to.

<https://www.moderngovernor.com/access-asbestos-schools-e-learning-module/>

It is noted that 21st Century Programme in tackling some of the poorest conditions schools Wales and includes removal of treatment of asbestos in schools where appropriate. Has Welsh Government issued Guidance to the local authorities with regard when funding for removal and/or treatment is available? How is this to be prioritised and are monies specifically set aside for asbestos works?

As ever I am extremely grateful for the attention that the Committee has given to the subject of asbestos in schools.

Yn gywir

Cenric

Cenric Clement-Evans

Agenda Item 3.3

P-05-707 Teachers' Training Must Include Statutory Training in Autism

This petition was submitted by Tim Thomas, having collected 313 signatures.

Text of the Petition

We call on the National Assembly for Wales to urge the Welsh Government to ensure that teachers' training must include statutory training in Autism.

One of the major concerns for people caring for people with Autism is the lack of understanding from teachers and others working in the education profession. While teaching in Wales is of high quality, improvements could be made in raising awareness of Autism, especially given how common it has become in society.

It is proposed, as part of the English Teacher's training review, Special Education Needs, including Autism will be a key part of teachers' training in England.

The review of the Initial Teacher Education in Wales must ensure that teachers get specific and statutory training in supporting people with Autism within the school environment.

Assembly Constituency and Region

- Bridgend
- South Wales West

Agenda Item 3.4

P-05-735 Make Foundation Phase more Effective for our Children, Provide more Teachers and Abolish Year 2 Stats.

This petition was submitted by Tamsin Osborne, which collected 14 signatures.

Text of the Petition

I would like the Welsh Assembly to stop letting our children down in the Foundation Phase.

To follow the lead of the most successful education systems in Europe, such as Finland and throughout Scandinavia.

To provide schools with training and funding for appropriate child teacher ratios, to enable the effective delivery of the Foundation Phase pedagogy.

I call for the abolishment of Nationalised tests, SATS, in the Foundation Phase. They simply do not correspond with the Foundation Phase ethos.

Additional information

We love the ethos of the Foundation Phase, the approach Welsh Assembly have taken is refreshing, and in line with the heaps of research that supports child-led play up to the age of seven. However, it is unfortunate, that the ethos of the Foundation Phase is lost in many schools across Wales. This is because of a lack of training in early years play provision; even if the teacher had the training, passion and knowledge to deliver the Foundation Phase pedagogy, the ratios of teachers to child makes it near impossible. How can any teacher follow a child's lead in play when there are up to 30 children in that class, with only one TA to support all of those children as they play, discover and learn?

We do not believe that nationalised tests, SATS, have any place in the Welsh foundation phase. The foundation phase is about supporting children in their Play:

To develop gross motor skills through movement,

To develop finer motor skills needed for writing,

To take risks and learn responsibility,

To give them the time they need to develop solid building blocks for language and numeracy,

To have opportunities to revisit and learn as and when a child needs/chooses too,

To develop the skills to self access and discover,

To learn key social skills with their peers and adults.

This is a proven approach to fully prepare children ready for primary education at the age of seven. This is how Europe's most successful education systems do it, yet children of six and seven years old in year two are expected to sit and write in tests to compare our children to those in England. This forces teachers in the Foundation Phase to start drilling phonetics and numbers into our children when they start Reception and by Year-one to be expected to sit read and write, "readying" them for these tests which reflect on the school.

Our children are being robbed of their childhoods, children who are starting school at just turned four years old in Wales, who are then forced into this system, six hours a day of classroom drilling. This is not the progressive Foundation Phase ethos that Welsh assembly put into play in 2010. I urge you all to consider the effectiveness of the Foundation Phase across Wales, provide the funding needed for more TAs and training for Foundation Phase practitioners, so that the Welsh Primary Education can be one Welsh Government can be proud of; delivered exceptionally at EVERY school across Wales. Give every child in Wales fair access to productive play, paving the way for them to have positive, rewarding, Learning Journeys.

Assembly Constituency and Region.

- Cardiff South and Penarth
- South Wales Central

Agenda Item 3.5

P-05-752 Building Resilience To Cyber-Bullying In Children

This petition was submitted by Jamie Denyer having collected 421 signatures.

Text of the Petition

We petition the Welsh Assembly government to fund and undertake evidence based research, and produce a strategy with recommendations for building resilience in our children – from infancy – against the devastating effects of Cyber-Bullying.

Additional Information

The strategy should include advice for parents and schools as to:

- * how to create healthy views and relationships around social media
- * how to prepare children to identify and guard against the behaviours that cyber-bullies use
- * how to teach children to emotionally separate their online experiences from their 'real life' ones
- * how to build emotional resilience to personal attacks online

Assembly Constituency and Region.

- Gower
- South Wales West

P-04-663 – Food in welsh Hospitals.

This petition was submitted by Rachel Flint having collected 40 signatures

Text of the Petition

We the undersigned call on the Welsh Government to examine the standards of food in hospitals in Wales. Each health board's provision must be investigated to ensure it is fit for purpose for patients, those with dietary needs and medical conditions, and impose standards across the whole of the Welsh NHS. Hospital food should be nutritious, fresh and be a major part of a patient's care package and road to recovery – not make things worse. Dietary needs must be catered for – such as gluten free, lactose intolerant, Celiac, vegetarian and vegan – experience shows this is not currently the case and patients are often made to feel awkward. Food tailored for medical conditions – including those who suffer from bowel conditions or have had surgery – must be standardised, to ensure patients are getting the right nutrition at all times. Currently patients on some wards are being fed all the same food regardless of their conditions, weight and dietary needs – this is not acceptable and can be upsetting and potentially damaging. Hospitals should not rely on relatives to bring in food, eat the same bland meal every day, or allow patients to waste away if they can't have any of the food on offer. Nutrition must be a key part of every patient's care package. We are not asking for Michelin Star quality, just meals that help rather than hinder.

Additional Information

My experiences of food in the NHS have shown that the standards vary across wards, hospitals and departments, as well as between England and Wales. The problem is not in Wales alone – as I find providing meals for those on low res or with dietary conditions is something the NHS as a whole struggles to deal with. But my experience in Wales recently showed that the standards are not up to scratch. There were no menus (as in Chester and other English hospitals) and patients were all fed the same regardless of their condition, weight or dietary needs. On one ward people who had just had bowel surgery were offered curry, lentil soup and tuna sweetcorn sandwiches which was totally inappropriate – and potentially damaging. At times the situation was that if you couldn't eat anything on the trolley or were not at your bed, you simply didn't eat, unless a nurse made some toast. This has to change; without the right nutrition I believe people are in hospital longer.

Assembly Constituency and Region

- Cardiff South and Penarth
- South Wales Central

Agenda Item 3.7

P-05-693 Give Every Child in Wales the Meningitis B Vaccine for Free

This petition was submitted by Rhian Cecil, having collected 1,195 signatures.

Text of the Petition

Health is completely devolved to Wales. We ask the Assembly and Mark Drakeford to change the age range that all children receive the vaccine .

All children are at risk from this terrible infection, yet the Government in Wales only vaccinate 2-5 month olds. There needs to be a rollout programme to vaccinate all children, at least up to age 11. Meningococcal infections can be very serious, causing MENINGITIS, SEPTICAEMIA & DEATH

Assembly Constituency and Region

- Pontypridd
- South Wales Central

Agenda Item 3.8

P-05-768 A call for the return of 24 hour Consultant led Obstetrics, Paediatrics and SCBU to Withybush DGH

This petition was submitted by SWAT (Save Withybush Action Team), having collected 759 signatures online and 2,773 on paper – a total of 3,532 signatures.

Petition text:

SWAT has fought for the retention of safe, effective and accessible secondary health care services for the people of Pembrokeshire since 2005. A previous petition failed to retain Consultant led Obstetrics, Paediatrics & SCBU at Withybush DGH. The Health Minister and Hywel Dda Health Board unjustly removed 24 hour Emergency Consultant led Obstetrics, Paediatrics & SCBU from Withybush DGH in 2014 and left the people of Pembrokeshire with an unsafe, inequitable and poorly accessible third class health option for, in particular, mothers, babies and children.

On behalf of SWAT and the people of Pembrokeshire I call upon the National Assembly for Wales to urge the Welsh Government to ensure that Consultant Obstetrics, Paediatrics & SCBU provision be immediately returned to pre 2014 levels. SWAT and the people of Pembrokeshire do not agree with the centralization of services onto the Glangwili site.

The Health Board was obliged to carry out Equality Impact assessments and these have clearly shown that a whole swathe of the most vulnerable in our society have been and are being put at risk by these changes. In particular the most vulnerable, the very young, pregnant women, the economically challenged and those with disabilities have been profoundly affected and continue to be. The Health Board have all this documented in their assessments but they seem to be unable or unwilling to find remedies for these issues.

Assembly Constituency and Region

- Carmarthen West and South Pembrokeshire
- Mid and West Wales

Dr Chris Overton
Chairman SWAT
7th September 2017
Your Ref P-05-768

Mr David John Rowlands AM
Chair – Petitions Committee
National Assembly for Wales
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Rowlands

I am writing in response to the letter from the Health Minister, Vaughan Gething, dated 6 July 2017. I will respond to each paragraph in order.

In paragraph 1 there is a typo, 764 instead of 768.

In paragraph 2 not only have these issues been raised with him but with the First Minister also. On 13 June 2017 our local AM, Paul Davies, raised a question relating to the new data we had released on 1st May which you already have a copy of. It was disappointing that the minister chose to try and deflect from these issues by suggesting that it had not been shared prior to its public release. I have attached a letter which was sent on 25th May 2017 to Steve Moore, CEO Hywel Dda HB, detailing the fact that he had known the state of the problem for many months. Vaughan Gething was a recipient of that letter and thereby the Welsh Government.

In paragraph 3 it is suggested that there is full commitment to Withybush playing an important role in the future. I would like to point out at this juncture that there are a number of ongoing consultations which propose significant reductions in the role Withybush will play in the provision of all types of acute care including mental health which appears to be heading to Llanelli, at least an hour away for most Pembrokeshire people so long as they have access to a car.

In paragraph 4 the national studies relied on are not current, they have a time lag. The figures that are being relied on are predominantly from before the changes! This is why the audit was done locally because it is possible to have current data now and not next year.

In paragraph 5 the equality impact assessments showed quite clearly that every vulnerable group in Pembrokeshire would be disadvantaged. They still are because the Health Board does not have to find solutions, they only have to recognise the problems and work towards possible remedies. The clinical standards mentioned are nothing to do with patient care but with junior doctor rota standards which are arbitrarily chosen and which were claimed to be a precursor to Glangwili providing level 2 neonatal care. Even this was deceitful as can be seen from the RCPCH

representative's report to the Board meeting earlier this year, following their second visit at the end of 2016, stating that Glangwili will never achieve level 2 status.

In paragraph 6 we return to the standards which are mostly related to arbitrary rota compliance rather than patient care. The remits given to the RCPCH on both occasions they visited were very tight and to suit the question masters, Hywel Dda and the previous health minister, Mark Drakeford. Maternity care was only really added at the last minute for the first and excluded totally for the second visit. The claim that services were/are safe and sustainable and have led to improved patient outcomes is unfortunately not evidence based.

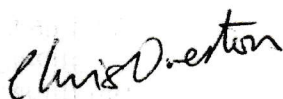
In paragraph 7 once again the 2015 review was relying on old data, predominantly from before the changes. Recently I have been informed of two further serious cases within the last 3 months where perinatal outcome was very sadly extremely poor. I have no details about these cases as they were after my dismissal for whistle blowing.

In paragraph 8 we can no longer dispute that the rules of the consultation were unlawful however those rules were changed significantly between 2006 and 2012 in favour of ministers and health boards in order to obtain the desired preordained result. The rules may have been followed but the outcome was not just or safe for the people of Pembrokeshire as has now been confirmed by the current dataset and should be reversed immediately.

In paragraph 9 the minister affirms what the Health board should be doing however I informed the risk management midwife about my findings in October 2016 and it was my understanding until I was dismissed in May 2017 that no report had been collated or presented. I had chosen to inform the risk management midwife because in early 2016 serious concerns had been raised by the neonatal consultants in Swansea in regard to the high numbers of HIE(Hypoxic Ischaemic Encephalopathy) cases they were being sent from Hywel Dda for cooling. This had resulted in a flurry of activity in the Maternity management section and a full scale investigation ensued. Nothing appears to have happened following my revelations in October 2016 and likewise now it seems the most important aim for Welsh Government ministers and Hywel Dda management is to discredit the current data rather than address the very real problems these service changes have caused the people of Pembrokeshire.

On behalf of SWAT and the people of Pembrokeshire I would be grateful if you would consider this letter in the next committee meeting and please act quickly if you want to save lives.

Yours sincerely



Dr Chris Overton
Chairman SWAT
Consultant Obstetrician (retired)



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Hywel Dda
University Health Board

Ein cyf/Our ref:

Gofynnwch am/Please ask for: Mr Overton's Secretary

Rhif Ffôn /Telephone: 01437 773283

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E-bost/E-mail:

Dyddiad/Date: 25th May 2017

Ysbyty Cyffredinol Llwynhelyg
Heol Abergwaun, Hwlfordd,
Sir Benfro, SA61 2PZ
Rhif Ffôn: 01437 764545

Withybush General Hospital
Fishguard Road, Haverfordwest,
Pembrokeshire, SA61 2PZ
Tel: 01437 764545

Mr Steve Moore
Chief Executive
Hywel Dda University Health Board
Corporate Offices, Ystwyth Building
Hafan Derwen, St David's Park
Job's Well Road
Carmarthen
SA31 3BB

Dear Mr Moore

As you are well aware, and as I pointed out to you in the evening meeting held in the Conference Centre in WGH nine months ago, the perinatal outcomes for Pembrokeshire women have worsened since the service changes - with the current Hywel Dda rate for 2017 up to 30th April being 6.55/1000 – giving a rolling triennial figure of 6.33/1000 for 2015-17 with only 8 months missing. I also mentioned that the Intrapartum death rate for 2014-16 triennium was significantly higher than the RCOG "Each baby counts" 2015 UK survey.

In December 2016 I decided to make this an official audit in order to be certain of the accuracy of my figures. During this interrogation it became obvious to me that some baby deaths were not recorded correctly. This audit can be found on the Hywel Dda University Health Board intranet site reference W1736.

You will also be aware that my 12 months post retirement contract has been terminated coincidentally.

I enclose a copy of the Clinical Audit Action Plan and your immediate attention to this would be greatly appreciated.

Yours sincerely

Mr C Overton
Consultant Obstetrician and Gynaecologist

cc: See Distribution list

Swyddfeydd Corfforaethol, Adeilad Ystwyth,
Hafan Derwen, Parc Dewi Sant, Heol Ffynnon Job,
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Cadeirydd / Chair
Mrs Bernardine Rees OBE

Prif Weithredwr/Chief Executive
Mr Steve Moore

Bwrdd Iechyd Prifysgol Hywel Dda yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Hywel Dda
Hywel Dda University Health Board is the operational name of Hywel Dda University Local Health Board

Mae Bwrdd Iechyd Prifysgol Hywel Dda yn amgylchedd di-fwg Hywel Dda University Health Board operates a smoke free environment

Cc:

Dr Phil Kloer – Executive Medical Director, Corporate Offices, Hafan Derwen
Miss N Piskorowskyj – Consultant Obstetrician and Gynaecology, GGH
Miss Geraldine McSweeney - Consultant Obstetrician and Gynaecology, GGH
Dr R Goel - Consultant Obstetrician and Gynaecology, GGH
Mr Shankar - Consultant Obstetrician and Gynaecology, GGH
Dr M Elbadrawy - Consultant Obstetrician and Gynaecology, GGH
Mr A Abdelrahman - Consultant Obstetrician and Gynaecology, GGH
Mr D Sanyal – Consultant Obstetrician and Gynaecology, WGH
Miss C Link - Consultant Obstetrician and Gynaecology, WGH
Mr R Husicka - Consultant Obstetrician and Gynaecology, WGH
Dr T Amin – Locum Consultant Obstetrician and Gynaecology, WGH
Mr Vaughan Gething AM – Cabinet Secretary for Health, Well being and Sport
Mr Paul Davies AM – Member for Preseli Pembrokeshire
Mr Simon Thomas AM – Member for Plaid Cymru, Mid and West Wales
Professor Lesley Regan – President RCOG

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David J Rowlands AC/AM
Chair
National Assembly for Wales
Petitions Committee
Cardiff Bay
Cardiff

Dear David

RE: Petition P-05-768 A call for the return of 24 hour Consultant led Obstetrics, Paediatrics and SCBU to Withybush DGH

Thank you for your letter of 7 August 2017, outlining the consideration given to the Save Withybush Action Team (SWAT) Petition P-05-768 "A call for the return of 24 hour Consultant led Obstetrics, Paediatrics and SCBU to Withybush DGH", by the National Assembly for Wales' Petitions Committee.

The Health Board has been requested to comment on three specific areas which have been addressed individually below:

1. Assessment of the Impact of the Changes

Following the revision of the Health Board obstetric, paediatric and neonatal services, two independent reviews of the changes have taken place. The first in September 2015 was conducted by the Royal College of Paediatrics and Child Health but also included the Royal College of Obstetrics and Gynaecology and the Royal College of Anaesthetists.

The review, which is provided here as appendix 1, concluded that there is no clinical sense in reversing the process to date and that:

- There is no evidence of worsened outcomes in maternity or paediatric care as a direct result of the reconfiguration;
- There is an improved compliance with national and professional service standards;
- Although further work is needed to consolidate the staffing and systems, it can be seen that there is a strong future for a single service increasingly integrated across two sites.

The Review made a number of recommendations, and subsequently an action plan was developed by the Health Board and a Monitoring Group established, chaired by the Medical Director. The implementation progress of the actions is reported quarterly to the Quality, Safety, Assurance and Experience Committee of the Health Board and quarterly to the Board.

The 2015 review recommended a follow up review by the RCPCH, specific to the Neonatal Service, a year after the publication of the first report in order to monitor progress. The follow-up review of the Neonatal service was carried out in September 2016.

Three members of the previous review team, plus a Consultant Neonatologist reviewer, undertook a comprehensive document appraisal of information supplied by the Health Board. The team spent two days at Glangwili General Hospital where they spoke with Health Board staff members from the Neonatal Unit and those who work with the Neonatal Unit. The review team also met with the Community Health Council (CHC) and families on the unit. Other stakeholders were encouraged to share their views as part of the review. A report of the review findings and recommendations was written by the team.

The report found that there is no evidence of unsafe care. The RCPCH found that:

- A significant change in culture within the neonatal unit has taken place. An improvement in the morale of the staff, with good evidence of a team who are working more cohesively,.
- Therapy services are more integrated within the unit.
- The neonatal outreach service continues to flourish.
- There is an improved relationship with the Neonatal Network and the Singleton Neonatal Intensive Care Unit (NICU) with better communication and some indication of earlier repatriation of infants.
- There is a close professional working relationship between Glangwili General Hospital and Singleton Hospital, this regarded as a paradigm of engagement for other units to emulate.

In March 2017, the RCPCH report was received by the Board and the outlined recommendations and findings were approved. The action plan developed to address recommendations highlighted within the RCPCH 2016 Neonatal Report was approved during the May 2017 Board meeting. This report is provided as appendix 2.

It was agreed that a joint action plan from the two reviews undertaken would be written and progress monitored by the established Monitoring Group. Reports are regularly provided to the Health Board, the most recent of which was presented to Board in September 2017. This is provided as appendix 3.

2. Monitoring of Perinatal Mortality Rates

The Health Board routinely collects and monitors data on all births (including rates of perinatal mortality and intrapartum stillbirth) for both local review and submission to a number of Wales and UK wide surveys. This includes the nationally recognised AWPSAll Wales Perinatal Survey (AWPS) and the MBRACCE Mothers and Babies: Reducing Risk Through Audits and Confidential Enquiries Across the UK (MBRACCE) perinatal mortality surveillance report.

The Health Board reviewed the information in the 'Perinatal Outcomes Audit 2012-16' which was published by a retired Consultant Obstetrician & Gynaecologist on the SWAT social media Facebook site. He concluded that the reconfiguration of obstetric and maternity services in 2014 had led to a deterioration in perinatal mortality rates for babies born to mothers resident in the Pembrokeshire area, and that this deterioration is predicted to continue during the next 2 years.

The Health Board has identified a number of concerns regarding the validity of this audit and has concluded that:

- The audit methodology is not statistically valid as the overall volume of stillbirths quoted in the audit is low;
- The categorisation of perinatal mortality used in this audit is unclear;
- There are significant discrepancies between the data reflected in this audit and the validated data available from within the Health Board;
- The audit appears to utilise historical data to 2016 to inform a future predicted increase in perinatal mortality during 2017 and 2018 respectively;
- The data or audit methodology was not shared with the Health Board for validation / verification prior to publication;

- Closer analysis of stillbirths during the period does not support the audit conclusion that perinatal mortality rates are a directly consequence of the reconfiguration of obstetric services.

In response to the points raised by this audit, the Health Board further reviewed all stillbirths ≥ 24 weeks gestation, (inclusive of therapeutic terminations of pregnancy), for the calendar period 2015 to the end of the first quarter of 2017. This data has been analysed to determine the maternal county of residence, and the review presented to the Health Board's Consultant Obstetric & Gynaecology consultant group and received by the Women & Children's Directorate Quality & Safety Committee.

The Health Board's review made a number of conclusions;

Perinatal Mortality Rates

- The number of stillbirths ≥ 24 weeks gestation (inclusive of therapeutic terminations of pregnancy) has increased during 2015 and 2016 compared to 2014 although remains similar to reported rates in 2012 and 2013. These variations remain within the range which is expected to be subject to random variation as the overall volume of stillbirths is low.
- This data is also reflected in the most recent Mothers and Babies: Reducing Risk through Audits and Confidential Enquiries across the UK (MBRACE-UK) report for 2015. The table below indicates the rates of mortality for stillbirth, neonatal and extended perinatal deaths for the calendar year 2015

	Mortality rates per 1000 births		
	*Stillbirth	*Neonatal	*Extended Perinatal
Crude	4.46	0.6	5.06
Stabilised & Adjusted	3.64	1.12	4.76

*Titles within the table above with an asterisk are defined as:

Stillbirth: A baby delivered at or after 24+0 weeks gestational age showing no signs of life, irrespective of when the death occurred.

Neonatal death: A live born baby who died before 28 completed days after birth.

Extended Perinatal: A stillbirth or neonatal death.
death

The MBRACE-UK reported data for 2015 highlights that whilst stillbirth rates in Hywel Dda Health Board were up to 10% higher than the average for comparative Trusts/Health Boards around the UK, neonatal mortality rates were more than 10% lower than the average for the comparative group during the same period.

The Women and Children's Directorate routinely continues to monitor and scrutinise perinatal mortality rates. During 2017 to date mortality rates are low and contrast sharply with the predicted mortality rates offered by the audit and referred to above.

Place of Residence

The review of all stillbirths across the Health Board area for the period 2015 to quarter 1 of 2017 has highlighted no significant statistical difference in rates of stillbirth per maternal county of residence as evidenced within the table below:

	Maternal County of Residence		
	Pembrokeshire	Carmarthenshire	Ceredigion
2015	7	6	3
2016	9	11	1
2017 (Qtr 1)	0	2	0

Causal Factors

In contrast to the conclusion offered in the audit referred to above, national studies consistently show that the causes of perinatal mortality cannot be attributed in over 50% of cases.

The review of all stillbirths for mothers who were resident in Pembrokeshire for the period 2015 to quarter 1 of 2017 shows that the majority of stillbirths occurred in the antepartum period, prior to the onset of labour. This information is provided within the table below:

	Categorisation of stillbirths for mothers resident in Pembs		
	Therapeutic Terminations	Antepartum ≥ 24 weeks gestation prior to commencement of labour	Intrapartum ≥ 37 weeks gestation where baby was thought to be alive at the commencement of labour
2015	1	5	1
2016	1	6	2
2017 (Qtr 1)	0	0	0

Antenatal care provision within Hywel Dda has remained unchanged since 2014 and continues to be provided locally in each county in accordance with NICE and Antenatal Screening Wales (ASW) standards. This contrasts with the conclusion offered in the audit above which attributes the variation on perinatal mortality rates directly to the reconfiguration of obstetric units in 2014.

Similarly, the low rate of neonatal deaths, as reflected in the 2015 MBRACE-UK report, contrasts with the conclusion offered in the audit that the reconfiguration of services has led to a deterioration in the quality of care provided.

I would like to emphasise here that the two independent reviews from the RCPCH found no cause of concern regarding perinatal deaths and indeed concluded that services were safe.

The Health Board constantly strives to improve services, care and outcomes for patients, and a part of this process is the routine development of new strategies in identified areas. A number of strategies have been developed to further mitigate the risk of perinatal mortality including:

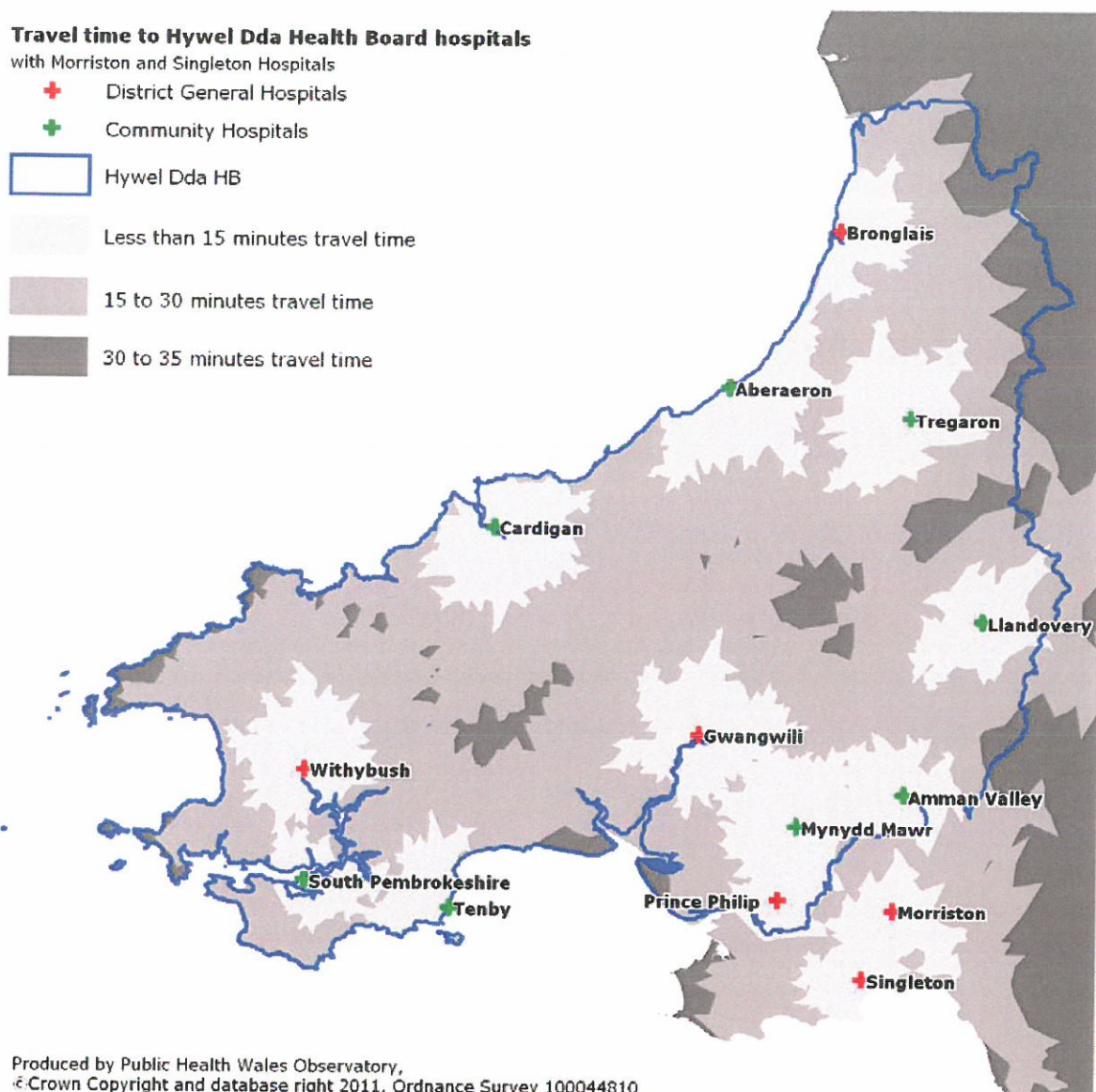
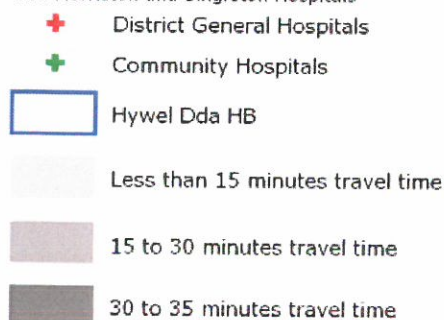
- Public health strategies for weight management during pregnancy: 'Move Baby Move', NERS
- GAP/GROW monitoring initiatives in place across all sites of the Health Board.
- Smoking cessation support including CO2 monitoring by default is in place in line with All Wales policies: 'Help me Quit'
- Monthly audits for fetal monitoring including the 'Kicks Count' initiative

Transfer times for patients to Glangwili General Hospital

Prior to the service changes in 2014, the Health Board undertook an analysis of travel times to all hospitals within the Health Board area. The map below is an extract from the Technical Documents supporting the consultation on the changes to women and children's services, (Technical Document-Women and Children's Services-Final August 2012). This illustrates the travel times for all hospitals across the Health Board area including to Morriston and Singleton hospitals within Abertawe Bro Morgannwg University Health Board, and the number of people who can access any hospital with time ranges.

Travel time to Hywel Dda Health Board hospitals

with Morriston and Singleton Hospitals



Produced by Public Health Wales Observatory,
 © Crown Copyright and database right 2011. Ordnance Survey 100044810

The average travel times between Withybush Hospital in Haverfordwest and Glangwili Hospital in Carmarthen is 45 minutes by car, this is faster by ambulance. The Health Board continues to provide a Dedicated Ambulance Vehicle (DAV), 24 hours every day which is operated by paramedic and emergency technician staff. This ambulance is based at Withybush Hospital and is dedicated for the emergency and urgent transfer of women and children who need to transfer from Withybush to Glangwili Hospital.

I trust that this has provided you with a full and comprehensive response to the three specific areas identified in your letter. If there is any further detail you require please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, reading "Steve Moore". The signature is written in a cursive style, with the first letter of each word being capitalized and larger than the others.

Steve Moore
Chief Executive

Dr Chris Overton
Chairman SWAT
5th October 2017
Your Ref P-05-768

Mr David John Rowlands AM
Chair – Petitions Committee
National Assembly for Wales
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Rowlands

I am writing in response to the letter from Steve Moore, CEO Hywel Dda Health Board, dated 4 October 2017. Firstly we need to differentiate the data in the audit which has been shared with you and Mr Moore's response. He spends quite a lot of his response labelled "1. Assessment of the impact of changes" not actually responding to the audit data.

Once again he returns to the findings of the RCPCH reviews, which relied on old data predominantly from before the changes in the first review, and no perinatal data in the second review. He kindly includes the very long review documents but I addressed these in my last letter and they are irrelevant to the question asked. For completeness may I repeat that the standards are predominantly related to arbitrary medical rota compliance rather than patient care. The remits given to the RCPCH on both occasions they visited were very tight and to suit the question masters, Hywel Dda and the previous health minister, Mark Drakeford. Maternity care was only really added at the last minute for the first and excluded totally for the second visit. The claim that services were/are safe and sustainable and have led to improved patient outcomes is still unfortunately not evidence based. May I also add that it is now 3 years since the service changes were brought in and we are still at the outline business case stage for any improvements in infrastructure.

"2. Monitoring of Perinatal Mortality Rates" one would expect to be a robust answer to counter the audit data I presented but he relies on calling into question the validity and veracity of the data and uses the typical statistical argument that the numbers are very low. These numbers are babies that have been lost forever. The categorisation was alluded to in

the audit and was the same as the AWPS dataset using their terminology. I note that the release of my audit seems to have stimulated some interest within Hywel Dda over and above simply reporting data to the national audits (which are always way behind in their data collection and reporting).

On page 4 he suggests that the Health Board have reviewed data from 2015 to the end of March 2017. He admits that the rate of perinatal mortality increased during 2015 and 2016 and tries to soften this by claiming that they are *similar* to 2012 and 2013. He quotes the 2015 MBRACE report but, in actual fact, he is using a different and incorrect data set when comparing with the perinatal mortality data in my audit. The AWPS report of 2014 was lauding the fact that the perinatal mortality rate had been falling consistently over several years. Not so in the 2015 report. Perinatal Mortality is defined as a combination of all stillbirths over 24+0 weeks and early neonatal deaths within the first 7 days of life. This is the data set that the AWPS use and because of the overall numbers they report them in triennia, which is why my audit reports in the same way in order for there to be a true comparison.

On page 5 Mr Moore claims that during 2017 rates are low however there is a problem with the Health Board's data. In the table for place of residence it claims that in the first quarter 2017 there were none for Pembrokeshire and Ceredigion and 2 for Carmarthenshire. This is incorrect as there were early neonatal deaths on 11th January 2017 from Pembrokeshire and 13th March 2017 in Ceredigion. These appear to have been "lost" from his report. If Mr Moore had included April 2017 there would have been 3 more, 2 from Pembrokeshire and 1 from Carmarthenshire making a total of 7 in the first 4 months of 2017. I put in a DATIX (HD32358) on one of the cases in April for two reasons; firstly, it is my genuine belief that the lady was so determined to deliver in Pembrokeshire, even though she wasn't allowed to, she delayed attending Glangwili and instead went to Withybush A&E (when it was too late) and secondly, the record of this stillbirth was recorded incorrectly as antepartum and not intrapartum. If the perinatal mortality rate were to match the first 4 months then it would be 28 deaths for 2017, again a big increase over previous years. No one would know this for another 2 years, when goodness knows how many unnecessary deaths might have occurred if we had to wait for national audits to report. This is why I produced my audit and felt duty bound to share it and petition the Welsh Government not to sit on it's hands this time. Worryingly, as mentioned in my email, my sources have informed me that there were 6 stillbirths during the month of August alone. I fear that the committee needs to read

the Northwick Park report from about 10 years ago. There was a forced merger of hospital maternity services which led to disharmony there and this resulted in many additional maternal deaths. Currently these service changes seem only to have impacted on babies.

Mr Moore is correct in his assertion that it is often difficult to work out why a baby is lost antenatally. There are a few cases where it is clear cut, such as excessive and unexpected bleeding or missed poor growth. However let us look at the service changes and try to evaluate what may have contributed to these excess cases. The way the service is provided is very different now. There is no local consultant unit or SCBU. The facilities available antenatally in Pembrokeshire were significantly reduced and more travelling to Glangwili was required for lots of women. The number of local community midwives was perhaps reduced by 50%, because there was an exodus of predominantly experienced midwives who did not want to work in Carmarthen and had already retired, but had previously returned to work in Withybush as they can retire at 55 but often work until 65, and community midwives were moved to Glangwili to prop up the inpatient service as there were not enough staff organised for the combined unit in advance. Women in Pembrokeshire had felt comfortable knowing that their local hospital had a full range of maternity services with consultants and a SCBU at hand 24/7. The fear factor and increasing anxiety for especially the vulnerable groups increased dramatically in August 2014. Instead of being able to hop on a bus, ask a friend for a lift or pay for a taxi to get to your local hospital, people with no transport (and usually little money) are expected to get to Glangwili at all times of the day or night, and many times a week if there are problems discovered. The equality impact assessments showed quite clearly that every vulnerable group in Pembrokeshire would be disadvantaged and yet in the third document attached they have a brief mention on page 5 where it is recognised that the assessments were done. The Health Board recognises these problems but does not give any detail of possible remedies.

The lovely map is smoke and mirrors as it is showing the travel times for pregnant women before the changes. The whole of the west of Pembrokeshire is now black, an option which does not appear on this map because on this map there was a consultant unit and SCBU in Pembrokeshire. Mr Moore tries to make you believe that travel times are now fine but he stresses between hospital travel times only and gives no mention of the additional 45 minutes it takes to get to Withybush from some western areas of Pembrokeshire. This is why in 1970 it was decided to build a new hospital in Pembrokeshire and gradually improve the care

of the local population. The removal of these services in 2014 was a retrograde step.

It may appear pedantic but I have to point out that the third attachment is dated 28/09/2017 and yet talks about a future meeting concerning Paediatrics on Friday 22/09/2017. It also talks about the outline business case for improvements and is hoping for full business case to be approved 3 years after the changes. These improvements are documented in the RCPCH reports as urgent.

I would also like to counter some of Mr Moore's Paediatric claims by referring you to Dr Gustav vas Falcao's television interview earlier this year which is readily available on the internet. Dr Vas Falcao was a highly respected Paediatrician for many years at Withybush but left in part because of bullying by management and his disappointment over the reduced quality of care for Pembrokeshire patients. Finally it is notable that CHANTS is still only for 12 hours a day and the health board's piece de la resistance must be on page 36 where it calls for the "Pushing of positive birth stories"!

It still seems that the most important aim for Welsh Government ministers and Hywel Dda management is to discredit my up to date data rather than address the very real problems these service changes have caused the people of Pembrokeshire.

On behalf of SWAT and the people of Pembrokeshire I would be grateful if you would consider this letter in the next committee meeting and please act quickly if you want to save lives.

Yours sincerely



Dr Chris Overton
Chairman SWAT
Consultant Obstetrician (retired)

P-05-721 Penegoes Speed Limit Petition

This petition was submitted by Isabel Bottoms, Peter Bottoms and Sarah Holgate, having collected 298 paper signatures.

Text of the Petition

We call on the National Assembly for Wales urge the Welsh Government to introduce a 30 miles per hour speed limit throughout the village of Penegoes (from the Penegoes village sign entering from Machynlleth, to the other side of the Maesperthi Caravan Park's Proposed new entrance) on the A489 road towards Newtown; and a 40 miles per hour speed limit from Machynlleth to Pengoes.

Assembly Constituency and Region:

Montgomeryshire

Mid and West Wales

Agenda Item 3.10

P-05-772 No to the proposed Iron Ring at Flint Castle

This petition was submitted by Gerwyn David Evans, having collected 11,091 signatures online.

Petition text:

We the undersigned call on the National Assembly for Wales to urge the Welsh Government to scrap the proposed plans of building an Iron Ring outside of Flint Castle as we are well aware of the historical significance of Edward I and his so called Iron Ring as a use to subjugate and oppress our people.

We find this extremely disrespectful to the people of Wales and our ancestors who have battled oppression, subjugation and injustice for hundreds of years.

We ask that you please rethink the decision to build this monument and use the money elsewhere.

Assembly Constituency and Region

- Rhondda
- South Wales Central



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-05-772
Ein cyf/Our ref KS/02846/17

David John Rowlands AM
Chair - Petitions committee.

Cardiff Bay
Cardiff Bay
CF99 1NA

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

Dear *David*

20 September 2017

Thank you for your letter of 3 August regarding Petition P-05-772 2 No to the proposed Iron Ring at Flint Castle2.

I have listened to and recognised the strength of feeling around the proposed art installation at Flint Castle, so I have asked my officials to pause and review the plans for the sculpture. Part of the review process will be to engage with stakeholders and the community at Flint.

The sculpture is one part of a planned wider investment which, although at an early stage, is aimed at greatly enhancing the visitor experience at Flint Castle, and to work with local partners in improving community facilities. Some improvements are already being delivered such as conservation works at the castle and a new staircase being installed in the north-east tower giving access to a viewing platform. This investment aspires to promote the significance of the area and attract more people to Flint bringing positive benefits to the community.

Yours sincerely

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

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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.

Pack Page 109

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.

Dear Committee Members,

Firstly I would like to thank you for considering the petition.

Having read Mr. Skates response dated 20th September 2017 which states that the sculpture is paused for review, I would like to ask for further confirmation that the plans for the sculpture will not go ahead.

With the petition it was never my intention to take any funding away from flint castle, the campaign was solely to try and stop plans for what myself and the signees of the petition saw as a deeply offensive artwork commemorating Edward I whom built flint castle and the "Iron ring" of castles.

There is a strong connection that many welsh people feel in regards to our history and the building of such a sculpture we feel would be disrespectful to our ancestors whom suffered under the oppression and subjugation of Edward I.

I understand the significance of Flint Castle where Richard II surrendered the crown of England to his cousin Henry IV both of whom were paternal descendants of Edward I but I fail to see what relevance this or indeed Shakespeare has with Wales' Year of Legends.

Both Cadw and George King Architects stated that "the sculpture symbolizes a giant rusted crown representing the intimate relationship between **the medieval monarchies of Europe and the castles they built.**" I believe that with this and the fact that the sculpture is called the "Iron Ring" it is easy to see why many people found the sculpture offensive, although the castles should stand as a reminder of the resilience of our ancestors, the fact that the castles were built to subjugate and oppress is something we should neither forget nor glorify.

Yours Sincerely

Mr Gerwyn D Evans

Agenda Item 3.11

P-05-746 Free School Transport for All Children in Wales

This petition was submitted by Rachel Griffiths, having collected 194 signatures.

Text of the Petition

I am setting this petition up for all children in Wales to receive free school transport to and from school where they fall within the catchment area.

Additional Information

To give an example, due to UK Government cuts to public sector funding and the resultant need for the council to make substantial savings, Rhondda Cynon Taff council now want to make charges from September 2016 of £285 per annum per child for transport to and from school or £95 for those receiving free school meals. Cuts could be made elsewhere e.g. are plants in the community really needed?

Assembly Constituency and Region.

- Pontypridd
- South Wales Central

Agenda Item 3.12

P-05-745 Increased Provision for Off Road Motorsports

This petition was submitted by Jonathan Barrett, having collected 318 signatures.

Text of the Petition

We call upon the Welsh Assembly to provide more support through Natural Resources Wales in making provision for off road motorcycles. We further ask that the Assembly provides direction for local authorities and the police in line with the Welsh Off Road Motors Steering Group (WORMS). We lastly ask that Ministers meet with some of those involved in off road provision to discuss the support that we seek.

Additional Information

The issue of "off road motorcycle" use in Wales has been one that has often polarised views with those in support against others. This has resulted in many legitimate off road users being demonised, treated unfairly and being tarred with the same brush as those that do ride anti-socially.

The issue of off road vehicles in Wales is worth many millions of pounds to the Welsh economy every year. In 2002 the Auto-Cycle Union (ACU) carried out a survey on behalf of Rhondda Cynon Taf Council and it was estimated there were 10,000 off road bikes and vehicles in use in that one council area. Local businesses are seeing constant increases in bike use year on year. Most of those involved in the sport do try and engage legally, however with very few venues and a reduction in the amount of available Byways Open to All Traffic (BOATS) more and more are falling short of the law. Whilst this is ongoing the police are often targeting off road users including those that are conducting themselves legally and responsibly.

The Welsh Off Road Motors Steering group which advises the Welsh Assembly, as well as all 22 local authorities and 4 Welsh police forces, concludes that the only way to stop illegal activity is through a three pronged approach of education, enforcement and provision. Whilst education and enforcement are regularly carried out, it seems little is done in the way to provide for off road users. In South Wales there is currently one motocross track that is open to the general public which is simply not enough and only caters for motocross riders. Many of the BOATs are being closed or put under Traffic Regulation Orders and initiatives to make provision are being stopped by the police or Natural Resources Wales.

The issue of anti-social use of motorcycles could be massively reduced by making areas which could be used for off road motorcycling. In Merthyr Tydfil, a dedicated mountain biking track has been created by NRW, attracting 66000 visitors in its first year.

Assembly Constituency and Region.

- Bridgend
- South Wales West



Agenda Item 4

Committee Chairs
National Assembly for Wales
Cardiff Bay
CF99 1NA

Your ref:
Our ref: EJ/GH

28 September 2017

Dear Committee Chair

Over the past two years the Senedd@ initiative has seen us taking the work of the Assembly to the people of Wales. To date we have taken the initiative to Wrexham, Swansea and Newport. We chose these locations because voter turnout in these areas was particularly low in the 2011 and 2016 Assembly elections.

Senedd@Wrexham, Senedd@Swansea and Senedd@Newport saw a comprehensive programme of events, visits and workshops which directly engaged thousands of people in the Assembly's work. We also established new working relationships with key local organisations and local media. To maintain the momentum generated by our visits to these towns, and building on the lessons we learned, I am eager to deliver another Senedd@ event during the week commencing 13 November 2017. The constituency of Delyn has been chosen as the location of the next Senedd@ initiative.

One key findings of the evaluations of previous Senedd@ initiatives was the need to enable committees to consider their potential involvement earlier in the planning process. Therefore, I am inviting any suggestions your committee may have about how you may wish to get involved in Senedd@Delyn.

In previous Senedd@ initiatives, committees have held formal meetings in community locations and taken the opportunity to encourage people to participate in their work. Senedd@Delyn will present a fantastic opportunity for your committee to raise its profile and engage with many local organisations and media.

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



Elin Jones AC, Llywydd

Cynulliad Cenedlaethol Cymru

Elin Jones AM, Presiding Officer

National Assembly for Wales

Should you require any further information, please contact Geraint Huxtable on
0300 200 6277 or via email: Geraint.Huxtable@Assembly.Wales

Thank you in advance for your co-operation.

Yours sincerely

Elin Jones AM
Llywydd

Agenda Item 6

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

Petition wording:

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

Petition raised by: Geraint Vaughn Jones

Date Petition first considered by Committee: 17 June 2014

Number of signatures : 2,754

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

Document is Restricted