

Agenda – Petitions Committee

Meeting Venue:

External

Meeting date: 12 May 2020

Meeting time: 14.00

For further information contact:

Graeme Francis – Committee Clerk

Ross Davies – Deputy Clerk

0300 200 6565

Petitions@senedd.wales

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Document is Restricted

Agenda Item 2.1

P-05-958 Recent Decisions Regarding AS Grades 2020

This petition was submitted by Sian Williams having collected a total of 219 signatures.

Text of Petition

A decision was recently made by Education Minister Kirsty Williams regarding AS Level qualifications 2020. The statement released says:

In summer 2021, current AS learners will have two options for their A level award. They will choose whether to:

- only sit the A2 units, with the A level grade based on their performance in the A2 units;
- or sit both the AS and A2 units. They will be awarded the best grade from either route.

However, this fails to take into consideration students that have worked extremely hard to achieve good predicted grades throughout the entirety of Year 12, and who were therefore prepared for upcoming exams, the first of which were due to begin in only four weeks from when this decision was made.

Year 12 would ordinarily contribute to 40% of the overall A Level grade.

If a student chooses to sit only A2 Units, as per the first option above, students will have worked tirelessly during Year 12 for 0% of their A Level grade, which has never previously been the case. This increases the pressure enormously for students continuing into Year 13 and contradicts the Minister's hope of a "fair system" that aids a student's "wellbeing". Further, this extra pressure will not be accounted for in the future when the 2021 cohort of students compete for jobs with students credited by the much fairer system that has previously always been in place.

The second route of taking both AS and A2 units in 2021 not only means that Year 12 again contributes nothing to the A Level grade overall, but does not decrease the already immense pressures of Year 13 either. Instead, it simply places the entirety of the pressure from both years and combines them for exams in the Summer 2021 exam series.

This is not fair, and we shouldn't be confused by the statements released into believing it is.

Additional Information

Education is a vital aspect of a student's life, especially those who have decided to continue with A Levels, all of which require great determination and hard work, in the hope of achieving grades needed for future plans.

This time is stressful enough for students.

The last thing we need is a rushed decision that is ultimately detrimental to our future plans.

Both pathways offered will be disadvantageous for students.

We ask for this decision to be adjusted to take every student into account.

Assembly Constituency and Region

- Clwyd South
- North Wales

Recent Decisions Regarding AS Grades 2020

Y Pwyllgor Deisebau | 12 Mai 2020

Petitions Committee | 12 May 2020

Research Briefing:

Petition number: P-05-958

Petition title: Recent Decisions Regarding AS Grades 2020

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- only sit the A2 units, with the A level grade based on their performance in the A2 units;
 - or sit both the AS and A2 units. They will be awarded the best grade from either route.
- However, this fails to take into consideration students that have worked extremely hard to achieve good predicted grades throughout the entirety of Year 12, and who were therefore prepared for upcoming exams, the first of which were due to begin in only four weeks from when this decision was made.

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The second route of taking both AS and A2 units in 2021 not only means that Year 12 again contributes nothing to the A Level grade overall, but does not decrease the already immense pressures of Year 13 either. Instead, it simply places the entirety of the pressure from both years and combines them for exams in the Summer 2021 exam series. This is not fair, and we shouldn't be confused by the statements released into believing it is.

Education is a vital aspect of a student's life, especially those who have decided to continue with A Levels, all of which require great determination and hard work, in the hope of achieving grades needed for future plans.

This time is stressful enough for students. The last thing we need is a rushed decision that is ultimately detrimental to our future plans. Both pathways offered will be disadvantageous for students.

We ask for this decision to be adjusted to take every student into account.

Background

On [18 March 2020, Kirsty Williams, Minister for Education announced](#) that due to the Covid 19 pandemic, the summer 2020 examination series would be cancelled. For 2020 all AS learners will receive **an estimated AS grade** and there will be no AS exams until summer 2021. The estimate will be based on a range of evidence, including teacher assessment grades, and will not contribute to A level results in 2021.

In Wales A level qualifications consist of Advanced Subsidiary (AS) and A2 units. The AS is a stand-alone qualification and also contributes 40 per cent towards the full A level qualification. AS exams can be taken at the end of the AS course or alongside A2.

The calculated grade issued to AS learners this summer will enable them to progress onto other pathways, such as other training, or employment, or to another school or college. If a learner is carrying on to the full A level in summer 2021, the calculated grade from this summer cannot be used because it will be a grade and not a mark. Usually marks from each AS unit are aggregated in the calculation of the final A level grade.

In summer 2021, AS learners will have two options for their A level award. They can either choose to only sit the A2 units, with the A level grade awarded solely on their performance in those units, or they can choose to sit AS and A2 units. If they choose to sit the AS units alongside the A2 units they will be awarded the best grade from either route – either the grade awarded from performance on the A2 units alone or the grade awarded from combining both AS and A2 units.

The Minister provided information on how this summer's exams would be graded to the [Children, Young People and Education Committee on 28 April 2020](#) (paragraphs 90–99).

Qualifications Wales

On 6 April 2020, the Minister for Education issued Qualifications Wales, the regulator of qualifications below degree level in Wales, with a [Direction](#) to have regard to Welsh Government policy regarding the cancellation of exams and the subsequent determination of grades.

The Direction requires Qualifications Wales to ensure that a fair and robust approach to issuing grades to the summer 2020 cohort of learners is adopted. This includes determining the approach centres must follow in arriving at judgements of their learners' attainment, standardising centres' judgements and ensuring an avenue of recourse is available for those learners who do not believe that the process has been followed correctly in issuing their grades.

On 28 April 2020, Qualifications Wales published a consultation on [Arrangements for summer 2020 exam series](#). This includes proposals for a set of aims to underpin the statistical standardisation model for the issuing of grades for learners taking GCSEs, AS, A levels and Skills Challenge Cymru qualifications in the summer 2020 exam series. It also consults on an appeals process. There is a [consultation for young people](#) and Qualifications Wales state that they are keen to hear from learners. The consultation ends on **Wednesday, 13 May 2020**.

England, Northern Ireland and Scotland

Summer examinations have been cancelled in [England](#), [Northern Ireland](#) and [Scotland](#) (who have a different examination system).

In **England**, AS levels differ from those in Wales and do not count towards the final A level grade. Ofqual, Office of Qualifications and Examinations Regulation, are developing a process that will provide a calculated grade to each student which reflects their performance as fairly as possible. They are working with exam boards with the aim of ensuring consistently for all students. Exam boards will ask teachers to submit their judgement about the grade that they believe the student would have received if exams had gone ahead. Pupils who do not feel their calculated grade reflects their ability will have the opportunity to sit an exam as soon as is reasonably possible after schools and colleges open again. Ofqual consulted on [Exceptional arrangements for exam grading and assessment in 2020](#) between 15 and 29 April 2020.

In [Northern Ireland](#), all AS students will receive an AS grade and there will be no AS exams until Summer 2021. The grade awarded will be based on previous student performance combined with centre assessed grades and centre rank orders. Similarly to Wales, the nature of the AS grade awarded in 2020 will not allow it to contribute to A level results in 2021. In Summer 2021, students will have two options for their A level award. If a student chooses to only sit the required A2 units, then their AS outcomes will be calculated using statistical predictions based on their performance in the A2 units. If they choose to sit any AS units, alongside the A2 units, they will be awarded the highest grade at A level from either route.

In [Scotland](#), the Scottish Qualifications Authority are putting in place a certification model using coursework, teacher assessment of estimated grades and prior attainment. There will also be an appeals mechanism.

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



Ein cyf/Our ref KW/01087/20

Janet Finch-Saunders AM
Chair Petitions Committee
National Assembly for Wales
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA

Government.Committee.Business@gov.wales

21 April 2020

Dear Janet Finch-Saunders AM,

Thank you for your letter of 14 April regarding Petition P-05-958 concerning Recent Decisions Regarding AS Grades 2020.

As you will be aware, in March, following detailed discussions with Qualifications Wales and the WJEC, I announced that the summer exam series would not go ahead. This was not an easy decision to make but the continued uncertainty around exams was causing additional stress for learners, parents and practitioners alike at an already challenging time.

On 27 March, following detailed consideration of the options available I was able to outline the approach for learners who were due to sit their AS levels and Year 10 learners who would have taken GCSE unit assessments this summer. Learners who were due to sit their AS exams this year will not be required to take those exams at a later date. Instead they will be treated in a similar way to those taking GCSEs and A levels.

As you will be aware, in Wales, AS levels are not only stand-alone qualifications, but also contribute to A level qualifications, AS units are usually taken in Year 12 and A2 units in Year 13. This year all learners due to sit AS exams will receive an AS grade and there will be no AS exams until summer 2021. The calculated grade awarded will be based on centre assessment data and statistical modelling but it will not contribute to A level results in 2021.

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

Bae Caerdydd • Cardiff Bay
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CF99 1NA

Gohebiaeth.Kirsty.Williams@llyw.cymru
Correspondence.Kirsty.Williams@gov.wales

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

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

In summer 2021, AS learners will have two options for their A level award. They can either choose to only sit the A2 units, with the A level grade based on their performance in those units, or they can choose to sit AS and A2 units. If they choose to sit the AS units alongside the A2 units, they will be awarded the best grade from either of these routes.

I understand that learners signing the petition think this is an inequitable approach however; I have taken detailed advice about the range of options available from Qualifications Wales and the WJEC. In doing so, I have sought to balance prioritising the health and well-being of all learners, ensuring that learners are not unfairly disadvantaged in their progression into work or further education, and maintaining the credibility of our qualifications system. In these unprecedented times, there are no easy decisions, but wherever possible I have sought to provide valid choices for learners.

For AS learners, this approach ensures that: students are provided with an AS grade to recognise their hard work over the course of the year; those who do not go on to complete a full A level course of study receive a qualification, and AS grades are available to support UCAS applications in the usual way.

The process for awarding A-level grades is complex and made up of a number of components, as such, not all of the information that is required for the complete A level award will be available as a result of the calculated AS grades this summer. Actual marks are needed from each AS unit, to provide a UMS (Uniform Mark Scale) mark which can then be combined with the A2 UMS marks, to produce the A level grade. This detail will not be available for calculated grades this summer and so cannot be used in production of the A level grade in summer 2021.

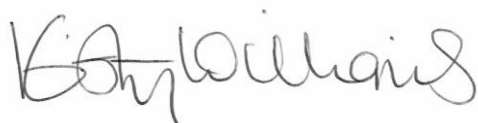
Consequently, on the detailed advice of the qualifications regulator, I have decided on the approach I outlined above, in order to maintain the credibility and robustness of our qualification system so that the efforts of learners affected by this pandemic are not undermined and are viewed credibly alongside those of learners in other years.

Under this approach, unless the learner opts to take their AS units alongside their A2 units, then for the purposes of determining the A-level award, the AS unit marks can be derived from the actual performance in A2 units. There is a clear statistical relationship between performance in these different units and this is a tested and well-established methodology, already used where students miss certain units due to illness.

Having engaged with headteachers and the teaching unions, I recognise there is a strong desire to get learning back on track in the autumn term, assuming that schools are open, and it is important that students are able to progress with their second year of A level studies, something that this approach enables us to achieve. It is also important to note that in taking such decisions, we are working closely with the FE and HE sectors to ensure learners are not disadvantaged.

I hope this explains the rationale behind the approach to AS levels that I have taken after much careful consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kirsty Williams'.

Kirsty Williams AC/AM
Y Gweinidog Addysg
Minister for Education

P-05-958 Recent Decisions Regarding AS Grades 2020, Correspondence – Petitioner to Committee, 04.05.20

Petition's Committee – Response

Firstly, I would like to say that I am extremely grateful that you are discussing my petition at such a difficult time. I am immensely passionate about this issue, as most AS students are, because we feel that the Minister is refusing to listen to us about a topic that will have an extremely detrimental effect on our education.

Response to Education Minister's Letter

Again, I am grateful that the Minister has responded to this petition. However, after receiving almost identical communications from the Minister previously, I cannot help but feel that this response has simply been copied and recycled.

I am also disappointed with the response due to the number of unfair and ill-judged comments throughout:

1. **“Continued uncertainty around exams was causing additional stress for learners...at an already challenging time”**. I fully comprehend and agree with the difficult decision to close schools and cancel 2020 exams, and also with the statement that this is, indeed a difficult time for all, including learners. However, I do not agree with the suggestion that, as a result of uncertainty, AS students should be given a decision that will ultimately place us in a disadvantageous position next year.
2. **“Health and wellbeing of all learners”** – I do not understand how giving students the *immensely* stressful option of sitting exams in every unit from AS and A2 would be beneficial to our wellbeing, because surely that would only increase pressures next year? From past experience, I have seen that students find it exceptionally difficult to achieve a good grade when taking this option. Further, to only sit A2 units will place too much pressure on next year also, because an *entire* A-Level will be based on only these exams. The only fair decision would be to allow AS grades to contribute towards 2021 grades.
3. **“Ensuring that learners are not unfairly disadvantaged in their progression into work or further education”** – Both options offered by the Minister will undoubtedly mean that 2020 AS students will be “unfairly disadvantaged”, and that the results achieved by this cohort of students will be incomparable to any other year because of the unjust system that the Minister has put in place.
4. **“Maintaining the credibility of our qualifications system”** – AS students simply cannot understand why allowing a calculated grade (one that has been given by teachers as a result of work from the entire year, and that can be used in UCAS applications and for students not continuing with education) to contribute to A-Level grades is less credible than using grades that are essentially calculated using A2 units anyway (that has also never been the case previously). Both grades are essentially being calculated, but calculated grades this year will actually be based on AS work, not A2 work, which is surely more accurate?
5. **“Sought to provide valid choices for learners”** – I maintain that “valid” choices are not necessarily the fair or correct choices for learners.
6. **“Recognise their hard work”** – AS students feel that the Minister fails to understand that students do not wish for their work to be recognised but *rewarded* also. An entire year was devoted to AS grades in the knowledge that work would be rewarded with 40% of A-Level grades being banked. We do not want recognition for this work, we already know how much

work and effort we put into preparing for AS exams – we want to know that this “hard work” was not devoted only to be told what we could have achieved if AS grades contributed this year (as has been tradition in Wales for a significant time).

7. **“Not all of the information...will be available as a result of the calculated AS grades”** – Teachers have been asked to assign a grade to each student, and to then rank students within each grade. Therefore, as students will be ranked based on ability within each grade, there must be a way that a scale can be produced, similar to the UMS (Universal Mark Scale), that can be used to assign a mark to each student.
8. **“Efforts of learners not undermined”** – I do not understand how this decision does not undermine the efforts of learners – an entire year of work and time devoted to preparing for exams will not give us any benefit.
9. **“Well-established methodology”** – I understand why this has been an established method of determining grades for students who have been unable to prepare for exams due to illness in the past. However, 2020 AS students will be given a grade that is based on work throughout the entirety of year 12, and that will be compared with other learners throughout the country to ensure consistency. Therefore, it makes more sense to use the calculated grade given in 2020 than a grade that has been effectively calculated anyhow by A2 units.

I would like to propose these questions to the Minister in response:

1. Why are we unable to use the ranking of students within each grade to create a similar scale to UMS?
2. How do these options ensure that learners are not disadvantaged?
3. Have you spoken with any teachers who feel that this decision is justified and will benefit any of their AS learners? If not beneficial, at least fair to these learners?
4. If you were an AS student in this position, would you be happy with the decision of your Education Minister?

I would also like to include some quotes from the Twitter accounts of WJEC and Qualifications Wales, from articles they have posted regarding AS grades 2020 (excluding names):

1. “Year 12 assessed grades count if you’re not progressing to A-Level. Somehow, they don’t if you do go on to A-Level. You’ll then be assessed on how you would have done based on your A2 results in Year 13. Only Kirsty Williams can contrive something so wrong.”
2. “I have an incredibly upset daughter as a result of this decision. She is in Year 12. It’s been hard enough over the past week trying to keep her focused after she was told there’d be no exams, but now you’ve said her efforts this year are wasted. She is devastated”.
3. “That’s very disappointing. A year’s worth of hard graft for nothing and all eggs in one basket, in one exam year! What a terrible decision. Please rethink”.
4. “Minister, please explain the rationale for not allowing AS Level predicted grades to count towards A-Level final grades next year, when predicted grades are being provided to Years 11 and 13 that they are able to rely on?”.
5. “So, all of the work that I did this year was for nothing?”.
6. “I would urge all Year 12 pupils/parents to ask the Minister to please reconsider, and allow AS grades to be included in the 2021 A Level results as normally happens, in order to ensure equality of treatment for all members of the current Year 12 cohort”.

There are a significant number of responses like these on the @quals_wales and @wjec_cbac Twitter pages. None have been responded to.

I would like to thank you for reading my response, and once more express my gratitude to the Petitions Committee in discussing my petition.

I really hope that something can come of this, for every AS student in the country.

Thank you again,

Sian Williams 17,

Llangollen.

Agenda Item 2.2

P-05-959 Give Welsh Vulnerable Access to Priority Supermarket Shopping Slots During COVID19

This petition was submitted by Lindsey Jones having collected a total of 73 signatures.

Text of Petition

As a mother of a vulnerable child I would like to get access to a priority shopping delivery slot with supermarkets while having to shield her during the COVID19 crisis.

I appreciate the local Governments are delivering free food parcels and there are many people working extremely hard to provide these. However good this gesture, it is not enough to replace a home shopping delivery. Furthermore, I have been in contact with many vulnerable people who feel the same.

Firstly, the free food box is for the vulnerable person only, and rightly so, but as a family we also need to eat, buy cleaning and sanitary products. As a result, I still need shopping and after 21 days of shielding I have not been able to get a shopping home delivery. This is making it very difficult for us to self-isolate as a family as advise by our Respiratory Nurse.

I feel it is very unfair for people in England to register for this on the GOV.uk website and this is automatically passed on to supermarkets, whereas people in Wales cannot. Welsh people claim benefits, tax our cars, complete self-assessments and much more on this website so why can't we have access to the website for priority access to shopping.

Please give the Welsh vulnerable priority access to shopping slots with the supermarkets on the GOV.uk website or set up a similar system/website for Wales.

Diolch yn fawr!

Assembly Constituency and Region

- Torfaen
- South Wales East

Title: P-05-959 Give Welsh vulnerable access to priority supermarket shopping slots during COVID19

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Reference: RS20/12505-1

Petition Number: P-05-959

Petition title: Give Welsh vulnerable access to priority supermarket shopping slots during COVID19

Text of petition: As a mother of a vulnerable child I would like to get access to a priority shopping delivery slot with supermarkets while having to shield her during the COVID19 crisis.

I appreciate the local Governments are delivering free food parcels and there are many people working extremely hard to provide these. However good this gesture, it is not enough to replace a home shopping delivery. Furthermore, I have been in contact with many vulnerable people who feel the same.

Firstly, the free food box is for the vulnerable person only, and rightly so, but as a family we also need to eat, buy cleaning and sanitary products. As a result, I still need shopping and after 21 days of shielding I have not been able to get a shopping home delivery. This is making it very difficult for us to self-isolate as a family as advised by our Respiratory Nurse.

I feel it is very unfair for people in England to register for this on the GOV.uk website and this is automatically passed on to supermarkets, whereas people in Wales cannot. Welsh people claim benefits, tax our cars, complete self-assessments and much more on this website so why can't we have access to the website for priority access to shopping.



Please give the Welsh vulnerable priority access to shopping slots with the supermarkets on the GOV.uk website or set up a similar system/website for Wales.

Diolch yn fawr!

Background

All those in Wales identified as being at high risk of severe illness from coronavirus due to a serious underlying health issue are required to undertake 'shielding'. This includes staying at home for 12 weeks.

These extremely vulnerable people should have received a letter from the Chief Medical Officer for Wales - a 'shielding letter' - by 17 April.

The letter advises that those receiving it will have access to priority delivery slots for online shopping deliveries from supermarkets.

It also says that if these individuals are unable to shop online, and have no other means of getting food (i.e. they have no family, friends, neighbours or support groups who can help), they are eligible for a free weekly food box delivered to their home.

The £15 million 'direct delivery food scheme' is funded by the Welsh Government and delivered by local authorities.

On 8 April the Welsh Government confirmed it had completed data agreements with the major supermarkets and that they will prioritise online home delivery slots for people who are shielding in Wales.

This follows a similar arrangement between the UK Government and supermarkets for the most vulnerable people in England, in place since late March.

However, in England, people are also able to register themselves as vulnerable if:

- they have a medical condition which means they're classed as being 'clinically extremely vulnerable' to coronavirus; or
- they've been told by their GP or hospital clinician that they're clinically extremely vulnerable and need to shield.

This is not the case in Wales; people here are not able to register as vulnerable. The advice on the Welsh Government website states:

People in Wales are not being asked to register as vulnerable. We realise that this is different to the arrangements in England, but in Wales we have decided to take a different approach.

If you are vulnerable but not in the shielding group you should ask family, friends and neighbours to support you and use online

services. If this is not possible, then the public sector, business, charities, and the general public are gearing up to help. Find out more from [Third Sector Support Wales](#).

If somebody in Wales feels that they are extremely vulnerable but hasn't received the shielding letter, they are advised to discuss their concerns with their GP or hospital clinician. The [Welsh Government's guidance](#) says that GPs have been given a list of the people who have been sent the letter. GPs should check the list against their patients and "contact any additional high-risk people who may not have been identified to ensure that they also receive the advice in the letters".

Welsh Government action

At the time of writing this briefing, the Committee has yet to receive a letter from the Minister in relation to this petition.

Senedd action

At the time of writing this briefing, the specific issue of people being able to register as vulnerable in England, but not in Wales, had not been discussed in Senedd business.

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-05-959
Ein cyf/Our ref LG/01038/20

Janet Finch-Saunders AM
Chair of the Petitions Committee

Government.Committee.Business@gov.wales

05 May 2020

Dear Janet

Thank you for your letter of 15 April, regarding priority access to supermarket home deliveries for vulnerable individuals and families. As matters relating to food supply fall within my portfolio I am responding as follows.

Covid-19 poses a serious risk to people with certain medical conditions who are extremely vulnerable, a group we are referring to as shielded individuals. The Chief Medical Officer has written to advise these individuals to shield themselves at home for 12 weeks. The group in Wales receiving shielding letters is approximately 90,000 people. More information about this group can be accessed here <https://gov.wales/guidance-on-shielding-and-protecting-people-defined-on-medical-grounds-as-extremely-vulnerable-from-coronavirus-covid-19>

Where possible, shielded individuals are asked to rely on family, friends, neighbours and community networks to help them with essential supplies. Where they have no help at all, their letter advises them to contact their Local Authority who will help request deliveries of food parcels and provide a range of other social support.

The Welsh Government has developed a straight forward solution in partnership with all the major food retailers who offer on-line food delivery services in Wales and we have struck data sharing agreements with them. Data identifying over 90,000 individuals in households in the shielding group was made available to all major retailers by 8th April. Retailers are now able to allocate priority delivery slots and supermarkets with loyalty schemes have been pro-actively contacting customers who are shielding to advise them of this.

The provision of food, medicines and other care to this shielded group is our top priority.

Bae Caerdydd • Cardiff Bay
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CF99 1NA

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

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

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

All GPs have also been given the lists of people who have been issued a shielding letter and guidance on what discretion they have if they believe someone has been missed out. To ensure all patients with serious underlying health conditions are captured, GPs can use their clinical expertise to advise further patients to shield. GPs now have the ability to issue the letter from the practice in these circumstances and to add the patient to the list of high risk individuals. High risk patients identified centrally or via their GPs will have their details passed to the relevant local authority and supermarkets. It should be noted that it may take up to 10 days from the issuing of the letter for the local authorities and supermarkets to receive notification that a person has been advised to shield and match it with their own database.

We recognise there are many vulnerable people outside the 'shielded' group of individuals and we are working to address their need for support at this time. As with the shielded group, where possible, vulnerable people are asked to rely on family, friends, neighbours and community networks to help them with essential supplies in the first instance. Welsh Government, local authorities and the third sector are working closely to put additional measures in place. Solutions identified and put in place by Welsh Government to date include access to food for those in supported housing and identifying accommodation for a range of vulnerable groups.

The scope of those identified as vulnerable means it will take time to determine the appropriate support for each group. However, please be assured, we are working urgently to help provide support to all those currently in need.

Regards

A handwritten signature in black ink, reading 'Lesley Griffiths'. The signature is fluid and cursive, with the first name 'Lesley' and the last name 'Griffiths' clearly distinguishable.

Lesley Griffiths AC/AM

Gweinidog yr Amgylchedd, Ynni a Materion Gwledig
Minister for Environment, Energy and Rural Affairs

Agenda Item 2.3

P-05-960 Fund the funeral costs of all NHS staff who die from or with Covid-19

This petition was submitted by Profs Jane Henderson & Karin Wahl-Jorgensen having collected a total of 414 signatures.

Text of Petition

They gave their lives to save ours. We call on the Welsh Government to fund the funeral costs of all NHS staff who die from or with Covid-19. The average simple funeral costs £4000. We ask the Welsh Government to ensure that bereaved families immediately have access to the funds to pay for funeral costs.

Additional Information

Source for funeral cost

<https://www.moneyadviceservice.org.uk/en/articles/help-paying-for-a-funeral>

Assembly Constituency and Region

- Cardiff West
- South Wales Central

P-05-960: Fund the funeral costs of all NHS staff who die from or with Covid-19

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Reference: RS20/12516-1

Petition Number: P-05-960

Petition title: Fund the funeral costs of all NHS staff who die from or with Covid-19

Text of petition: They gave their lives to save ours. We call on the Welsh Government to fund the funeral costs of all NHS staff who die from or with Covid-19. The average simple funeral costs £4000. We ask the Welsh Government to ensure that bereaved families immediately have access to the funds to pay for funeral costs.

1. Context

Across the United Kingdom, at least 100 NHS staff and care workers working on the frontline have lost their lives to coronavirus. Among those who have died are surgeons, nurses, porters, paramedics and volunteers. At least 9 of the recorded deaths of



frontline staff were people working in hospitals, care homes and the ambulance service in Wales.

On Tuesday 28 April, a minute's silence was observed for those who have died working on the frontline against this disease.

2. Welsh Government action

On 27 April 2020, the Minister for Health and Social Services, Vaughan Gething announced a COVID-19 Death in Service Scheme for NHS and Social Care frontline workers in Wales.

The Welsh Government announcement notes that the scheme:

provides financial support of £60,000 to eligible beneficiaries of frontline staff, particularly those working in the NHS and Social Care, should they die in service as a result of being affected by COVID-19.

The scheme is considered 'non-contributory', with no additional costs to employers. The Scheme provides for a '**one off sum**' of **£60,000** to an eligible beneficiary. It will be payable, regardless of the individual's salary or whether an individual is a member of a Pension Scheme.

The Scheme is time-limited, and will only be in place during the period of the pandemic, and will retrospectively apply from 25 March 2020.

While the announcement does not specifically mention that the financial support is there to help families pay funeral expenses of healthcare workers who died as a result of COVID-19, this is nevertheless implied. The Minister's announcement stated the following:

Our frontline workers are being asked to go above and beyond to deliver care and services for patients and individuals and this scheme goes some way to offer greater peace of mind and financial security for their loved ones.

A near identical scheme has also been introduced for frontline NHS and social care workers who die in England, with the Health Secretary, Matt Hancock noting on the UK Government website:

Financial worries should be the last thing on the minds of their families so in recognition of these unprecedented circumstances we are expanding financial protection to NHS and social care workers delivering publicly funded care on the frontline.

Similar schemes are also being introduced by the Scottish and Northern Ireland Executives.

3. Funeral costs

According to the Royal London National Funeral Cost Index 2019 (PDF 4.6MB), the UK average funeral costs in 2019 is **£3,785**.

The average funeral costs are based on a *simple* funeral arranged through a funeral director. Typically, included within the average funeral costs are the charges for a burial plot and internment, or charges for cremation and delivery of ashes, collection/care of deceased, a basic coffin, hearse and a simple service at a crematorium.

The average costs **do not include** third party fees that fall outside funeral directors' immediate control, such as minister fees. The cost index notes that the **average amount spent** by consumers on a funeral is higher at **£3,989**.

The average cost of a funeral is also for the whole of the UK. There will be significant variability in costs in different parts of the UK and within Wales (see section 2.3).

3.1. Burial vs. Cremation Costs in the UK

The average costs above combine both *simple* burial and cremation funerals together. However, **burial funerals** are generally **more expensive** than **cremations**. Burial funerals cost £1,000 more on average.

Average burial funeral costs vs. cremation funeral costs across UK:

- Average cost for a **burial funeral**: £4,321
- Average cost for a **cremation funeral**: £3,250

3.2.Direct cremation

A third type of funeral is also an option in the UK, known as a 'direct cremation'. A direct cremation is offered by some companies as a cost-efficient method for families. The deceased would be collected from a mortuary during normal working hours and cremated at a convenient time. There is no ceremony or viewing beforehand, or limousines for family and mourners. Ashes must also be requested and collected.

UK Average cost of a direct cremation:

- Direct cremation: £1,600

3.3.Funeral Costs in Wales

The average cost of a funeral is slightly lower in Wales, with the Royal London National Funeral Cost Index recording an average cost of **£3,586**.

Average funeral costs by local authority in Wales are provided in the table below (burial and cremation costs are provided separately):

Wales

Average: £3,586

Lowest

Highest

LOCATION	COUNTY	BURIAL	CREMATION
Bridgend	Bridgend	£4,249	£3,156
Cardiff	Cardiff	£3,858	£3,092
Llanelli	Carmarthenshire	£3,864	£3,237
Aberystwyth	Ceredigion	£3,513	£3,317
Colwyn Bay	Conwy	£4,138	£3,172
St Asaph	Denbighshire	£3,723	£3,302
Northop	Flintshire	£4,418	£3,317
Bangor	Gwynedd	£3,648	£3,013
Port Talbot	Neath Port Talbot	£4,039	£3,069
Newport	Newport	£4,523	£3,267
Narberth	Pembrokeshire	£3,998	£3,033
Aberdare	Rhondda Cynon Taff	£3,985	£3,142
Pontypridd	Rhondda Cynon Taff	£4,138	£3,142
Swansea	Swansea	£4,128	£3,147
Cwmbran	Torfaen	£4,058	£3,222
Barry	Vale of Glamorgan	£3,666	£3,252
Wrexham	Wrexham	£3,947	£3,165

Source: Royal London National Funeral Cost Index.

4. Armed Forces

The Armed Forces provide immediate help with the arrangements and costs of the funeral of service personnel killed in Service.

The Armed Forces will pay for the provision of a coffin and delivery to a undertaker of the family's choice. The family of the deceased can choose to have a **service funeral, burial** or **cremation** which is at public expense, paid for and arranged by the Armed Forces, or a **private burial** or **cremation** for which the Ministry of Defence (MOD) provides a funeral grant of up to **£3,446**.

5. Child burial

In November 2017, the Welsh Government announced the removal of child burial fees across the whole of Wales.

The Welsh Government allocated **£1.5 million** (available up until 2020) to support local authorities with the new policy. According to the Welsh Government, other providers of cemeteries and crematoria can also access this fund 'if they agree not to charge on the same basis'.

The Welsh Government published an FAQ on the end of child burial fees in Wales. The document states that all fees in relation to a child's burial, **including cremation** are included. However, other funeral costs such as an funeral directors, flowers and coffins are **not covered** as part of the funding.

The equivalent fund in England, the *Children's Funeral Fund*, covers the cost of burial and cremation as in Wales, but also waives the fee for a doctor's certificate and a coffin or shroud (up to a cost of £300). The fund does not cover other funeral expenses.

6. Funeral Expenses Payment

Some families in receipt of certain benefits may qualify for Funeral Expenses Payment to support them with the cost of a funeral. The payment is administered by the Department of Works

and Pension (DWP), not by the Welsh Government or local authorities.

Funeral Expenses Payment can help pay for some of the costs of the following:

- burial fees for a particular plot
- cremation fees, including the cost of the doctor's certificate
- travel to arrange or go to the funeral
- the cost of moving the body within the UK, if it's being moved more than 50 miles
- death certificates or other documents.

Some may also qualify for financial support for other funeral expenses, such as funeral director's fees, flowers or the coffin. Families could get up to:

- £700 if the person died **before 8 April 2020**
- £1,000 if the person died **on or after 8 April 2020**

The payment would not usually cover all of the costs of the funeral however.

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

P-05-960 Fund the funeral costs of all NHS staff who die from or with Covid-19, Correspondence – Petitioner to Committee, 04.05.20

Dear Petitions committee

First let me thank you for taking the time to hear this petition. Our request is short and simple but it relates to a huge social issue.

‘Fund the funeral costs of all NHS staff who die from or with Covid-19

They gave their lives to save ours. We call on the Welsh Government to fund the funeral costs of all NHS staff who die from or with Covid-19. The average simple funeral costs £4000. We ask the Welsh Government to ensure that bereaved families immediately have access to the funds to pay for funeral costs.’

Further details:

When we attend the hospital we hope for, and indeed expect, equal care from everyone we meet whether we are being helped out of a chair or placed on a respirator. As a society we have realised more than ever that we need and appreciate the staff who keep the NHS working. A compassionate, educated and committed NHS staff is more critical now than ever. If we ask for this service, we as a society must in turn meet our responsibilities.

This petition was prompted by a personal loss where a friend and mum to my son’s friend died of covid-19. It was only when the local fundraising started that I discovered that funeral costs were not being covered by government, leaving families without at their weakest moment. It seems obvious that as NHS staff are public servants this is a cost we should all share. As Carolyn Harris MP for Swansea successfully campaigned to alleviate the financial cost of losing a child we ask that you consider showing a similar responsibility to those who die in what is today’s modern national service.

Just as we are treated equally when we enter the hospital we believe that those who care for us should be treated equally. We ask therefore that any such benefit is offered to locum and agency staff dying of Covid-19 following a period of working in the NHS. We also note that it is discriminatory to withhold any benefits from non-British citizens working in the NHS. They give service and pay tax like all other NHS staff. Tragically they sometimes also die from the pandemic so we ask that all such support is offered equally (see attached letter from Albany Solicitors Cardiff).

We note the money that the governments of the UK are offering to NHS staff but know how many financial demands there will be for the families and as such we request that this specific cost from a death in work is covered by the state, distinct from any lump sum.

As this request represents an urgent and immediate support for families, we ask that the money is not deducted from other payments nor made the subject of any disclaimer or legal

waiver, simply that these costs are made available on application to those NHS staff in Wales who have given everything for all of us.

Thank you again for your consideration

Jane Henderson

Source for funeral cost <https://www.moneyadviceservice.org.uk/en/articles/help-paying-for-a-funeral>



ALBANY
SOLICITORS

Email: info@albany solicitors.co.uk
Web: www.albany solicitors.co.uk
www.facebook.com/AlbanySolicitors

The National Assembly for Wales

Partners:

Misha Slough LL.M. LL.B
Sara Chang Kee LL.B

Your Ref:

Via Email: SeneddPetitions@Assembly.Wales

Our Ref: ASF:MS:30000

Date: 29 April 2020

Dear Sirs

E- Petition: Fund the funeral costs of all NHS staff who die from or with Covid - 19

We write in support of the above petition as one of the largest firms practising Immigration Law in South Wales and the West of England. Our client base covers the whole of Wales and wider areas of the UK.

We act for a significant number of non British nationals who work for NHS Trusts as doctors, nurses, health care assistants, porters etc. The vast majority of these clients are prohibited from claiming any recourse to public funds in the UK for a period of either five or ten years depending on their visa route. During this period, they still pay the same tax and National Insurance contributions as British workers.

Non British citizens make up a significant proportion of our NHS personnel. They remain working on our frontline at the current time, often thousands of miles away from their home country and own families.

Given that all NHS workers are currently working under the same conditions regardless of nationality, we request that the petition be considered as including all NHS staff and not just those who hold British citizenship and/ or permanent residency rights in the UK.



Contracted with the Legal Aid Agency

Regulated by the Solicitors Regulation Authority Recognised
Body No: 440517

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10 Park Street
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Tel: 0117 915 4541
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We thank you for your consideration of this matter and please do not hesitate to contact our Cardiff office if you have any queries or require any additional information regarding this.

Yours sincerely

Misha Slough
ALBANY SOLICITORS



Ein cyf/Our ref VG/02766/20

Janet Finch-Saunders AM
Chair, Petitions Committee

Government.Committee.Business@gov.wales

5 May 2020

Dear Janet,

Thank you for your letter of 17 April seeking my views on the issues raised to fund funeral costs for all NHS staff who die from or with COVID-19.

I announced on 27 April the Welsh Government had established a special scheme that provided financial support of £60,000 to eligible beneficiaries of frontline staff, particularly those working in the NHS and Social Care as a result of being affected by COVID-19.

Our frontline workers are being asked to go above and beyond to deliver care and services for patients and individuals and this scheme goes some way to offer greater peace of mind and alleviate some financial hardship arising as a result of the loss of their loved ones.

Yours sincerely,

Vaughan Gething AC/AM
Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

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

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Gohebiaeth.Vaughan.Gething@llyw.cymru
Correspondence.Vaughan.Gething@gov.wales

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

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

P-05-960 Fund the funeral costs of all NHS staff who die from or with Covid-19, Correspondence – petitioner to Committee 07.05.20

It was when [REDACTED] a nurse in [REDACTED], died that myself and Prof Wahl-Jorgenson were inspired to start this petition. Our sons have known her son through school and sport. We saw her family having to rely on the kindness of friends and family to fund the funeral at such an awful time. None of us minded helping such a wonderful family but these costs and the decisions as to how to manage them are yet another burden to a family in the throes of grief.

The generosity of people giving to the too many health and social care workers we are losing is amazing, and a real sign that the public accept our collective duty in these cases, and families shouldn't have to rely on being able to set up crowdfunding.

Funeral costs are sudden, and are coming to families who have never thought about having to hold funerals for their loved ones. While the financial support payment is welcome, the reason we set up the petition was to take some of the emotional cost as well as the financial cost off people. We think that an announcement that all funerals are financially covered, so that everyone knows this is the case, would make a big difference to peace of mind, not just at the time when families are faced with this, but to NHS staff who must be worrying every day what would happen to their families if they died: in the same way that everyone knows about children's funerals. The 60k benefit will be stretched in many families to cover costs of supporting dependents, some of whom are very young and vulnerable. It is our view that a funeral cost arising from covid is a work related cost and as such should be covered in addition to death in service benefits.

We also note that BMA Cymru Wales* has expressed its disappointment in the rejection of their call for families of doctors to receive full death in service benefits. To also refuse the relatively modest funeral costs seems to us to be undervaluing the risk taken by our health and social care staff, especially when in some cases they have worked without suitable PPE.

However, if the Minister is determined that the financial support payment covers this, then we would accept this as fulfilling the petition if the financial support is made, at least in part, within a day of the death to make sure that funerals can take place in accordance with any religious observance or other reason; arrangements are made to help vulnerable people to deal with those costs, for example people without access to suitable banking services, little understanding of English, bereaved children; and the payments are going to all workers regardless of their nationality; tax free and without any detriment to benefits.

<https://www.bma.org.uk/news-and-opinion/bma-cymru-wales-says-welsh-government-s-death-in-service-benefit-for-families-of-healthcare-workers-may-not-go-far-enough>

with thanks

jane henderson

Agenda Item 3.1

P-05-908 CF3 against the Incinerator

This petition was submitted by Andrew Evans having collected 2,224 signatures online and TBC number on paper.

Text of Petition

A new incinerator is planned to be built in CF3 on Newlands Road, Wentloog Cardiff. This is in very close proximity to homes & schools. For example it is only 500 meters away from Eastern High School. Many residences and other schools within the CF3 are also well within a 1/2-mile radius of it.

The planned incinerator will burn 200,000 tonnes of industrial waste per year and will operate 24/7. It is planned to be built as early as 2020/21.

The industrial waste to be burned will be transported to the planned site using 80 lorries everyday each carrying 20 tonnes of waste. The toxic ash generated by the incinerator will also need to be transported away.

The size of the planned site is 1.5 rugby pitches in size with the main building being over 40 meters in height and the chimney stack being over 70 meters in height. We believe this incinerator is not what residents of CF3 want in their community.

We believe this will generate noise, air pollution, traffic and will not be good for the health of those living in the CF3 community.

Assembly Constituency and Region

- Cardiff South and Penarth
- South Wales Central

P-05-908 CF3 against the Incinerator

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Petition Number: P-05-908

Petition title: CF3 against the Incinerator

Text of petition:

A new incinerator is planned to be built in CF3 on Newlands Road, Wentloog Cardiff. This is in very close proximity to homes & schools. For example it is only 500 meters away from Eastern High School. Many residences and other schools within the CF3 are also well within a 1/2-mile radius of it.

The planned incinerator will burn 200,000 tonnes of industrial waste per year and will operate 24/7. It is planned to be built as early as 2020/21.

The industrial waste to be burned will be transported to the planned site using 80 lorries everyday each carrying 20 tonnes of waste. The toxic ash generated by the incinerator will also need to be transported away.

The size of the planned site is 1.5 rugby pitches in size with the main building being over 40 meters in height and the chimney stack being over 70 meters in height. We believe this incinerator is not what residents of CF3 want in their community.

We believe this will generate noise, air pollution, traffic and will not be good for the health of those living in the CF3 community.

-3



1. Background

Proposed development

Môr Harfen Bio Power are proposing to build an Energy Recovery Facility on Newlands Road, Cardiff. Newlands Farm, 140m from the proposed site, is the nearest residential property. The nearest residential estate is approximately 500m to the north east of the site. The Eastern High School, Trowbridge Primary School and St John Lloyd R.C. Primary School are all within a kilometre of the proposed site. The facility would be situated in the Gwent Levels - Rumney and Peterstone Site of Special Scientific Interest (SSSI).

The proposals are for a £150m energy-from-waste (EfW) facility which would incinerate 200,000 tonnes of commercial and industrial waste annually. This would generate 15 megawatts of electricity (MWe), enough energy to power approximately 30,000 homes per year.

In operation, it is estimated that there would be 116 vehicle movements per day between the hours of 6am and 6pm, Monday to Saturday (36 from cars and 80 from lorries). The incinerator would run 24 hours a day, seven days a week.

The 1.67 hectare facility would have an expected lifespan of 25-30 years. The building itself would be 47m high, with a chimney reaching 70m in height. Under the plans, the project would take two years to build, and is estimated to provide 40 permanent jobs on completion.

Planning process

The proposals are currently at the pre-application stage. The first round (PDF, 131KB) of public consultation ended on 29 November 2019.

As the proposed facility would generate more than 10 MWe, it is designated as a Development of National Significance (DNS). As such, the Welsh Government is responsible for the planning decision, rather than the Local Planning Authority, Cardiff Council.

The facility would require an environmental permit from Natural Resources Wales (NRW). An Environmental Impact Assessment (EIA) will need to be carried out and an Environmental Statement (ES) will need to accompany the planning application. The ES will include an assessment of the proposed facility's impacts in the following areas: air quality; noise and vibration; ecology; landscape and visual impact; transport; and flood consequences.

Further information on the planning process for a DNS can be found in "The Planning Series: 14 - Developments of National Significance" Research Service briefing. Môr Harfen Bio Power are intending to publish and consult (PDF, 131KB) on the draft planning application and associated ES in the coming months

The energy-from-waste debate

EfW facilities commonly burn waste that would otherwise go to landfill. The incineration process can reduce the volume of waste by up to **90%**. The bottom ash produced in the incinerator can be processed and **used in construction**. However, it has been **reported** (PDF, 1.2MB) that even after treatment, bottom ash could still be toxic and negatively impact the environment.

Campaigners have **stated** that the emissions from EfW incinerators - including heavy metals, dioxins and particulate matter - pose a danger to human health. A Defra **Waste Management Technology Brief** (PDF, 1.2MB) states that modern facilities are able to filter flue gases before their release, removing these pollutants. This process results in Air Pollution Control (APC) residues, which are classed as a hazardous material.

Public Health England (PHE) **commissioned** a series of studies into the impacts of municipal waste incinerators (MWIs) on health. The studies found no evidence for increased risk of infant mortality for children living close to MWIs. PHE's position on MWIs is that:

... modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small.

Analysis from the campaign group UK Without Incineration Network (UKWIN) suggests that the amount of carbon dioxide produced per kWh of electricity generated in EfW facilities is greater than at natural gas power stations, and only slightly less than at coal powered stations.

However, Recycle for Wales **state that** a conventional EfW plant can reduce greenhouse gas emissions by between 32% and 41% when compared to sending waste to landfill. This is because landfill sites release methane as well as other environmental **pollutants** such as leachate.

Campaigners have suggested that incinerators can **maintain incentives** for waste production as they require a continuous supply of waste throughout their lifetime. Germany has started to **import waste** to maintain its incinerators after its recycling rate increased.

2. Welsh Government action

Towards Zero Waste strategy

Towards Zero Waste, published in 2010, sets out the Welsh Government's current strategy for waste management. By 2050 Wales aims to re-use or recycle all waste, without the need for any landfill or energy recovery. As such, the strategy states that:

This means there will be far less need for residual waste treatment facilities such as energy from waste plants with the number and/or capacity required progressively reducing from 2025 to 2050.

The strategy incorporates the waste hierarchy from the EU Waste Framework Directive. In the hierarchy, EfW recovery sits above landfill as a management option, although it comes below waste prevention, re-use and recycling.

The strategy does recognise the role of EfW in the short to medium term plans for sustainable waste management. It sets a target for 70% of waste to be recycled by 2025, with the remaining 30% of waste to be sent to high efficiency EfW facilities.

Circular economy consultation

The Welsh Government is currently consulting on a new circular economy strategy.

The consultation document states that the Welsh Government will legislate to ensure key recyclables are banned from energy recovery and landfill. It also says that the Welsh Government will consult with the UK Government on whether an incineration tax would be desirable to increase recycling rates.

The consultation is open until 3 April 2020.

Minister's letter to Committee Chair

The Minister for Housing and Local Government, Julie James, wrote to the Chair of the Assembly's Petitions Committee on 26 February.

She stated that the proposed facility would be a DNS. As such, the planning application would be made directly to her as the Minister with responsibility for planning decisions. She therefore declined to comment on the petition as doing so may prejudice any future decision on proposals.

3. National Assembly for Wales action

In June 2019 Russell George AM called for the Welsh Government to implement a moratorium on all new incinerators while a review is carried out ahead of the development of a new national waste strategy:

Having noted the lack of a national plan myself, I certainly feel that a moratorium on all applications for incinerators should be put in place when a full and detailed review is carried out ahead of a plan being developed.

In response, the Minister for Housing and Local Government, Julie James, did not address the request for a moratorium however commented on the Welsh Government's "Towards Zero Waste" strategy:

My colleague Hannah Blythyn is actually undertaking a review of our 'Towards Zero Waste' strategy with a view to looking again at the circular economy in Wales. [...] Certainly, the end disposal of any waste that's remaining will be part of that relook. Obviously, a circular economy wouldn't have any waste in it and so there'd be a falling need for end-of-life disposal of that sort. So, we will be looking again at our 'Towards Zero Waste' policy, with a view to implementing as much of a circular economy in Wales as possible...

Mike Hedges AM made a statement in Plenary in June 2019, calling on the Welsh Government to ban new incinerators for non-medical waste:

[...] Will the Minister, in conjunction with ministerial colleagues, consider the following: banning new incinerators except for medical incinerators to deal with pathogens [...]

The Minister for Environment, Energy and Rural Affairs, Lesley Griffiths, responded:

I'm certainly very happy to have those discussions with a range of ministerial colleagues. Clearly, air quality is a matter across Government, and it's certainly discussed in Cabinet. But I will look at all those issues and write to you further.

Russel George AM laid a written question in July 2019, asking about the role of incinerators in the Welsh Government's plans for a "Zero Waste" economy.

In response the Deputy Minister for Housing and Local Communities, Hannah Blythyn, said:

The Welsh Government's preferred solution for treating waste which cannot be recycled is to utilise high efficiency energy from waste facilities, as this also prevents this material from becoming a problem elsewhere. [...]

Energy recovery from waste has a role to play for non-recyclable waste, provided the facilities meet development planning and environmental permitting requirements.

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-05-908
Ein cyf/Our ref: JJ/00221/20

Janet Finch-Saunders AM

Chair, Petitions Committee
National Assembly for Wales
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA

26 February 2020

Dear Janet,

Thank you for your letter of 11 February regarding Petition P-05-908 against the proposed Mor Hafren Energy Recovery Facility, Wentloog, which is a prospective Development of National Significance ("DNS") planning application. Such planning applications are made directly to the Welsh Ministers.

As Minister with responsibility for planning, my remit includes making decisions on all DNS planning applications. I therefore politely decline your offer for my views on the proposal as to do so may prejudice any future decision I make in relation to it were a DNS planning application before me.

Yours sincerely,

Julie James AC/AM
Y Gweinidog Tai a Llywodraeth Leol
Minister for Housing and Local Government

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

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Gohebiaeth.Julie.James@lyw.cymru
Correspondence.Julie.James@gov.Wales

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

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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.

P-05-908 CF3 against the Incinerator, Correspondence – Petitioners to Committee, 16.03.20

Andrew (the original organiser of this petition) forwarded to myself to compose a response to you.

My name is James Alderman, one of the founding members of the "Residents against the CF3 Incinerator" group (with other 3000 members).

To say I am disappointed by the attached response from Mrs James would be an understatement.

I understand completely that she can't comment fully on the planning/DNS side of things but it would have been nice for her to recognise the sheer scale of the resistance from the community against this Incinerator.

We are working alongside Vaughan Gething who has come out publicly as opposing this Incinerator, and also Stephen Doughty.

We also worked with Cardiff Council who have also opposed this development.

Please pass on the link to the debate when it is held. I have over 3000 concerned residents who will want to see this debate.

Thanks

James Alderman

Agenda Item 3.2

P-05-946 Save Royal Glamorgan A&E

This petition was submitted by Geraint Williams having collected 13,342 signatures online and 1,222 on paper, a total of 14,564 signatures.

Text of Petition

There are serious concerns that a closure or partial closure of A&E services at Royal Glamorgan Hospital could be taking place very soon. This will have a significant impact on access to A&E for patients in Rhondda Cynon Taff and will also put additional pressures on A&E departments in Merthyr Tydfil, Cardiff and Bridgend. The Welsh Government should intervene and do all it can to prevent any reduction of service in the provision of A&E Services at Royal Glamorgan Hospital and do all it can to facilitate the recruitment and appointment of badly needed A&E Consultants to the health board.

Assembly Constituency and Region

- Merthyr Tydfil and Rhymney
- South Wales East

P-05-946 Save Royal Glamorgan A&E

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Reference: RS20/11947

Introduction

Petition number: P-05-946

Petition title: Save Royal Glamorgan A&E

Text of petition: There are serious concerns that a closure or partial closure of A&E services at Royal Glamorgan Hospital could be taking place very soon. This will have a significant impact on access to A&E for patients in Rhondda Cynon Taff and will also put additional pressure on A&E departments in Merthyr Tydfil, Cardiff and Bridgend. The Welsh Government should intervene and do all it can to prevent any reduction of service in the provision of A&E Services at Royal Glamorgan Hospital and do all it can to facilitate the recruitment and appointment of badly needed A&E consultants to the health board.



Background

In 2014, an agreement was made to centralise accident and emergency care (A&E) in fewer hospitals across South Wales. Health Boards agreed that the current configuration of A&E services was fragile in terms of their ability to deliver safe and sustainable models of care and the medical recruitment difficulties affecting these services. The primary recommendation of the NHS South Wales Programme was that consultant-led services within the scope of the programme should in future, be strengthened and delivered from five hospitals within the region:

- University Hospital of Wales, Cardiff;
- Morriston Hospital, Swansea;
- Grange University Hospital, Cwmbran;
- Prince Charles Hospital, Merthyr Tydfil; and
- Prince of Wales Hospital, Bridgend.

A key consequence of this was a reduction in consultant-led services to be delivered in future from the Royal Glamorgan Hospital. The recommendation to deliver consultant-led 24 hour A&E services across fewer hospital sites meant replacing the 24 hour consultant-led A&E service at the Royal Glamorgan Hospital with a nurse-led minor injuries unit.

However, the recommendation remains unimplemented. It has now been six years since the recommendation was agreed, and so the context in which the specific South Wales Programme recommendation was made has changed. Changes include the new footprint of Cwm Taf Morgannwg University Health Board.

Following recommendations made in a number of recent reports (including a November 2019 Targeted Visit Report by Health Education and Improvement Wales and the Wales Audit Office/ Healthcare Inspectorate Wales Review of quality governance arrangements at Cwm Taf Morgannwg University Health Board), the Health Board decided in October 2019 that it needed to revisit and progress the recommendations of the South Wales Programme.

In November 2019, Cwm Taf Morgannwg University Health Board established a project to look at how it could take forward the recommendations made by the South Wales Programme – with the aim to develop and agree service models by Spring 2020, and implementation commencing in September 2020. The initial work on

the project has been informed by a Health Board-wide clinical leaders workshop held on 29 November 2019.

Current Situation

Currently, A&E services continue to be delivered from three sites in Cwm Taf Morgannwg Health Board:

- Princess of Wales Hospital, Bridgend;
- Royal Glamorgan Hospital, Llantrisant; and
- Prince Charles Hospital, Merthyr Tydfil.

However, recent service and staffing pressures have highlighted the challenges facing A&E services at the Royal Glamorgan Hospital. In a Board paper for its meeting on 30 January 2020, Cwm Taf Morgannwg University Health Board state that “the situation is becoming increasingly unsustainable and safe services cannot be sustained beyond the immediate short term without unacceptable risks to patient safety” (p.104).

The Board paper explains that in December 2019, ambulances had to be diverted from the Royal Glamorgan Hospital to Prince Charles Hospital in Merthyr Tydfil due to a shortage of middle-grade doctors. It also states that staffing levels at all three of Cwm Taf Morgannwg’s A&E units are well below UK standards. It makes the point that the Royal Glamorgan Hospital has been dependent on locum emergency department doctors. Further, it states that the upcoming retirement of the only full time A&E consultant at the hospital will mean that from April 2020 the current staffing model at the Royal Glamorgan Hospital, already heavily reliant on agency staff, becomes further challenged (see page 104). At the moment, consultant-led 24 hour A&E services are being delivered at the Royal Glamorgan Hospital, with consultants from Princess of Wales Hospital providing some cover.

Options for the future of A&E services at the Royal Glamorgan Hospital

The Health Board states that recent pressures highlight that the rationale for the changes recommended by the South Wales Programme “remain valid” (p.99) and have only become more pressing. It also states that it is considering and assessing alternative options, in addition to the original specific South Wales Programme recommendations.

The Health Board's January Board paper sets out two favoured options for the future of A&E at the Royal Glamorgan Hospital (see page 112). The first option would close the consultant-led A&E service at Royal Glamorgan Hospital, replacing it with a 24 hour nurse-led minor injuries unit. The second option would be to close the hospital's A&E department overnight, but keep a minor injuries unit open. Both options would involve looking at alternative ways of working to increase access to primary care and community services (both in and out of hours), and ways in which patients could be admitted directly onto wards at the hospital in the absence of A&E.

Cwm Taf University Health Board's response to the Petition

On 11 February 2020, the Health Board made a Statement on the Royal Glamorgan Hospital explaining that "no decisions about the best solution and actions have been made". It went on to say that "conversations are taking place with staff and communities, listening to people's concerns".

On 27 February 2020, the Chair of Cwm Taf Morgannwg University Health Board, Professor Marcus Longley reiterated in a meeting with Assembly Members of the Health, Social Care and Sport Committee that 'no stone will be left unturned' in attempts to make the current system safe and sustainable. This would mean recruiting sufficient specialist emergency doctors to maintain a 24 hour consultant-led service, though Professor Longley explained that "we can't simply recruit our way out of this easily" (para 9). At the same meeting, the Health Board admitted that "the focus at the Royal Glamorgan has been to appoint locum doctors, rather than substantive consultants" (para.71).

In his letter to the Chair of Petitions Committee on 4 March 2020, the Chief Executive of Cwm Taf University Health Board again stresses that **no decision has been made** by the Health Board on the future provision of A&E services at the Royal Glamorgan hospital. The Health Board explains that "we are not simply accepting that the original South Wales Programme recommendation in relation to the Royal Glamorgan Hospital emergency department remains valid".

The Health Board's February 2020 Board paper provides details of the work of the project so far.

In its letter, the Chief Executive states:

We are following an appropriate and open process, subject to public and political scrutiny, that will result in defined options being brought to the Board for further consideration and, ultimately a formal Board decision on future service delivery. I do not think it would be appropriate for the Welsh Government to intervene in this process.

Welsh Government response

In response to a question from Leanne Wood AM in Plenary on 11 February 2020, the First Minister, Mark Drakeford AM, stated his view that "it is for doctors, not politicians, to decide the future of the Royal Glamorgan Hospital's A&E department" (para.55). The First Minister said that the South Wales Programme was led by doctors and clinicians in the health service, and that a decision on the future of A&E services should be made by them.

In Plenary on 12 February 2020, Leanne Wood AM asked the Minister for Health and Social Services, Vaughan Gething AM, whether he agreed with the First Minister - that the decision about the future of the A&E department at the Royal Glamorgan Hospital should be made by doctors. The Minister responded saying that the decision was a matter for the Health Board but that he expected the Health Board to listen to and engage with the medical workforce and the public. The Minister explained in his response that "emergency medicine is a shortage area of practice" (para 122), highlighting the difficulties there are recruiting the right number of permanent consultants to deliver a safe service - not just in Cwm Taf Morgannwg University Health Board, but across Wales and the UK.

During the Welsh Conservatives debate that followed, several Assembly Members, including some Labour backbenchers, called on the Welsh Government to intervene 'to prevent the downgrading or closure of A&E services at the Royal Glamorgan Hospital'. Members questioned whether the staffing shortages at the A&E department in the Royal Glamorgan Hospital were due to the uncertainty around its future. They questioned whether it has been difficult to attract doctors to work in the department because it's future has been unclear.

On 27 February 2020, the Medical Director of Cwm Taf Morgannwg University Health Board, Dr Nick Lyons accepted in a meeting with Assembly Members of the Health, Social Care and Sport Committee that the South Wales Programme, when agreed in 2014, made recruitment more difficult (para 66).

On 10 March 2020, in response to a question from Adam Price AM, the First Minister stated it would not intervene in the Health Board's decision on A&E Services, explaining that:

There is a very well set out and legally necessary process by which a decision arrives on the desk of a Welsh Minister. That is a process in which those organisations that have a legal right to refer a matter to the Minister's desk are the people who have to do that, if they choose to do it. We're not at that point. The health board will have to make its determination, and then an organisation, such as a community health council, who can refer that matter to a Minister for determination, would have to decide to do that. That's how the process works. That's how the process has to work to be legally watertight. And, we're not at that point. We may not get to that point, because the decision has to be referred for a Minister to take a decision. But, if it does happen, Ministers have legal responsibilities. And that's why it has been so important, in all of that, that Ministers don't pre-judge a situation in which any decision they then made would be vulnerable to challenge.

In his letter to the Chair of the Petitions Committee, the Minister for Health and Social Services states "At this stage, the proposals remain a matter for the health board to determine. However, it is possible that, in line with the guidance, the final decisions may be referred to me for consideration". The Minister goes on to say:

I am currently unable to comment on any of the proposals, as it may compromise my future role in the process. I do, however, encourage you to engage with the health board and have your say in helping to shape future services. Further information on how you can get involved can be found here: <https://cwmtafmorgannwg.wales/proposed-service-changes-at-royal-glamorgan-hospital/>



Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

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4 March 2020
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Chair and Chief Executive

Ms Janet Finch-Saunders AM
Chair
Petitions Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

Dear Ms Finch-Saunders

Petition P-05-946 Save Royal Glamorgan A&E

Thank you for your letter of 10 February 2020 and for inviting my views on the above petition and the issues it raises.

Firstly, I must stress that no decision has been made by the University Health Board in relation to the future provision of emergency medicine at the Royal Glamorgan Hospital (RGH). We have, however, established a project to address the outstanding recommendations of the South Wales Programme, which includes an extant decision, previously endorsed by the former Cwm Taf UHB, NHS Wales and Welsh Government, that a consultant led emergency medicine department (A&E) should no longer operate at the RGH and that it should be replaced by a nurse led minor injuries unit.

The background to, and rationale for, the current project are set out in the enclosed paper that was considered by our Board in January. This makes clear that we are not simply accepting that the original SWP recommendation in relation to the RGH emergency department remains valid.

At the January Board meeting, a decision was made to further develop two options for further assessment, whilst 'leaving no stone unturned' in attempts to seek to recruit sufficient specialist emergency medicine doctors to maintain a 24 hour consultant led service. The two options being developed further are described in the enclosed second paper, received by the Board at its February meeting.

Cyfeiriad Dychwelyd/ Return Address:

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg, Pencadlys, Parc Navigation, Abercynon, CF45 4SN
Cwm Taf Morgannwg University Health Board, Headquarters, Navigation Park, Abercynon, CF45 4SN

Cadeirydd/Chair: Professor Marcus Longley Prif Weithredwr/Chief Executive : Dr Sharon Hopkins

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg yw'r enw swyddogol Bwrdd Iechyd Lleol Prifysgol Cwm Taf Morgannwg
ICwm Taf Morgannwg University Health Board is the operational name of the Cwm Taf Morgannwg University Local Health Board

The February Board paper also provided a briefing on the activity conducted within the project up to that point, with a particular emphasis on our extensive engagement with the public and staff and the messages we have received. We have ensured that Welsh Government officials and Ministers have been kept informed of progress.

In summary, we are following an appropriate and open process, subject to public and political scrutiny, that will result in defined options being brought to the Board for further consideration and, ultimately a formal Board decision on future service delivery. I do not think it would be appropriate for the Welsh Government to intervene in this process.

Kind regards.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Sharon Hopkins', followed by a long horizontal flourish.

Dr Sharon Hopkins
Prif Weithredwr/Chief Executive



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

AGENDA ITEM

3.3

CTM BOARD

SOUTH WALES PROGRAMME – PROGRESSING OUTSTANDING RECOMMENDATIONS

Date of meeting

30/01/2020

FOI Status

Open/Public

If closed please indicate reason

Not Applicable - Public Report

Prepared by

██████████ Programme Director

Presented by

██████████ Executive Medical Director (SRO)

Approving Executive Sponsor

Executive Medical Director

Report purpose

FOR APPROVAL

Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals

Date

Outcome

PID and Resources Paper previously approved by Management Board

18/12/2018

ENDORSED FOR APPROVAL

ACRONYMS

A&E

Accident and Emergency (Emergency Medicine and Emergency Department are now the preferred terms)

CHC

Community Health Council

CRG

Clinical Reference Group

ED

Emergency Department

EM

Emergency Medicine

MIU	Minor Injuries Unit
PCH	Prince Charles Hospital
POW	Princess of Wales Hospital
RGH	Royal Glamorgan Hospital
SWP	South Wales Programme
UHB	University Health Board
UHW	University Hospital of Wales
WAST	Welsh Ambulance Service NHS Trust

1. SITUATION AND BACKGROUND

1.1 Situation

A number of recommendations of the South Wales Programme (SWP), agreed by all health boards in South Wales in 2014, remain unimplemented. Perhaps most importantly, consultant led 24 hour emergency medicine services continue to be delivered from three sites in the Health Board: Princess of Wales Hospital (POW), Bridgend, Royal Glamorgan Hospital (RGH), Llantrisant and Prince Charles Hospital (PCH), Merthyr Tydfil.

Inpatient paediatric services also continue to be delivered at RGH. The SWP recommendations included a transition to a nurse led minor injuries unit (MIU) and an end to inpatient paediatric services at RGH.

Other recommendations of the SWP, including in relation to maternity and neonatal services have been fully implemented.

Recent service and staffing pressures have highlighted that the rationale for the changes recommended by the SWP remain valid and have only become more pressing.

As a result, in November 2019, the Health Board established a project, within the regional context, to take forward the implementation of the remaining recommendations of the SWP. As a first step, and in recognition of relevant recent changes, the project is considering and assessing alternative options, in addition to the original specific SWP recommendations, as described below, in order to ensure the very best model of care.

1.2 Background: The South Wales Programme

Introduction to the South Wales Programme

The South Wales Programme (SWP) within NHS Wales was set up in 2012 to look at the future of four **consultant-led** hospital services:

- maternity services
- neonatal care
- inpatient paediatrics
- emergency medicine (EM)

These services were selected for consideration due to their fragility, in terms of their ability to deliver safe and sustainable models of care, as then configured (see below for further information on the rationale).

The SWP was a partnership of the five health boards serving people living in South Wales and South Powys, working with the Welsh Ambulance Service NHS Trust (WAST). The then Cwm Taf UHB and Abertawe Bro Morgannwg UHB were partners in the SWP.

Extensive work was undertaken over a two year period to prepare plans for the future configuration of services, central to which was clinical leadership, engagement and professional advice, complemented by broader stakeholder engagement and formal periods of engagement and consultation. Much of the work was undertaken through the vehicle of specialty specific Clinical Reference Groups (CRGs), with multi-disciplinary clinical membership drawn from across the region.

Further extensive information continues to be available via the SWP website¹.

Recommendations of the South Wales Programme

Following extensive public consultation in 2013, the recommendations of the SWP were finalised. Decisions on the outcome of the programme were taken by health boards and WAST at Board meetings in February 2014 and the collective position of all partner organisations was confirmed in March 2014.

In headline terms, the primary recommendation of the SWP was that the consultant-led services within the scope of the programme should, in future, be strengthened and delivered from five hospitals within the region:

- University Hospital of Wales (UHW)
- Morriston Hospital
- Grange University Hospital (then referred to as the SCCC)
- Prince Charles Hospital (PCH) – within CTMUHB
- Princess of Wales Hospital (POW) – within CTMUHB (then ABMU)

A key consequence of this was a reduction in consultant led services to be delivered in future from the Royal Glamorgan Hospital (RGH) in maternity, neonatal, in-patient paediatric and emergency medicine services, but with a refocussing on the development of innovative new models of acute medicine at RGH, and an increased role in diagnostics, outpatient and ambulatory care across South Wales.

¹ <http://www.wales.nhs.uk/SWP/home>

Rationale for the South Wales Programme recommendations

The clinically-endorsed rationale for the changes recommended by the SWP was set out, in detail during the public consultation process² and is summarised below:

- NHS Wales was facing unprecedented challenges, as set out below, and there was a need for timely action to ensure the continued delivery of safe and sustainable services.
- Although most patients in South Wales and South Powys received very good treatment, and standards were improving, the highest quality of care was not delivered for everyone all of the time.
- There was a concern that NHS Wales would start to fall behind other countries in keeping people well and in treating illness and injuries.
- There was a desire to ensure that people did not have to come to hospital unless absolutely necessary, and so there was a need to strengthen primary care and community services.
- It was considered necessary for the sickest patients attending hospital to have rapid access to treatment from senior clinicians, whatever time of day or night.
- There was a desire to offer everyone the benefits of medical advances.
- It was recognised that modern, safe and effective medicine could only be delivered by teams of doctors, nurses and therapists with regularly used specialist skills. It was further recognised that this could not be provided in every hospital because there were not enough specialists, but even if there had been more, they would not have been able to keep up their skills because they would not have been seeing enough patients.
- Each specialist team had, and was supported by, doctors-in-training – the specialists of the future. There was an identified need for more of these doctors-in-training and training had become more complex, as medicine had become more specialised.
- Doctors-in-training needed to see large numbers of patients to ensure they had the necessary experience and skills to specialise.
- Because the service was trying to run services in too many places there were frequent shortages of doctors-in-training and consultants.
- Not only did this make providing safe services difficult, it made it harder to fill consultant posts and impacted on the quality of teaching for the doctors-in-training that did exist.
- It was concluded that the NHS in South Wales could not continue as before. Consultant-led services in the scope of the SWP needed to be provided together, in fewer hospitals as part of a wider integrated healthcare network.

² <http://www.wales.nhs.uk/sitesplus/documents/1077/SWP%20consultation%20document%20FINAL.pdf>

- The evidence was deemed to be clear that doing this would improve the outcomes of care for patients even if they had to travel further for this treatment.
- It was also concluded that, if we did not take immediate action, there would be a very real risk that we would be forced to take emergency measures when one of these services failed.

The above rationale needs to be tested in its details, but remains valid. In some respects, the situation described by the SWP has since become more urgent (see below).

Current status of the SWP recommendations in CTMUHB

Implementation of the recommendations was, and remains, primarily a health board responsibility, with regional planning mechanisms being put into place to ensure the ongoing coordination of implementation and additional work across health board boundaries.

The position agreed through the SWP, with a specific focus on services at RGH, together with the current status in CTMUHB, is set out in the table below:

Services	Agreed position at end of SWP in 2014	Current status
Obstetric and Neonatal services	Consultant-led obstetric and neonatal services should not be delivered from the RGH site in the future.	Fully implemented Consultant led obstetric and neonatal services now delivered from PCH and POW. There is a new midwifery led birth centre at RGH (the Tirion Centre) and a new neonatal unit opened at PCH in March 2019.
Acute Medicine, Ambulatory Care and Diagnostics	RGH should develop a significant role in diagnostics and ambulatory care, supporting the wider network of hospitals within a South Wales Central Alliance, and become a 'beacon site' for developing innovative models of care in	Partially implemented A new 50 bed Acute Medicine Unit, co-located with the RGH ED was opened in September 2015. The unit bolsters the ability to treat patients with complex comorbidities and minor injuries ³ .

³ An audit by the Society for Acute Medicine (2015) showed there was an increase in the percentage of patients seen by a consultant within eight hours of admission by day and within 14 hours for overnight admissions, putting the consultant team in the top 5 of 82 participating acute medicine departments. A GMC Survey (2015) reported acute medicine in RGH as an "above outlier" for overall satisfaction and adequate

	acute medicine and diagnostic services.	A Diagnostic Hub at RGH, providing regional services, was opened in February 2018.
Services	Agreed position at end of SWP in 2014	Current status
Inpatient Paediatric services	Consultant-led inpatient paediatric services should not be delivered from the RGH site in the future.	Not implemented, but planning has progressed A consolidation of RGH and PCH inpatient paediatric services on the PCH site was originally scheduled to take place in June 2019 and was subsequently postponed several times. To ensure a safe and seamless transition, and allow time to consider and develop new models at RGH, this move is currently planned for late 2020.
Emergency Medicine (EM)	Twenty four hour consultant-led EM services should not be delivered from the RGH site in the future. The RGH Emergency Department (ED) should, over time, move from a consultant-led service dealing with major cases to a nurse practitioner led service dealing with minor injuries (MIU), co-located with a GP out of hours service and enhanced selected 24 hour medical intake ⁴ .	Not implemented Consultant-led 24 hour emergency medicine services continue to be delivered from three sites in the UHB (POW, RGH and PCH) and there is no currently fully developed plan for an alternative service model.

experience. Since implementation there are higher zero day lengths of stay as the model includes capacity for rapid diagnostics and consultant review. The presence of a senior decision maker at the front door of an acute medical intake has reduced the overall bed occupancy.

⁴ <http://www.wales.nhs.uk/sitesplus/documents/1077/QAs%20-%20Programme%20Board%20Recommendations%20Final.pdf>



2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

2.1 Current issues with delivery of ED services in CTMUHB

As stated above, CTMUHB has continued to deliver consultant-led 24 hour emergency medicine services from three sites. This situation is becoming increasingly unsustainable and safe services cannot be sustained beyond the immediate short term without unacceptable risks to patient safety.

A November 2019 *Targeted Visit Report* of a Health Education and Improvement Wales visit to the PCH ED recommended that “work regarding the amalgamation of the Royal Glamorgan and Prince Charles Hospitals in line with the South Wales plan continues”.

The recent Wales Audit Office/Healthcare Inspectorate Wales *Review of quality governance arrangements at Cwm Taf Morgannwg University Health Board*⁵ stressed that the UHB “needs to take a strategic and planned approach to improve risk management across the breadth of its services. This must ensure that all key strategies and frameworks are reviewed, updated and aligned to reflect the latest governance arrangements”.

Staffing levels, in relation to activity levels, at all three EDs are well below national workforce benchmark levels.

The following recent developments in the RGH ED significantly increased the risk of the need take urgent action to ensure service continuity:

- In the evenings of both 25 and 26 December 2019, due to sickness of middle grade ED doctors, the ED department at RGH was not able to maintain normal medical staffing levels.
- With support and agreement from WAST, ambulances were, therefore, diverted to PCH on both nights. The department remained open to minor injuries and any patient self-presenting.
- In the last week of December 2019, the Health Board received the resignation of the only substantive ED consultant at RGH from April 2020. In addition to the loss of middle grade locum doctors, this expected retirement means that the current staffing model at RGH, already heavily reliant on agency staff, becomes further challenged.

⁵ <https://www.audit.wales/publication/joint-review-cwm-taf-morgannwg-university-health-board>

2.2 Project to implement the remaining recommendations of the SWP in CTMUHB

Purpose, aim and scope of the project

Following engagement with clinicians and managers across the health board, the Health Board has formally established a project, within the South Wales regional context, to address the remaining implementation of the SWP recommendations within the health board, specifically including the development and implementation of:

- local service models for emergency medicine, across the Health Board footprint and within the regional context
- an appropriate paediatric service model at RGH
- completion of the acute medicine beacon site model at RGH
- the already planned transfer of consultant led inpatient paediatric services from RGH to PCH.

The aim of the project is to develop and agree service models by Spring 2020, with implementation commencing in September 2020 (noting the interrelationship and interdependencies with actions to ensure service continuity in the meantime).

Key work-streams within the project include:

- Communications and engagement
- Data analysis, modelling and evaluation
- Transport and patient access
- Workforce and OD
- Finance
- Capital and accommodation.

Establishment and governance of the project

Informal discussions between the Medical Director and senior clinicians about the need to revisit and progress the recommendations of the SWP commenced in October 2019. Following these discussions, a Project Initiation Document (PID) was subsequently drafted and approved by the Health Board Management Board in October, with the identification of the Medical Director as Project Senior Responsible Officer (SRO).

To support the SRO, a project team including a Programme Director and a Quantitative Planner were identified during November and December 2019, to work alongside current Planning and Programme Management Office departments. A clinical lead is to be appointed.

Because of the regional dimension to the project, and in line with the agreement at the end of the SWP, the project has a dual line of accountability:

- within the Health Board, via an internal project board and the SRO, to the Board
- regionally, via a regional project board, to the Regional Planning and Delivery Forum

The internal Health Board project board has been established and met for the first time on 7 January 2020.

The establishment of the project has been reported formally to the South Central and East Wales Regional Planning and Implementation Group at its January meeting and this was well received, with a commitment from partner organisations to engage appropriately. The regional project board is planned to meet for the first time in February 2020.

Project ways of working

As with the SWP, and in alignment with the Health Board values and behaviours, the project is being conducted with a focus on:

- safety, quality and patient experience
- clinical leadership and involvement
- open engagement and communication with internal and external stakeholders, including staff, the public, elected representatives and partner organisations

The initial work on the project has been informed by a Health Board-wide Clinical Leaders Workshop held on 29 November 2019.

Ongoing clinical leadership and engagement is being ensured through the role of the SRO, the membership of the internal and regional project boards, the planned appointment of a clinical lead and, importantly, through the re-establishment and operation of the following Clinical Reference Groups (CRGs), as used by the SWP:

- Emergency Medicine (chair briefing 14/1/20; first meeting 13/2/20)
- Acute Medicine (chair briefing 9/1/20; first meeting 12/2/20)
- Paediatrics (chair briefing 27/1/20); first meeting TBC)

In view of the relevant links and interdependencies, there will also need to be close working with, and consideration of the implications of changes for, surgery, anaesthetics, critical care, primary care and other services.

Key external stakeholders have been briefed informally by the Chair, Chief Executive and Executive Medical Director on the establishment of the project and the Programme Director has, together with the Assistant Director of Planning and Partnerships, briefed Community Health Council (CHC) officers on 17 January 2020. A further, formal, briefing is being provided at the CHC Service Planning Committee on 27 January 2020, following the publication of this Board paper.

A formal engagement and communications plan is being finalised and includes arrangements for:

- engagement and communication with staff across the Health Board and their union representatives
- ongoing formal engagement with the CHC (including at a planned additional Service Planning Committee on 14 February, at which it is intended to agree the wider programme of formal public engagement)
- both formal and informal engagement events with the public (including through already planned 'Let's Talk Healthcare' events)
- engagement and communication with other key stakeholders, including elected representatives, local government and Welsh Government.

2.3 Options for further consideration by the project

Within the context of the newly established project, it is recognised that the overall rationale for the SWP recommendations (as summarised above) remains valid and the need for action has only become more urgent since the recommendations were made, consulted on and accepted. It is, however, recognised that, in the six intervening years, there have been specific changes that create a different context within which the specific SWP recommendations for emergency medicine in CTMUHB should be reconsidered. These changes include:

- the footprint of the new CTMUHB, which includes three emergency departments (RGH, POW and PCH) and which potentially facilitates service delivery and staffing options that may have been more difficult to implement across health board boundaries
- the development of emergency department service models elsewhere in the UK that may provide lessons for service delivery in CTMUHB and South Wales
- further development of the 'care closer to home' concept within the Health Board
- the implementation of a Major Trauma Network in South Wales from April 2020
- the planned opening of the Grange University Hospital, and subsequent changes to services delivered by Nevill Hall Hospital in Aneurin Bevan UHB

- further exacerbated staffing issues affecting the nursing, as well as the medical, workforce
- extensive new housing developments in the areas of the Health Board adjacent to Cardiff
- increasing experience of ambulatory care models.

As a result of the above, the project SRO, in discussion with relevant clinicians and managers across the Health Board and with input from the new project board, has, through a process of ongoing iteration, developed the following high level options for potential further consideration:

Option	Specific features	Common features
Option 1	Implementation of the remaining SWP recommendations Transition the RGH Emergency Department (ED) from a consultant-led service to a 24 hour nurse practitioner led Minor Injuries Unit (MIU).	Implementation of already planned move of inpatient paediatrics from RGH to PCH in September 2020
Option 2	Implementation of the remaining SWP recommendations with additional service changes Transition the RGH Emergency Department (ED) from a consultant-led service to a 24 hour nurse practitioner led Minor Injuries Unit (MIU). Increase access to 'care closer to home' across the Health Board for those not requiring ED services, through enhanced access to primary care and community services (in and out of hours), in line with the agreed transformation programmes of the Regional Partnership Board.	Development and implementation of an appropriate paediatric service model at RGH (tailored to interface appropriately with the selected ED service model) GP admissions and paramedic differentiated admissions (of appropriate acuity) direct to RGH wards 24 hours
Option 3	No significant changes to the existing RGH ED service, beyond those required by the establishment of the Major Trauma Network and the transfer of paediatric inpatient services Twenty four hour consultant-led EDs to continue at RGH, POW and PCH.	Ongoing development of RGH acute medicine, ambulatory care and diagnostic services, in line with the SWP
Option 4	Overnight reduction in the hours of consultant led ED at RGH	



	<p>Consultant-led EDs to continue at RGH, POW and PCH, but with an overnight reduction in the hours of the RGH ED (exact operational hours to be determined based on modelling of demand).</p> <p>Determine how best to deliver a nurse practitioner-led Minor Injuries Unit (MIU) on the RGH site during the hours when a consultant-led ED is not provided.</p>	
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Modelling work, informed by that done by the SWP, has commenced to assess the patient access and flow implications of the above options, and to help define more specific and detailed 'optimal' service models under each option, with clinical involvement through the emerging CRGs and using the most up to date data available.

Following discussion at the first project board, it is recommended that:

- in light of the Health Board's wider approach and commitment to the Regional Partnership Board transformation programmes, it would be inconceivable that Option 1 would be implemented without the types of additional service change that are described under Option 2. As such, Option 1 should be rejected at this stage
- Option 3, which was deemed to be unsustainable by the SWP, remains unsustainable and difficulties in mainlining services on a day to day basis have only increased. As such, Option 3 should be rejected at this stage.

It should be noted that members of the project board discussed potential alternative approaches, differing from the recommendations of the SWP, based on a focusing of ED services on a single site within the health board (either at an existing site or in a newly built hospital). This is incompatible with clinical pathways and sustainability of services.

As a result of the above considerations, it is recommended that the options set out in the Recommendations section of this paper (Section 5) should be prioritised for further, more detailed, development and assessment within the project structure, primarily through the work of the CRGs and the associated modelling.



2.4 Service continuity

Until changes developed and recommended by the current project are implemented, there will need to be a parallel focus on ensuring safety and workforce sustainability relating to the ongoing delivery of EM services at all three EDs within CTMUHB. This work will be, primarily, an operational matter and will not be conducted under the auspices of the project. There will, however, be a need to ensure close ongoing liaison between the two processes, with an emphasis on ensuring that ongoing operational decisions remain compatible with the emerging direction of the project.

3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD

The following are key risks and issues relating to, and stemming from, the project:

- There is a need to ensure that operational action is taken to ensure safe service continuity of service provision prior to the implementation of future project recommendations. This will be particularly challenging from 1 April 2020, following staff resignations.
- Any service changes will be controversial and contested by relevant stakeholders.
- The need for urgent responses to changing circumstances, prioritising patient safety, may lead to decisions and changes needing to be made by the Health Board without as much analysis/engagement/consultation etc. as would be optimal.
- The regional nature of the project, with the need for involvement of other health boards in the development, assessment and implementation of solutions and the overall governance, may compromise rapid decision making.
- Resource constraints, including in relation to capital investment may compromise the ability to implement optimal service models.



4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	Yes (Please see detail below)
	To be considered within the scope of the project.
Related Health and Care standard(s)	Safe Care
	All standards applicable
Equality impact assessment completed	No (Include further detail below)
	To be addressed as part of the project.
Legal implications / impact	Yes (Include further detail below)
	To be considered within the scope of the project.
Resource (Capital/Revenue £/Workforce) implications / Impact	Yes (Include further detail below)
	To be considered within the scope of the project.
Link to Main Strategic Objective	To Improve Quality, Safety & Patient Experience
Link to Main WBFG Act Objective	Provide high quality care as locally as possible wherever it is safe and sustainable

5. RECOMMENDATION

The Board is invited to **APPROVE** the continuation of the project and the further consideration of specified options, in ongoing engagement with internal and external stakeholders, with progress reports to be provided to each Board meeting.

Specifically, it is recommended that the project should focus on the further development, assessment and evaluation of the following options and the development of proposals for implementation, as shown in the table overleaf:



Option	Specific features	Common features
Option A	<p>Implementation of the remaining SWP recommendations with additional service changes</p> <p>Transition the RGH Emergency Department (ED) from a consultant-led service to a 24 hour nurse practitioner led Minor Injuries Unit (MIU).</p> <p>Increase access to 'care closer to home' across the Health Board for those not requiring ED services, through enhanced access to primary care and community services (in and out of hours), in line with the agreed transformation programmes of the Regional Partnership Board.</p>	<p>Implementation of already planned move of inpatient paediatrics from RGH to PCH in September 2020</p> <p>Development and implementation of an appropriate paediatric service model at RGH (tailored to interface appropriately with the selected ED service model)</p>
Option B	<p>Overnight reduction in the hours of consultant led ED at RGH</p> <p>Consultant-led EDs to continue at RGH, POW and PCH, but with an overnight reduction in the hours of the RGH ED (exact operational hours to be determined based on modelling of demand).</p> <p>Determine how best to deliver a nurse practitioner-led Minor Injuries Unit (MIU) on the RGH site during the hours when a consultant-led ED is not provided.</p>	<p>GP admissions and paramedic differentiated admissions (of appropriate acuity) direct to RGH wards 24 hours</p> <p>Ongoing development of RGH acute medicine, ambulatory care and diagnostic services, in line with the SWP</p>



GIG
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WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

AGENDA ITEM

2.1

CTM BOARD

SOUTH WALES PROGRAMME – PROGRESSING OUTSTANDING RECOMMENDATIONS - UPDATE REPORT

Date of meeting	27/02/2020
FOI Status	Open/Public
If closed please indicate reason	Not Applicable - Public Report
Prepared by	██████████ Programme Director
Presented by	██████████ Executive Medical Director (SRO)
Approving Executive Sponsor	Executive Medical Director
Report purpose	FOR DISCUSSION / REVIEW

Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals	Date	Outcome
This specific paper has not been considered by any other committee or group. Progress with the project has separately been reported to Management Board	20/02/2020	NOTED

ACRONYMS

CHC	Community Health Council
CRG	Clinical Reference Group
ED	Emergency Department



EM	Emergency Medicine
GP	General Practitioner/General Practice
MIU	Minor Injuries Unit
PCH	Prince Charles Hospital
POWH	Princess of Wales Hospital
RGH	Royal Glamorgan Hospital
SWP	South Wales Programme
UHB	University Health Board
WAST	Welsh Ambulance Service NHS Trust

1. SITUATION AND BACKGROUND

1.1 Situation

In September 2019 consideration of the future model for emergency services began in earnest again and in November 2019, the University Health Board established a formal project, within the regional context, to take forward the consideration of the implementation of outstanding recommendations of the South Wales Programme (SWP). As a first stage, the project is considering and assessing alternative options, focusing on emergency medicine at the Royal Glamorgan Hospital (RGH), in order to ensure safe, sustainable and effective care. The sustainability of safe services has become more acute since December requiring the pace of the work to be brought forward and requiring immediate attention to maintain safe services whilst a sustainable solution is being developed. The staff continue to be highly committed, doing everything they can to care for patients.

At its public meeting on 30 January 2020, the Board agreed that the following two options should be prioritised for further, more detailed, development and assessment within the project structure, primarily through the work of Clinical Reference Groups (CRGs):

Option	Specific features	Common features
Option A	<p>Implementation of the remaining SWP recommendations with additional service changes</p> <p>Transition the RGH Emergency Department (ED) from a consultant-led service to a 24 hour nurse practitioner led Minor Injuries Unit (MIU).</p>	<p>Increase access to 'care closer to home' across the University Health Board for those not requiring ED services, through enhanced access to primary care and community services (in and out of hours), in line with the agreed transformation programmes of the Regional Partnership Board.</p>
Option B	<p>Overnight reduction in the hours of consultant led ED at RGH</p> <p>Consultant-led EDs to continue at RGH, Princess of Wales Hospital (POWH) and Prince Charles Hospital (PCH), but with an overnight reduction in the hours of the RGH ED (exact operational hours to be determined based on modelling of demand).</p>	<p>Implementation of already planned move of inpatient paediatrics from RGH to PCH in September 2020</p> <p>Development and implementation of an appropriate paediatric service model at RGH (tailored to interface appropriately with the selected ED service model)</p>

	Determine how best to deliver a nurse practitioner-led MIU on the RGH site during the hours when a consultant-led ED is not provided.	GP admissions and paramedic differentiated admissions (of appropriate acuity) direct to RGH wards 24 hours Ongoing development of RGH acute medicine, ambulatory care and diagnostic services, in line with the SWP
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In addition to further work on Options A and B, the Board tasked the project with continuing to test the viability of retaining a 24/7 consultant led ED at RGH, including through enhanced efforts to recruit medical staff.

This paper summarises the work that has been done within the scope of the project since the January Board meeting, including:

- Communication and engagement
- Work by the CRGs to develop and refine Options A and B
- Work to recruit medical staff and make more flexible use of existing staff

1.2 Background

The background to the current project is set out in the paper *South Wales Programme – Progressing Outstanding Recommendations*, received by the Board on 30 January 2020.

2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

2.1 Communication and Engagement

Overview and approach

The project has had a high public and media profile since the publication of the paper for the January 2020 public Board. The January Board meeting was well attended by members of the public with a particular interest in the issues under consideration and a peaceful and well mannered demonstration took place outside the building.

Outward communications and receiving feedback through engagement with staff, the public, elected representatives and the Community Health Council (CHC) are vital elements in ensuring safe and sustainable services.

It is essential that concerns raised and ideas suggested by individuals, communities and organisations are considered and used to help shape the development and assessment of options for service change. The University Health Board has already learned a huge amount from listening to what has been said so far.

The project is working to a draft Communications and Engagement Strategy and Plan. Liaison continues with the CHC to ensure that these are formally approved by the CHC as a basis for the University Health Board's engagement activities. The Strategy and Plan were presented to the CHC's Strategic Planning Committee on 14 February 2020 prior to further development and scrutiny.

Key messages delivered by the University Health Board

The University Health Board has focused its outward communications to date on explaining the rationale for the project and the nature of the high level options under consideration.

Key messages have included:

- The reason for the project is to make sure that services provided are safe for patients and communities and that staff can work in safe and supportive environments
- There are not enough medical staff, training opportunities are limited and the circumstances in which our staff are working pose risks that are too high
- The staffing challenges we face make the current way services are provided unrealistic in the long-term
- External independent reports have agreed that action must be taken for patients, for staff and for communities
- There is a need to take action in response to the recommendations contained in Regulation 28 notices issued by Her Majesty's Coroner
- The University Health Board recognises and understands that members of the public and members of staff have legitimate concerns about potential service changes and the impact such changes may have on them and their families, friends and colleagues
- The University Health Board recognises that many people have questions about potential service change, not all of which can currently be answered
- The University Health Board knows that its staff are hugely committed and are continuing to work exceptionally hard for patients and communities in difficult and stressful circumstances

- Conversations are taking place with staff and communities, listening to people's concerns and, most importantly, their suggestions about how emergency services can be delivered for our communities safely and sustainably, with the right numbers of staff, into the future
- No decisions about the best solution and actions have been made
- There will be no change to ITU, theatres and surgical services
- There will be no job losses
- RGH will not be closing
- Services at RGH have been developed recently, with the diagnostic hub, the acute medicine model and the Tirion Birth Centre
- Investment in RGH will continue to be made to deliver a wide range of services to patients
- As new ways of providing safe and sustainable services are developed, the University Health Board is committed to making sure that as many people as possible can still access their emergency needs at RGH. This will include increasing the number of people who can be admitted directly to RGH medical and surgical wards when referred by their GP or brought in by ambulance with medical or surgical conditions
- Work is under way with the transformation programme to identify where investment and resource are best placed to strengthen and develop services closer to home.

Engagement activity to date

Specific engagement activity to date has included:

- attendance of the Chair, Interim Chief Executive and Medical Director and other relevant staff at well attended public meetings organised by Assembly Members and Members of Parliament
- discussion of the project with individuals attending public 'Let's Talk Healthcare' events organised by the University Health Board
- specifically convened staff meetings and 'drop in' sessions and existing 'Let's Talk' events at all three general hospitals, attended by the Interim Chief Executive, Medical Director and members of the project team. These have attracted a wide range of staff, including members of staff from the RGH ED
- attendance by Board members at the Rhondda Cynon Taf County Borough Council Scrutiny Committee

A list including engagement events and key activities to date is included in Appendix 1.



Key messages received from staff, the public, and their representatives

Concerns, ideas and other views put forward by the public, members of staff, politicians and CHC members are being listened to, considered and carefully factored into the ongoing work of the project.

The key themes from the engagement events, and correspondence received, to date include:

- Concerns about **transport and accessibility** (including journey times to other hospitals in a variety of circumstances)
 - The unique topography of the Valleys makes it impossible to rely entirely on maps for calculating distances or estimating travel times
 - Mountain roads are difficult to navigate in bad weather and are often closed
 - Other roads feature bottle necks and are heavily congested at busy times
 - Accidents can lead to the closure of the M4, the A470 and other trunk roads, greatly increasing travel times
 - Many people do not have their own transport and would not be able to easily travel to more distant hospitals
 - Ambulance response times are cited as a problem and this will be exacerbated by more ambulance journeys to and from more distant hospitals
- **Impact on other hospitals** of any changes to services at RGH (including staffing, facilities, parking etc.)
 - There will be an adverse impact on PCH and POWH, especially around ED waiting times and attendances, pressure on existing staffing levels and parking
- **Staff recruitment and retention** (including concerns that insufficient efforts have been made to recruit emergency medicine doctors and that uncertainty over future service provision is a barrier to recruitment and retention)
 - Efforts made to recruit ED medical staff to RGH in recent years have been inadequate
 - Uncertainty over the future of RGH and its services have hampered efforts to recruit and retain staff
 - Greater, more creative, efforts should be made urgently to recruit ED medical staff, highlighting the advantages of working in the University Health Board
 - The University Health Board should make use of community expertise and resources in attracting potential candidates to work in the area
 - Consideration should be given to a range of recruitment incentives

- The University Health Board should deploy existing staff more flexibly to support all three EDs
- **Impact on other RGH services** (including as a result of uncertainty over future emergency medicine service provision)
 - Any reduction in RGH ED services would impact on other services in the hospital and could lead to further reductions in services, including critical care
 - It would be difficult to ensure the safety of very ill patients attending the hospital at times when there was no consultant led ED provision
- The need for detailed **impact assessments** of any proposed changes
 - The University Health Board must undertake impact assessments on any proposed changes which take into account equality, access, disability, socioeconomic, environmental and population health issues
 - To fully understand the implications of any proposals, impact assessments need to be robust, using high quality and up to date information and modelling
- Doubts about the **continued relevance of the South Wales Programme**
 - Assumptions made by the SWP are outdated, given changes within the population, such as new housing developments, and other service changes
 - The current project must take into account changes in demographics and other developments and assumptions around travel times need to be tested
 - It has been queried why RGH is the hospital where changes have to be made and whether the outcome of the SWP can be reconsidered to look at alternative sites and options
- The need to improve **access to primary and community care services**, in particular the MIU service at Ysbyty Cwm Cynon and Ysbyty Cwm Rhondda
 - Access to primary and community care services must be improved to reduce unnecessary ED attendances
 - Existing MIUs, particularly at Ysbyty Cwm Rhondda, should allow walk-in access and be open for longer hours
 - There should be further investment in primary care services, particularly in more deprived areas, to improve access to appointments and supporting services that can help people in their communities
- Confusion about the **scope of minor injuries services**
 - There is a lack of understanding about the definitions of minor illness and minor injury and what conditions can be treated in an MIU

- There needs to be greater public awareness of what MIUs can be used for
- **A lack of trust and confidence** in the University Health Board and its senior leaders
 - The University Health Board is not trusted to listen to people, to take action in the public interest and, specifically, to make sufficient effort to recruit staff
 - It is widely believed that a decision has already been made to close, or significantly reduce, the ED service at RGH as part of an overall plan to reduce services

Advice from the Consultation Institute

In parallel with the communications and engagement activities referred to above, the project has been taking advice from the Consultation Institute on best practice in planning and associated engagement and consultation, in the context of current legislation and case law. Key messages from the Consultation Institute have included the need to comply with the relevant requirements of:

- section 183 of the **NHS (Wales) Act 2006**
- the **Community Health Councils Regulations 2010**
- the **2011 Guidance for engagement and consultation on health service changes in Wales**
- the **Well-being of Future Generations (Wales) Act 2015**
- the three imperatives of the **Equality Act 2010**
- Section 149 of the **Public Sector Equality Duty (PSED)**
- the **Equality Act 2010**
- the **Gunning Principles** (derived from *R ex p Gunning v LB Brent* 1985)

2.2 Work through the Clinical Reference Groups (CRGs) to develop and refine Option A and Option B

The following multi disciplinary Clinical Reference Groups have commenced work within the project:

- Emergency Medicine
- Acute Medicine
- Paediatrics

The CRGs are using iterative modelling work, to assess the patient access and flow implications of each option, and to help define more specific and detailed 'optimal' service models under each option, using the most up to date data available.

The CRG are working to fulfil the following **objectives**, set by the Project Board:

- Safe and high quality care for patients which matches the best elsewhere
- Deliverable by a sustainable workforce
- Optimise access by ensuring patients received the right care as quickly as possible

The outputs from the CRGs will be assessed against the following **Critical Success Factors**:

- Quality
- Safety
- Sustainability
- Access
- Equity
- Strategic Fit

The objectives are supported by a set of **design principles**, which are set out in Appendix 2.

Each CRG provides the professional leadership and advice to develop safe and effective service models and has responsibilities to:

- agree the clinical service planning principles to support the project to design the best possible healthcare system
- advise on the core clinical standards that should apply to the delivery of services
- advise on the core workforce standards, including training and supervision, that should apply to the delivery of services
- review examples of best practice models of care that have been developed in other areas to deliver services
- review and develop the clinical service model for services
- specify core clinical assumptions and dependencies underpinning service model e.g. clinical transfer requirements, workforce availability, and facilities requirements
- test the impact of the proposed service model and describe the level of service that would be deliverable under each option

- provide appropriate advice and clinical input to enable the development of supporting workforce and finance assessments

2.3 Work on the recruitment and deployment of Emergency Medicine doctors

Active recruitment for permanent consultants and middle grade doctors to work across the University Health Board's emergency departments is underway. This has included:

- prominent job advertisements in the British Medical Journal (BMJ)
- postings on the NHS Jobs website
- commissioning of recruitment agency work
- discussions with existing agency staff
- promotion of the recruitment campaign through social media (with the University Health Board's posts being widely shared)

It is, however, important to note that there is a national shortage of emergency medicine doctors and the experience of others shows that recruitment is likely to be very challenging.

Consultants based at POWH are providing support to the RGH ED as an interim arrangement while a safe and sustainable way of providing emergency services is developed.

3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD

The following remain key risks and issues relating to the project:

- There is an ongoing need to take operational action to ensure safe service continuity of service provision prior to the implementation of future project recommendations. This will be particularly challenging from 1 April 2020, following staff resignations.
- Any service changes will be controversial and contested by relevant stakeholders.
- The need for urgent responses to changing circumstances, prioritising patient safety, may lead to decisions and changes needing to be made by the University Health Board without as much analysis/engagement/consultation etc. as would be optimal.
- The regional nature of the project, with the need for involvement of other health boards in the development, assessment and implementation of solutions and the overall governance, may compromise rapid decision making.
- Resource constraints, including in relation to capital investment may compromise the ability to implement optimal service models.



4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	Yes (Please see detail below)
	To be considered within the scope of the project.
Related Health and Care standard(s)	Safe Care
	All standards applicable
Equality impact assessment completed	No (Include further detail below)
	To be addressed as part of the project.
Legal implications / impact	Yes (Include further detail below)
	To be considered within the scope of the project.
Resource (Capital/Revenue £/Workforce) implications / Impact	Yes (Include further detail below)
	To be considered within the scope of the project.
Link to Main Strategic Objective	To Improve Quality, Safety & Patient Experience
Link to Main WBFG Act Objective	Provide high quality care as locally as possible wherever it is safe and sustainable

5. RECOMMENDATION

The Board is invited to **NOTE** the content of this report and **APPROVE** the continuation of the project, including the following next steps:

- Completion of the first phase of the work of the Clinical Reference Groups to develop and assess more detailed service models under Options A and B
- Continuation of public and staff engagement under the Communications and Engagement Strategy and Plan
- Continuation of efforts to recruit ED medical staff
- The production of a further report for consideration at the March meeting of the Board

Appendix 1 – COMMUNICATIONS AND ENGAGEMENT ACTIVITIES (to week ending 21 February)

Date	Project Governance	Staff Engagement	Public Engagement	Community Health Council	Partner Engagement
21/01	Acute Medicine Clinical Reference Group preliminary meeting at Royal Glamorgan Hospital				
22/01		Programme briefing e-mailed to all staff regarding forthcoming Public Board paper		Programme briefing shared with CHC regarding forthcoming Board paper	Programme briefing shared with neighbouring health boards regarding forthcoming Board paper
23/01		Publication of Cwm Taf Morgannwg Public Board paper			Chief Executive & Programme Director met with Leader, Councillor and Director of Social Services for Bridgend CBC
		Let's Talk... event at the Ysbyty Cwm Cynon			

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24/01		Programme Director meeting with Pontypridd & Rhondda Integrated Locality management team	Chief Executive statement on Royal Glamorgan Hospital emergency department posted on social media	CHC Chief Officer attended AM/MP/Local Authority Engagement Event with Chairman, Chief Executive and Medical Director	AM/MP/Local Authority Engagement Event with Chairman, Chief Executive and Medical Director
27/01				Programme Director and AD Planning & Partnerships attended CHC Strategic Planning Committee	
28/01		Programme briefing and FAQs e-mailed to all staff and made available to public via social media and website			
29/01			Programme briefing and Medical Director video made available to public via social media		Programme Director gave briefing to RCT GP Cluster meeting
30/01		Medical Director and Programme Director discussion with Children & Young People Clinical Director			



	Cwm Taf Morgannwg Public Board Meeting			
30/01	Acute Medicine Clinical Reference Group preliminary meeting at Prince Charles Hospital	Chairman, Chief Executive & Medical Director attended Public Meeting in Tonypany hosted by Chris Bryant MP		
		Media Interviews with Chief Executive		
31/01	Cwm Taf Morgannwg Project Board meeting with representation from across UHB, CHC and WAST	Programme briefing sent to all staff via e-mail regarding Board discussions	Cwm Taf Morgannwg Project Board meeting with representation from across UHB, CHC and WAST	
				Project meeting with Richard Bowen, Programme Director 111 Wales Service



Date	Project Governance	Staff Engagement	Public Engagement	Community Health Council	Partner Engagement
03/02 <div>Pack Page 106</div>	Regional Project Board meeting with representations from neighbouring HBs and WAST	Emergency Medicine Clinical Reference Group preliminary meeting with Clinical Leads from across the UHB	Chairman, Chief Executive & Medical Director attended Public Meeting in Porth hosted by Leanne Wood AM		Regional Project Board meeting with representations from neighbouring HBs and WAST
		Medical Director and Programme Director Drop-In Session at Royal Glamorgan Hospital			
		Paediatric Clinical Reference Group Chair meeting at Prince Charles Hospital			
04/02		Programme briefing regarding proposals for the emergency department at the Royal Glamorgan Hospital sent to all staff via e-mail and made available to the public via social media		Programme briefing shared with Community Health Council	
05/02		Chief Executive Staff Drop-in Session at Royal Glamorgan Hospital			Chairman, Chief Executive and Medical Director attended the RCT CBC Meeting



06/02		Paediatric Clinical Reference Group preliminary meeting at Prince Charles Hospital	Let's Talk Your Healthcare at Rhondda Sports Centre with Community Health Council present		
07/02			Chairman, Chief Executive & Medical Director attended Public Meeting in Llantrisant hosted by Mick Antoniw AM and Alex Davies-Jones MP		Chairman, Chief Executive and Medical Director attended meeting with Local AMs, MPs and Council Leader
			Statement on the Campaign for Save Emergency Care across Cwm Taf Morgannwg shared with public via Social Media		
10/02		Chief Executive Staff Drop-in Session at Royal Glamorgan Hospital	Let's Talk Your Healthcare at Llantrisant Leisure Centre with Community Health Council present		
		Let's Talk... event at Ynysmeurig House	Public Meeting in Ferndale hosted by Leanne Wood AM		



11/02		Programme briefing regarding proposals for the emergency department at the Royal Glamorgan Hospital sent to all staff via e-mail and made available to the public via social media		
			Let's Talk Your Healthcare at Redhouse, Merthyr Tydfil with Community Health Council present	
12/02	Acute Medicine Clinical Reference Group (CRG) Meeting with clinical representation from across HB and WAST			Acute Medicine Clinical Reference Group (CRG) Meeting with clinical representation from across HB and WAST
13/02	Emergency Medicine Clinical Reference Group (CRG) Meeting with clinical representation from across HB and WAST		Chairman, Chief Executive & Medical Director attended Public Meeting in Llanharan hosted by Huw Irranca-Davies AM and Chris Elmore MP	Emergency Medicine Clinical Reference Group (CRG) Meeting with clinical representation from across HB and WAST
				Programme Director and AD Planning & Partnerships attended Stakeholder Reference Group



14/02	Paediatrics Clinical Reference Group (CRG) Meeting with clinical representation from across Health Board and WAST			Programme Director and AD Planning & Partnerships to attend Extraordinary CHC Strategic Planning Committee	Paediatrics Clinical Reference Group (CRG) Meeting with clinical representation from across Health Board and WAST
17/02		Chief Executive Staff Drop-in Session at Royal Glamorgan Hospital			
18/02			Let's Talk Your Healthcare at Abercwmboi RFC with Community Health Council present		
19/02		Staff Drop In Session for Proposals for RGH Emergency Department at the Princess of Wales Hospital, Bridgend	Let's Talk Your Healthcare at Bridgend Life Centre with Community Health Council present		



Date	Project Governance	Staff Engagement	Public Engagement	Community Health Council	Partner Engagement
20/02		Staff Drop In Session for Proposals for RGH Emergency Department at the Prince Charles Hospital, Merthyr Tydfil			
		Extraordinary Medical Staff Advisory Committee meeting with Medical Director and HB Consultants			
21/02		Staff Drop In Session for Proposals for RGH Emergency Department at the Royal Glamorgan Hospital, Llantrisant			

Appendix 2 – CLINICAL REFERENCE GROUP DESIGN PRINCIPLES

- Safe services should be provided as locally as possible
- Service delivery should be evidence based and be consistent with national quality standards
- The workforce must be fit for purpose, sustainable and affordable
- Services should positively promote good health and prevent illness, disease and injury
- Services should be designed from the patient's point of view
- Services should be delivered in the most appropriate care environment, as close to home as possible, and should ensure that acute hospital admissions are kept to a minimum
- Local services should be developed as part of a wider network to ensure that patients can be "escalated" to more specialist care where necessary
- There must be robust and effective transfer protocols for patients who require more specialist services
- Services should, as far as possible, provide a 'one stop shop' approach
- Services should provide optimum efficiency and be deliverable within the existing resource envelope using value-based healthcare principles
- The service model must be supported by patients, parents, the public, our partners and other key stakeholders
- Where there are opportunities to do so, the service model should optimize equity and minimize health inequality
- There is a need to ensure that the service model should minimize the number of secondary transfers where possible to avoid delays in the patient pathway
- Access to appropriate senior clinical decision maker and treatment should be available 24/7 for major emergencies
- Provision of sufficient ambulance resources to undertake inter-facility transfers in a timely manner
- Impacts on theatre workload and workforce will need to be considered in the redesign
- Services should be provided in comfortable, child-friendly environments
- Services should be planned to meet peaks and troughs in demand



Ein cyf/Our ref VG/00485/20

Janet Finch-Saunders AM
Chair, Petitions Committee
National Assembly for Wales
Ty Hywel
Cardiff Bay
Cardiff
CF99 1NA

16 March 2020

Dear Janet,

Thank you for your letter of 10 February on behalf of the Petition Committee regarding Cwm Taf Morgannwg University Health about Cwm Taf Morgannwg University Health Board's proposals for changes to health services in the region.

In 2014, the health board held a formal public consultation on the South Wales Programme proposals to address major challenges faced by many hospitals in recruiting and retaining highly skilled staff in certain speciality areas. The consultation led to agreement to make a number of significant changes to how services are delivered including changes to services at the Royal Glamorgan Hospital. Some of these changes have already been delivered.

Where changes have not been implemented many of the issues which triggered the original consultation remain or have worsened. However, given the time that has elapsed since 2014 the health board is now considering whether the outcome of the South Wales Programme remains the best way forward. Four options for the future of A&E services at the Royal Glamorgan Hospital were discussed at its Board meeting held on 30 January. These included the option to replace A&E with a minor Injuries unit as agreed in the South Wales Programme along with other options that would see an A&E service remaining at the site.

In deciding which of these options best enables the provision of safe and sustainable services for the people of Cwm Taf I expect the health board to work closely with staff, the public and all key partners in line with extant service change guidance.

At this stage, the proposals remain a matter for the health board to determine. However, it is possible that, in line with the guidance, the final decisions may be referred to me for consideration. I hope you will therefore appreciate that I am currently unable to comment on any of the proposals, as it may compromise my future role in the process.

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

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

Back Page 112
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I do, however, encourage you to engage with the health board and have your say in helping to shape future services. Further information on how you can get involved can be found here:

<https://cwmtafmorgannwg.wales/proposed-service-changes-at-royal-glamorgan-hospital/>

Thank you again for taking the time to write to us on this matter.

Yours sincerely,

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

Vaughan Gething AC/AM

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

Agenda Item 3.3

P-05-948 Save the green fields at Cefn Yr Hendy, Miskin

This petition was submitted by Sophie Seymour having collected 696 signatures online and TBC on paper.

Text of Petition

We call on the National Assembly for Wales to urge the Welsh Government to stop their plans to sell the green fields at Cefn Yr Hendy, Miskin for 460 houses. We ask that Welsh Government use their powers to not sell the land for house building and to desist in their plans for the development which they secured outline planning permission on in 2018. We ask that if they are not able to desist entirely from stopping the development, to leave some of the fields in their natural state. The land is owned by Welsh Ministers. We urge Welsh Ministers to take heed of the Climate Emergency they declared and adhere to the principles of the future generation act and withdraw, or significantly reduce, plans for building on these beautiful Welsh fields. The fields border Coed Yr Hendy (ancient woodland), the River Clun and the Pant Marsh which is a site of nature conservation. The fields have 2 large Oak trees, hedgerows throughout and a good number of Oak saplings at it's northern parts. Any house building will damage the hedgerows and saplings. A large number of birds, small mammals and insects make Coed Yr Hendy and the fields their home, birds and bats are always swooping over the fields to feed – we should not take this away from them. Building on these fields will have a disastrous outcome for local wildlife and the local ecological system.

In light of this country's Climate Emergency it is also becoming more and more important to retain our trees, hedgerows and green spaces when you consider how they absorb and filter carbon dioxide, other air pollutants, they aid with rain water drainage and help with reducing soil erosion. Continuing to leave these fields for sheep farming would bring immense benefits to our environment in Miskin and beyond. This is an opportunity for Welsh Ministers to be climate smart and save this green field site.

Additional Information

The fields are in use for sheep farming by a tenant farmer who has farmed these fields for decades. They have also been used by local families for over 70 years for leisure & enjoying nature. A Village Green application was made

in 2017 and while it met many of the legal criteria it was not ultimately successful but the Inspector noted that there was “clear evidence of the use of the site for lawful sports and pastimes”.

There are traffic and infrastructure implications; local schools and health services are likely to suffer from unsustainable development. The A4119, running along the side of some of the fields has extremely high pollution. There is an air quality management area on the A4119 immediately neighbouring this site. The Rhondda Cynon Taff Council “Air Quality Progress Report 2019” shows that Nitrogen Dioxide (NO₂) readings for this AQMA have been above the EU and UK legal limit for the last 12 of 13 years. There are thousands of homes being built within 10 minutes drive at Creigiau, Plasdwr, and Laniltid. We question the need for these fields to be built on. Adding c.1000 residents to Miskin's population is not sustainable to the small village (no shops, no health services and 1 Welsh medium primary school) and will lead to an enormous number of new trips by car to access services and schools with an additional 460 houses. There are concerns from local residents that the outline planning permission plans submitted for Welsh Ministers in 2017 also disregarded aspects of the Rhondda Cynon Taff Local Development Plan – notably by not committing to providing a school, by going over the 400 houses specified, by not including a grade separated interchange onto the A4119 and seeking to build on land directly opposite Ysgol Llantrisant (not within LDP). Building there will cause fumes from building works to discharge directly into the school and playground for years as well as increased traffic – causing more pollution and traffic hazards for children.

Assembly Constituency and Region

- Pontypridd
- South Wales Central

Title: P-05-948 Save the green fields at Cefn yr hendy, Miskin

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Petition Number: P-05-948

Petition title: Save the green fields at Cefn yr hendy, Miskin

Text of petition: We call on the National Assembly for Wales to urge the Welsh Government to stop their plans to sell the green fields at Cefn yr hendy, Miskin for 460 houses. We ask that Welsh Government use their powers to not sell the land for house building and to desist in their plans for the development which they secured outline planning permission on in 2018. We ask that if they are not able to desist entirely from stopping the development, to leave some of the fields in their natural state. The land is owned by Welsh Ministers. We urge Welsh Ministers to take heed of the Climate Emergency they declared and adhere to the principles of the future generation act and withdraw, or significantly reduce, plans for building on these beautiful Welsh fields.

The fields border Coed yr hendy (ancient woodland), the River Clun and the Pant Marsh which is a site of nature conservation. The fields have 2 large Oak trees, hedgerows throughout and a good number of Oak saplings at it's northern parts. Any house building will damage the hedgerows and saplings. A large number of birds, small mammals and insects make Coed yr hendy and the fields their home, birds and bats are always swooping over the fields to feed - we should not take this away from them. Building on these fields will have a disastrous outcome for local wildlife and the local ecological system.

In light of this country's Climate Emergency it is also becoming more and more important to retain our trees, hedgerows and green spaces when you consider how they absorb and filter carbon dioxide, other air pollutants, they aid with rain water drainage and help with reducing soil erosion. Continuing to leave these fields for sheep farming would bring immense benefits to our environment in

-3



Miskin and beyond. This is an opportunity for Welsh Ministers to be climate smart and save this green field site.

Further information: The fields are in use for sheep farming by a tenant farmer who has farmed these fields for decades. They have also been used by local families for over 70 years for leisure & enjoying nature. A Village Green application was made in 2017 and while it met many of the legal criteria it was not ultimately successful but the Inspector noted that there was "clear evidence of the use of the site for lawful sports and pastimes".

There are traffic and infrastructure implications; local schools and health services are likely to suffer from unsustainable development. The A4119, running along the side of some of the fields has extremely high pollution. There is an air quality management area on the A4119 immediately neighbouring this site. The Rhondda Cynon Taff Council "Air Quality Progress Report 2019" shows that Nitrogen Dioxide (NO2) readings for this AQMA have been above the EU and UK legal limit for the last 12 of 13 years. There are thousands of homes being built within 10 minutes drive at Creigiau, Plasdwr, and Laniltid. We question the need for these fields to be built on. Adding c.1000 residents to Miskin's population is not sustainable to the small village (no shops, no health services and 1 Welsh medium primary school) and will lead to an enormous number of new trips by car to access services and schools with an additional 460 houses. There are concerns from local residents that the outline planning permission plans submitted for Welsh Ministers in 2017 also disregarded aspects of the Rhondda Cynon Taff Local Development Plan - notably by not committing to providing a school, by going over the 400 houses specified, by not including a grade separated interchange onto the A4119 and seeking to build on land directly opposite Ysgol Llantrisant (not within LDP). Building there will cause fumes from building works to discharge directly into the school and playground for years as well as increased traffic - causing more pollution and traffic hazards for children

Background

The Research Service cannot comment on individual cases or discuss the merits of individual planning applications.

Proposed development at Cefn yr hendy, Miskin

The documentation relating to the planning application for this proposed development can be seen on Rhondda Cynon Taf County Borough Council's (RCT CBC) website here: [Cefn yr hendy](#).

The planning process

Local Planning Authorities should make planning decisions in accordance with national and local planning policy plus other relevant issues, known as 'material considerations'.

The Welsh Government's national planning policy is set out in Planning Policy Wales (PPW) Edition 10.

Local planning policies are set out in the LDP for the area. The LDP sets out proposals and policies for the future use of all local land. It is the main document that planning applications should be determined in accordance with, unless material considerations indicate otherwise.

In principle, any consideration which relates to the use and development of land is capable of being a material consideration. It is ultimately for the courts to decide.

Once an application has been accepted for consideration by a Local Planning Authority, a statutory period of publicity and consultation commences. The extent of this depends on the type of application submitted and the policy of the Local Planning Authority. However the law requires it to give publicity to an application in various ways. This allows those who may be affected by it have the opportunity to make their views known.

When determining an application, all comments received must be taken into account. Once a decision has been made, all those who provided comment must be informed.

An applicant can appeal against either a refusal of planning permission or the conditions imposed by the Local Planning Authority as part of an approval. Appeals against planning decisions are normally handled by Planning Inspectorate Wales. There is no right of appeal by any other interested parties (known as third parties) affected by the application.

Welsh Government action

The Minister for Economy, Transport and North Wales, Ken Skates AM, wrote to the Committee Chair on 17 March 2020. His letter states the following:

- The property concerned is subject to a joint venture agreement between the Welsh Ministers and Talbot Green Developments Limited where the joint venture parties are obligated to jointly promote the property for residential development and to dispose of the property with the benefit of planning consent for residential development.
- This agreement is a legacy from agreements entered into by the former Land Division of the Welsh Development Agency.
- A public inquiry was held in March 2019 at Pontyclun to consider whether the fields should be registered as a Town and Village Green. The Inspector found that the statutory test for registration had not been met and therefore rejected the application.

- Outline planning permission was granted in February 2018 for approximately 460 dwellings, a primary school, local centre, open space and associated drainage and landscaping with all matters reserved (i.e. subject to a further more detailed application) other than access.
- The site is allocated in the adopted RCT LDP for residential development as part of a strategic site allocation.
- The permission is subject to 31 planning conditions including conditions requiring tree protection measures, a wildlife protection plan, a habitat management plan and a scheme of mitigation for protected species.
- An accompanying planning obligation (a section 106 agreement) secures an employment and skills plan, a park and ride financial contribution, provision of the local centre, implementation of a 25 year long habitat land management plan and woodland buffer zone management plan, provision of public open space and play areas and associated management, and 20% affordable housing.
- There is also a requirement for payment of a Community Infrastructure Levy which will be calculated at the time of the reserved matters approval.
- The illustrative masterplan shows that significant parts of the site will remain undeveloped, as well as areas of public open space within the body of the site. In total there will be 0.76ha of public open space, 3.3ha of informal open space and 0.65ha of woodland.
- Open fields adjoining the northern boundary of the site will be kept open and managed for ecology and public access purposes as part of the habitat land management plan.
- Natural Resources Wales and the RCT LPA ecologist each raised no objection subject to the conditions and section 106 agreement referred to above.

Further detail is contained in the Minister's letter.

National Assembly for Wales action

In October 2017 Andrew RT Davies AM asked a series of written questions relating to the proposed development. Ken Skates AM, the then Cabinet Secretary for Economy and Infrastructure, responded:

Regular meetings have taken place with the company which is now called Talbot Green Developments Limited to discuss and progress the proposed development. I am unable to confirm which companies were originally considered as development partners as it was a development agreement made between the former Welsh Development Agency and the company.

The Welsh Government has incurred professional fees for the completion of studies and the preparation and submission of a planning application, as has the company. In view of the fact that this is a joint venture with a private company the full financial details are considered to be commercially sensitive.

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



Ein cyf/Our ref KS/00594/20

Janet Finch-Saunders AM

Government.Committee.Business@gov.wales

17th March 2020

Dear Janet,

RE: Petition P-05-948 Save the Green Fields at Cefn Yr Hendy, Miskin

I refer to your letter dated 11 February 2020 to Julie James, Minister for Housing and Local Government, I am responding to your letter as the subject site falls within my portfolio. The Property concerned is subject to a joint venture agreement between Welsh Ministers and Talbot Green Developments Limited where the joint venture parties are obligated to jointly promote the Property for residential development and to dispose of the Property with the benefit of planning consent for residential development. This land is a 'legacy' from agreements entered into by the former Land Division of the Welsh Development Agency.

A non-statutory inquiry was held on 12, 13, 14 and 15 March 2019 at Tyla Garw Community Centre, Pontyclun with Mr Michael Bedford QC acting as Inspector. The inquiry considered an application made by Ms Sophie Seymour that the fields be registered as Town and Village Green. In his report prepared following the inquiry, Mr Michael Bedford QC concluded that the statutory test for registration had not been met, namely that it had not been demonstrated on the balance of probabilities that "a significant number of the inhabitants of [the neighbourhood of Miskin village] have indulged as of right in lawful sports and pastimes on the land [subject to the application] for a period of at least 20 years." Following the recommendation of the inspector, on 19 December 2019 the Commons Registration Authority for the land in question rejected the application for registration of the land as a Town or Village Green under Section 15(2) Commons Act 2006.

Outline planning permission was granted on 8th February 2018 for "approximately 460 dwellings, primary school, local centre (up to 200 sq. net sales), open space and associated drainage and landscaping" with all matters reserved other than access. The permission remains extant. The site is allocated in the adopted Local Development Plan for residential development as part of a strategic site allocation.

The permission is subject to 31 planning conditions including (*inter alia*) conditions requiring tree protection measures, a wildlife protection plan, a habitat management plan and a scheme of mitigation for protected species. An accompanying planning obligation ("s106 agreement")

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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.

secures an employment and skills plan, a park and ride financial contribution, provision of the local centre, implementation of a 25 year long habitat land management plan and woodland buffer zone management plan, provision of public open space and play areas (in line with the LPA's standards) and associated management, and 20% affordable housing. There is also a requirement for payment of a Community Infrastructure Levy which will be calculated at the time of the reserved matters approval, as per the Regulations.

While in outline, the illustrative masterplan shows significant parts of the site remaining undeveloped (principally along the northern boundary) as well as areas of public open space within the body of the site. In total there will be 0.76ha of public open space, 3.3ha of informal open space and 0.65ha of woodland. Furthermore, open fields adjoining the northern boundary of the site will be kept open and managed for ecology and public access purposes as part of the 'habitat land management plan' referred to above. It should also be noted that NRW and the Council's Ecologist each raised no objection subject to the conditions and s106 agreement referred to above.

In conclusion, the relevant Council committee report notes "In the final analysis, the application is considered to be in accordance with the relevant policies of the Local Development Plan and in Planning Policy Wales with regard to the provision of new residential development. Furthermore, the proposal, subject to conditions and a legal agreement, has been shown to be acceptable in terms of all other material considerations, particularly in this case, highway impacts, amenity, impact on the character and appearance of the area, ecology, infrastructure provision, and health impacts when the key issues involved are balanced."

Yours Ever,

A handwritten signature in grey ink, appearing to read 'Ken', with a stylized flourish above it.

Ken Skates AC/AM

Gweinidog yr Economi, Trafnidiaeth a Gogledd Cymru
Minister for Economy, Transport and North Wales

Agenda Item 3.4

P-05-949 SAVE COWBRIDGE OLD GIRLS' SCHOOL FROM DEMOLITION

This petition was submitted by Sara Pedersen having collected 2,080 signatures online and 3,442 on paper (not final), a total of 5,522 signatures.

Text of Petition

We call on the National Assembly for Wales to urge the Welsh Government to protect the former Intermediate School for Girls' in Cowbridge, Vale of Glamorgan. This was the first intermediate school to be built specifically for the education of girls in Wales (and England) and is the subject of a planning application for demolition. Failure to protect it will lead to the loss of a nationally important historic asset.

Opened in 1896, Cowbridge was the first girls' intermediate school to be built in Wales (and England) as a result of the Welsh Intermediate Education Act of 1889, a pivotal moment in Welsh History. Amid its contemporaries, Cowbridge was highly unusual in including accommodation for boarders from the outset and largely funded by a local philanthropist.

The original character of the school survives to a very high degree, both internally and externally, including the original hall and staircase. Only 5 comparable (of 95) schools are listed across Wales. A survey of them all confirms that Cowbridge survives to an equivalent degree to some and a better degree than others.

The architect, Robert Williams, was a pioneer of his time and renowned for being a radical, prominent advocate of building conservation, national pioneer of social housing, promoter of the Welsh School of Architecture and proponent for the publication of building literature in the Welsh language. He later went on to work in London and then Egypt for the Davies Bryan family, where many of his buildings still stand and are nationally protected.

In summary, the former Cowbridge Intermediate School for Girls' survives as a prominent and attractive testimony to a pivotal moment in Welsh history and the equal opportunities afforded to underprivileged girls of the time. We urge the Welsh Government, as custodians of our heritage, to protect this building either through listing or the provision of additional social housing funding to allow its conversion.

Additional Information

Reference: Scourfield (2019). FORMER COWBRIDGE COMPREHENSIVE SCHOOL, ABERTHIN ROAD, COWBRIDGE – AN HISTORICAL AND ARCHITECTURAL APPRAISAL.

Assembly Constituency and Region

- Vale of Glamorgan
- South Wales Central

Save Cowbridge Old Girls' School from demolition

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Reference: RS20/11947

Petition Number P-05-949

Petition title: SAVE COWBRIDGE OLD GIRLS' SCHOOL FROM DEMOLITION

Text of petition: We call on the National Assembly for Wales to urge the Welsh Government to protect the former Intermediate School for Girls' in Cowbridge, Vale of Glamorgan. This was the first intermediate school to be built specifically for the education of girls in Wales (and England) and is the subject of a planning application for demolition. Failure to protect it will lead to the loss of a nationally important historic asset.

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In summary, the former Cowbridge Intermediate School for Girls' survives as a prominent and attractive testimony to a pivotal moment in Welsh history and the equal opportunities afforded to underprivileged girls of the time. We urge the Welsh Government, as custodians of our heritage, to protect this building either through listing or the provision of additional social housing funding to allow its conversion.

1. Background

The petition calls on the Welsh Government to use the listing system to protect this building. Listing is the way that a building or structure of special architectural or historic interest is recognised by law. Changes to listed buildings are managed through listed building consent, which is part of the planning system. Listing is intended to help manage change and protect the building, its setting and its features from unsympathetic works that could damage its special interest.

Many buildings are of interest architecturally or historically, but for buildings to be listed, this interest must be special. The Welsh Government uses Technical Advice Note 24: the historic environment, which provides the criteria used for listing. In summary, the main criteria are:

- Architectural interest.
- Historic interest
- Close historical associations
- Group value
- Age and rarity.

Anyone can request that the Welsh Government considers a building for listing. As the response from the Welsh Government to the petitioner points out, however, there is no right of appeal against a decision not to list a building, though an individual could look to pursue a judicial review if they felt the Welsh Government had not followed the correct process.

The Historic Environment (Wales) Act 2016 modernised the legislation that underpins the listed building regime. The Act introduced a right of review a decision by the Welsh Government to list a building, but not an equivalent right to review a decision **not** to list a building. You can

read more about legislation relating to listed buildings – including changes introduced by the Historic Environment Act – [here](#).

In addition to the national list, local listing can be a way of protecting historic buildings of special local interest which do not meet national criteria for listing but have a vital role in maintaining local character and a sense of place. Local planning authorities are able to draw up lists of historic assets of special local interest. Cadw has published [Managing lists of historic assets of special local interest](#).

This document sets out general principles and good practice for preparing and managing lists of local historic assets and provides guidance on their use in the planning system. This guidance is aimed primarily at local planning authorities, but also at third sector organisations and the owners of historic assets. Compiling a list of historic assets of special local interest is voluntary, but where a local planning authority chooses to identify these assets, it must include policies for their conservation and enhancement in its development plan.

2. National Assembly for Wales action

In 2017 the Culture, Welsh Language and Communications Committee conducted an inquiry into the [historic environment](#). It did not recommend any changes to the listing system.

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-05-949
Ein cyf/Our ref DET/00161/20

Janet Finch-Saunders AM
Chair
Petitions Committee
seneddpetitions@assembly.wales

06 March 2020

Dear Janet,

Petition P-05-949 Save Cowbridge Old Girl's School from Demolition

Thank you for your letter of 18 February regarding the petition from Sara Pedersen about the former Cowbridge Intermediate School for Girls. Ms Pederson is one of a number of people that have previously written to Cadw requesting that the former school be listed.

My officials have very carefully considered all of the arguments put forward for listing the building but I am afraid that it does not meet the criteria to be listed at the national level. I attach a copy of Cadw's analysis and the final decision. My officials have advised campaigners to contact the local authority about the possibility of including the building in its list of County Treasures, and to ask for the significance of the building to be taken into account by the local authority when considering the application for planning permission for the proposed development.

I am unable to comment on the potential for funding to support conversion of the school to social housing through the Welsh Government's Social Housing Grant (SHG) Programme since this is a matter for the Minister for Housing and Local Government. I understand that the Programme can support both new build and renovation of existing properties. Local authorities are responsible for deciding which affordable housing schemes are a priority, what type of accommodation is needed in a specific location and which housing associations take forward the schemes for development.

Yours sincerely,

Yr Arglwydd Elis-Thomas AC/AM
Y Dirprwy Weinidog Diwylliant, Chwaraeon a Thwristiaeth
Deputy Minister for Culture, Sport and Tourism

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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.



Llywodraeth Cymru
Welsh Government

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Sara Pedersen

[REDACTED]
[REDACTED]
[REDACTED]

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

Ebost
Email:

qA1134323

13 August 2019

[REDACTED]

[REDACTED]
[REDACTED]

Dear Sara,

Thank you for your email of 10 July enclosing a report from Mr Robert Scourfield in support of listing the Former Intermediate School for Girls, Cowbridge and asking for a decision not to list the school to be reconsidered.

In the light of Mr Scourfield's report I asked Cadw's Head of Regeneration and Conservation, Ms Judith Alfrey, to carefully consider the arguments that he has put forward against the criteria for listing, which I understand has previously been sent to you by Mr Rhodri Kelly. I attach a copy of her analysis.

On balance, I have no reason to disagree with Ms Alfrey's advice and, for the reasons explained in her analysis, I do not consider that the building meets the criteria for listing. I should explain that there is no right of appeal against the decision but it is open to you to seek legal advice on the merits of seeking permission to begin an action for judicial review. Further guidance is available [here](#).

I appreciate that my reply will be disappointing but there is a very high standard that needs to be met in order for any building to be listed on account of its special architectural or historic interest at the national level. That is not to say that this building should merely be dismissed because as Ms Alfrey points out in her analysis, the building has local importance. Therefore, the Vale of Glamorgan Council could consider taking the necessary steps so that this 'local importance' is taken into account when development is proposed. Further advice on this issue is available [here](#) and I would recommend that you approach the Council about the possibility of the former school being included on its list of County Treasures.

Yours sincerely,

Gwilym Hughes
Head of Cadw

Gwasanaeth amgylchedd hanesyddol Llywodraeth Cymru yw Cadw, sy'n gweithio i sicrhau bod amgylchedd hanesyddol Cymru yn hygyrch ac yn cael ei ddiogelu'n dda.

Cadw is the Welsh Government's historic environment service working for an accessible and well-protected historic environment for Wales.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.

Pack Page 131



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



Former Cowbridge Intermediate School for Girls Assessment

Background

In February 2019, we responded to a spot-listing request for this building, the former girls' intermediate school, by concluding that whilst of local interest, it did not meet the criteria for listing and did not compare favourably when benchmarked against other examples of this important building type which are already listed. Our reasons for not listing cited alterations to the building, including the replacement of most of the windows with UPVC, and noted also that the original building had been very quickly and heavily extended.

We have now been asked to reconsider this recommendation, in the light of new information presented in a detailed assessment prepared for a local residents group by Robert Scourfield.

I have considered this report carefully, but have concluded that the new information presented does not add up to a strong enough case to overturn our earlier position.

Assessment

The salient points from Mr Scourfield's report are as follows

1. *It was the first girls' intermediate school to be built in Wales (1895-6) under an Act of parliament of seminal importance.*

The Welsh Intermediate Education Act of 1889 was pioneering legislation in making provision for education for girls and boys beyond primary age by county and county borough councils. Separate schools for girls and boys were provided in some areas, but in others, dual or mixed schools were established. The importance of the Act is recognised in several other listings, including most recently Ysgol Maesydre, Welshpool. Listed examples include both mixed and single sex schools.

In my view, there is no special significance attached to the fact that Cowbridge was built as a girls school, as education for girls was envisaged by the Act, and it was a matter of local choice as to how it was delivered. In any event, as a girls' school, Cowbridge was very swiftly followed by what is now Harold Road Junior School, Abergavenny, built as an Intermediate Girls school in 1897, and listed as such in 1998.

2. *The establishment of the school (and of intermediate education in Glamorgan more generally) was in the teeth of local controversy generated by the refusal of Cowbridge Grammar School to join the county scheme.*

Whilst this is interesting, it is not the only instance of local controversy: for example, the establishment of the listed County Intermediate School in Llanfyllin was only carried through by public support.

3. *The school is unusual in that it accommodated boarders, and the boarders' block is a distinctive element in the architecture of the school.*

This is indeed unusual, but I am not persuaded that 'unusual' necessarily equates to 'significant'. Although the boarders' block does retain distinctive architectural features, they are insufficient in my view to tip the balance in favour of listing. Friars School, Bangor, which is listed, included dormitory accommodation, and is a design of real distinction.

4. *The original character of the school survives intact to a high degree externally and internally, including retention of original plan form, and is of greater design quality than most other intermediate schools, designed by an interesting and under-valued architect.*

The extent to which the original character of the school survives intact is a debatable point. The building was massively extended not long after it first opened (in 1909). Although these historic extensions were sympathetic in character to the original, they overwhelm the original in terms of scale. Some detail from the first building survives (and was acknowledged to do so in our original assessment), but in my view, the dominant character of the school is of a building of 1909.

The Cowbridge school does not compare particularly favourably with other listed examples – the schools in Llanfyllin and Welshpool, for example, both retain their original form without substantial alteration, and are both fine examples of Queen Anne and baroque revival styles popular at the turn of the century – are in my view, of greater architectural distinction than the school at Cowbridge.

Like Cowbridge, the listed Harold Road School in Abergavenny was also built in two principal phases, but is also a building of greater architectural distinction: the second phase did not apparently overwhelm the original building to the same extent.

More problematic is the loss of detail through replacement of the windows with uPVC. This is not mentioned in Mr Scourfield's report but was noted by the then Assistant Inspector of Historic Buildings when he visited in February.

Conclusion.

Mr Scourfield's report makes the point that even if better examples have already been listed, that is not in itself reason to decline to list the Cowbridge school. He claims that it is among the best-preserved of surviving intermediate schools in Wales, and that the plan form and fittings are as complete and important as existing listing examples.

I cannot agree with this assessment, which overlooks the replacement of the fenestration, and blurs the distinction between the building of 1895-6 and the extensions of 1909. It is reasonable for us to use existing listed buildings as a benchmark for assessing this example of an Intermediate School, and I am satisfied that in terms of its architectural quality it falls short. On the principal point of historic

interest – that it was the first intermediate school for girls in Wales – I do not find this a compelling argument in favour of listing, since the principle of education for girls was enshrined in the 1889 Act, and other listed examples reflect the diversity of arrangements for providing education for both girls and boys according to the terms of the Act.

Although the building does not meet the criteria for listing, as our earlier assessment made clear, it is of obvious local importance and might warrant inclusion on the Vale of Glamorgan's County Treasures list.

Judith Alfrey

1 August 2019

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
22nd March 2020

Dear Members of the Petitions Committee,

RE: Petition P-05-949. Save Cowbridge Old Girls' School from Demolition

Thank you for considering our petition which calls on the Welsh Assembly to urge the Welsh Government to protect the former Intermediate School for Girls, Cowbridge, from demolition. The school was the first intermediate school throughout Wales and England to be built specifically for the education of girls as a result of the Welsh Intermediate Education Act of 1889. It stands as an attractive testament to a pivotal moment in Welsh history about which we should be quite rightly proud. The building is under threat of demolition and the petition calls on the Welsh Government to protect it through either listing or the provision of additional social housing grant to allow the developers (Hafod Housing Association) to convert the building.

As outlined in the Minister's response of 6th March 2020, our campaign group has previously requested that Cadw consider the former Cowbridge Girls' School for listing. In order to provide new information in support of listing, we commissioned Robert Scourfield MA IHBC FSA to undertake a detailed historical and architectural appraisal of the school in June 2019. Mr Scourfield is a full member of the Institute of Historic Building Conservation and has served as a local authority buildings conservation officer for over 24 years. He also worked on the Cadw Resurvey of Wales from 1993-1995 and was a Cadw Inspector of historic buildings from 1999-2000. His full report, which was submitted to Cadw in July 2019, is enclosed for your information so that it can be considered alongside the petition and Ms Alfrey's response of the 1st August 2019.

Whilst it is respected that the Minister is obliged to concur with the opinion of Ms Alfrey, we would like to respectfully point out that her conclusion is very much based on her own highly subjective opinion rather than the clearly laid out guidelines for assessing suitability for listing. Enclosed is the rebuttal to Ms Alfrey's report which was sent to Cadw in August 2019. Cadw declined to respond to this rebuttal stating that it did not include any additional new information in support of listing, however, since it provided evidence to counter Ms Alfrey's view not to list, we feel this deserves consideration and an appropriate response.

More specifically, one of the reasons put forward for not listing the school buildings is that it would have been considered and rejected for listing in 1999 when Cadw undertook a community resurvey to identify historic buildings. No evidence has been presented to demonstrate that this was the case and there is the possibility that it was simply 'missed' due to the high density of listed buildings within Cowbridge. Furthermore, in the twenty years since the resurvey, knowledge surrounding Victorian buildings has increased substantially along with our appreciation of such buildings.

Another concern, as highlighted in Mr Scourfield's rebuttal, is that Ms Alfrey's report does not consider the merits of the architects. Mr Scourfield's report has led to the unearthing of a significant amount of information regarding the importance of Robert Williams, the architect of the original school buildings. As a result, Professor Dafydd Johnston has recognised that Robert Williams has provided a significant contribution to Welsh culture and an entry is currently being written for inclusion in the Dictionary of Welsh Biography and will be published shortly. This development in itself warrants further consideration by Cadw.

Following Cadw's response to Mr Scourfield's report and the widely differing views of Ms Alfrey and Mr Scourfield, a request for a peer review of the listing decision was made via Jane Hutt AM. We enclose both the letter sent to Jane Hutt AM (including a table detailing instances where historic buildings have been converted into social housing) and also the response received from the Minister on 11th September 2019 declining a peer review.

In September 2019 the Victorian Society listed the school buildings in their 'Top 10 Endangered Buildings List' – the only building in Wales included in the listing. Christopher Costelloe, Director of the Victorian Society, said *'Cowbridge School is a beautifully crafted building, solid, handsome and capable of being reused. Its thoughtless demolition would be a huge blow to the town. Many other Victorian school buildings are in a similar position – these buildings can and should be reused.'*

As a result of the listing decision by Cadw, the recognition of the importance of the building by the Victorian Society and the continuing feeling within the heritage profession that the building should be protected, in November 2019 we met with the developers (Hafod Housing Association) at a meeting chaired by Jane Hutt AM. During the meeting we discussed options for retention of the building for social housing and that it was felt it would be a fitting tribute to the architect who was an early pioneer for social reform. Due to the reasons cited for demolition being purely financial, we discussed options for community funding raising schemes to bridge the gap and also opportunities for heritage funding. Hafod Housing Association's recent conversion of Aberdare Intermediate School for Girls was discussed and how this demonstrated that historic buildings could be repurposed for social housing in line with current building standards (article enclosed). Unfortunately, all options for retention of the building were declined, and the building once again is subject to a planning application for demolition (due before the Vale of Glamorgan Planning Committee on 28th April 2020). The sale of the site to Hafod Housing Association by the Sir Thomas Mansel Franklen Trust is subject to planning permission for the scheme being approved.

As a result of the real threat of loss of this important historic asset, the petition was launched on 18th February 2020. Due to the imminent planning decision, there has been only a short time in which to collect signatures, however, the number collected demonstrates the overwhelming objection to loss of this building and that this resonates further afield than the immediate locality. Therefore, given the national level of support to save the building, the communal value (which forms part of the listing criteria) should be considered as high.

In order to demonstrate that Cadw's decision is widely disputed, we enclose a letter to the Deputy Minister for Culture Sport and Tourism which has been signed by a number of highly esteemed experts across the heritage profession. Also included with this letter is a report from Dr Sian Williams, former senior lecturer in educational history at Cardiff Metropolitan University, who states that the school 'was a building of note in both Wales and England'. The signatories of the group letter include several Fellows of the Learned Society of Wales, British Academy Fellows, the Director of the Victorian Society, the President of the Post-medieval Archaeological Society, the President of the Royal Historical Society, the President of the Honourable Society of Cymmrodorion, the former President of the British Academy and former member of Cadw's Historic Building Council. Given the aforementioned subjective nature of Cadw's rejection to list the building by a single specialist in comparison with the number of highly respected specialists and academics who oppose this decision, we feel that this calls into question Cadw's assessment of the building and calls for greater scrutiny of their decision not to list.

In summary, we ask that you consider all of the concerns raised in this letter and enclosed documents regarding the decision not to list this important building. We feel that the extreme views of Cadw and the Minister in comparison to those who have signed the group letter demonstrates that at the very least a peer review is warranted, if not their decision overruled and the building protected through listing.

During our research we came across a quote from Maud Gunter, one of the first pupils who attended the school and later returned as headmistress. In 1971 when the girls' school was about to close and amalgamate with the local boys' school, she gave this message to the pupils:

'You can be proud of the history of your school. See to it that you uphold its record in your own day and generation.'

We now call on the custodians of our heritage to ensure that this building is preserved for generations to come and that it is protected so that it can continue to stand proudly as a reminder to the role that it played in ensuring equal opportunities in the education of women and that Wales, as a nation, was pivotal in creating these opportunities.

Yours sincerely,

A handwritten signature in cursive script, reading 'Sara Pedersen', enclosed in a light blue rectangular border.

Sara Pedersen
SAVE Cowbridge Girls' School Campaign Group

FORMER COWBRIDGE COMPREHENSIVE SCHOOL, ABERTHIN ROAD, COWBRIDGE - AN HISTORICAL AND ARCHITECTURAL APPRAISAL



Prepared by Rob Scourfield M.A. I.H.B.C. F.S.A.

scourfieldconsultancy.co.uk

June 2019

EXECUTIVE SUMMARY

This appraisal of the heritage interest of the former comprehensive school at Aberthin Road, Cowbridge reassesses reports from various parties including the planning applicant, Cadw, the Vale of Glamorgan Council and the Victorian Society. Extensive research has produced a fascinating wealth of new information which underpins the very high architectural and historical importance of the school not just in a local context, but critically, in a national one. Whilst the building is undoubtedly a candidate for inclusion within the register of 'county treasures', it is also an obvious candidate for statutory listing.

The importance of the school may be summarised thus:-

Historical Importance.

- Cowbridge was the first girls' intermediate school to be built (1895-6) in Wales and England, under an Act of Parliament that was of seminal Welsh importance.
- The school was built amid notorious local acrimony, which resonated at a national scale, Glamorgan being the last county in Wales to adopt the county schools scheme as a result.
- Amid its contemporaries, Cowbridge was highly unusual in including accommodation for boarders at the outset and for being funded to a great part, by private patronage (not strictly in the spirit of council-provided education).

Architectural Importance

- The original character of Cowbridge School survives intact to a very high degree, externally and internally. It retains its original plan-form and was extended in 1909 in a remarkably sensitive manner.
- Only 5 comparable (of some 95 in total) schools are listed across Wales. A survey of them all confirms that Cowbridge survives to an equivalent degree to some and to a better degree than others.
- The architectural style of Cowbridge School is of greater quality than the majority of intermediate schools built across Wales, constructed of carefully-dressed limestone and designed with some flair as a picturesque and striking group. Certain details such as the unusual dormers, 'baronial' hostel range (with crow-stepped detail and pretty oriel window) and prominent corner chimneys, are atypical of the standard 'county' school vocabulary. Its immediate setting within its original railed forecourt survives intact.
- The sensitive design and siting of the school was no accident. The architect of the original school, Robert Williams, is a figure urgently deserving of greater recognition. He was a renowned radical, prominent (and rather early) advocate of building conservation, a national pioneer in terms of social housing (in Wales and England), archaeologist and early promoter of the Welsh School of Architecture (and in tandem, a noted critic of contemporary building design and practice in South Wales). He was also a proponent of the

Welsh language in building literature, and designed some prominent buildings in South Wales. In his later years, he was central to the Welsh community in Egypt, designing buildings for the Davies Bryan family, who were prominent in the promotion of Aberystwyth University. Rhys S Griffiths, architect of the extensions was a prolific and talented architect in South Wales, who eschewed his typical classical manner in response to his predecessor's work at Cowbridge. Robert Williams especially emerges from the shadows of history as a key figure in the history of late Victorian industrial Wales - he urgently deserves a biography.

Historical, evidential, aesthetic and communal values

- The schools survive as a prominent and attractive testimony to a specially Welsh education Act of Parliament. Its exterior character and interior plan-form and fixtures intact to a very high degree, as recognised by the Victorian Society. The school is central to the history of Cowbridge and plays a significant part of the educational history of Wales. Its communal importance is evidenced by the level of objection raised at the proposed demolition of the school.

The setting of Cowbridge Conservation Area

- A separate study by Dr Tudur Davies demonstrates that there is inter-visibility between the school and the nearby conservation area, and as such, the demolition of the schools would affect the setting of the conservation area.
- In terms of relevant Welsh policy guidance, the 'sensory' implications of demolishing the schools on the setting of the conservation area are also relevant. The history of the school is intrinsically linked to that of the town in educational and social terms, and was clearly designed as an 'eye-catcher' building prominently set along one of the main routes into Cowbridge. Its loss would be of great detriment to the setting of the conservation area - and indeed, there is good argument for the inclusion of the school within the conservation area itself, notwithstanding modern infill between it and the historic town.

Condition and viability

- The structure, layout and construction of the schools would confirm that any structural problems would be localised and largely associated with post-closure neglect (typically blocked gutters and gullies, failing flashings etc). The buildings appear to be in sound structural condition and readily capable of conversion to a new use.

All of these aspects are considered in greater detail within the body of the report.

Lord Dafydd Elis-Thomas AM
Deputy Minister for Culture, Sport and Tourism
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

18th March 2020

Dear Lord Elis-Thomas,

Old Girls School, Aberthin Road, Cowbridge, Vale of Glamorgan

We, the undersigned, write to demonstrate our objection to the decision not to list the former intermediate School for Girls on Aberthin Road, Cowbridge which we consider to be of high architectural and historical importance on a national level. The school is currently under threat of demolition as part of a proposed housing development on the site.

Concerned local residents have sought our support for the case to list the building by Cadw. With all due respect to Cadw, we find their rationale for rejecting to list the building to be lacking in this case, given the surviving architectural attributes of the building, the significance of the building in relation to the history of Welsh education, the history of equality in women's education and the output of Robert Williams, the school's architect, a figure of outstanding importance, hitherto rather in the shadows.

The Welsh Intermediate Education Act of 1889 was a specifically Welsh experiment, where, for the first time in British history, intermediate education was to be offered to all children, regardless of their economic status or ability. The Welsh Intermediate Education Act pre-dated similar legislation in England by 12 years, which is a fact about which Wales should be proud. The schools built in response to the act were an educational experiment of national importance, putting Wales at the forefront. Cowbridge has the accolade of being the first purpose built Intermediate Girls' School in Wales, constructed in 1895-6 and skilfully extended in 1909.

Some 95 Intermediate schools were built in Wales. Of these, only five are listed, that at Pontypridd now sadly derelict. The intact nature of the Cowbridge School - externally and internally - compares very favourably with the listed schools. Typically, many schools were modernised across Wales, but Cowbridge retains many splendid features including the original staircase, open timbered roofs, doors, partitions, fireplaces etc.

It is a national tragedy that Cadw refuses to list the building, their decision based on ignoring it during the resurvey of Cowbridge in 1999, at a time when our understanding of Victorian buildings and their architects in Wales was somewhat lower than at present. We contest Cadw's conclusion that the school has been too heavily altered to retain its original character, given the sympathetic manner in which it was extended in 1909. Cadw's claim that the school has lost its character following the replacement of some of its original windows with UPVC is also perplexing, given that this has not altered the main fabric of the building and that there are numerous examples of buildings listed in Wales without their original fenestration.

Of the 95 Intermediate Schools to be built, Cowbridge is highly original in its style, the nods towards Scots Baronial and the striking array of chimneys of special note. The construction of local limestone (eschewing the typical brick trim) reveals the ideals of the original architect, Robert Williams, a renowned radical, prominent (and rather early) advocate of building conservation, a national pioneer in terms of social housing (in Wales and England), archaeologist and early promoter of the Welsh School of Architecture (and in tandem, a noted critic of contemporary building design and practice in South Wales). He was also a proponent of the Welsh language in building literature, and designed some prominent buildings in South Wales. He has emerged from the shadows as an important and highly influential figure and a talented designer. His practice extended to London, and later, Egypt. He is one of a very few Welsh 'exports' in terms of architects and was at the very centre of national debate on social issues including welfare, architectural design and conservation. Robert Williams has also been recognised by the Dictionary of Welsh Biography as providing a significant contribution to Welsh culture.

In terms of local politics, so strong was the opposition of Cowbridge grammar school to adopting the county scheme, that this resulted in Glamorgan being the last county to adopt the provisions of the 1889 Act. This controversy propitiated the foundation of the new girls' school, aided by a local benefactor.

In short, the school stands as testimony to the remarkably early provision of free school education in Wales and is a pioneer in being the first girls' Intermediate School to be completed within the country. In terms of education for girls, the school at Cowbridge is a very important aspect of Welsh history, surely resonating strongly with the aspirations of the Welsh Government with regards to gender equality. Put simply, it is a monument of Welsh history to be proud of.

We ask the heritage minister to reconsider the listing of the old girls school in Cowbridge and undertake an independent peer review of the decision not to list the building. To allow the demolition of a building of such demonstrable architectural and historical importance would be a national disgrace and would run counter to the spirit of a devolved Wales, as so well enshrined within the Well-being of Future Generations (Wales) Act 2015.

Yours sincerely

Dr Lloyd Bowen BA MA PhD FRHS. Senior Lecturer in Early Modern and Welsh History, Cardiff University.

Alan Brooks BA. Architectural Historian; Specialist in Historic School Buildings, Author of several Pevsner buildings of England volumes.

Chris Costello Director of the Victorian Society.

Dr Jonathan Durrant BA (Hons) MA PhD FHEA. Principal Lecturer in History, University of South Wales.

Professor Robert Evans FBA FLSW (Founding Fellow and member of its inaugural Council). Regius Professor of History Emeritus at the University of Oxford.

Professor Margot Finn PhD FBA Professor of Modern British History, UCL, President of the Royal Historical Society

Professor Angela V. John BA MA PhD FRist.S FLSW Honorary Professor of History, Swansea University; historian and biographer.

Professor Dafydd Johnston BA PhD FLSW. Director of the University of Wales Centre for Advanced Welsh and Celtic Studies; Editor of the Dictionary of Welsh Biography.

Dr Kate Giles BA MA PhD. Buildings Archaeologist (specialising in Medieval and Post Medieval Buildings); Senior Lecturer and Director of the MA in Archaeology of Buildings, University of York.

Dr Marion Löffler Dipl Päd DPhil FRHS. Reader in Welsh History, Cardiff University; Assistant Editor of the Dictionary of Welsh Biography.

Professor Lord (Kenneth Owen) Morgan of Aberdyfi DLitt (Oxon.) FBA FLSW (Founding Fellow). Fellow in Modern History, the Queen's College, Oxford; Former Vice-Chancellor, University of Aberystwyth; Senior Vice-Chancellor, University of Wales; Editor of Welsh History Review/Cylchgrawn Hanes Cymru, 1971 - 2002; author of 35 works on Welsh and British history.

Professor Prys Morgan DL DPhil FSA FLSW (Founding Fellow). Emeritus Professor of History, Swansea University; President of the Honourable Society of Cymmrodorion; Former member of Cadw's Historic Building Council. Cwrt Herbert, Bishopston, Swansea, SA3 3DW

Jacqui Pearce BA (Hons) FSA MCIfA. Senior Ceramics Specialist, MOLA, London. President of the Society for Post-Medieval Archaeology.

Dr Oriel Prizeman MA (Cantab) AADip PhD (Cantab) RIBA SCA. Chartered Specialist Conservation Architect; Reader and Course Director MSc Sustainable Building Conservation, Welsh School of Architecture, Cardiff University.

Rob Scourfield BA MA IHBC FSA. Pembrokeshire coast conservation officer, former Cadw inspector; Author of a number of 'Pevsner' Buildings of Wales volumes.

Professor Patricia M. Thane MA (Oxon) PhD (LSE) FBA. Professor in History, Birkbeck College, London; author of several publications on modern gender and political history.

Professor Sir Keith Thomas CH FBA FLSW (Founding Fellow). Honorary Fellow of All Souls College, former Professor of Modern History, University of Oxford; Past President of the British Academy.

Dr Christopher J. Whitman B.Arch (Hons), Dip.Arch, Architect, FHEA, PhD. Lecturer and Course Leader MSc in Sustainable Building Conservation, Welsh School of Architecture, Cardiff University.

Esther Robinson Wild BA PgDip MA ACIfA. Historic Environment Consultant; Honorary Research Associate, Department of Archaeology, University of York.

Dr Sian Rhiannon Williams BA (Hons) PhD. Historian; Former Senior Lecturer in History Education, Cardiff Metropolitan University.

Dear Members of the Petitions Committee,

4th May 2020

RE: Petition P-05-949. Save Cowbridge Old Girls' School from Demolition

Further to my previous letter dated 22nd March, 2020 I enclose further correspondence that our group has had from the Deputy Minister for Culture, Sport and Tourism. Following submission of the group letter (Encl. 6 in my previous correspondence), the Minister responded on 29th April, 2020 to inform us that he had requested an independent assessment of the listing decision and this was undertaken by Richard Hayman, an independent heritage consultant. I enclose the response from the Minister (Enc. A) alongside further reports from Ms Alfrey on behalf of Cadw (Enc B, dated 26th March, 2020) and the report compiled by Richard Hayman (Enc. C, dated 7th April, 2020).

In my previous letter I laid out the reasons for our request of an independent peer review and feel that the response from the Minister does not satisfy this and indeed raises many concerns about their selection criteria for independent assessments. As previously discussed, there are clearly laid out procedures in place for an independent peer review of listing decisions through Historic England or Historic Scotland. It is unclear why this course of action has not been undertaken in this case and how and why the Minister has instead selected his own assessor in the absence of any transparent selection criteria.

I also enclose a rebuttal prepared by Dr Tudur Davies and Robert Scourfield to the latest reports from the Minister, which was submitted today (Enc D 4th May 2020). As outlined in their email response (Enc E), there are serious questions regarding the selection criteria of Richard Hayman as an independent consultant in this case in addition to concerns over the subjective and bias nature of his report. I would particularly like to draw to your attention to the fact that Richard Hayman is currently contracted by Cadw as a self-employed consultant to assist in clearing the backlog of spot-listing requests. In addition, a member of his immediate family is currently working in partnership with Hafod Housing Association, who are the developers seeking demolition of the school. **These are two very clear conflicts of interest which have not been disclosed.**

The lack of transparency in due process and procedure, lack of consistency in decision making, failure to address concerns repeatedly raised, failure to acknowledge the viewpoint of leading specialists as outlined in the group letter and failure to demonstrate an ability to select an independent reviewer raises serious questions over the handling of the listing decision. An independent peer review by Historic England or Historic Scotland is urgently required to ensure that no biases or conflict of interests can be inferred.

We therefore ask you to ensure that the correct due processes are put in place, and adhered to, to ensure that an important part of our history is not lost. The evidential historical, aesthetical and communal values of the former Cowbridge Intermediate School for Girls have been clearly demonstrated and a group of the county's leading specialists in this area are all in agreement that this is an historically important building and should be protected for generations to come.

Yours sincerely,

A handwritten signature in black ink, reading "Sara Pedersen", written in a cursive style.

Sara Pedersen

SAVE Cowbridge Girls' School Campaign Group



Llywodraeth Cymru
Welsh Government

Yr Arglwydd Elis-Thomas AC/AM
Y Dirprwy Weinidog Diwylliant, Chwaraeon a Thwristiaeth
Deputy Minister for Culture, Sport and Tourism

Ein cyf/Our ref DET/00276/20

Dr Tudur Davies
[REDACTED]

29 April 2020

Dear Dr Tudur Davies,

Thank you for your email of 18 March and the additional information opposing Cadw's decision not to list the former Girls School, Aberthin Road, Cowbridge as a nationally important building of special architectural or historic interest.

I have received a considerable amount of correspondence about this matter and I know that there is a great deal of support for the retention of the School. I am grateful for the additional information that you have provided which I sent to Cadw for formal consideration. The new information has been assessed by Ms Judith Alfrey, Cadw's Head of Regeneration. In addition, I asked for all the information received by Cadw relating to the school to be considered against the listing criteria by Richard Hayman, an independent building historian and archaeologist <https://www.richard-hayman.co.uk/index.html>.

Ms Alfrey and Mr Hayman have considered the information separately and impartially. Both have concluded that the original decision not to list is in line with the criteria for listing and that the additional material provided does not alter that position. I have attached a copy of their assessments and have no reason to disagree with their conclusion.

I appreciate that campaigners are passionate about saving the building but my position is that I remain in agreement with the decision not to list the building.

I appreciate that my reply will be disappointing but as there is no real prospect of the building being listed, and if campaigners have not already done so, may I recommend that they submit representations to the Vale of Glamorgan Council so that their concerns can be taken into account in the context of local listing and in deciding the planning application.

Yours sincerely,

Yr Arglwydd Elis-Thomas AC/AM
Y Dirprwy Weinidog Diwylliant, Chwaraeon a Thwristiaeth
Deputy Minister for Culture, Sport and Tourism

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

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

Gohebiaeth.Dafydd.Elis-Thomas@llyw.cymru
Correspondence.Dafydd.Elis-Thomas@gov.wales

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

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

**Former Cowbridge Intermediate School for Girls: Assessment of Additional
Information, March 26th 2020**

Background

Dr Tudur Davies has written to the Deputy Minister raising a series of points in respect of the assessment of the former Girls School in Cowbridge, and enclosing a letter from the local campaign group, and additional information supplied by Dr Sian Williams. Having carefully considered the points in these three submissions, I have concluded that the information presented does not seriously challenge the basis of our previous assessments.

Assessment

I will address each of the points raised in turn:

1. That the building was not assessed against the criteria for listing.

We have carefully considered the case for special architectural and historic interest and addressed both aspects already.

In brief, for post-1840 buildings, the selection criteria point to the necessity to identify the best examples of particular building types, listing only buildings of definite quality and character. We recognise the intermediate school as an important building type, and the benchmark for listing is set by other examples previously cited. At Cowbridge, the original building does not wholly survive, as large-scale additions were made in 1909. We concluded that the building as it survives cannot be described as a good surviving example of a late C19 intermediate school, and that its overall architectural character (as a multi-phase building) has also been seriously compromised, most notably by the insertion of UPVC windows. This may seem like a minor incident, but the impact of refenestration on the architectural interest of buildings is very serious, undermining any claim to definite quality and character. Our assessment acknowledges the retention of some features (including roof structures and staircase), but we have concluded that overall, it is not an especially good or well-preserved exemplar of its type.

As regards historic interest, the case in favour rests on this building being the first intermediate school for girls in Wales. The criterion of historic interest focuses on buildings that illustrate important aspects of the nation's social, economic, cultural or military history. We are in no doubt whatsoever that the Welsh Intermediate Education Act is of seminal importance, and we have listed the best examples of schools built according to its provisions, including an early Girls School (Harold Road Junior School, Abergavenny). I am satisfied that the statutory list already includes buildings that illustrate this important aspect of national cultural/social history (both in respect of education generally, and education for girls more specifically). The ability of this particular building to illustrate that history is compromised by the points addressed in consideration of its architectural merits, principally the fact that it does not survive as built.

2. That the building is historically significant

We have addressed this in our consideration against the criteria; it is the Welsh Intermediate Education Act that is of historical significance, and we have already identified those buildings that best exemplify its provisions. We have also previously addressed the controversy that surrounded its establishment.

3. That the building is a C19 building of note

We have addressed this in our consideration against the criteria: as surviving, the building has a late C19 phase, but was considerably extended in the early years of the C20; although these alterations were carried out in a manner that respected the general style of the original building, they were on a very considerable scale, marking extensive change, particularly in overall form. The building has also been altered since, notably by the replacement of the windows with UPVC.

4. The contribution of the architect of the original building to Welsh culture

I am in no doubt that the architect (Robert Williams) is a highly interesting figure, but I am not persuaded that in itself this provides grounds to list this building, as his original design does not survive intact, and cannot be said to be a clear expression of his ideals. Any case for listing based on historical association is undermined for the same reason: the criteria direct us to consider the extent to which elements of a building's original contemporary character have been retained. As already set out, in this case, the original contemporary character has not been well retained.

Conclusion

Our evaluation necessarily refers back again and again to the architectural merits of the building; the criteria for listing are partly focused on special architectural interest, both in terms of design, decoration and craftsmanship, and also in terms of important examples of particular types; they are also partly focused on special historic interest: the illustration of important aspects of the nation's history. The illustrative capacity of a building is dependent on the quality and integrity of its historic fabric – the better preserved a building is architecturally, the better it is able to illustrate an aspect of history. On all these counts, the fact that the building does not survive as built, and that its final form has also been compromised by alteration, undermines any case for listing against the criteria of architectural interest, historic interest, or historical association.

Judith Alfrey
26th March 2020

Cowbridge Intermediate School for Girls

A request that this building should be considered for listing was made in December 2018, in response to a proposal to demolish the building and redevelop the site. An independent visual impact assessment was undertaken by Dr Tudur Davies in January 2019, which was chiefly concerned with demonstrating the building's contribution to the historic character of Cowbridge. Although it only suggested that the building be considered for listed status, the assessment nevertheless recommended that the building should be included in the list of County Treasures. The building was inspected by Cadw in February 2019 and was rejected for listing. The reasons for rejection included substantial extension that overwhelmed the character of the original school and unsympathetic alterations to a building that compared unfavourably with other listed examples of this building type. Subsequently, in June 2019 a report advocating its listing was commissioned by a local campaign group from Scourfield Associates. While this provided much background information, the content and the argument therein was considered insufficient to alter the original decision, as set out in a report by Cadw dated August 2019. Scourfield Associates subsequently submitted a Rebuttal and, in March 2020, a letter of protest was submitted to Cadw, signed by numerous academics and heritage professionals. The content of the letter, however, is largely a paraphrase of the Scourfield Rebuttal, with some escalation of language – Cadw is accused of 'ignoring' the building during Resurvey, while the hitherto largely obscure architect Robert Williams is now described as a man of 'outstanding importance'.

This report comments on the content of the Scourfield Rebuttal, the initial Scourfield Associates Report, and the letter of protest sent in March 2020.

The main points that have been made and reiterated are:

The significance of Robert Williams

Little of the biographical detail that has been provided is germane to his quality as an architect. The statement that Williams has 'emerged from the shadows' is not substantiated. It would be useful to know who is now interested in his architecture and which of his buildings are now attracting attention. As Robert Scourfield stated in his original report, Williams is rarely mentioned in the volumes of the Buildings of Wales (or England) and it is not clear how his qualities as an architect have previously been misjudged. For example, are there other buildings by him that have hitherto been unattributed, or have his known works been underestimated? The market hall at Pontypool is the only example of his work listed in Wales. It was listed principally as a surviving intact example of a Victorian market hall, rather than for its special architectural interest. John Newman described it as 'utilitarian'.

Cowbridge Intermediate School for Girls was the first example of its kind

The 1889 Intermediate Education Act made provision for boys' and girls' education, but whether this occurred in a mixed school (with separate entrances for boys and girls) or in separate schools was governed by practical considerations. The date of completion of schools under the Act reflected these considerations. In my opinion, therefore, the

landmark event was the passing of the Act rather than the completion of the first all-girl school built under its terms. In any case, Cowbridge was not the first Intermediate School to offer education for girls. It could be argued that mixed schools were a greater symbol of gender equality in education than single-sex schools. Of the five Intermediate schools that have been listed, two were girls' schools. The County School for Girls in Abergavenny (listed as Harold Road Junior School) was opened in 1897 and the Cardiff Intermediate School for Girls was completed in 1900 (and listed as Coleg Glan Hafren). I do not think they are of lesser historical significance because they happened to be finished later than Cowbridge. They are certainly of superior architectural quality.

Provision for boarders

Provision for boarders is described in the Rebuttal as rare, although no other examples are cited for Intermediate Schools (Bangor had boarders before it became an Intermediate school). Perhaps 'rare' is used as a cautious alternative to 'unique' in this context. However, other types of schools accepted boarders and, given the short lifespan of Intermediate Schools before the 1902 Education Act, this aspect of its history is ancillary to the debate about its historic importance. The state of preservation of its dormitories is not described in the Rebuttal or the previous Report, so the contribution they make to the evidential value of the building is uncertain. Their significance nevertheless seems to be limited and could therefore be used only to support the main argument for listing.

Local controversy

The rebuttal adds nothing new to counter the criticism made in Cadw's initial response. The Scourfield report compared Cowbridge with other listed Intermediate schools but, where it only considered the architecture of the other schools, it included the historical interest of Cowbridge. This unbalanced comparison has not been remedied.

Loss of architectural character

Cadw's main criticism of Scourfield's original Report was that it blurs the distinction between the original school of 1895-6 and the extension of 1909. This was not addressed in the Rebuttal. The interior description in the first Report is vague and relies, in the case of the assembly hall and classroom corridor, on photographs taken in 2017. Furthermore, it is not made clear whether the classroom and corridor belong to the 1895-6 or 1909 phase. Email correspondence with Cadw in 2019 has suggested that the fireplace surrounds in the building have been removed, but the Report specifically cites the fireplaces as part of the surviving fabric. Little detail is provided regarding the plan of the original school, which would be necessary to substantiate the claim that it retains its original plan 'to a very good degree' (although the word 'original' is applied in the Report and Rebuttal to both phases of work). There is evidence that the original plan was changed. A 1907 photograph of the original building shows a projecting gabled bay on the left side of the assembly hall, balancing the classroom wing on the right-hand side. This was replaced by a new two-storey range in the extension of the school in 1909. This is important because it shows that the original

balanced front (it was symmetrical in its mass but not in its fenestration) was lost in the 1909 extension.



this part was taken down in 1909

The most important exterior view of the school is the east front facing Aberthin Road. From here the original school is sandwiched between extensions, the result of which is that the building has more the character of 1909 than 1895-6. The original school comprises a 4-bay range (presumably the assembly hall) and a gabled classroom wing on its right-hand side. The school was extended by three additional gabled bays on the right side, larger in scale than the original work and including a new assembly hall at the right end. On the left side the original gabled wing was replaced by a two-storey block incorporating a shaped gable to the central bay (and which might have incorporated the extra dormitory added in 1909, although Scourfield describes it as a classroom block). This largely obscures the original entrance/dormitory range of the school, which is set further behind and is no longer visible from the road to its best advantage.

The Rebuttal's argument that many listed buildings have been extended, restored or re-fashioned in other ways over time is employed in a misleading way. The important point is whether later work has intrinsic merit and whether it adds to or detracts from the architectural interest of the original work. In the case of the Cowbridge Intermediate School the later work does not have special architectural interest for its date, and by its scale it dominates a view of the school from the road, subsuming the 1895-6 work. This is inadvertently recognised in the Rebuttal where it states that the aesthetic value of the building relies to a significant extent on its dramatic roofline, a clear reference to the triple-gabled 1909 work.

A comparison of the Cowbridge school with other listed intermediate schools was covered in Cadw's previous response and the Rebuttal offers no counter arguments.

Replacement of windows

The Rebuttal rejects Cadw's opinion that loss of original windows is a negative factor in considering the building for listing. To counter it, some examples are quoted of buildings that have been listed in spite of having plastic windows, giving the impression that window alteration is not an important factor. This is clearly wrong. In considering a building for listing the window detail is of varying importance, depending on its contribution to overall character and architectural merit. In a building which has large windows, which the assembly hall and the original classroom wing, as well as the 1909 extensions all do, the original window detail is important to the overall historic character. The Rebuttal plays down the importance of the windows, but Cadw's original site inspection correctly noted that the loss of the original window detail and its replacement using unsympathetic materials is a significant negative factor.

Conclusion

Neither the Rebuttal nor the more strongly worded letter of protest offers any new insights or arguments that make a convincing case for overturning the decision not to list. The Rebuttal does not make a full assessment of the building, as it overlooks or plays down the importance of any negative factors. In my opinion the historical argument that the building represents a significant 'first' is also overplayed.

Richard Hayman

7 April 2020

Former Girls School, Aberthin Road, Cowbridge – Response to Listing Assessment of March/April 2020

By Tudur Davies BA Hons, MA, PhD

Robert Scourfield MA, IHBC, FSA.

Executive summary

This report has been compiled in response to assessments by Judith Alfrey (Cadw) and Richard Hayman (independent consultant) which were commissioned by the Deputy Minister of Culture Sport and Tourism in March 2020. Both Alfrey and Hayman advise that the former Intermediate School for Girls does not meet the criteria for listing. Their assessments do not recognise the extent to which the original 1895-6 school building survives and overlook the historic value of the school despite the fact it was the first purpose built intermediate girls school across both England and Wales. These views are contested as being inaccurate and highly subjective in nature. Our rationale for objecting to these assessments are described according to the four forms of heritage value outlined in Cadw's Conservation Principals (2011).

Evidential value

Alfrey and Hayman claim that the school does not survive as originally built and that it has been excessively altered such that it no longer retains the character of the original 1895-6 building. However, new research undertaken in preparation of this report demonstrates that to the contrary, the original girls' school in Cowbridge survives to a very high degree retaining more than 72% of the façade around its original perimeter and more than 84% (possibly even 100%) of the original footprint of the building. Internally, changes to its original layout have been minimal, consisting only of the removal of one partition wall and the removal of part of an external wall from the 'professor's room' to create a corridor leading to the classrooms and hall of the 1909 extension. Numerous original features still survive within the building, including original fireplaces, staircase, roof-beams and the original 1895-6 water cistern located above the servants' bedroom.

The claim that the school has lost its original character as a result of the 1909 extension is contested, given that the majority of that building work was undertaken in identical style to the original school. The old entrance wing was partially demolished as part of the 1909 works, but new evidence suggests the retention of the internal walls, the majority of the external ground floor walls, windows and doorway, demonstrating a continuity in style between the two phases of building. Indeed, from both an internal and external perspective, it is very difficult to differentiate the two phases of building. Given the skilful manner in which the 1909 extension blends with the original structure, it is argued that the unfair criticism of the 1909 work as being without 'special architectural interest' is entirely misleading, as is the claim that it has lost its original character. It also is noted that several buildings across Wales have been listed despite more extensive modification (including replacement of fenestration).

Historical value

Both Alfrey and Hayman contest that there is any significance to the fact Cowbridge was the first purposely built intermediate girls' school across both England and Wales. They claim that other schools built at the same time are better preserved (without substantiation) and suggest that schools such as

Abergavenny and Cardiff girls' intermediates 'illustrate this important aspect of cultural history'. However, the current examination of the historical contexts of these schools suggests that Cowbridge is as well preserved if not better than the examples given by Alfrey and Hayman and have very different social contexts that contributes to its genuine significance. Hayman also subjectively contests that mixed schools were symbols of greater equality, yet historical sources also suggest that mixed schools were often prejudicial in the implementation of the curriculum. From an architectural perspective this is also immaterial given that Hayman himself notes differences between the designs of mixed and single sex schools. Early schools built specifically for girls are also very rare, especially one like Cowbridge which had purpose built science facilities built from their onset.

Richard Hayman's assessment questions the extent to which Robert Williams, the school's architect should be recognised for his design skills. Although the extent of Williams' surviving work is uncertain, this report provides prominent examples of his work across the world that survive because of the use of quality materials and his prizewinning designs.

Aesthetic Value

Although the old girls school in Cowbridge is an architecturally attractive building, Alfrey and Hayman claim that the loss of original fenestration has resulted in a loss of architectural character. This is both subjective and inaccurate as there are in fact original stained glass windows retained within the school's hostel range. Furthermore, the replacement of other original windows by UPVC frames does not negate the character of its standing masonry and original internal features. Such UPVC windows are easily replaced to restore the character of the building and there are many examples of buildings that have been listed throughout Wales despite replacement of some or all of the original windows.

Communal Value

Even if Alfrey and Hayman think the school is unworthy of listing based on its architectural and historical merits, their opinions are contrasted by more than 20 senior academics and specialists with more specific experience in the history of education in Britain. The communal value of the building is also demonstrated by over 5,500 signatures calling on the Welsh Assembly to urge the Welsh Government to intervene to save the building. Their views are as valid, if not more so than Alfrey and Hayman, and should not be brushed aside.

This evidence is discussed in greater detail within the report to support the conclusion that the school should be considered as having a high national significance and should be reconsidered for listed status.

Agenda Item 3.5

P-05-955 Objection to proposal by Costain to implement Option B in the rerouting of the A465 at Brynmawr

This petition was submitted by Heads Of the Valley Petition Group having collected a total of 1,128 signatures.

Text of Petition

For the reasons below, we the undersigned, object to the proposal by Costain to implement Option B in the rerouting of the A465 at Brynmawr. Costain favour option B and intend that it will be implemented in April 2020. There will be no entrance or exit to or from Brynmawr from the Western Valley. Option B will dramatically increase the already excessive volume of traffic through Beaufort Village and Brynmawr as drivers heading West have no way of getting onto A465 from the Western Valley areas. ,e.g Nantyglo, Blaina, Abertillery, Aberbeeg, LLanhilleth, Blaenavon etc. There will be implications for traders in both Beaufort and Brynmawr as the already struggling towns will be bypassed by traffic travelling from the East. The environmental impact on both towns will also be unacceptable due to the increased carbon emissions from slow moving traffic which, during peak times is already at a standstill. The road through Beaufort has a 7.5 tonne weight restriction; however, heavy traffic in excess of 7.5 tonnes will not be able to access the A465 without travelling through Beaufort and Brynmawr Public transport will have a detour of up to 6 miles to access the A465.

Assembly Constituency and Region

- Blaenau Gwent
- South Wales East

P-05-955 - Objection to proposal by Costain to implement Option B in the rerouting of the A465 at Brynmawr

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Reference: RS20/12394-1

aiIntroduction

Petition Number: P-05-955

Petition title: Objection to proposal by Costain to implement Option B in the rerouting of the A465 at Brynmawr

Text of petition: For the reasons below, we the undersigned, object to the proposal by Costain to implement Option B in the rerouting of the A465 at Brynmawr. Costain favour option B and intend that it will be implemented in April 2020. There will be no entrance or exit to or from Brynmawr from the Western Valley. Option B will dramatically increase the already excessive volume of traffic through Beaufort Village and Brynmawr as drivers heading West have no way of getting onto A465 from the Western Valley areas. ,e.g Nantyglo, Blaina, Abertillery, Aberbeeg, LLanhilleth, Blaenavon etc. There will be implications for traders in both Beaufort and Brynmawr as the already struggling towns will be bypassed by traffic travelling from the East. The environmental impact on both towns will also be unacceptable due to the increased carbon emissions from slow moving traffic which, during peak times is



already at a standstill. The road through Beaufort has a 7.5 tonne weight restriction; however, heavy traffic in excess of 7.5 tonnes will not be able to access the A465 without travelling through Beaufort and Brynmawr. Public transport will have a detour of up to 6 miles to access the A465.

1. Background

Under the Highways Act 1980, the Welsh Government is the highway authority for the Welsh trunk road and motorway network. This includes the A465, commonly known as the 'heads of the valleys' road, which runs from Abergavenny to Neath.

A465 Section 2

The Welsh Government is undertaking a project to dual 40km of the road between Abergavenny and Hirwaun. The project was split into six sections to enable a phased delivery, and includes a scheme to widen the road between Gilwern and Brynmawr – known as section 2 of the project. The Welsh Government has published an overview of the scheme and a number of documents relating to it.

This section of the project involves converting 8km of the road to 2 lanes in each direction. It was awarded by the Welsh Government to Costain in June 2011.

A public inquiry was held in March 2014 and in October 2014 the Welsh Government issued a decision letter confirming the Orders for the scheme.

The scheme was originally due for completion in 2018. The Welsh Government's website now states that it will be completed in Spring 2021.

In February 2020, the Wales Audit Office (WAO) published a report into the scheme. This stated that it:

...will cost the public purse around £100 million more than estimated at the start of construction and take more than two years longer than expected to complete.

There has also been a legal dispute between the Welsh Government and Costain as reported in the media.

Temporary road layout options

This petition concerns changes to the temporary road layout already in place around the Brynmawr roundabout to allow for certain aspects of work to take place. In his letter to the Chair of the Committee, the Minister for Economy, Transport and North Wales describes the proposal as:

... a significant change in the temporary road layout...which is essential to the completion of the project.

As outlined in the Minister's letter, two options have been considered for the temporary road layout. He states:

...consideration of options has identified that there is no solution that does not involve disruption in the area...two main options were identified as the most likely to meet the project requirements, option A and option B.

The Minister considers that "option B is the optimum solution overall".

The petitioners raise concerns regarding the impact option B would have. The Minister's letter to the Chair states that under this proposal, the westbound exit-slip road from the A465 into Brynmawr would be closed until near the project completion date and the westbound entry-slip road onto the A465 would be closed for 3 months. The petitioners are concerned over the impact this would have on trade in Brynmawr, over the possibility of heavy vehicles passing through Beaufort, and the congestion and delays the diversion would cause.

The impacts of the proposal have also been reported in the media.

In his letter to the Chair, the Minister states:

...the traffic modelling carried out indicates that motorists would travel into Brynmawr quicker under option B...Option B is anticipated to improve journey times as a whole and reduce the incentive for rat-running as predictability improves. The diversion route should take 7 minutes.

The Minister also outlines that there is a 7.5 tonne weight restriction for vehicles traveling through Beaufort and that signing to make drivers aware of this has been “reinforced”.

Public consultation

Public exhibitions were due to be held in March 2020 to outline the impacts of the two options after which the Welsh Government:

... [hopes] that a number of those who have signed the petition will understand why option B is the optimum solution overall.

Due to the Coronavirus pandemic, these events have been delayed. However, in his letter to the Chair, the Minister states that changes “will not occur” until this engagement has taken place.

In March 2020, a statement was posted on the official Twitter account for the project regarding the postponed public consultation events. It stated:

We are currently exploring alternative methods to communicate the options and we will publicise these as soon as is possible in the current circumstances and at the latest by mid-April.

As of the 29 April, at the time of writing this brief, no further information on the events was available.

2. Welsh Government and Senedd Action

On 19 February 2020, the Minister for Economy, Transport and North Wales issued a written statement providing the latest position on the section 2 scheme.

Whilst the temporary road layout options for this aspect of the works have not been debated in the Senedd, there have previously been a number of questions raised regarding the overall scheme. The Public Accounts Committee (PAC) also plans to conduct an inquiry into the scheme due to the project going over budget and being significantly delayed.

Most recently, the impact of the Coronavirus pandemic on construction work leading to further project delays was raised in Plenary. The Minister stated:

I think we have seen construction in a number of areas being maintained in order to support the health and economic effort that's under way right now...the A465 as well—a vital piece of economic infrastructure that will be at the heart of the regional economy and the resurgence from coronavirus in the years to come.



Eich cyf/Your ref P-05-955
Ein cyf/Our ref KS/00903/20

Janet Finch-Saunders AM
Chair, Petitions Committee

Government.Committee.Business@gov.wales

17th April 2020

Thank you for your letter of 16 March regarding 'Petition P-05-955 Objection to proposal by Costain to implement Option B in the rerouting of the A465 Brynmawr.'

Costain are undertaking a significant change in the temporary road layout in the construction of the A465 Section 2 project which is essential to the completion of the project. The proposal is to switch both lanes of traffic up onto the high split-level new A465 for the westernmost 2km of the scheme. The traffic switch enables construction work to begin on the existing low-level A465 which has been carrying the traffic until now.

A number of options have been considered to manage traffic while this work is carried out. In choosing an option the project team have balanced a number of competing factors taking into consideration:

- Safety to the travelling public and workforce
- Journey times and reliability on the A465 and on the local road network
- The level of disruption to the local communities along the route.

However, consideration of options has identified that there is no solution that does not involve disruption in the area with the project team's priority to minimise that level of disruption. As a result of the work done to date, two main options were identified as the most likely to meet the project requirements, Option A and Option B.

Assessment of the Option A layout identified extensive queuing and the need to investigate alternatives. The development of Option B has involved extensive stakeholder consultation. Costain have developed their proposals in conjunction with the Traffic Management Liaison Group (TMLG) which includes officers from the local authorities, South Wales Trunk Roads Agency and the Emergency Services. The project team have consulted with local elected members and the Brynmawr Business Forum.

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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.

A full briefing session has taken place with the Brynmawr Business Forum to explain predicted traffic delays under option A and to explain that the traffic modelling carried out indicates that motorists would travel into Brynmawr quicker under option B. The traffic management is designed to facilitate free flowing A465 traffic, although still limited to 40mph. Option B is anticipated to improve journey times as a whole and reduce the incentive for rat-running as predictability improves. The diversion route should take 7 minutes.

It is recognised that to avoid queues on the A465 under the current layout, additional traffic has been experienced in Beaufort. We also recognise that the current Blaenau Gwent CBC diversion route, following the closure of the A4046, has increased traffic on the A4047 between Beaufort and Brynmawr Roundabout where the current layout has queues on the A465.

During the 3 month westbound on-slip construction, advance signage and diversion routes will minimise A467 traffic traveling through Beaufort and A465 traffic will use the free flowing A465. Following the completion of the westbound on-slip traffic it is anticipated that westbound A467 traffic would use the free flowing A465. We do not anticipate a significant increase in traffic or queuing therefore do not anticipate an increase in emissions. There is also a 7.5t restriction for vehicles traveling through Beaufort and we have reinforced advanced signing of the weight restriction.

While Option A appears to operate in a similar way to the existing layout and could provide some benefits during off-peak times, it will introduce significant congestion on both the A465 and local road network at peak times in the morning and evenings and encourage rat-running. It is also not a suitable layout for large vehicles.

Option B, westbound exit-slip road into Brynmawr will be closed until near project completion. The westbound entry-slip road will be closed for 3 months. Officials continue to challenge Costain to explore opportunities to complete the works as quickly and as safely as possible. In addition, once the scheme is completed, access into Beaufort and Brynmawr from the A465 will be via Brynmawr roundabout similar to the arrangements in place before construction started.

Further stakeholder engagement is planned to outline to the public the impacts of both options after which it is hoped that a number of those who have signed the petition will understand why Option B is the optimum solution overall. This was to be in the form of public exhibitions but due to the COVID-19 restrictions the project team are developing alternative ways to undertake this information exercise. The switch will not occur until this engagement has occurred.

Finally, I can assure you that officials are doing everything possible to mitigate any potential negative impacts arising from the new temporary traffic management. Everyone involved in the project continues to be very grateful to those living and working in the area for their patience whilst these works to complete this project are carried out.

Yours sincerely



Ken Skates AC/AM

Gweinidog yr Economi, Trafnidiaeth a Gogledd Cymru
Minister for Economy, Transport and North Wales

Agenda Item 3.6

P-05-956 SAVE NEEDED DOCTOR SURGERIES

This petition was submitted by Anthony Diblasi having collected a total of 69 signatures.

Text of Petition

We call on the National Assembly for Wales to urge the Welsh Government to reconsider the closure of the following surgeries

Troed y Bryn in Penyrheol

Lansbury Surgery in Caerphilly

The two practices combined have a total of 3,962 registered patients.

Additional Information

If they close then it would create a knock on effect with other surgeries taking the extra patients.

Longer wait times for appointments and / or restricted access due to numbers.

There are planned housing works in the Caerphilly Borough including Caerphilly and surround, so that would increase the patient registered numbers mentioned.

Assembly Constituency and Region

- Caerphilly
- South Wales East

Save needed doctor surgeries

Y Pwyllgor Deisebau | 12 Mai 2020
Petitions Committee | 12 May 2020

Reference: RS20/12511

Petition Number:

Petition title: Save needed doctor surgeries

Text of petition:

We call on the National Assembly for Wales to urge the Welsh Government to reconsider the closure of the following surgeries

Troed y Bryn in Penyrheol

Lansbury Surgery in Caerphilly

The two practices combined have a total of 3,962 registered patients

If they close then it would create a knock on effect with other surgeries taking the extra patients. Longer wait times for appointments and / or restricted access due to numbers.

There are planned housing works in the Caerphilly Borough including Caerphilly and surround, so that would increase the patient registered numbers mentioned.



1. Background

Lansbury Park and Troed y Bryn (Penyrheol) GP surgeries in Caerphilly have closed as of 1 May 2020.

The Aneurin Bevan University Health Board (ABUHB) website reported that patients of Lansbury Surgery had been informed that Dr Fakande would be resigning from his General Medical Services Contract with effect from 30 April 2020. As a single handed GP, Dr Fakande was required to provide a three-month notice period. Troed y Bryn Surgery is a branch of the Lansbury Surgery and Dr Fakande was also the sole GP at this practice.

The Health Board stated that it would ensure that all patients registered with Lansbury Surgery will have access to a GP practice from 1 May 2020 and Dr Fakande would continue to deliver General Medical Services to patients as normal until the contract ended on 30 April 2020.

The Health Board's Vacant Practice Panel met on 24 January 2020 to discuss the options available. It was agreed that the practice would be advertised nationally, with the aim of recruiting a new GP contractor to continue providing GP services to the patients registered with Lansbury Surgery. Letters were issued to patients explaining this. Drop-in sessions were organised at Lansbury Surgery for patients to discuss any concerns they had with a Health Board representative.

ABUHB failed to find a replacement for its retiring doctor through national advertising which means the 3,962 patients registered at the surgery have been relocated to other surgeries nearby. A Wales Online article in March 2020 states that patients at the Lansbury Surgery will be dispersed across Courthouse Medical Centre and Ton-Y-Felin Surgery, while Penyrheol patients will be able to access healthcare at Nantgarw, Abertridwr and Llanbradach surgeries. The article notes that many of these surgeries have been described as "already bursting at the seams".

Procedure for a GP resigning their contract

The ABUHB website provides a link to a document with information relating to a GP resigning their contract, which is set out below.

GP practices are independent contractors that are commissioned by the Health Board to provide care through the General Medical Services Contract. GPs can choose to terminate (resign) their contract arrangement with the Health Board. If the practice is a single handed GP, 3 months' notice is required.

When a practice resigns its contract, it is the Health Board's responsibility to ensure all patients have access to General Medical Services from the date the contract will end.

The Health Board should follow a process called the Vacant Practice Process, where a panel meets to discuss the options available: The Vacant Practice Panel includes representation from Aneurin Bevan Community Health Council and the Local Medical Committee. Several factors are considered including the size of the practice, existing premises and local population health needs. This process details a number of options that can be considered, examples include:

- Advertising the practice, with the aim to secure a new GP partnership to take over the practice.
- Allocating patients to local GP practices - patients will be registered with an alternative GP close to where they live.
- Health Board Management - the Health Board takes over the responsibility of the practice.

The Health Board should notify patients in writing on how they will access care when the contract ends and should try and ensure that patients still have a choice of a GP practice to register with.

ABUHB notes that there is sufficient money to secure all of the GPs that are needed for the population but there can be issues relating to the shortage of GPs it can attract to work in an area.

2. Welsh Government action

Correspondence from the Minister for Health and Social Services to the Committee on 20 April 2020 reiterates that when an independent GP contractor decides to terminate its contract with a Health Board, that Health Board has a responsibility to ensure the on-going provision of high quality primary care services for those patients affected by the closure. It confirms that ABUHB had issued a letter to patients stating that they would be moved to neighbouring practices and that changes would be in place by 1 May 2020.

The Minister highlights that Wales, along with other parts of the UK, has needed to deal with GP recruitment issues. In 2016, a national campaign was launched to promote medical careers in Wales; "This is Wales: Train, Work, Live". The campaign supports the recruitment activities undertaken by health boards, trusts and GP practices.

As part of the campaign two incentives have been available. The first incentive of £20,000 is offered to GP trainees who take up a training place in a specified hard to recruit area. The incentive is paid if the GP trainee commits to remain in a targeted area for one year of practice after qualification. A second incentive, available to all GP trainees, is a one off payment of £2,000 to cover the final GP trainee examination costs.

The Minister goes on to say that the campaign, along with the financial incentives are helping to increase the number of doctors choosing Wales to complete their GP training.

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



Ein cyf/Our ref VG/01687/20

Janet Finch-Saunders AM
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20 April 2020

Dear Janet,

Thank you for your letter of 30 March on behalf of the Petition Committee regarding the closure of Troed y Bryn and Lansbury GP Surgeries.

Although I nor my officials are able to intervene directly in this matter, we do appreciate this is an unsettling time for those patients affected by the closures. When an independent GP contractor decides to terminate its contract with a health board, that health board has a responsibility to ensure the on-going provision of high quality primary care services for those patients affected by the closure.

Aneurin Bevan University Health Board have plans to move patients to neighbouring practices. A letter has been issued from the Health Board and the changes will be in place by 1 May 2020.

Wales, along with other parts of the UK, has needed to deal with GP recruitment issues. In 2016, I launched a national campaign to promote medical careers in Wales; "This is Wales: Train, Work, Live". The campaign supports the recruitment activities undertaken by health boards, trusts and GP practices.

As part of the campaign two incentives have been available. The first incentive of £20,000 is offered to GP trainees who take up a training place in a specified hard to recruit area. The incentive is paid if the GP trainee commits to remain in a targeted area for one year of practice after qualification. A second incentive, available to all GP trainees, is a one off payment of £2,000 to cover the final GP trainee examination costs.

The campaign, along with the financial incentives are helping to increase the number of doctors choosing Wales to complete their GP training.

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

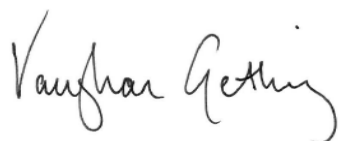
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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.

Yours sincerely,

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

Vaughan Gething AC/AM

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