

SUBJECT:	MINOR AMENDMENT TO STREET NAMING AND NUMBERING POLICY REGARDING REPLACEMENT OR ADDITIONAL STREETNAME SIGNS FOR EXISTING STREETS
MEETING:	INDIVIDUAL CABINET MEMBER (Cllr Jane Pratt)
DATE:	22nd DECEMBER 2021

1. PURPOSE:

- 1.1 To consider the proposal to amend paragraph 1.2.6 of the Council's Street Naming and Numbering Policy regarding the provision of replacement or additional streetname signs for existing streets, following updated advice from the Welsh Language Commission.

2. RECOMMENDATIONS:

- 2.1 To agree to the proposal to amend paragraph 1.2.6 of the Council's Street Naming and Numbering Policy.

3. KEY ISSUES:

- 3.1 Paragraph 1.2.6 of Monmouthshire County Council's Street Naming and Numbering policy currently states:

All existing streets that require additional or replacement street nameplates will be given its Welsh Translation to be added to the nameplate in order to comply with Monmouthshire County Council's Welsh Language Scheme. The Welsh Translation however does not form part of the Official Street Name unless put through the Street Renaming procedure. Please see Section 4.2. As this is a very time consuming and costly procedure this will not happen and the Welsh Translation will remain as an unofficial part of the street name until further guidance is received from the Welsh Commissioner and the National Land & Property (NLPG) Custodians of South Wales.

- 3.2 As the Street Naming and Numbering Authority, we are responsible for ensuring that streets can be identified quickly and easily by emergency services. This paragraph potentially undermines this by requiring us to install street nameplates which could give rise to confusion. For example, if a Welsh speaker attempted to summon the emergency services to a street which does not officially exist on the gazetteer used by the emergency services, this could lead to a dangerous delay.
- 3.3 Since this policy was written, the Welsh Language Commissioner has produced The Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015 (released on 19 February 2020) which states the following:

If no Welsh language street name has been recorded in accordance with the Public Health Act 1925, do these standards mean that the name of the street must be translated into Welsh in order to display it in Welsh on the sign?

4.13.16. No. These standards do not place a duty on a body to translate a street name into Welsh, in order to display it in Welsh on a sign. [See Appendix A]

- 3.4 The Welsh Language Standards have therefore been clarified to the effect that replacement or additional street nameplate signs for existing streets do not need to be

bilingual if they are currently monolingual. Many authorities have now adopted this policy including our neighbours at:

- Torfaen County Borough Council
- Newport City Council
- Powys County Council
- Caerphilly County Borough Council.

Further information regarding how other Welsh Councils are dealing with this issue can be found in Appendix 4.

3.5 The current wording of paragraph 1.2.6 of the Street Naming and Numbering policy is out of date because:

- a) Monmouthshire County Council's Welsh Language Scheme no longer exists; instead, we should be referring to the Welsh Language (Wales) Measure 2011;
- b) Further guidance has now been provided in the form of *The Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015*.

Following consultation with the Council's Welsh Language and Equality Officer and others, it is proposed that paragraph 1.2.6 of our Street Naming and Numbering Policy be reworded to read:

The names of existing, monolingual streets which require additional or replacement street nameplates will not be translated.

4. **EQUALITY AND FUTURE GENERATIONS EVALUATION (INCLUDES SOCIAL JUSTICE, SAFEGUARDING AND CORPORATE PARENTING):**

4.1 This proposal aims to standardise the provision of street nameplates in line with Welsh Language Commissioner recommendations and the approach taken by neighbouring councils. It will reduce the chances of confusion around road names, particularly where the Welsh version is significantly different to the English version. This will particularly benefit groups such as those with learning disabilities, dementia and visual impairment.

5. **OPTIONS APPRAISAL**

5.1 Table One below therefore provides an options appraisal of the proposal:

Options	Benefits	Risks	Comments/Mitigation
Do Nothing	<ul style="list-style-type: none"> • Use of the Welsh language is promoted. 	<ul style="list-style-type: none"> • Risk of Welsh speaker contacting emergency services and requesting assistance to a street which doesn't officially exist. • Failure to comply with Welsh Language Commission Code of Practice. 	This is not a sensible option
Amend paragraph 1.2.6 as proposed	<ul style="list-style-type: none"> • Aligning ourselves with Welsh Language Commission recommendations and neighbouring local authorities • Eliminate the risk of a Welsh speaker contacting emergency services and requesting assistance to a street 	<ul style="list-style-type: none"> • None 	This is the preferred option.

	<p>which doesn't officially exist.</p> <ul style="list-style-type: none"> • Modest savings can be made from ordering street nameplates with fewer letters. 		
--	---	--	--

6. REASONS:

6.1 The preferred option is to amend paragraph 1.2.6 as described above to adhere to the Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015, to align our policy with those of our neighbouring councils which will ensure a consistent delivery of Street Naming and Numbering services around South Wales, and to reduce the risk of the emergency services not being able to respond to an emergency call referring to a street name that does not appear on the National Land and Property Gazetteer.

7. RESOURCE IMPLICATIONS:

7.1 Nil.

The proposal to amend paragraph 1.2.6 of the Council's Street Naming and Numbering Policy has zero cost implications to the delivery of the street naming and numbering service.

8. CONSULTEES:

- Chief Officer People and Governance – Legal Services
- Chief Officer, Resources - Local Land and Property Gazetteer (LLPG) representatives.
- Head of Policy, Performance and Scrutiny - Welsh Language and Equality Officer
- Enterprise DMT
- SLT

9. BACKGROUND PAPERS:

None

10. AUTHORS:

Libby Johnes, Street Naming and Numbering Officer
Mark Davies, Highway Development Manager

11. CONTACT DETAILS:

E-mail: markhand@monmouthshire.gov.uk Tel: 07773 478579

Appendix 1: Wellbeing of Future Generations Equalities Impact Assessment

Appendix 2: Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015

Appendix 3: Information from Royal Mail

Appendix 4: How other Welsh Councils deal with the issue

Appendix 5: Public Health Act 1925, Section 18; Alteration of name of street.

Appendices

Appendix 1: Wellbeing of Future Generations Equalities Impact Assessment



monmouthshire
sir fynwy

Equality and Future Generations Evaluation

Name of the Officer completing the evaluation

Libby Johnes and Mark Davies

Phone no:

E-mail: Elizabethjohnes@monmouthshire.gov.uk
Markdavies2@monmouthshire.gov.uk

Please give a brief description of the aims of the proposal

Our Street Naming and Numbering policy currently states:

1.2.6 All existing streets that require additional or replacement street nameplates will be given its Welsh Translation to be added to the nameplate in order to comply with Monmouthshire County Council's Welsh Language Scheme. The Welsh Translation however does not form part of the Official Street Name unless put through the Street Renaming procedure. Please see Section 4.2. As this is a very time consuming and costly procedure this will not happen and the Welsh Translation will remain as an unofficial part of the street name until further guidance is received from the Welsh Commissioner and the National Land & Property (NLPG) Custodians of South Wales.

As the Street Naming and Numbering Authority, we are responsible for ensuring that streets can be identified quickly and easily by emergency services. This paragraph potentially undermines this by requiring us to install street nameplates which could give rise to confusion. (For example, if a Welsh speaker attempted to summon the emergency services to a street which does not officially exist, this could lead to a dangerous delay.)

Since this policy was written, the Welsh Language Commissioner has produced *The Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015* (released on 19 February 2020) which states the following:

If no Welsh language street name has been recorded in accordance with the Public Health Act 1925, do these standards mean that the name of the street must be translated into Welsh in order to display it in Welsh on the sign?

	<p><i>4.13.16. No. These standards do not place a duty on a body to translate a street name into Welsh, in order to display it in Welsh on a sign. [see Appendix A]</i></p> <p>Many Welsh authorities have now adopted this policy and it is proposed that we do the same.</p>
<p>Name of Service area</p> <p>Placemaking, Regeneration, Highways and Flooding</p>	<p>Date 22nd October 2021</p>

1. Are your proposals going to affect any people or groups of people with protected characteristics? Please explain the impact, the evidence you have used and any action you are taking below.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	This proposal will reduce the chances of confusion around road names, particularly where the Welsh version is significantly different to the English version. This will benefit groups such as those with dementia and visual impairment which are more prevalent among older people.	None	N/A
Disability	This proposal will reduce the chances of confusion around road names, particularly where the Welsh version is significantly different to the English version. This will particularly benefit people with learning disabilities.	None	N/A
Gender reassignment	None	None	N/A
Marriage or civil partnership	None	None	N/A

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Pregnancy or maternity	None	None	N/A
Race	None	None	N/A
Religion or Belief	None	None	N/A
Sex	None	None	N/A
Sexual Orientation	None	None	n/a

The Socio-economic Duty and Social Justice

The Socio-economic Duty requires public bodies to **have due regard to the need to reduce inequalities of outcome which result from socio-economic disadvantage when taking key decisions This duty aligns with our commitment as an authority to Social Justice.**

	Describe any positive impacts your proposal has in respect of people suffering socio economic disadvantage	Describe any negative impacts your proposal has in respect of people suffering socio economic disadvantage.	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Socio-economic Duty and Social Justice	None	None	N/A

Policy making and the Welsh language.



How does your proposal impact on the following aspects of the Council's Welsh Language Standards:	Describe the positive impacts of this proposal	Describe the negative impacts of this proposal	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts
<p>Policy Making</p> <p>Effects on the use of the Welsh language, Promoting Welsh language Treating the Welsh language no less favourably</p>	<ul style="list-style-type: none"> • To adhere to the Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015; • To align our policy with those of our neighbouring councils; • To ensure a consistent delivery of Street Naming and Numbering services around South Wales. 		N/A
<p>Operational</p> <p>Recruitment & Training of workforce</p>	None	None	N/A
<p>Service delivery</p> <p>Use of Welsh language in service delivery Promoting use of the language</p>	None	Reduced promotion of the Welsh language via translated street nameplates	None – this policy relates only to existing named streets. New streets on new developments will be named bilingually or in Welsh only. The negative impact of reducing potential use of the Welsh language by translating existing street names is offset by the safety benefits for emergency services.




4. Does your proposal deliver any of the well-being goals below? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. There's no need to put something in every box if it is not relevant!

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs	Positive: The proposal will allow us to make a small saving on the cost of the provision of street nameplates as the signage will be smaller.	N/A
A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)	Positive: Slightly smaller signage will result in small savings in materials.	N/A
A healthier Wales People's physical and mental wellbeing is maximized and health impacts are understood	N/A	N/A
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	Positive: The risk of a caller to emergency services using a Welsh language streetname translation that does not appear on the NLPG is minimise, increasing community safety.	N/A
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	N/A	N/A
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	Negative: Opportunities to increase knowledge of and use of the Welsh language are reduced	N/A – the safety benefits outweigh this small harm. New streets will continue to be names bilingually or in Welsh only.

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A more equal Wales People can fulfil their potential no matter what their background or circumstances	N/A	N/A

3. How has your proposal embedded and prioritised the sustainable governance principles in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
 <p>Long Term</p> <p>Balancing short term need with long term and planning for the future</p>	<p>Eventually, all street nameplates in the county will be either mono-lingual or officially bi-lingual thus eliminating any possibility of confusion.</p>	
 <p>Collaboration</p> <p>Working together with other partners to deliver objectives</p>	<p>As the Street Naming and Numbering Authority, we consult with all relevant stakeholders and are responsible for ensuring that streets can be identified quickly and easily. The proposal means that we will no longer install street nameplates which could give rise to confusion.</p>	

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>A number of organisations and individuals have been consulted:</p> <ul style="list-style-type: none"> • Local Land and Property Gazetteer (LLPG) Team; • Alan Burkitt, Welsh Language and Equality Officer, Monmouthshire County Council • Neighbouring Street Naming and Numbering authorities • Advice from the Welsh Language Commissioner utilised 	None
 <p>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	This proposal will both save resources and prevent potential problems around road name confusion.	None
 <p>Integration</p> <p>Considering impact on all wellbeing goals together and on other bodies</p>	As the Street Naming and Numbering Authority, we are responsible for ensuring that streets can be identified quickly and easily by emergency services. The proposal means that we will no longer install street nameplates which could give rise to confusion.	None

4. Council has agreed the need to consider the impact its decisions has on the following important responsibilities: Corporate Parenting and Safeguarding. Are your proposals going to affect any of these responsibilities?

	Describe any positive impacts your proposal has	Describe any negative impacts your proposal has	What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?
Safeguarding	Not applicable	Not applicable	n/a
Corporate Parenting	Not applicable	Not applicable	n/a

5. What evidence and data has informed the development of your proposal?

The approach taken by other Welsh councils (particularly those which neighbour our own) to mitigate issues of confusion around mono-lingual streets with bi-lingual street name plates.
 We have:

- Looked at the Welsh Language Commissioner’s Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015
- Researched the policies of other Welsh Councils
- Consulted with The Welsh Language Commissioner’s Office

6. SUMMARY: As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?

Positive impacts: to reduce / eliminate the chances of confusion from inappropriately translated street name plates and to ensure a consistent approach to street name plate provision around South Wales.

7. ACTIONS: As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable.

What are you going to do	When are you going to do it?	Who is responsible
Update the Street Naming and Numbering Policy	ASAP	Libby Johnes and Mark Davies

8. VERSION CONTROL: The Equality and Future Generations Evaluation should be used at the earliest stage, such as informally within your service, and then further developed throughout the decision making process. It is important to keep a record of this process to demonstrate how you have considered and built in equality and future generations considerations wherever possible.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
1	Initial draft	22 nd October 2021	
2	Final version	5 th December 2021	Additional reference to the negative implications of reduced awareness of the Welsh language.
3			

Appendix 2: Code of Practice for the Welsh Language Standards (No. 1) Regulations 2015

Standard 63: *this section is relevant to Street Naming and Numbering and the renewal of street nameplates (found in pages 72 to 73 of the guidance):*

If no Welsh language street name has been recorded in accordance with the Public Health Act 1925, do these standards mean that the name of the street must be translated into Welsh in order to display it in Welsh on the sign?

4.13.16. No. These standards do not place a duty on a body to translate a street name into Welsh, in order to display it in Welsh on a sign.

4.13.17. However, if a Welsh language or bilingual name of a street has been determined and recorded in accordance with the Public Health Act 1925, a body (local authority in this context) must ensure that the Welsh language name is displayed on the sign when the sign refers to that street. It must also ensure that the English name is also displayed (if an English name has been determined and recorded) in accordance with the requirements of that Act.

4.13.18. Although these standards do not place a specific duty on a body to determine a Welsh or bilingual name for a street in order to display it in Welsh on a sign, county councils and county borough councils have a statutory right to undertake the following in accordance with the Public Health Act 1925:

- change a street name into Welsh if no name had previously been designated to the street
- give a street a new name in Welsh if no name had previously been designated to the street, and
- oppose an application proposing a new street name which is not in Welsh.

4.13.19. County councils and county borough councils have the right to change street names (bilingual or English) for which they are responsible for naming into Welsh only ones. However, in doing so, they will have to be recorded in Welsh only with the relevant agencies and ensure that any signs display the name in Welsh only after the name has been registered.

4.13.20. Therefore, a body may use these provisions in accordance with the Public Health Act in order to ensure that it can, ultimately, display a street name in Welsh on a sign (if there is no pre-existing Welsh language name for a street).

Appendix 3: Information from Royal Mail

By Law (The Welsh Language Act 1993) if a local authority has street furniture that displays both the English wording and Welsh translation then we must hold both languages on our Postcode Address File (PAF) (& website).

Appendix 4: How other Welsh Councils deal with the issue

Street Naming and Numbering policies for the following councils are not available via an internet search:

- Blaenau Gwent County Borough Council
- Bridgend County Borough Council
- Caerphilly County Borough Council*
- Carmarthenshire County Council
- Flintshire County Council
- Gwynedd Council*
- Neath Port Talbot Council
- Pembrokeshire County Council

- Vale of Glamorgan Council
- Wrexham County Borough Council

**See below*

The following councils' policies don't mention the translation of existing streets:

- Ceredigion County Council
- City and County of Swansea
- Isle of Anglesey County Council

The remainder are as follows:

Torfaen County Borough Council

Alan Vernon-Jones, Welsh Language & Armed Forces Policy Officer, Torfaen County Borough Council has kindly provided this information:

I've attached a conversation we (myself and Torfaen Street naming and numbering) had with the Commissioner back in 2018.

The advice note (email) references the legislation in as far as the Measure cannot supersede anything already set in law, in this case, Section 18 of the Public Health Act 1925

However, if a council, through its powers gives a bilingual name from the outset, then the standards apply.

The danger (if not done from the outset) is that a street name which has been known in English only, since being built, is suddenly made bilingual.

The Welsh Standards then apply and the Welsh must appear first.

Hence our email to the Commissioner to seek clarification.

Our policy has subsequently changed and we no longer translate existing names (each street has only one name (English or Welsh) on the gazetteer, but encourage developers of new sites to adopt Welsh names for their streets.

The Gazetteer has the capability to store both Welsh and English street names, but not Place Names, therefore any extraction of the data i.e. mail merge will result in addresses not complying with the Standards (this has already happened to one Welsh Council who were investigated by the Commissioner for not displaying an address fully in Welsh). I believe this investigation is ongoing.

I have attached the Regulations (Welsh Language Standards March 2015) under the Welsh Language Measure, please see Part 3 (25) (Page 32)

"A body is not required to produce to display or to send material in Welsh to the extent that another enactment has specified the wording of a document, a sign or a form which would run contrary to that requirement."

And the Welsh Language Commissioners Official Guidance (DG S Cod Ymarfer Rheoliadau Rhif 1) on the Regulations, please see page 70-74 (Standards 61-63)

"If no Welsh language street name has been recorded in accordance with the Public Health Act 1925, do these standards mean that the name of the street must be translated into Welsh in order to display it in Welsh on the sign?"

"No. These standards do not place a duty on a body to translate a street name into Welsh, in order to display it in Welsh on a sign."

City of Cardiff Council

1.1.6 The Council has historically operated the following standards relating to street naming: □ In the city centre, core routes into the city centre and the Cardiff Bay area (see Appendix 1 Boundary Map), street naming is bilingual with both Welsh and English on street name plates. There is a historical precedent for this approach and the guiding principle is that these streets are shared streets, as opposed to the city's purely residential streets. This maintains consistency with other shared public spaces under the Council's control such as parks and public buildings and allows residents to navigate the capital's busiest streets in the language of their choice.

Outside of this area, existing street names are not required to be bilingual.

1.1.7 The Council has a commitment to ensure that it works towards parity between the number of Welsh street names and English street names across the city. Monitoring of street names will be carried out.

1.2.2. *With the exception of those street names considered 'bilingual' by the Council under 1.1.6, there will be no change to existing street names and these will remain in the 'known' language to mitigate potential confusion.*

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/Street-naming/Documents/Street%20Naming%20Policy.pdf>

Conwy County Borough Council

5.5. Existing street names that are in only one language will not be translated except where a request is made to re-name the street as per the renaming process in Section B. paragraph 4 (below)

<https://www.conwy.gov.uk/en/Business/Licenses-and-Permits/Assets/documents/Street-Collections/Street-Naming-and-Numbering-Policy-2018.pdf>

Denbighshire County Council

5.4. The policy in relation to new street names will therefore be to adopt either a Welsh language name or a bilingual name that is consistent with the local heritage and history of the area.

5.5. Existing street names that are in only one language will not be translated except where a request is made to re-name the street as per the renaming process in Section B. paragraph 4.(below)

<https://moderngov.denbighshire.gov.uk/ielIssueDetails.aspx?Id=9339&Opt=3&LLL=0>

Newport City Council

<https://www.newport.gov.uk/documents/Planning-Documents/Supplementary-Planning-Guidance/Street-Naming-and-Numbering-Guidance.pdf>

1.2.5. There will be no change to existing street names and these will remain in the 'known' language to mitigate potential confusion.

Powys County Council

1.2.4. There will be no change to existing street names, and these will remain in the 'known' language to mitigate potential confusion.

<https://en.powys.gov.uk/article/5948/Register-a-new-property--street-name>

Caerphilly County Borough Council

Although I was unable to locate a Street Naming and Numbering policy for Caerphilly County Borough Council, the Street Naming and Numbering officer has told me:

Since I've been in post, we do not translate historical street names, our LLPG must represent what is on the physical street name plate. It's too costly to redo all street signs - so we do a 50/50 policy on the language used. As it is, English names far outnumber Welsh, so the majority of recent street names are monolingual Welsh. The rest of the address is bilingual, as we translate the locality, town, postal town and authority. I've discussed it with the Welsh language commissioner's office who were happy with our process.

Appendix 5: Public Health Act 1925, Section 18; Alteration of name of street.

- (1) The urban authority by order may alter the name of any street, or part of a street, or may assign a name to any street, or part of a street, to which a name has not been given.
- (2) Not less than one month before making an order under this section, the urban authority shall cause notice of the intended order to be posted at each end of the street, or part of the street, or in some conspicuous position in the street or part affected.
- (3) Every such notice shall contain a statement that the intended order may be made by the urban authority on or at any time after the day named in the notice, and that an appeal will lie under this Act to a petty sessional court against the intended order at the instance of any person aggrieved.
- (4) Any person aggrieved by the intended order of the local authority may, within twenty-one days after the posting of the notice, appeal to a petty sessional court.

From <http://www.legislation.gov.uk/ukpga/Geo5/15-16/71/section/18>