

SUBJECT:	AMENDMENT TO STREET NAMING AND NUMBERING POLICY REGARDING REPLACEMENT OR ADDITIONAL STREET NAMEPLATE SIGNS FOR EXISTING STREETS
MEETING:	INDIVIDUAL CABINET MEMBER (Cllr Catrin Maby)
DATE:	24th January 2024

1. PURPOSE:

- 1.1 To amend the Council's Street Naming and Numbering Policy to include the provision of bilingual replacement or additional street nameplate signs for existing streets.

2. RECOMMENDATIONS:

- 2.1 To agree the amendments to the Council's Street Naming and Numbering Policy regarding the provision of bilingual replacement or additional street nameplate signs for existing streets.

3. KEY ISSUES:

- 3.1 Historically, Monmouthshire County Council implemented a street naming and numbering policy whereby when replacement or additional nameplate signs were requested for existing named streets, bilingual signs would be provided. This policy was put in place pending clarification from the Welsh Language Commissioner on the need for such an approach.
- 3.2 In December 2021, the then Cabinet Member approved amendments to the Street Naming and Numbering policy to allow for replacement or additional street nameplates on existing named streets to be like for like, which in many cases would be monolingual English nameplates. This decision was in accordance with the now confirmed Welsh Language Commissioner's requirement for replacement street nameplates.
- 3.3 The primary reason for making this change was due to concern that the content of new bilingual nameplates would not be replicated on the official address gazetteer.
- 3.4 In January 2022, a complaint was made to the Welsh Language Commissioner regarding the Council's policy change. The Commissioner's role was to consider the way in which the policy change decision was reached rather than the policy change itself. The Commissioner responded in August 2022 having ruled that the process for making the December 2021 decision was in breach of Welsh Language Measures 88, 89 and 90 related to how the language is considered during policy making.
- 3.5 The Commissioner's ruling did not quash or require the December 2021 Street Naming and Numbering Policy itself to be revised. It did, however, require a number of steps to be taken to ensure Welsh Language considerations are more clearly shown to be taken into account in future decision-making. Completion of those steps was overseen by the Head of Policy, Performance and Scrutiny in 2022.
- 3.6 The primary challenge arising is that the Council had, for several years, gone above and beyond the Commissioner's now-confirmed requirement that replacement signs needn't be translated to provide bilingual signs. Having gone further than the minimum requirement, the Council would have to satisfy itself that any policy change retreating from that position would meet Measures 88, 89 and 90. In particular, as explained in the

Commissioner’s decision, Measure 89 requires consideration of how a policy change would have positive effects, or increased positive effects:

“It is important to note that it is not the decision itself that is under consideration here. The purpose of this Report is not to consider whether the revised policy complies with the Standards. The investigation focuses on the process for deciding to amend an existing policy in favour of a policy which is arguably less favourable to the Welsh language. The function of the investigation is to determine whether the Council’s decision-making process in revising the Street Naming and Numbering policy complied with the policy making Standards.

The investigation does not consider any complaint that the amended policy fails to comply with the Standards or the Code of Practice. However, the aim of the Code was not to provide organisations with a precedent for taking decisions to do less for the benefit of the Welsh language than it was doing previously, or to do the minimum under the Code where more progressive action in relation to the Welsh language was already being taken.”

- 3.7 Although the Commissioner’s ruling did not quash or directly comment on the December 2021 policy change, the new policy has not been implemented in practice, and no monolingual replacement or additional signs have been installed since the Commissioner’s ruling.
- 3.8 It is vital that the policy is consistent with the council’s commitment to grow the language and celebrate the county’s rich heritage. Officers have reviewed the options over the intervening months to seek to ensure any future decision on replacement or additional nameplates for existing streets is robust and consistent with this ambition.
- 3.9 Different options have been explored with the emergency services and the Council’s Welsh language and GIS officers. Legal advice was sought and on the basis of the advice received, it is concluded that translating an existing monolingual street name into Welsh to provide bilingual nameplate signs is simply a translation of the existing name and does not amount to renaming a street. Consequently, the problem of the time, costs and risk of consulting all residents in the affected streets and potential need to defend the proposal at the Magistrates’ Court fall away.
- 3.10 It is therefore proposed to revert to the original (pre-December 2021) policy position. When replacement or additional street nameplates are required for existing streets with monolingual English names, those nameplate signs will be bilingual (Welsh first). However, the Welsh translation will now added to the Gazetteer.
- 3.11 The Street Naming and Numbering Policy has been re-arranged, and a new section inserted to cover Welsh language considerations (section 3).
- 3.12 There is no change to the policy approach for naming new streets, which will continue to be Welsh only or bilingual Welsh and English (never monolingual English).

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

- 4.1 This proposal will mean that the Welsh language continues to be visible via everyday activities and its use promoted, complying with the Welsh language measures. There are no other identified equality impacts.

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"> Easiest option 	<ul style="list-style-type: none"> Decisions are at risk of challenge because the December 2021 policy change did not demonstrate compliance with the Welsh Language Measures 	This is not a sensible option nor is it the right thing to do
Re-take the December 2021 policy change decision but with an updated Integrated Impact Assessment that fully considers the Welsh language implications	<ul style="list-style-type: none"> Aligns with Welsh Language Commission recommendations and practice at neighbouring local authorities Welsh language versions of the street names will be available on the gazetteer without the need for a formal renaming 	<ul style="list-style-type: none"> Officers have been unable to word an IIA that reconciles a lesser promotion of the Welsh language than our previous policy with Welsh Language Measure 89, meaning decisions continue to be at risk of challenge 	This is not a robust option
Revert to the pre-December 2021 approach of providing bilingual street nameplates when replacement or additional nameplates are required for existing streets, but enter the translated name onto the Gazetteer	<ul style="list-style-type: none"> Promotes visibility and use of the Welsh language Complies with Welsh Language Measure including standards 88-90 The translated street name is entered into the Gazetteer eliminating the risk previously identified 	<ul style="list-style-type: none"> Someone claims that translating their street name to provide bilingual replacement signs amounts to renaming their street and challenges the process taken. However our legal advice confirms translating an existing name to add a Welsh language version of the existing English street name does not amount to renaming the street. 	This is the preferred option.

6. REASONS:

- 6.1 To develop an option which is consistent with the authority's commitment to the Welsh language and meets the requirements of all stakeholders. The preferred option is to adopt the December 2023 revised policy, which reverts to the pre-December 2021 position whereby requests for replacement or additional signs to existing streets result in the provision of bilingual nameplate signs (Welsh then English). The Welsh translation will be added to the Gazetteer. New streets will continue to be given Welsh only or bilingual names.

7. RESOURCE IMPLICATIONS:

- 7.1 The proposal to amend the Council's Street Naming and Numbering Policy has no cost implications in itself, being arranged using existing officer resources.
- 7.2 The provision of bilingual nameplates incurs a small additional cost only if the number of characters exceeds a (generous) set limit, which is unlikely. Any such additional cost would be met by existing budgets.
- 7.3 Going forwards, the Welsh translation of the street name will be entered onto the Gazetteer routinely when replacement or additional nameplate signs are provided. This will be done by existing staff resource. However, to mitigate the safety risk, an additional fixed term (6 month) administrative officer capacity is required to enter historic translated

signs to ensure records are complete. Options to meet this short term resource requirement are being explored and would be met via existing budgets.

8. CONSULTEES:

- Cabinet
- SLT
- Legal Services
- Local Land and Property Gazetteer (LLPG) and GIS colleagues
- Emergency Services
- Welsh Language Officer
- Communities and Place DMT

9. BACKGROUND PAPERS:

None

10. AUTHORS:

Mark Hand – Head of Placemaking, Highways and Flooding

11. CONTACT DETAILS:

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

Appendix 1: Integrated Impact Assessment

Appendix 2: Proposed amended Street Naming and Numbering Policy December 2023

Appendix 1: Integrated Impact Assessment



monmouthshire
sir fynwy

Integrated Impact Assessment Including Equality and Future Generations Evaluation

<p>Name of the Officer completing the evaluation</p> <p>Mark Hand Phone no: 07773478579 E-mail: markhand@monmouthshire.gov.uk</p>	<p>Please give a brief description of the aims of the proposal</p> <p>To consider the proposed amendments to the Street Naming and Numbering Policy to revert to the practice of installing bilingual replacement or additional street nameplate signs on existing streets.</p>
<p>Name of Service area</p> <p>Placemaking, Highways and Flooding</p>	<p>01/12/2023</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	None identified at this stage	It could be argued that there is an increased risk of confusion around road names, particularly where the Welsh version is significantly different to the English version. This would affect people with dementia or visual impairment, conditions that are more prevalent among older people. However, bilingual signs are commonplace in Wales.	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?
Disability	None identified at this stage	It could be argued that there is an increased risk of confusion around road names, particularly where the Welsh version is significantly different to the English version. This would affect people with learning disabilities or visual impairment. However, bilingual signs are commonplace in Wales.	N/A
Gender reassignment	None identified at this stage	None identified at this stage	N/A
Marriage or civil partnership	None identified at this stage	None identified at this stage	N/A
Pregnancy or maternity	None identified at this stage	None identified at this stage	N/A
Race	None identified at this stage	None identified at this stage	N/A
Religion or Belief	None identified at this stage	None identified at this stage	N/A
Sex	None identified at this stage	None identified at this stage	N/A
Sexual Orientation	None identified at this stage	None identified at this stage	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 identified at this stage	None identified at this stage.	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,</p> <p>Promoting Welsh language</p> <p>Treating the Welsh language, no less favourably</p>	<p>The proposed policy change would mean damaged or missing street nameplates will be replaced with bilingual (Welsh first) nameplates, increasing visibility, understanding and use of the Welsh language.</p>	<p>None identified at this stage</p>	<p>There is no change proposed for the naming of new streets, which will continue to be given Welsh only or bilingual names.</p>
<p>Operational</p> <p>Recruitment & Training of workforce</p>	<p>There are no recruitment implications from this proposal</p>	<p>None identified at this stage</p>	<p>The Council's Welsh language Officer and official translation service provide appropriate support when needed.</p> <p>All employees have the opportunity to attend Welsh language courses if they wish.</p>
<p>Service delivery</p> <p>Use of Welsh language in service delivery</p> <p>Promoting use of the language</p>	<p>The proposed policy change would mean damaged or missing street nameplates will be replaced with bilingual (Welsh first) nameplates, increasing visibility, understanding and use of the Welsh language. When a nameplate is renewed and the Welsh name added to the new name plate, the Welsh version of the name will also be added to the gazetteer so that both names will be official.</p>	<p>None identified at this stage</p>	<p>The Council's Welsh Language Officer and official translation service provide appropriate support when needed.</p> <p>There is no change proposed for the naming of new streets, which will continue to be given Welsh only or bilingual names.</p>



2. 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	Neutral. The additional costs of bilingual nameplates is negligible.	N/A
A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g., climate change)	Neutral.	N/A
A Healthier Wales People's physical and mental wellbeing is maximized, and health impacts are understood	Neutral.	N/A
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	Positive: bilingual nameplate signs will increase visibility, understanding and use of the Welsh language.	N/A
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	Neutral. Bilingual signs will be larger and therefore require additional raw materials to produce.	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	Positive: bilingual nameplate signs will increase visibility, understanding and use of the Welsh language.	N/A

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	Positive: bilingual nameplate signs will increase visibility, understanding and use of the Welsh language.	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>The amended policy approach will comply with the Welsh Language Measures including measures 88-90, ensuring future decisions are robust and make an efficient use of time and money.</p>	<p>None identified at this stage</p>
 <p>Collaboration</p> <p>Working together with other partners to deliver objectives</p>	<p>Support will be sought from the Welsh Language Officer and official translation service as applicable to ensure accurate translations are provided.</p> <p>The Emergency Services and Council GIS officer have been involved in reaching this proposed solution.</p>	<p>The policy approach to naming new streets is not changing, but this involves engaging with local community representatives to understand the history and culture of the locality to select an appropriate new street name.</p>
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>Support will be sought from the Welsh Language Officer and official translation service as applicable to ensure accurate translations are provided.</p> <p>The Emergency Services and Council GIS officer have been involved in reaching this proposed solution.</p>	<p>The policy approach to naming new streets is not changing, but this involves engaging with local community representatives to understand the history and culture of the locality to select an appropriate new street name.</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>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	<p>Translated street names will be entered onto the official Gazetteer to mitigate any concerns regarding calls to the emergency services being delayed or misdirected.</p>	<p>None identified at this stage</p>
 <p>Integration</p> <p>Considering impact on all wellbeing goals together and on other bodies</p>	<p>The proposal should have a positive impact on wellbeing, by providing a more welcoming highway environment for all users.</p> <p>Bilingual street nameplate signs will increase visibility, understanding and use of the Welsh language.</p>	<p>None identified at this stage</p>

4. Council has agreed the need to consider the impact its decisions have on the following important responsibilities: Social Justice, 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?
Social Justice	None identified at this stage	None identified at this stage	N/A
Safeguarding	None identified at this stage	None identified at this stage	N/A
Corporate Parenting	None identified at this stage	None identified at this stage	N/A

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

- Advice from emergency services and GIS officer regarding Gazetteer use
- Advice from Welsh Language Officer and Welsh Language Commissioner regarding compliance with Welsh Language Measures
- Advice from legal services to confirm that replacing missing or broken street nameplate signs on monolingually named streets with bilingual signs does not constitute re-naming a street in the sense of the 1925 Act

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: Bilingual nameplate signs will increase visibility, understanding and use of the Welsh language. The policy approach will comply with the Welsh Language Measures. Additional cost is negligible.

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
Implement the proposed amended policy	Following Cabinet Member approval	Street Naming and Numbering Officer

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	ICMD	January 2024	
2			
3			