

**P-05-1001 Hold an independent inquiry into the choice of site for the proposed new Velindre Cancer Centre, Correspondence – Petitioners to Committee, 31.01.21**

Dear Clerk to the Petitions Committee of Senedd,

Thank-you for forwarding the latest response from the Minister of Health & Social Services to our Petition. Thank-you again for all the assistance given by members and officers as well as the conscientious attention given to our petition. **We concentrate our response on answers to the Petition Committee's questions:**

**Question One:** What are your thoughts on the attached document?

It's appreciated that this is a demanding time for the Minister and, like many others, we express our support in the battle against Covid. We welcome some additional elaboration. However we must admit to finding unsettling features in the letter and a seeming failure to take seriously arguments concerning this grave issue of our time, namely future cancer care.

- **Apparent unfamiliarity of the Minister with the actual wording of the petition.**

The 'call for an independent clinical review', though completely supported by us, is not the wording of our petition. It originally came from the:

- Constituency MP
- Deputy Minister for Health and Social Care
- Front-line clinicians, who powerfully merit an influencing voice in great decisions impacting the patients they serve, especially in these times.

**The Nuffield Project** has transformed the conversation about Velindre but *claims not to be a review. In fact, it has made the call in our petition even more alive and urgent.*

- **Apparent misunderstanding of what the petition actually asked for**, namely to '*hold an independent inquiry into the choice of site for the proposed new Velindre Cancer Centre*'.

The choice of site threatens environmental disaster for the Northern Meadows and tramples on the rights of future generations. It threatens our wellbeing and physical health, places local communities at risk of flooding, and threatens the resilience of local ecosystems. It also conceals the defunct status of the stand-alone model, discredited by clinical consensus and the Nuffield Trust.

- **Seeming misunderstanding of our reason for supporting the call for an independent clinical review – not because we have doubts about the 'veracity' of the business case.**

*Our stance is **not down to doubts about the veracity of the business case** for the simple reason we've never even been allowed direct access to it!* Nor, to our knowledge, has Senedd or the electorate seen it. The real grounds for our doubt is the absolute necessity for *robust critical and scientific evaluation in clinical matters*, the environmental impact of the choice of site, and the cost of the model at the expense of cancer patients and other satellite sites, including the Abergavenny satellite centre.

- **The Minister's apparent exclusion from the process of clinicians with their crucial expertise and concern for patient welfare. They're still barred from evaluating the project's current proposals and so from major decisions on cancer care - ignoring even the 57 senior and specialist clinicians.**
  - This apparent, alleged irrelevance of the clinical community to a business case is clear-cut in the Minister's letter, even though the Chief Medical Officer himself led Velindre into a limited but **purely clinical** study - the Nuffield project narrowly focused on the regional network. And Nuffield clearly stated there would be no account taken of finance – i.e. the business side.
  - What's more this dismissal of sustained clinical enquiry contradicts the Government's own *Infrastructure Investment Guidance*. That speaks of the 'development of clinical strategies *which will clearly influence the plans developed*' (p.9). Yet senior specialist clinicians don't even merit a passing mention in the Minister's letter. Something else to shock us, especially at this time.
- **The Minister seems to believe that the Infrastructure Investment Board (IIB) was able to decisively evaluate the Nuffield report within only a fortnight after it was posted on December 2.**

Yet Velindre's own records from board and risk meetings mid-December (10<sup>th</sup> & 14<sup>th</sup>) show everyone there needing time to digest the report properly - the view also held by the clinicians we know. Again, we know nothing of the NHS IIB's clinical skills, which means we can't have confidence in its ability to conduct a thorough and sound analysis of Nuffield in such a short time.

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

**Sadly, we have to say that the letter takes little account of our concerns and evidence.** It only confirms how urgently needed is the debate to consider a proper inquiry. As we've indicated above, some statements in the letter are in fact alarming.

Primarily, in the Minister's letter everything seems to rest solely on the NHS IIB, a body which can't be found on the Senedd website. Its ongoing work seemingly by-passes even Senedd scrutiny not just specialist clinical scrutiny.

- Whilst we accept that an independent review of the *business* case is underway, this must include an independent inquiry of the *clinical* case and choice of site conducted in parallel. We are asking for an independent inquiry of the clinical case in conjunction with the business case review. We understand that:
  - a recent letter signed by 164 senior clinicians from 4 Health Boards also discusses the Nuffield Advice stating that co-location with an acute hospital would provide safer acute in-patient care, enhance opportunities for world class research and it would be in line with best practice elsewhere.
  - Appendix One of the Nuffield Trust report clearly suggests that co-location at an acute site is the best option, and not a merely a reasonable compromise.
- To date no independent clinical review been undertaken, as Nuffield stated their report did not amount to a review.
- Further, the Minister's response takes no account of the way this project will be detrimental to the physical and mental wellbeing of the local community. This is a

statutory duty for the minister, repeatedly highlighted to him by letters also circulated to MS members outside of this process. The failure to address this concern is alarming.

- We call for an independent inquiry, not only because of the clinical, environmental, and health and wellbeing issues with the project, but because there is a wide perception of serious and repeated mistruths and inaccuracies regarding the reasons for choosing the Northern Meadows as the site for the new Cancer Centre.

For example, Velindre NHS Trust in a document "Why not build a new Velindre Cancer Centre on another hospital site?" published on 21/7/2020 page 2 paragraph 2. claims:

- "The clinical lead in an external review of the project, carried out in 2017, was Dr Jane Barrett OBE, an eminent UK clinical oncologist and past President of the Royal College of Radiologists."  
This statement is untrue. The following statement is from Dr Jane Barrett in an email dated 22/8/2020:
- "You are correct that I was involved in the review into the siting of satellite centres in South Wales. However it was not a review into the redevelopment of Velindre. As far as I know there is no stand-alone report but the decision was based on presentations and papers received. I imagine Velindre still has the relevant papers."
- To date no explanation has been provided for the misleading and factually incorrect statement made by Velindre NHS trust as shown above (The oft cited 'Barrett report' simply does not exist). No copy of the report has been made available for scrutiny, despite this being promised to the local member of parliament.

#### **Other concerns also warranting further inquiry with regard to Velindre:**

- Misrepresentation of the number of patients transferred urgently.
- Misrepresentation of the role of EMRTS (Emergency Medical Retrieval and Transfer Service).
- Falsely stating EMRTS had attended a patient who sadly died.
- Misrepresenting the time taken for ambulance transfer for escalation of care.
- Misrepresentation/Suppression of the Level of concern within Velindre NHS trust.
- Failure to fully and meaningfully engage stakeholder Health Boards in the planning process.

An open and honest debate in the Senedd is justified in order to clarify the situation, to address the concerns of the community and the public, and to prevent the minister from making the wrong decision based on incorrect information that he has accepted in good faith as being true.

#### **Question 3: Do you have further questions in response?**

*The following questions bear on our concerns:*

1. Who in particular sits on the NHS IIB and how many of them are specialist clinicians?
2. Who was permitted to scrutinise the Nuffield advice in December beside Velindre and the Chief Medical Officer, and did the 57 senior clinicians (now at least 164 senior clinicians wanting to be heard) contribute significantly to the IIB considerations?

3. In view of the £20 million incurred for this confused and broken project already stretching far into the future with the use of MIM and Governmental Grants to fund enabling works, may we expect the Health Committee, Finance Committee and/or Public Accounts Committee and Future Generations Commissioner to scrutinise the decision's merits and demerits.
4. What representation has there been from cancer clinical leads from South East Wales to the business case process?
5. How long will Welsh Government be relaxed about the Nation's capital being the only place in Wales to lack a safe, one-stop co-location of cancer care in an acute hospital? And, so far as we know, the only recent one in the UK to actually *choose* a stand-alone site?
6. What considerations has the minister made regarding the impact of the development, both in construction and long term operation, of the long term health and wellbeing impacts of the development? We believe this is especially pertinent in light of covid-19 and the need scientifically established need of people to travel less and stay local more and Welsh Government itself telling people to use local green spaces?

**Question Four:** Is there anything additional that you would like the Committee to know at this stage, either in response to this document or as an update to the Committee?

**We request that the Petition be still pursued right to a Senedd debate, but also:**

- 1. We call upon Welsh Government to make public the business case itself, which it seemingly expected us to know, with details on discussion of clinical matters and the Nuffield Report as well as the financing of this project**
- 2. We similarly call for the reports being considered on the environmental, health, and wellbeing impact of the development.**
- 3. Through the Minister and the petitions committee we urge the IIB to make known details of the clinical review taking place in the business case process.** Welsh government says the IIB 'supports the delivery of safe, sustainable and accessible services, and facilitate high standards of patient care.' (Infrastructure Investment Guidance p.10). How exactly is that done without close working with the specialist clinical community?
- 4. We repeat the concerns expressed in our letter to the Petitions Committee of 7<sup>th</sup> December, not addressed in the Minister's letter (now strengthened by post-Nuffield awareness). Especially the need to:**
  - Act on the Nuffield recommendation for Velindre's transitional role in cancer for the next ten years. A revised down Velindre proposal is essential, excluding a profligate, unnecessary spend on access roads to Northern Meadows. A smaller post-Nuffield build does not need to be on the Northern Meadows.
  - Work *transparently* with the Health Boards to urgently progress plans for the Velindre footprint at UHW towards ultimate co-location. Using the UHW covid surge unit as a base for a new Velindre development at UHW makes perfect sense and needs to be explored. We now know this footprint programme could be supported with funds freed up from unnecessary major capital spending.

- Enable Velindre to cease pure tokenism in so-called public 'consultation' and work openly and honestly with the local community.
- Address the need for fresh leadership to take forward a true Transforming Cancer Services project.
- Confirm that the IIB is not seriously proposing a minimum public spend of £220m (build costs estimated way back 7 years ago) on a hospital useful for a maximum 10-15 years use after completion, (likely much less). There must be scrutiny of the financing of this new programme and the decision to choose the Northern Meadows, as this opens the door to unsustainable housing development in other areas of Wales.

**5. We urge Welsh Government to expedite rapid renewal of University Hospital of Wales rebuild with a cancer hospital of excellence at its heart, pooling the investment for Velindre and UHW.**

**7. In the continuing Covid, Climate and Economic Emergencies we urge Welsh Government to guarantee the continuance of the Northern Meadows as the indispensable, high-value health asset that it is for the population's resilience and for those recovering from Long Covid and other illnesses, including cancer.**

For the consideration of the Planning Committee, we have also attached our letters sent to the Health Minister and Environment Minister, for which we have yet to receive a response.

In addition we encourage Committee members to read the definitive, powerful, comprehensive letter sent, unbeknown to us, to the Minister for Health and Social Services, by north-west Cardiff councillors. It appeared 30<sup>th</sup> January 2021 on the Facebook page of Whitchurch & Tongwynlais Councillors. Also shared to STNM Facebook. In the light of that letter and this one, we trust the Petitions Committee to act wisely once more and raise the serious questions posed against the choice of clinical model and the Northern Meadows as the site for the new build. The arguments for putting the Centre there are now widely discredited and alternative sites remain available for a transitional post-Nuffield scaled down role of Velindre, including its current site. The prize at the end is a cancer centre of international excellence located at the New UHW.

Finally, the Health Committee of Senedd agreed in September to considering our petition further after Nuffield reported and we see no report that it has.

Thank-you again for your help and interest,

Yours sincerely,

Save the Northern Meadows

Tuesday 19th January 2021

Dear Ms.Griffiths MS,

We are acutely aware of the relentless demands of COVID-19 on both you and your department and greatly appreciate all you do. So we wouldn't write to you at this time if the matter was not urgent.

You will be aware of our **six previous letters** to yourself, and we are disappointed you have so far not sent a response. We are a campaign to Save the Northern Meadows, 14 hectares of green space to the north of Whitchurch Hospital and directly adjacent on two sides to the Glamorganshire Canal and Forest Farm local nature reserve (LNR). The meadows themselves constitute a Site of Importance for Nature Conservation (SINC) and an area of the Canal is a Site of Special Scientific Interest (SSSI). **Building here would cause an environmental disaster for biodiversity in Cardiff. Building works are due to start in late January.**

**Therefore it is imperative you act now.**

Time and options remain which could stop this disaster if you step in. The Nuffield Trust, commissioned by Velindre following advice from the Chief Medical Officer, advised the footprint of the new Velindre Cancer Centre (nVCC) should be radically changed.<sup>1</sup> Velindre purchased 'the Grange' site in the mid 2010s intending to build the cancer centre there, yet ultimately stated this site was too small and chose to relocate to the meadow land offered by Cardiff and Vale University Health Board. **Given that the healthcare model and its associated infrastructure must now be revised, work should not be permitted to begin on the meadows.** The adjacent Grange Brownfield site should be reconsidered for the new centre so that the meadows are protected for present and future generations.

We are calling for Transforming Cancer Services (TCS), the Welsh Government, and Cardiff Council to **work with the community to identify a solution which uses the adjoining Whitchurch Hospital site and 'the Grange', but leaves the meadows unharmed and protected from any development.**

1. Working together, we could ensure the meadows are protected for future generations, allowing a self seeding urban forest to develop further;
2. Our proposed solution enables TCS, Velindre, and the Welsh Government live up to the requirements to 'maintain and enhance' ecosystems,<sup>2</sup> which they are not doing at present;

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<sup>1</sup> <https://www.nuffieldtrust.org.uk/project/independent-advice-to-velindre-nhs-university-trust>

<sup>2</sup> 3(2), The Environment (Wales) Act (2016).

3. Such a solution would ensure the local community - where many live in flats and have no means to access the countryside - have access to nature, and space to roam during these lockdowns and in the future.

Should you choose not to engage with us and negate to act, you shall be ignoring your duties and responsibilities to:<sup>3</sup>

- Tackle climate change, meet emission reduction targets and carbon budgets;
- Natural Resources Management, including oversight and implementation of the Environment (Wales) Act and Natural Resources Wales;
- Cross-cutting measures of mitigation and adaptation in relation to climate change, including water; land drainage; flood and coastal risk; and control of marine and air pollution;
- Water;
- Forestry policy and legislation, including re-stocking, tree health and forest reproductive material;
- Biodiversity policy, including implementation of the Nature Recovery Plan;<sup>4</sup>
- The protection and management of wildlife, including control of pests, injurious weeds and vermin and the regulation of plant health, seeds and pesticides;
- Local Environment Quality, including litter, fly-tipping, noise policy and regulation;
- Access to the countryside, coast and rights of way and Areas of Outstanding Natural Beauty and National Park.

This would be as a result of the significant, permanent impacts of building on the meadows as envisaged by TCS. Their work will result in:

**1. Increased risk of flooding:**

- a. The development envisages the discharge of surface water into the Glamorganshire Canal and adjoining Melingriffith Feeder. Both these watercourses have flooded in recent months, and caused the flooding of housing around Forest Farm Road in February 2020;
- b. Cutting down trees, adding concrete surfaces, building concrete bases for radioactive therapies, and removing soils and greenery will reduce the ability of the meadow to act as a water sink;
- c. Lady Cory Field will be raised to pavement level by developers. This will increase the likelihood of flooding around Lon-y-Celyn, Pant-y-Celyn, Pendwyallt Road, and Pantmawr Road. The junction between L-y-C and P-y-C flooded in the rain during Christmas 2020.

**2. Dangerous levels of air pollution:**

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<sup>3</sup> <https://gov.wales/lesley-griffiths-ms>

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<https://gov.wales/sites/default/files/publications/2020-10/nature-recovery-action-plan-wales-2020-2021.pdf>

- a. The increase of idling construction traffic in the area will negatively impact our physical and respiratory health, especially those of the children who live here;
- b. In November, 101 parents from Coryton Primary School signed a letter opposing the development largely on these grounds;
- c. These are significant concerns, especially following the premature death of Ella Kissi-Debrah as a result of dangerous levels of air pollution. A Coroner's Court found that air pollution "made a material contribution" to her death. Ella, who had asthma, lived close to one of London's busiest roads.

**3. Harm to protected species:**

- a. Evidence from the developers suggest dormice, badgers, grasssnakes, slowworms, bats, and hedgehogs nest on, or hunt on the site;
- b. Red and amber listed protected birds are present in Forest Farm, and will be affected by a large-scale, long-term development on the border of the Local Nature Reserve.

**4. Felling of hundreds of trees:**

- a. The developers estimate in their application for the cancer centre granted in 2018 that just 122 would be felled on the meadows, failing to consider the trees within the railway cutting. There are over 200 trees under threat on the meadows alone;
- b. Within their December 2020 applications to discharge conditions in order to begin tree felling, of over 200 Grade A trees along the old railway cutting in order to construct two access bridges to the site.<sup>5</sup> These are within the LNR, and by felling them you will unquestionably harm Welsh attempts to address the climate and biodiversity crises;
- c. Furthermore, an additional 100 trees will be felled whilst constructing the access road at Asda, and tens more will be felled to construct the temporary access road.

**5. Housing resulting from the use of the meadows:**

- a. There are plans proposed by TCS, Cardiff Council, and notably Cardiff and Vale University Health Board (application 20/00357/MJR) to place houses on the meadows, and on the Whitchurch Hospital site;
- b. Regardless of the Cancer centre, there are grand ambitions for the area which will harm the air quality in Whitchurch, will result in increased use of the LNR and protected areas, putting the quality of these areas under threat, especially if the size of the protected space is greatly reduced by the building of the cancer centre.

**6. Significance of Carbon Capture**

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<sup>5</sup> Appendix A, 20\_01481\_MJR-APPENDIX\_L1\_ARBORICULTURAL\_IMPACT\_REV\_C\_VER1-2347609.pdf, attached to this email.

- a. The Northern Meadows has significant potential as an urban carbon sink, with a self seeding forest growing on the meadows and around the railway cutting. Furthermore, longwood is a semi-ancient forest - hence its categorisation as an SSSI - and must be enhanced to ensure its resilience;
- b. Should you choose not to utilise this space for the community, you will be forced to redouble your efforts to plant more trees and create more carbon sinks. This would be nonsensical following the destruction of this green space.

**7. The loss of a significant community amenity:**

- a. The Northern Meadows, Lady Cory Field, and the railway cutting have provided this community with necessary reprieve during lockdown. As we cannot travel, we cannot access nature or the countryside, and the mental and physical benefits spending time in nature provides;
- b. However, we have been privileged to have access to the meadows, and the wildlife, biodiversity, and clean air it offers. To have this taken away at this time would be a criminal act against this community;
- c. Open space is crucial for maintaining mental and physical wellbeing. At present, only 8% of Cardiff remains publicly accessible green space, (compared to 15% in cities such as Birmingham). Given the scarcity of alternatives for residents, it is imperative that this space is protected.

I do not need to remind you of the ample national and international legislation which requires you to protect and enhance biodiversity, including:

**A. The Convention on Biological Diversity, 1992.**

- a. **Article 8**, In-situ Conservation: Each contracting party shall, as far as appropriate...
  - (d) **Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;**
  - (e) **Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;**
  - (f) Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species.
- b. **Article 9**, ex-situ Conservation: Each Contracting Party shall, as far as possible and as appropriate and predominantly for the purpose of complementing in-situ measures:
  - (a) Adopt measures for the ex-situ conservation of components of biological diversity...;

(c) Adopt measures for the recovery and rehabilitation of threatened species and for their reintroduction into their natural habitats under appropriate conditions.

- c. **Article 10**, Sustainable use of components of Biological Diversity: Each Contracting party shall, as far as possible and appropriate:
- (a) Integrate consideration of the conservation and sustainable use of biological resources into national decision-making;
  - (d) Support local populations to develop and implement remedial action in degraded areas where biological diversity has been reduced.

## B. The Rio Declaration, 1992.

**Principle 1: Human beings are entitled to a healthy and productive life in harmony with nature;**

**Principle 4:** In order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation to it;

**Principle 11:** States shall enact effective environmental legislation.

Environmental standards, management objectives and priorities should reflect the environmental and developmental context to which they apply;

**Principle 15:** In order to protect the environment, the **precautionary approach shall be widely applied by states** according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

## C. Well-Being of Future Generations (Wales) Act, 2015.

- a. Section 2 in this Act, “sustainable development” means the process of **improving** the economic, **social, environmental** and cultural **well-being of Wales by taking action**, in accordance with the sustainable development principle (see section 5), aimed at achieving the well-being goals (see section 4);
  - b. Section 4 specifies the wellbeing goals - a prosperous Wales, a resilient Wales, a **healthier Wales**, a more equal Wales, a **Wales of cohesive communities**, a Wales of vibrant and thriving welsh culture, a globally responsible wales;
  - c. Section 5(1) In this Act, any reference to a public body doing something “in accordance with the sustainable development principle” means that the body **must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.**
- We believe that future generations of Whitchurch deserve the chance to see how Wales used to be and the spaces where our ancestors would have farmed or enjoyed. They deserve the opportunity to have the wellbeing benefits provided by the space.

#### D. The Environment (Wales) Act, 2016.

- a. This Act encourages public bodies to “promote the resilience of ecosystems” and “maintain and enhance the resilience of ecosystems.”
- b. The Sustainable Management of Natural Resources.
  - i. 3 (1) In this Part, “sustainable management of natural resources” means—
    - (a) using natural resources in a way and at a rate that promotes achievement of the objective in subsection 3(2);
    - (b) taking other action that promotes achievement of that objective, and
    - (c) not taking action that hinders achievement of that objective.
  - ii. 3(2) The objective is to **maintain and enhance** the resilience of ecosystems and the benefits they provide and, in so doing—
    - (a) **meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and**
    - (b) contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015.
- c. The Biodiversity and resilience of ecosystems duty.
  - i. 6 (1) A public authority **must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales**, and in so doing **promote the resilience of ecosystems**, so far as consistent with the proper exercise of those functions.
  - ii. 6 (2) In complying with subsection (1), a public authority must take account of the resilience of ecosystems, in particular the following aspects—
    - (a) diversity between and within ecosystems;
    - (b) the connections between and within ecosystems;
    - (c) the scale of ecosystems;
    - (d) the condition of ecosystems (including their structure and functioning);
    - (e) the adaptability of ecosystems.

You will note the requirement of the Convention on Biological Diversity article 8(e), with the obligation to ‘**Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas**’. This reflects your numerous obligations under the Nature Recovery Action Plan. The ‘Nature Recovery Action Plan 2020-21’ also identifies:

1. The requirement of ‘**urgent short-term actions**’ (section 6) including:
  - a. Aligning the responses to the climate emergency and the **biodiversity crisis**;

- b. Providing **spatial direction for action for biodiversity**. Resilient ecological networks are **needed everywhere** to create mosaics across Wales, but further identification of 'core resilience areas' is needed in which to prioritise action;
- c. **Improving the condition of the Protected Sites Networks.**

Protecting the meadows will help directly implement the short term responses identified by the Nature Recovery Action Plan. Moreover, given the Welsh Government voted to declare a Climate Emergency, now really is the time to act swiftly to ensure coherence between your actions and existing environmental commitments.

We are asking Government Ministers to:

1. **Act urgently to prevent any enabling works (costing Velindre-estimated £26.9m) from going ahead on Northern Meadows and saving the biodiverse space of County importance currently at risk;**
2. **Promise no further funding to this project and forbid further expenditure;**
3. **Call in applications 20/01110/MJR and 20/00357/MJR, giving the community a stake in the development of Whitchurch Hospital;**
4. **Work cooperatively with clinicians to identify the best option for cancer care for the people of South East Wales.**
5. **Work cooperatively with us and all local stakeholder groups and elected members to design a solution to the Northern Meadows and Whitchurch Hospital Site which maintains and enhances biodiversity and secures long term solutions for cancer treatment in Wales.**

**We also call for long term commitments from this Government to ensure communities are never put under such significant pressure and manipulation by a public body again:**

1. Investigate where so much went wrong so as to prevent such a disastrous waste of public money for an NHS project ever happening again;
2. Save the Northern Meadows and railway cutting, by designating the area a Local Nature Reserve and forbidding any construction here in future.

We are looking forward to your swift response.

Kind regards,

Save the Northern Meadows



Monday 21st December 2020

Dear Ministers,

We are acutely aware of the relentless demands of COVID-19 on both you and your department and greatly appreciate all you do. So we wouldn't write to you at this time were not urgent action forced upon us by others right now.

We believe that as a result of the Nuffield Advice; the economic impact of the Transforming Cancer Services (TCS) project, the threats to biodiversity and public health and wellbeing posed by the project, and the widespread community opposition to building on the Northern Meadows, you must act urgently to stop any and all construction relating to the enabling works and the new Velindre Cancer Centre.

We remind you:

- Over 1,000 objections were submitted to four planning applications which were granted without covering community concerns;
- Over 100 parents at Coryton Primary expressed concerns over their children's health if the development goes ahead;
- 11,000 people signed a petition asking the Government to stop the destruction;
- 5,000 people called for an independent inquiry into the medical model and choice of site;
- Hundreds of people protested in Whitchurch on multiple occasions;
- And we joined over 1,000 people across Cardiff to call for environmental, racial, economic, and social justice in Wales in September.

As a result, we sincerely hope we are able to work together to find a solution for the issue of the development of the Northern Meadows. We believe the only solution now recommends placing the nVCC Satellite centre on the Whitchurch Hospital, or alternative site. This would protect the Northern Meadows, and could enable the connecting of both sites with accessible pavements to allow cancer patients and people across Whitchurch to experience the healing powers of nature, without destroying the wonderful biodiversity which exists across the meadows, railway cutting, and Historic Gardens of Whitchurch

Hospital. This option has already been widely supported by the community, who wish to protect the meadows and continue the historic connection of the people of Whitchurch to the NHS.

The Nuffield Advice to the Velindre University NHS Trust compels immediate radical changes to the TCS project. The Advice recommends the downsizing of the cancer unit resulting in a much smaller land footprint for the Centre, stating it would be unreasonable for the project to continue with the current plan. As a result, **Velindre itself has now begun drastically reducing its projected inpatient admission numbers.**

Commonly, we have heard of the alleged time constraints regarding the rebuilding of UHW, which is being used to block co-location. This lacks definitive proof and is largely an assumption. All because the less expensive option had been sidelined by TCS, who have spent the last six years and £20 million researching and developing this outdated project, with little to show for it.

In summary:

- The safety of cancer patients drives this dramatic change, just as already supported by most senior clinicians in the region.
- **The key criteria of excellence in cancer care, must be co-located at UHW as soon as possible: in-patient care, research, training education resources.**
- For a period Velindre must continue on a suitable stand-alone site as a radiotherapy and chemotherapy unit, focusing on outpatient treatment, assessment, processing, counselling etc, but this will end when a suitable acute site has been located.

The following list contains conclusions, recommendations and implications to be drawn from the Nuffield Trust's advice to the Velindre NHS Trust and TCS:

- Co-Location at UHW (University Hospital Wales) is the gold standard especially for safety (This is clearly described in Appendix One of the Document).

- The Transforming Cancer Services (TCS) Programme has been insular and as such has failed to properly engage key stakeholders.
- Recent proposals by TCS appear to be **reactive** to circumstances rather than proactive.
- 6 years and £20 Million have not provided a blueprint to transform cancer services. The plan is simply to replicate current services.
- **Failure to co-locate threatens patient safety, research, teaching programmes.**
- The redevelopment of Velindre Cancer Centre at UHW is a once in a lifetime opportunity to transform cancer services for the whole of South East Wales, yet **this opportunity may be missed through inflexibility, inaction or partiality.**
- Transforming Cancer Services should never have been the responsibility of a single organisation that delivers only part of the pathway. **The whole regional network, transparent, accountable and well led, is the key to excellence.**

Despite these conclusions, TCS have put redundant contracts out to tender, seeking to begin pointless, damaging enabling works. So, we ask urgently - why has the outmoded business case from November not been formally and publicly set aside, and the project halted? **Surely, such damning advice demands a rethink of the entire project and the executive staff entrusted with providing excellent cancer care for South East Wales, of which they have clearly failed and exacerbated a dangerous situation.**

Accordingly, you must act to halt this project on the Northern Meadows. Enabling works are, as we write, being progressed by TCS, wasting even more public money. This is malpractice with public funds and only you can stop it. No further advice to your department is needed to enable good judgement. The first stage of decision is being forced upon you by TCS jumping the gun without incorporating the Nuffield Advice.

They are pursuing the beginning of this project, **after repeatedly lying to yourself and the public** regarding crucial aspects of the project, including:

- How they engaged the public and medical staff within the Centre, and how they accounted for the concerns of the hundreds of individuals who engaged in due process;

- The number of emergency transfers from Velindre to UHW by ambulance, repeatedly stating there were 'less than 30,' when our Freedom of Information Request identified **a yearly average of over 100 transfers**, many red and amber listed;
- The number of severe incidents on the site, including the **cover-up of an unexpected death** by not labelling the tragedy a 'significant incident;'
- The time it takes for emergency transfers to be made between Velindre and UHW (which Velindre said took 'minutes', but our FOI's identified an **average transfer time of nearly two hours**, including an hour wait at the Centre itself);
- The research conducted into their clinical model of choice, which they emphasised was robust, **did not exist**. Repeatedly emphasising the Barrett Report, which we subsequently identified by contacting Dr. Barrett herself did not include research on the model proposed by the Trust;
- Repeatedly **failing to comply with FOI requests**, of which we still have at least two outstanding for over ten weeks. Surely this is an unacceptable way for a public body to behave.

We must highlight that if you do not act, biodiversity of a County Importance (as identified by the developers), including the homes of bats, dormice, slow worms, grass snakes, and category red and amber listed birds will be destroyed, and pointless damage done to the Whitchurch Hospital Grade 2 Listed Historic Gardens and Chapel will occur. The open space of the meadow is already heavily used for health and wellbeing purposes, and will be denied to the wider community just as your Government implements another national lockdown.

We ask why this must occur, as a number of suitable alternatives have been identified for the Centre, including the Grange, site K of Whitchurch Hospital (with a planning application seeking to put a 200 bed hospital there). We also query why the new Covid centre at UHW cannot be considered as an alternative space for the nVCC post pandemic, given that (1) this will be available much quicker than a new hospital could be built on the meadows and (2) it is a more suitable location according to the Nuffield report and the clinicians who have spoken out about the standalone model?

Should the project continue, you will be willfully polluting and harming our community by removing our only access to open space; failing to acknowledge the deathly impact of increased air pollution, whilst committing to **locking many of us in gardenless flats for an unspecified amount of time**. This will be in violation of the Wellbeing of Future Generations Act, as well as your own policies which seek to maintain and enhance biodiversity. As Nuffield requires significant downscaling of the centre, **surely the balance between necessity and the community now moves in favour of the community**.

Therefore, we ask you to:

- 1. Act urgently to prevent any enabling works from going ahead and saving the biodiverse space of County importance currently at risk;**
- 2. Promise no further funding to this project and forbid further expenditure;**
- 3. Call in applications 20/01110/MJR and 20/00357/MJR, giving the community a stake in the development of Whitchurch Hospital;**
- 4. Work cooperatively with clinicians to identify the best option for cancer care for the people of South East Wales.**
- 5. Work cooperatively with us and Julie Morgan MS to design a solution to the Northern Meadows and Whitchurch Hospital Site which maintains and enhances biodiversity and secures long term solutions for cancer treatment in Wales.**

**We also call for long term commitments from this Government to ensure communities are never put under such significant pressure and manipulation by a public body again:**

- 1. Investigate where so much went wrong so as to prevent such a disastrous waste of public money for an NHS project ever happening again;**
- 2. Save the Northern Meadows and railway cutting, by designating the area a Local Nature Reserve and forbidding any construction here in future.**

Signed,

Save the Northern Meadows

