

## **Agenda – Petitions Committee**

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Meeting Venue:

**Committee Room 5 – Tŷ Hywel**

Meeting date: 11 December 2023

Meeting time: 14.00

For further information contact:

**Gareth Price – Committee Clerk**

0300 200 6565

[Petitions@senedd.wales](mailto:Petitions@senedd.wales)

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### **1 Introductions, apologies, substitutions and declarations of interest**

### **2 Session with Professor Cristina Leston-Bandeira**

(Pages 1 – 34)

### **3 P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities**

(Pages 35 – 40)

Robin Waddell, Development Director Greenbelt

Adam Cooper, Group Legal Director Greenbelt

Colin Thomson, Managing Director Greenbelt

### **4 New Petitions**

#### **4.1 P-06-1377 Decline planning permission for the development planned proposed as Parc Solar Caenewydd**

(Pages 41 – 47)

#### **4.2 P-06-1378 We want farm subsidies to be extended to small scale and market gardeners**

(Pages 48 – 56)



- 4.3 P-06-1379 Ban the sale of single-use vapes  
(Pages 57 – 65)
- 4.4 P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis  
(Pages 66 – 76)
- 4.5 P-06-1383 Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included  
(Pages 77 – 91)

## **5 Updates to previous petitions**

- 5.1 P-06-1247 We call on the Welsh Government to lead the way by supporting trials of a four-day week in Wales  
(Pages 92 – 93)
- 5.2 P-06-1294 Don't leave metastatic breast cancer patients in Wales behind  
(Pages 94 – 96)
- 5.3 P-06-1348 Commission suitable NHS services in Wales for people with EDS or hypermobility spectrum disorders  
(Pages 97 – 101)
- 5.4 P-06-1341 Accessible guidance for parents and schools to help develop plans to support children with additional learning needs  
(Pages 102 – 105)
- 5.5 P-06-1350 Re-open Dyfi Ward at Tywyn Hospital now  
(Page 106)
- 5.6 P-06-1356 Introduce comprehensive safety measures at the A477 'Fingerpost' junction  
(Pages 107 – 108)
- 5.7 P-06-1359 Offer Welsh working parents the same financial support for childcare as England  
(Pages 109 – 115)

5.8 P-06-1362 Match the new childcare offer in England of 15 hours for 2 year old's from April 2024

(Pages 116 – 122)

**6 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting**

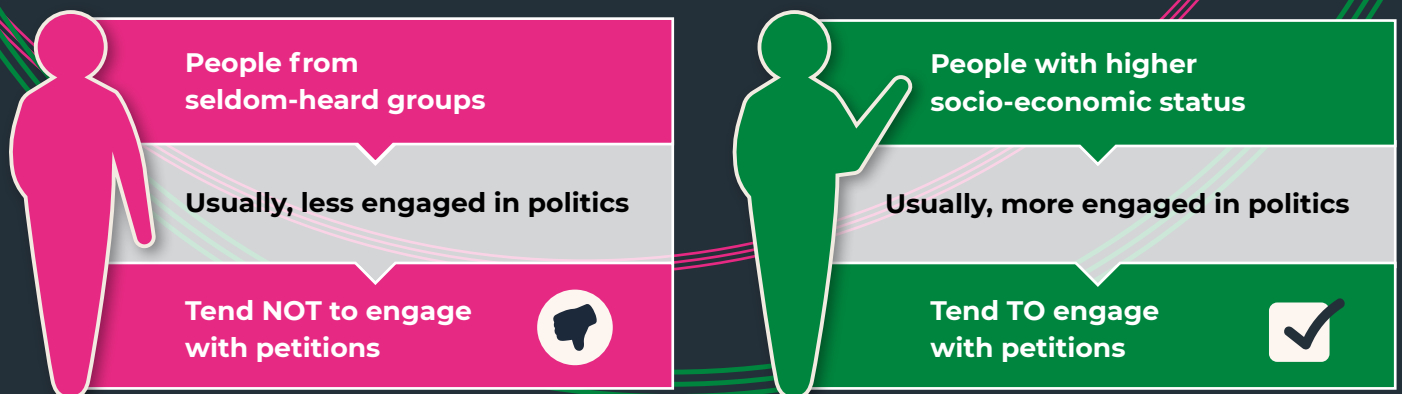
**7 Discussion of evidence – P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities**

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# Breaking barriers to engagement with parliaments

Millions of people regularly engage with petitions, using them to make their voices heard in parliaments. To facilitate this, many parliaments have developed new processes to make petitions more effective. However, these tend to be used by a limited group of people.







These new processes can amplify democratic unfairness: those who are already involved gain tools to engage more deeply. In addition, the value and reach of petitions to parliament are not always clear. This can increase frustrations with democratic processes rather than enhancing engagement.

## 'Seldom-heard' groups

Parliaments often refer to **'hard-to-reach'** groups, including individuals less likely to engage in politics, like those from low socio-economic backgrounds and ethnic minorities. However, this term is criticised for implying these groups are challenging to find. **'Seldom-heard'** places the responsibility for engagement on parliaments and acknowledges the underrepresentation of these groups in decision-making conversations. While we use 'seldom-heard' here for simplicity, experiences differ among groups.

## Research overview

This co-designed\* research project sought to:

-  understand people's experiences and perceptions of petitioning and politics
-  recognise key barriers to engagement
-  identify enablers to make petitioning accessible to a wider and more diverse demographic
-  improve the petitioning experience

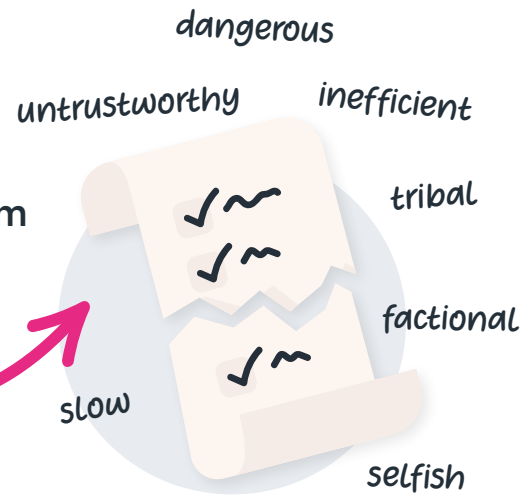
**6 focus groups** across England and Wales with petitioners and people who had never petitioned before, including participants from seldom-heard groups

**18 interviews** with parliamentary officials and representatives of community organisations

# Our **six** key findings

## 1 There is deep **mistrust** of politics across society and a wide disconnect among seldom-heard groups from the political system

Although everyone who took part in the research identified core issues they felt strongly about, **they did not see those issues as being related to politics**. Participants also held very negative perceptions of politics and politicians. As a result, they did not view politics as a route to try to solve core issues affecting them.





Positive experiences with politicians didn't alter these perceptions. Seldom-heard group participants felt politics wasn't for them, despite expressing interest in it.

## 2 People aren't familiar with **petitions to parliament**, or misunderstand how multiple platforms work



This includes politically engaged individuals who were unaware of how petitions to parliament can directly influence decision-making. There was **misunderstanding** about Change.org's connection to parliament or government, and petitions were seen as pointless. Non-petitioners were surprised that petitions had caused policy changes.

Petitioners had **mixed perceptions**. Despite positive interactions, petitioners found that:

-  the process is difficult to engage with, disjointed and unclear
-  if they got involved in petitioning, it was because they cared strongly about an issue rather than to engage with politics
-  the language is challenging to understand

## 3 Seldom-heard groups experience significant **barriers** to political engagement

Seldom-heard groups often experience intersecting inequalities which exacerbate each other, making it extremely difficult to engage in politics. We identified specific barriers that preclude these groups from engaging in politics, but our findings are relevant for engagement with all citizens.

### Barriers include:

limited knowledge of the political system

insufficient campaigning skills for successful petitions

low awareness of petitioning parliament

low confidence to engage with official processes

### Seldom-heard groups can be further affected by:

- poverty
- illiteracy
- IT poverty
- isolation
- language barriers
- low IT literacy
- disability

## 4 Community organisations are important **intermediaries** between parliamentary staff and seldom-heard groups

Organisations that work with seldom-heard groups are important because they have:



built long-term relationships with these communities



a good understanding of the groups' circumstances and challenges



direct access to these groups



gained trust within the groups

Hence, they are well-positioned to raise awareness of petitioning among these groups and help them start a petition, just as they help with access to other services.



However, **these organisations may not think of facilitating engagement with petitions.** They might be unaware or unconvinced of their value and often lack the capacity or resources for this role. Interviewees proposed a buddy system with community engagement “champions” to raise awareness about petitioning and its value.

## 5 It's important to manage **expectations**, which shape perceptions

Managing expectations was a recurring theme in our research, shaping perceptions of petitioning effectiveness. This requires clarity of process.

*“Help(ing) people understand the process...is managing expectations.”*

*parliamentary official*



Managing expectations and ensuring clarity of process are intimately linked to improving petitioning websites, resources, communication and language across all channels, with the aim of making petitioning more citizen-focused and therefore **more inclusive and accessible** to citizens from all walks of life, including seldom-heard groups.

*“You’ve got to have that clarity, otherwise people’s expectations go up here and they’re just going to be massively deflated by the end of it, so there’s huge potential here for real positive change.”*

*focus group participant*

## 6 Parliamentary citizen centred **services** are important but links with petitions staff aren't strong enough

Petitioning processes can't be considered solely through the actions of the officials directly involved. **Other citizen centred services play a key role** (e.g. communication, education, engagement and participation within each parliament). However, we found that links between these other services and petitions (committees) staff are not always well established.





# Recommendations

## for citizen-focused parliamentary petitions systems

### Increase awareness of petitioning parliament

- 1** **Develop or deepen collaboration** with community organisations to better understand the needs of diverse seldom-heard groups and demonstrate the value of petitioning. This could be done through:
  - a. parliaments' citizen centred services (e.g. education, participation)
  - b. staff (committee) supporting the petitions process
  - c. an 'engagement champions' scheme based in community organisations
- 2** **Produce materials** specifically aimed at disseminating the value of petitioning to all citizens, giving particular attention to explaining how the system works and how petitioners can build their campaigns. Materials should be issue-based, using stories from diverse past petitioners, not procedure-led.
- 3** **Develop close collaborations and more systemic cooperation** between petitions staff (committee) and the parliamentary citizen centred services. This could include building pools of:
  - a. case studies (illustrating different outcomes from a petition)
  - b. stories of diverse petitioners (representing various demographics and issues)

### Enhance the experience of petitioning

- 4** **Develop clear integration** between websites hosting e-petitions and parliamentary websites supporting the processing of petitions, so petitioners can easily access information explaining how the system works.
- 5** **Transform communications from parliament-led to citizen-focused.** This may include:
  - a. reviewing language across all communication channels (digital and non-digital)
  - b. introducing Easy Reads, infographics and other audio-visual materials
  - c. introducing more regular communication with petitioners
  - d. ensuring all materials are easy to understand for the general public

*"In order to expand the use of petitioning beyond the usual suspects and to enhance the petitioning experience, parliamentary processes need to adopt more citizen-focused communications, consider procedures in place from a citizen's perspective and be more proactive in disseminating the value of petitioning."*

**Professor Cristina Leston-Bandeira and Dr Blagovesta Tacheva, University of Leeds**

For more information contact Professor Cristina Leston-Bandeira [c.leston-bandeira@leeds.ac.uk](mailto:c.leston-bandeira@leeds.ac.uk)



\*This visual summary is based on research conducted at the University of Leeds in partnership with the Petitions Committees of Senedd Cymru and the UK Parliament, funded by Research England. The views expressed are those of the authors and not necessarily those from the parliaments.

Pack Page 64

Edit and design: [Research Retold](#) (2023)

# Commit to the adoption of the maintenance of new housing estates by local authorities

Y Pwyllgor Deisebau | 27 Chwefror 2023  
Petitions Committee | 27 February 2023

Reference: SR23/5289-1

Petition Number: P-06-1307

Petition title: Commit to the adoption of the maintenance of new housing estates by local authorities.

Text of petition: The residents of the Mill, a new estate in Canton, Cardiff are having to pay an annual fee of £102 for the maintenance of a park bordering the estate. This payment must be made alongside other maintenance payments covering the unadopted highways, green spaces etc. Residents also must pay the full council tax required. Residents are not provided with a detailed breakdown of the costs of the park, just a notice to say they must pay the fee.

The Mill was regarded as a good example of Welsh Government policy due to its status as a mixed tenure estate including affordable housing alongside freehold purchasing – therefore with the current cost of living crisis we believe that the Welsh Government should support residents on estates like The Mill by encouraging and facilitating the adoption of maintenance by local authorities and to remove these punitive charges.



# 1. Background

Where the local authority has not adopted common areas like roads, open spaces and play facilities on housing estates, private arrangements can be put in place to ensure they are maintained. This will generally result in a charge being levied on residents by a management company, or their agent, to pay for maintenance costs.

According to a [2020 Welsh Government consultation](#), these spaces and facilities may include:

- *open areas,*
- *play parks,*
- *roads and paving,*
- *car parking areas,*
- *street lighting,*
- *landscaping,*
- *environmental initiatives such as wild flower verges, and*
- *provision of private shared sprinkler systems.*

These charges are often referred to as estate charges. Freeholders are likely to be charged directly, while leaseholders and tenants may have to pay through their service charges and rent. This briefing uses the term “residents” to cover all groups who may be liable for estate charges.

According to the [responses to the 2020 consultation](#), estate charges can range anywhere between £50 and £500 per year, with most amounting to £100-£150. Residents are still liable for council tax in addition to any estate charges.

A number of concerns have been raised about estate charges by Members of the Senedd and through the consultation referred to above. A key issue is transparency, with residents complaining that estate managers are able to [set charges without consultation](#). Residents have also commented that [developers often don't provide information on estate charges](#) during the sale of a property.

Respondents to the 2020 consultation questioned why they are being charged for the maintenance of what are largely public facilities when they already pay council tax. The 2020 consultation noted a ‘strong preference’ among respondents for ending estate charges and bringing the management of community infrastructure into the hands of local authorities.

At present, freeholders may only have limited powers to challenge estate charges. This differs from leaseholders, who can apply to a Leasehold Valuation Tribunal to challenge service charges.

The use of estate charges in Wales appears to have increased over the last decade, with the 2020 consultation reporting that 72% of respondents lived on estates built after 2010. There has been a corresponding rise in media coverage of estate charges and their impact on freeholders in particular, resulting in the popularisation of the term 'fleecehold' across the UK housing sector.

## 2. Welsh Government action

The Welsh Government consultation on estate charges ran between February and April 2020 and received over 600 responses. On 30 November 2020, the then Minister for Housing and Local Government, Julie James MS, released a written statement responding to its findings.

The Minister announced changes to the Help to Buy-Wales scheme to address some of the concerns raised in the consultation responses and committed to exploring different methods of estate management.

The Minister's statement highlighted the possible impact on local authorities if they were made responsible for communal areas or facilities covered by estate charges:

I recognise it is not simply the case that local authorities could take on these additional responsibilities in perpetuity without the necessary resources to provide for such a service. This question requires proper thought and investigation, to ensure any changes we make do not bring about unintended consequences and unforeseen adverse impacts.

The Welsh Government included estate charge reform in their June 2021 Programme for Government, stating that they would:

*Ensure that estate charges for public open spaces and facilities are paid for in a way that is fair.*

Following a question in plenary on 24 May 2022, the First Minister reaffirmed that the Welsh Government would not give a guarantee that local authorities would pick up maintenance costs of new housing estates. The First Minister noted:

If a developer believed that no matter how shoddy the work they carried out, no matter how poor the standard of communal facilities it provided, there was a guarantee that the public purse would pick that up and put it right, there's no incentive at all for them to do the job in the way that we want it to be done.

The First Minister also confirmed that the Welsh Government would introduce new building safety legislation during this Senedd term, including a new registration and licensing scheme. This scheme will cover residential property management companies. The First Minister said that it would “help to eliminate some of the abuses” relating to estate charges.

In addition, the First Minister commented that the Welsh Government was waiting for the UK Government to introduce leasehold reform (based on the recommendations of the Law Commission) that would give freeholders greater power to challenge estate charges and management. At the time of writing, these reforms have not yet taken place. On 30 January 2023, the UK Secretary of State for Levelling-up, Housing and Communities, Michael Gove MP, said that his aim was for a leasehold Bill to be included in the King's Speech, expected to be in autumn 2023.

The Minister for Climate Change, Julie James MS, replied to the petition on 1 November 2022. In her letter, the Minister reiterated the Welsh Government's expectation that the UK Government will introduce legislation to improve freeholders' rights. The Minister noted in the letter that the Welsh Government was considering how to address communal infrastructure on new estates:

For new estates, we will explore the practicality of using legislation to bring together the various regimes to pay for the maintenance of communal infrastructure into a single approach. This will include consideration of placing a duty on local authorities to adopt communal infrastructure in return for an appropriate payment from the developer.

However, the Minister maintained that retrospective adoption of community infrastructure would remain a choice for councils.

### 3. Welsh Parliament action

On 14 March 2018, the Senedd debated a Member's Legislative Proposal submitted by Hefin David MS, who proposed a Bill aimed at regulating estate

management companies. The proposed Bill would also strengthen the ability of freeholders to challenge estate managers.

In response, the then Minister for Housing and Regeneration, Rebecca Evans MS, committed to establishing a task and finish group to examine the issue. The group's findings were published in a [report](#) on 17 July 2019.

On 1 November 2020, a [petition](#) was submitted calling for freeholders in Wales to have greater powers to challenge estate management companies. The Minister for Climate Change [responded to this petition](#) on 5 October 2021, and the petition was closed by the Committee as the petitioner was satisfied with the Minister's response. The research briefing prepared for this petition can be found [here](#).

Estate charges have also been raised several times in plenary. Hefin David MS [raised the issue on 15 June 2021](#), receiving a response that the Welsh Government was considering 'all options' in addressing the matter.

On 24 May 2022, Rhys ab Owen MS [raised the question of estate management](#) following complaints from the [Mill estate in Canton](#), Cardiff (as referenced in this petition).

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

# P-06-1377: Decline planning permission for the development planned proposed as Parc Solar Caenewydd

Y Pwyllgor Deisebau | 11 Rhagfyr 2023  
Petitions Committee | 11 December 2023

Reference: SR23/7253-1

**Petition Number:** P-06-1377

**Petition title:** Decline planning permission for the development planned proposed as Parc Solar Caenewydd

**Text of petition:**

Decline planning permission for the development planned proposed as Parc Solar Caenewydd; on farm land at the farm known as Penyfodau Fawr Farm, Swansea, SA4 4LN and surrounding areas.

This development will result in some of the farm being covered in solar panels. The resulting visual impact will be negative on an approach route close to the Gower AONB.

It will have a negative impact on green space.

Not only will natural beauty be affected; ground nesting birds will be affected as well as migration routes of bird species.

This project can not be allowed to progress.

A farm that provides vital services to the local community will be changed significantly.

Loss of green space.

Animal habitats will be affected.

Whilst this project may be proposed as one that meets the criteria for green renewable energy; it can not be allowed to go ahead. The resulting impact to



local farming; wildlife and the community far outweighs the need for this project.

We the undersigned of this petition formally request that this project not be allowed to be approved in any form of development.

\* The text of this petition has been altered since it was created to reflect new information about the application.

## 1. Background

Senedd Research can't advise on individual cases, but we can provide some general information.

Parc Solar Caenewydd is a proposed development of ground mounted solar photovoltaic (PV) arrays and associated infrastructure in Swansea.

The proposed development has been accepted as a Development of National Significance (DNS) and therefore the planning application will be decided by the Welsh Ministers.

DNS applications must follow a statutory process, which includes a formal pre-application consultation stage, after which the applicant must produce a pre-application consultation report which must be submitted with the planning application.

There's a further formal consultation and publicity stage following submission of the application to Planning and Environment Decisions Wales (PEDW).

PEDW then appoints an independent Planning Inspector to assess the proposal. The Inspector provides a report with advice and recommendations for consideration by the Welsh Ministers. The Welsh Ministers make the final decision on DNS applications.

There is no right of appeal against the decision of the Welsh Ministers to grant or refuse planning permission for a DNS. A decision may only be challenged through judicial review on the grounds of either illegality, irrationality or procedural impropriety. Such a challenge must be logged within six weeks of the decision.



More information on the DNS process can be found in Senedd Research's [DNS quick guide](#) and the Welsh Government's [DNS guidance](#).

## 2. Welsh Government action

The Minister wrote to you in relation to this petition on 21 November 2023. The letter outlines the DNS process, as above, and states:

Due to my role as a Minister responsible for determining DNS applications it would not be appropriate for me to comment [on] the case, so not to prejudice the final decision on the application.

## 3. Welsh Parliament action

There's no record of the Senedd discussing Parc Solar Caenewydd, other than the Petitions Committee doing so in relation to this petition.

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

Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1377  
Ein cyf/Our ref JJ/02899/23

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

21 November 2023

Dear Jack Sargeant MS,

Thank you for your letter of 23 October regarding the proposed solar farm development at Penyfodau Farm, Gower.

The proposal, known as “Parc Solar Caenewydd”, has been accepted by Planning and Environment Decisions Wales (“PEDW”) as a Development of National Significance (“DNS”) and is at pre-application stage.

The DNS process is rigorous and includes engagement and consultation with the public, stakeholders and the local authority. The applicant is required to undertake statutory pre-application consultation and engagement, this provides communities with an early opportunity to engage with and comment on a project. Once an application is submitted, it is subject to further consultation and publicity. Guidance on the process, consultation, how proposals are examined and a guide for communities are available on the Welsh Government website at <https://www.gov.wales/developments-national-significance-dns-guidance> .

When a DNS application is submitted to PEDW an independent Planning Inspector is appointed to assess the proposal. The Inspector provides a report with advice and recommendations for consideration by the Welsh Ministers. The Welsh Ministers make the final decision on DNS applications.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

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

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

Due to my role as a Minister responsible for determining DNS applications it would not be appropriate for me to comment the case, so not to prejudice the final decision on the application.

Yours sincerely,

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive, flowing style.

**Julie James AS/MS**  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

## **P-06-1377 Decline planning permission for the development planned proposed as Parc Solar Caenewydd, Correspondence – Petitioner to Committee, 29.11.23**

In the attached document it states the Development is of National Significance. Whilst this is appreciated there needs to be a significant consideration as to how the local population is going to be affected by this development.

It is also stated that the process is rigorous. If the process is rigorous I ask that the following information be considered as well as the local opposition as indicated in the volume of signatures of objection in the petition.

The volume of signatures against this development need to be considered as this is the view of the local population. The developer has failed to engage fully with the public. Whilst they have held 'roadshows' these were poorly advertised and this resulted in not many of the local population being aware of this development. Further the roadshows were held in locations not readily accessible to the local population. The example of this being the roadshow in Loughor held in a location with limited on road parking. When I attended this event there was nowhere to easily park due to local residents parking as well as the developers cars taking up the remainder of the on street parking. Thus many people that I saw at this time who were going to attend drove past.

Thus the developers have not fully engaged with the local population fully due to:

1. poor advertising;
2. lack of access to the events held;
3. late provision of the documents relating to development being available online.

Many of the people that I have spoken to gathering signatures for this petition have stated that this development is one of the best kept local secrets.

Even now the petition is closed there continues to be a large volume of people making contact asking as to how they can object to this development. This is not easy for the public to see within the public domain.

The areas bordering the development in Garden Village; Llewitha and parts of Fforstafch did not have an opportunity to engage with the developer as the road shows were held a distance away from the development area and not adjacent to it.

Significantly the committee is asked to consider how the tenant farmers are going to be affected. A number of people have approached the tenant farmers to ask about the development. The tenant farmers have stated they have been told they are not to speak to the public regarding the development or the landowners will end their lease and evict them. How is this a fair process in a democratic society?

The landowner and developers have stated that the farm will continue to function in its current form even with panels with sheep roaming between the panels. This is a cattle farm and a farm that grows produce. The farmer can not suddenly stop farming cattle and then farm sheep. That is like asking a brain surgeon to do heart surgery. The techniques are totally different. The positioning of the panels on fertile land used for growing will affect the ability to grow produce. Produce that is sold in the farm shop.

Further the studies the developer has commissioned available on their website have not been performed by local expert groups aware of the local wildlife or have been undertaken as desktop studies. These studies should have been undertaken by local experts/ expert groups familiar with the land and none should have been desktop exercises. There seems to be no great significance given to how the Owl and Bat populations on the farm will be affected.

The Welsh Assembly Government is committed to net zero. Whilst these panels may produce 'green power'; how will they contribute to loss of local produce production? There would be a need for produce to be purchased into the shop to be sold that will require vehicles to deliver this. That would not be net zero. There is more likely to be a loss of the shop all together in the medium to long term due to loss of custom. This will allow the developer/ land owner to have the next phase of holiday accommodation development.

Significantly the local farm and shop provide a vital service to the local community. The farm shop sells produce from the farm; supports small local businesses selling their products such as cheese, cakes, bread and milk. If this development occurs it will not only affect the farm, farm shop, local community but have an economic impact also on other businesses. The developer states that this will not occur; however I have seen no economic studies or reports undertaken by the developer to support their assumption there will be no negative impact. There is no document or study undertaken to examine the economic impact of the business of the farm shop.

When people come to visit the farm shop they also are able to visit the animals such as cattle, ducks etc. This is how children learn about animals. If the developers go ahead, ask a local child in 20 years and they are unlikely to see a cow in reality locally. Even the pumpkins the farm grows attract many visitors. Children get an opportunity to learn about the farm and how things are grown.

The developer and land owner also states the farmer has been offered alternate land and the farm buildings will remain. Where is this new land they are offered? This has not been shared publicly. Does this land have intact fences for the animals? Is the land suitable for growing the produce? Is it adjacent to the current farm? Will the farmer need to drive between sites and thus affect vehicle emissions locally as well as traffic flow? There is no land adjacent to the current farm and from my research the nearest land owned by the landowner that could be used by the farmer is some distance away.

Consideration needs to be given to the visual impact of this development on the edge and on access roads to the Gower Area of Outstanding Natural Beauty. This will be a blight on the local landscape for at least the next 40 years.

I ask that the committee consider these aspects and listen to the views of the public so this can be further debated in the Senedd.

Yours sincerely;

Richard Lake

Our reference MARSDC/VOLOT/373363-12

7 December 2023

BY EMAIL TO PETITIONS@SENEDD.WALES

Petitions Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

Dear Sirs

### **Petition to decline planning permission for the development proposed as Parc Solar Caenewydd**

As you are aware, we are instructed on behalf of Taiyo Power & Storage Limited (**Applicant**) in relation to their proposed application to the Welsh Government allocated reference DNS CAS-01900-V0J7C7 (**Application**) for "*construction operation, management, decommissioning of a ground mounted solar power and battery storage facility with associated development including battery storage facility, cable trench and connection infrastructure*" (**Proposed Development**).

The background to the Application is set out in our letter of 22 June 2023, a copy of which is appended to this letter for ease of reference.

#### Petition

We have previously written to you in relation to the petition registered on the Welsh Government website regarding the Application created by Richard Lake (**Petition**). By way of reminder, the Petition calls for the planning permission for the Proposed Development to be declined.

We note that the Petition has now got more than 10,000 signatures and, as such, will be considered for a debate in the Senedd.

This letter sets out the Applicant's position in relation to the Petition.

#### **Applicant's position**

##### Consultation

The Application is subject to an ongoing DNS application process. Pursuant to the provisions of the Development of National Significance (Procedure)(Wales) Order 2016 (**Order**), the Applicant is required to consult on the Application proposals before it formally submits its application. The Application proposals have been the subject of an extensive consultation process which commenced in September 2022 and included Public Exhibitions and meetings with Town and Community Councils. A formal consultation period ran from 8 June 2023 to 3 August 2023. The consultation process provided an opportunity for all interested parties to express their views on the Proposed Development.

A further re-consultation ran from 10<sup>th</sup> October 2023 to 22 November 2023, again providing opportunity for all interested parties to express their views on the Proposed Development.

10-78148746-1373363-12

Addleshaw Goddard LLP, 3 Sovereign Square, Sovereign Street, Leeds LS1 4ER  
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The Order imposes an obligation on the Applicant to prepare a Consultation Report to accompany the Application, which would, amongst other things provide:

- a summary of all issues including confirmation of whether the issues raised have been addressed and, if so, how; and
- the particulars of all responses received from persons consulted, including copies of responses from specialist consultees; and the account taken of these.

Following submission and validation of the Application, the Application will be subject to further consultation led by the Planning Inspectorate, again open to all interested parties, and the results of any such consultation summarised in the Local Impact Report.

If the Inspector determines that a hearing or inquiry is required, any members of the public are able to attend and those specifically invited to speak by the Inspector are able to formally participate in the process.

As such, signatories to the Petition have had and will have sufficient opportunities to raise their concerns in relation to the Application. The Petition is therefore considered to be premature and inappropriate, given that there are a number of alternative means for third parties to comment on the Application in a fair and balanced manner, as provided for in the Order.

### Petition Grounds

Turning to the petition grounds, which have been amended following our letter of 22 June 2023, and are now stated to be as follows:

*"This development will result in some of the farm being covered in solar panels. The resulting visual impact will result in some of the farm being covered in solar panels. The resulting visual impact will be negative on an approach route close to the Gower AONB.*

*It will have a negative impact on green space.*

*Not only will natural beauty be affected; ground nesting birds will be affected as well as migration route of bird species.*

*This project cannot be allowed to progress.*

*A farm that provides vital services to the local community will be changed significantly.*

*Loss of green space.*

*Animal habitats will be affected.*

*Whilst this project may be proposed as one that meets the criteria for green renewable energy; it can not be allowed to go ahead. The resulting impact to local farming; wildlife and the community far outweighs the need for this project."*

### **(Petition Grounds).**

Whilst amendments introduced to the Petition Grounds are welcomed by the Applicant, it remains the Applicant's position that the Petition Grounds contain grossly inaccurate statements and the Petition itself is based on false information defamatory to the Applicant, as set out in our letter of 21 June 2023.

The Petition Grounds are false and have no basis in fact. They completely ignore information that has been shared by the Applicant (whether as part of the consultation process or otherwise).

Inclusion of false and defamatory information in the Petition also led to false information being published in social media campaigns (drawing upon the original Petition wording) and, as a result, undermine the Application process. It has also resulted in harm to the Applicant's reputation in the industry.

### Petition Standards and Examination of the Application

According to the Senedd's guidance on petitions, a petition may be submitted *"on any issue that is the responsibility of the Senedd or the Welsh Government"*. It further provides that petitions must call for a specified action from the Senedd or Welsh Government. However, a petition would be rejected if *"it's about something that the Welsh Government or Parliament is not responsible for"*. That includes:

*"[...] something that your local council is responsible for (including planning decisions); something that the UK Government or Parliament is responsible for; and something that an independent organisation has done."*

The Petition calls for the Application to be declined. Whilst it is acknowledged by the Applicant that the Welsh Government is responsible for decision making in the DNS process, it notes that process for deciding DNS applications is clearly set out in the Order and it would be inappropriate for Welsh Government to make a decision on the Application outside of that process. Instead, the Application should be subject to an appropriate examination and determination by the Welsh Ministers, and which members of public will be able to participate in and make their views known, as further explained above.

We would be grateful if the above could be taken into consideration when the Petition is considered further by the Petitions Committee on 11 December 2023.

Should the Petitions Committee require any further information in relation to the above, they should not hesitate to get in touch with either ourselves or the Applicant.

Yours faithfully

*Addleshaw Goddard LLP*

**Addleshaw Goddard LLP**

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Our reference VOLOT/373363-12

22 June 2023

BY EMAIL TO PETITIONS@SENEDD.WALES

Petitions Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

Dear Sirs

**Petition to decline planning permission for the development planned proposed as Parc Solar Caenewydd**

By way of introduction, we are instructed on behalf of Taiyo Power & Storage Limited (**Applicant**) in relation to their proposed application to the Welsh Government allocated reference DNS CAS-01900-V0J7C7 (**Application**) for "*construction operation, management, decommissioning of a ground mounted solar power and battery storage facility with associated development including battery storage facility, cable trench and connection infrastructure*" (**Proposed Development**).

**Background**

Notice of the Applicant's intention to submit the Application was submitted by the Applicant on 16 January 2023 and on the same day the notice was officially accepted by the Case Officer.

Pursuant to the provisions of the Development of National Significance (Procedure)(Wales) Order 2016 (**Order**) the Applicant is required to consult on the Application proposals before it formally submits its application. This consultation process commenced on 8 June 2023 and all persons and organisations required to be consulted under the Order have been notified accordingly and provided with the Application documents packs for their comments and input. The members of public who expressed interest in the Proposed Development have also been directed to the website<sup>1</sup>, which contains copies of all Application documents.

The consultation period will run until 5pm on 3 August 2023 and any responses can be submitted to the Applicant either via email to [parcsolarcaenewydd@pegasusgroup.co.uk](mailto:parcsolarcaenewydd@pegasusgroup.co.uk), by phone at 01454 625945 or by post to Parc Solar Caenewydd, C/O Pegasus Group, First Floor South Wing, Equinox North, Great Park Road, Almondsbury, Bristol, BS32 4QL.

**Petition**

Following commencement of the consultation process the Applicant became aware of a petition registered on the Welsh Government website in relation to the Application. The petition was created by Richard Lake and calls for the planning permission for the Proposed Development to be declined (**Petition**).

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<sup>1</sup> <https://www.parcsolarcaenewydd.co.uk/downloads>

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Reasons for the Petition are stated to be as follows:

*"This development will result in 99% of the farm being covered in solar panels. The resulting visual impact will be negative on an approach route close to the Gower AONB.*

*It will have a negative impact on green space, with a loss of land used for agricultural production.*

*Not only will natural beauty be affected; there will be a loss of ancient rights of way; ground nesting birds will be affected as well as migration routes of bird species.*

*There will also be a loss of a vital public farm shop. This project can not be allowed to progress.*

*Loss of a vital farm will occur; a farm that provides vital services to the local community.*

*Loss of green space.*

*Animal habitats will be affected.*

*Whilst this project may be proposed as one that meets the criteria for green renewable energy; it can not be allowed to go ahead. The resulting impact to local farming; wild life and the community far outweighs the need for this project."*

#### **(Petition Grounds).**

The Petition is collecting signatures until 23 November 2023 and, as at the date of this letter, has over 990 signatures.

#### **Applicant's position**

It is the Applicant's position that the Petition Grounds contain grossly inaccurate statements and the Petition itself is based on false information defamatory to the Applicant. Accordingly, it should not have been accepted and/or published by the Petitions Committee, as per the rules governing the petitions process (as further described below).

We would emphasise that, notwithstanding the fact that details of the Proposed Development are set out in this letter, the Applicant is not inviting any determination on the planning merits and the detail provided in this letter is used solely to illustrate the factual inaccuracies in the Petition Grounds.

#### **Rules governing the petitions process**

Any petition submitted to the Welsh Government is covered by the Standing Order 23.3 made by the Presiding Officer of the Welsh Government, which determines the proper form of public petitions (**Standing Order**).

Pursuant to the provisions of the Standing Order, any petition which does not meet the standards for petitions will be rejected. These standards provide, amongst other things, that petitions must not contain "*potentially false or potentially defamatory statements*".

#### **False and defamatory statements**

The Petition Grounds are based on a number of statements, which are grossly inaccurate and based on incorrect understanding of the Application. Each ground is addressed below in further detail.

#### The development resulting in 99% of the farm being covered in solar panels

No clarification has been provided in the Petition in terms of what farm is being referred to. The Proposed Development is spread across a number of fields, which are leased and form part of an estate with wider landholdings. The solar panels and battery elements of the Proposed Development are proposed to be located on fields currently leased to two tenants. One of the holdings is Penyfodau Fawr Farm and the other is Caenewydd (new fields).

The extent of the Proposed Development is shown on the Application drawings and plans, which are available publicly on the Applicant's website set up of the Proposed Development. In particular, they illustrate that across over 60% of the total leased fields across Penyfodau Fawr and Caenewydd are not proposed for the solar and/or battery elements of the Proposed Development and over 50 acres of that land are dedicated for improved wildlife habitats (as detailed in the Landscape Strategy Plan), including:

- planting over 4.5 acres of new trees and 3km of new hedgerows;
- creating over 7.5 acres of lowland meadow and over 8.5 acres of habitats for invertebrates, reptiles and farmland bird species;
- enhancing 17 acres of Rhôs pasture within the local Site of Importance for Nature Conservation; and
- extending the wildlife river corridor by over 13.5 acres.

The Petition Ground, which states that the Proposed Development will result in 99% of the farm being covered in solar panels is, therefore, clearly false and mis-interprets the Proposed Development.

The Planning Statement prepared by Pegasus on behalf of the Applicant (**Planning Statement**), as well as the Design and Access Statement (**DAS**) (both submitted to the persons and organisations required to be consulted as part of the Application documents pack) describe the Proposed Development in detail.

Paragraph 1.3 of the Planning Statement specifically describes parts of the Proposed Development, which will constitute solar PV arrays, by reference to percentages and reads as follows:

*"The proposed development prioritises conforming with the designations for the landscape and nature conservation areas by including designs for over 57 hectares of green infrastructure and wildlife habitat improvements across c.63% of the fields; with the PV arrays only occupying c.37% (around 34 hectares) of the site".*

As is further outlined in paragraph 1.2 of the DAS:

*"The proposed development will deliver a host of landscape, biodiversity, soil and hydrological enhancements. These include measures to strengthen habitat connectivity through this part of the valley, the creation of green buffer zones and public rights of ways improvements."*

Paragraph 1.2 of the DAS further reiterates that *"the proposed development prioritises conforming with the designations for the landscape and nature conservations areas"* and clarifies that the Proposed Development includes designs for over 57 hectares of green infrastructure and wildlife habitat improvements (across c. 63% of the fields), whereas PV arrays will only occupy around 34 hectares (c. 37% of the Application site).

#### Negative visual impact on an approach route to the Gower AONB

Landscape and visual impacts of the Proposed Development are covered in the Landscape and Visual Impact Assessment (**LVIA**), which again forms part of the Applicant's Application documents pack shared with the consultees. The LVIA was prepared in line with best-practice methodology. It confirms that the solar PV element of the Proposed Development would result in a degree of harm to the landscape character and visual amenity of the part of the Application site fronting the A484 and Swansea Road (B4560). However, the landscape and visual effects would be localised owing to the sloping landform of the Afon Llan valley, the surrounding built form, woodland and high sided hedgerows.

In relation to visual impacts on the Gower AONB, in particular, the LVIA provides as follows (paragraph 11.12):

*"[...] The Gower AONB is located approx. 3.4km from the Site and is a material consideration [...]. Following the Site visits and Screened Zone of Theoretical Visibility [...] which shows no potential areas of visibility, it is assessed that there are no likely effects on visual receptors within the Gower AONB looking towards the Site or likely effects on the landscape character of the Gower AONB and its setting due to its distance from the Site."*

The LVIA also addresses visual impacts of the Proposed Development on any road users and the Public Rights of Way (**PROW**) network surrounding the Proposed Development and concludes as follows (paragraphs 11.10 and 11.11):

*"Considering the intervening boundary vegetation and low-lying profile of the proposed development it is assessed that views from the surrounding network of PROW would be considerably screened and visual effects would not be adverse. Views from small sections of the PROW footpaths which cross or are close to the Site including LC26 (Viewpoint 1) which runs south from Swansea Road (B4560), west of Days Motors to the Afon Llan, LC101 (Viewpoint 4) north and south of Afon Llan, and CO600 south of Afon Llan, would be subject to adverse visual effects due to the proposed developments proximity causing a high magnitude of change to existing views at year 1.*

*There would be no major effects on road users along Swansea Road/A484 [notably due to the A484 passing through a cutting and the Swansea road lined with mature tree belts], Titanium Road, Statutory Access land users north and west of the Site, or long distance footpath users (Wales Cost Path and the Gower Way)".*

#### Negative impact on green space/loss of green space

The Proposed Development's impact on green space is assessed in the Planning Statement and paragraphs 6.114 -6.115 provide as follows:

*"[...] habitat retention, creation and enhancement measures are designed to increase the extent and quality of habitat on key corridors within and through the application site. These measures will strengthen habitat connectivity through the application site, including creation of buffer zones. This will include native wildflower seeding/green hay from a donor site (likely to be from retained habitat to the south) and alteration of grassland management to extend and enhance priority habitat. A wildlife corridor will be created along the public right of way linking the site from north to south. This will comprise a habitat mosaic of grassland, scrub and hedgerow planting. Additional woodland and hedgerow creation and infill planting will also strengthen habitat connectivity across the wider site.*

*The river corridor and adjacent SINC are considered to be a key component of the mitigation approach; a continuous wide corridor of habitat creation and enhancement will be created along the river corridor within the redline boundary, extending and linking valuable habitats as an ecological network. Open riparian habitats will be retained as part of the mosaic, but with a wider buffer zone than at present. An area of farmland bird mitigation will also be created adjacent to the river. Treatment and removal of extensive Japanese Knotweed will also provide habitat enhancement".*

Furthermore, drawings and plans submitted for consultation as part of the Application pack and, in particular the Green Infrastructure Plan, clearly illustrate the amount of the green space enhancements that are proposed to be delivered as part of the Proposed Development. As is further outlined above, extensive part (over 57 hectares) of the Proposed Development constitutes green infrastructure and wildlife habitat improvements lying across 63% of the Application site.

Green infrastructure proposed to be provided as part of the Proposed Development is described in detail in the Application documents and includes:

- 4.75 acres of new tree planting;
- 3km of new hedgerows;
- re-establishment of the 6.8ha Rhos grassland habitats;
- enhanced 5.5ha of riparian habitats along the Afon Llan;
- Creation of 2.9ha of lowland meadow; and
- 3.5ha of targeted habitats for reptiles, invertebrates and farmland birds.

As provided in the Planning Statement, overall the Proposed Development will result in a biodiversity net gain of 24.99% when measured against existing baseline conditions. Paragraph 6.41 of the Planning Statement provides:

*"[...] Based on improvement of the habitat distinctiveness of improved grassland habitats, conversion of arable habitats to grassland and enhancement of grassland in ecological buffer areas, the development proposals are currently likely to result in a significant net gain in biodiversity on the application site."*

#### Loss of agricultural production, farm and a farm shop

Impacts of the Proposed Development on the existing agricultural production are covered in the Planning Statement, as well as the document entitled Agricultural Considerations and dated May 2023.

The Agricultural Considerations explain that most of the Application site is occupied by Business A, Penyfodau Fawr and the eastern fields are occupied by Business B and let annually for grazing.

In terms of impacts of the Proposed Development on this existing use, paragraph 2.43 of the Planning Statement provides as follows:

*"The applicant has advised that as part of the contractual arrangement with the landowners, the tenant farmer would surrender land within the application site in exchange for replacement agricultural assets (The applicant understands that these include alternative fields land of the same and better quality, property and outbuildings owned by the same Estate landlord). The tenant farmer already took occupation of these nearby replacement fields in March 2022. The developer and Estate landlord intend to continue agricultural use within the site by way of sheep grazing during the operational lifetime of the development".*

Agricultural Considerations further explain that, whilst the farm enterprises as they are currently operated will need to change, they will not be lost, and agricultural use of the land can continue (paragraphs 6.4 – 6.11):

*"There are open areas within the development where grazing by cattle could take place.*

*Under the panels, grazing by sheep will be possible and forms a good way to manage the grassland. Sheep grazing between and beneath panels is a feasible agricultural use [...].*

*Sheep grazing will involve similar amounts of labour to cattle grazing, and the economics (whilst variable, as is common with all agricultural enterprises) are not dissimilar. Therefore there are no significant economic impacts.*

*The farm shop sells products mostly not produced on the farm, based on observations and the Facebook advertising. The conversion of beef grazing land to mostly sheep grazing land will not affect the potential for a farm shop to operate from another location and still sell imported dairy produce, vegetables, fruit cakes, meat products, juices, Christmas trees etc.*

*It is recognised that the farm would not be able to grow so many pumpkins as were grown in 2022.*

*However agricultural use of the land can continue. The shop could relocate. There are no other significant economic or severance impacts.*

*The eastern land is let on short-term grazing agreements, and there will be no significant effect on any farm business as a consequence."*

#### Loss of ancient rights of way

The Planning Statement confirms that no PROWs will be lost as a result of the Proposed Development. As provided in paragraph 2.46 of the Planning Statement:

*"The consultation layout incorporates and protects the 'used-line' of the Public Rights of Way traversing the application site. For the final submission and in consultation with the Local Planning Authority, the layout will be amended to also incorporate the definitive line where this deviates from the 'used-line'."*

#### Impacts on birds

Impacts on birds are considered in detail in the Ecological Appraisal, which forms part of the Application documents pack. Paragraph 4.5.2 which deals with habitat creation and enhancement explains that

potential impacts include the loss or alteration of grassland habitat beneath the solar arrays, particularly within the footprint of the SINCs, and the loss of open habitat for ground-nesting birds. However, it further provides that the enhancement measures carried out within the large mitigation field and farmland bird mitigation area will mitigate these impacts, as will the proposed sympathetic grassland management within and around the solar arrays.

Paragraph 4.5.2 of the Ecological Appraisal further provides as follows, in terms of the habitat retention, creation and enhancement measures, which form part of the Proposed Development:

*"Habitat retention, creation and enhancement measures, which form part of the Proposed Development, are designed to increase the extent and quality of habitat on key corridors within and through the Application site. Planting of native hedge, tree and scrub, and creation of wild bird cover plots will aim to extend the habitat mosaic and enhance habitat value for a range of species including bats and farmland bird species."*

Paragraph 4.5.3 lists additional habitat features, which will be provided and reads as follows:

*"A minimum of 20 bat boxes and 20 bird boxes will be installed on retained mature trees across the site to provide new roosting and nesting opportunities for these species. Bird boxes will be suitable for a range of woodland bird species."*

In conclusion, the Ecological Enhancement provides:

*"The proposed extensive green infrastructure works designed across the majority of the site will result in habitat retention and management, including restoration of priority habitat associated with the SINCs. This will enhance retained commuting/foraging habitat for badgers, bats, birds, dormice and reptiles, and provide enhancement measures for new roosting/nesting opportunities for bats and birds. The areas of infrastructure associated with the solar arrays will cause some loss of low quality habitats of value to foraging badgers, bats, birds and reptiles".*

Therefore, whilst the Proposed Development will have some impact on ground nesting birds, these are outweighed by the extensive biodiversity enhancements, which are proposed by the Applicant, as part of the Proposed Development.

#### The Proposed Development's impact to local farming, wild life and the community

Impact of the Proposed Development on local farming and wildlife is considered in detail above. As to any impacts on the community, these are considered in the Economic Benefits Statement (submitted as part of the Application documents pack), which highlights a number of economic benefits that will be created by the Proposed Development. These include:

- Jobs – the Proposed Development will create jobs in Swansea and support the area's growth by providing new labour market opportunities.
- Supporting a post-Covid-19 recovery.
- Construction phase employment – the Proposed Development could support up to 163 temporary jobs, both direct jobs on-site and the wider supply chain, during the nine-month construction period (and similar levels of employment during decommissioning of the project).
- Contribution of construction phase to economic output - The gross value added (**GVA**) generated by jobs supported during the construction phase could be up to £6.2 million.
- Operational benefits - the Proposed Development will support up to five full-time equivalent (**FTE**) jobs in Swansea and the wider economy once it is operational. The GVA associated with the five FTEs is estimated to be £5.55millions (present value) over 40-year operational life span. Business rates generated by the solar project element of the Proposed Development could be in the region of £150,000 per annum.
- Supporting economic development objectives – the Proposed Development will support the Welsh Government's pledge to become net zero and the COP27 aim of reducing carbon emissions and increase generation of clean energy. At the regional scale, it will support South

West Wales regional economic objectives in respect of investment in renewable energy and generating benefits across the wider economy and society.

- Public attitudes towards renewable energy – a report from BEIS found that public support for renewable energy was at 85% in Spring 2022. This increased to 87% public support when asked about solar energy projects.

In addition to the above, the Applicant is also exploring the option of providing an element of shared community ownership of part of the Proposed Development. Community Energy Wales has been commissioned to discuss local interest to develop shared community ownership with entities such as Gower Power Co-Op CIC.

As part of the community benefits the Applicant is also looking to enter into a legal agreement to provide funds to the local planning authority to upgrade the local PROW infrastructure.

### **Conclusion**

The above illustrates that the Petitions Grounds are false and have no basis in fact. They completely ignore information that has been shared with the interested parties, as well as the members of public. The Petition Grounds are also potentially defamatory to the Applicant and its Application, as they incorrectly set out context of the Proposed Development.

The publication of the Petition is likely to cause serious harm to the Applicant's reputation in the industry, which may also result in serious financial loss. This is notwithstanding whether the Applicant's Application is refused, as suggested in the Petition.

The Welsh Government should not have allowed the Petition to be published and the Applicant respectfully requests that it is rejected and held void as soon as reasonably possible to prevent any further damage to the Applicant and/or the Application.

Should the Welsh Government require any further information in relation to the above, they should not hesitate to get in touch with either ourselves or the Applicant.

Yours faithfully



### **Addleshaw Goddard**

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## P-06-1378: We want farm subsidies to be extended to small scale and market gardeners

Y Pwyllgor Deisebau | 11 Rhagfyr 2023  
Petitions Committee | 11 December 2023

Reference: SR23/7253-2

**Petition Number:** P-06-1378

**Petition title:** We want farm subsidies to be extended to small scale and market gardeners

**Text of petition:** Most farmers receive around 50% of their income from government subsidies. This means they have enough money to make a living from farming and they can continue to grow food. Most farms are large but small farms (1-5 hectare) are more productive and tend to grow fruits and vegetables for local markets. These currently are not eligible for subsidies, due to their size, which is unfair and shows a lack of support for local, seasonal food growing.

More details:

This petition is inspired by OurFood1200. They want to build farming that:

Is small-scale, highly productive and commercially viable.

Helps provide food security in South Wales.

Gives the asset poor, particularly our young people, a chance to access land and start a regenerative farming enterprise.

Promotes community through local trading and shared community ownership of our landscape – a “foundational economy”.





Is regenerative: purposefully building biodiversity, fixing carbon in the soil, and avoiding harmful chemicals and pollution.

Creates short local supply chains that keep profits local and at a scale that opens new opportunities to all local farmers.

Provides communities with opportunities for education, training and mental wellbeing support

Encourages healthy eating by making fresh, nutritious, locally grown fruit and veg available to everyone in our region.

Reduces the impact of our food and drink consumption on carbon emissions and deforestation across the world.

## 1. Background

Agricultural support in Wales has been designed under the rules of the EU's Common Agricultural Policy (CAP) for many years. The 2014-2020 CAP rules still largely apply in Wales under domestic legislation. Farmers receive direct payment support if they have a minimum of **five hectares** of eligible land. Farmers can receive funding under Glastir (the Welsh agri-environment scheme) if they have a minimum of **three hectares** of eligible land.

The continuation of the CAP system in Wales has been an interim measure ahead of a new agricultural policy, currently being developed by the Welsh Government (the Sustainable Farming Scheme - detailed below). The new scheme, including eligibility criteria such as holding size, is due for consultation at the end of this year.

## 2. Welsh Government action

### 2.1. Common Agricultural Policy system

EU Member States and regions had flexibility in implementing the 2014-2020 CAP. The Basic Payment Scheme rules (direct payments of the CAP) required administrations to set a minimum claim size of either €100 or one hectare, but governments could opt to set a minimum claim size above this threshold had they wished. Those minimum requirements were meant to avoid the excessive

administrative burden caused by managing small payments. The Welsh Government set a five hectare requirement.

The Welsh Government published [a decisions document](#) in 2014 setting out its rationale for the five hectare limit:

The Welsh Government will be applying a 5 ha limit. In European terms Welsh farms are large, with an average size of 83 ha. Our consultation suggested a minimum claim size of 3 ha to tie in with the Glastir minimum claim size but on further reflection it has been decided to increase it to 5 ha. This will allow more of the BPS to be distributed to larger farms which are generally more productive, and it will reduce administration. Farms with 3 ha or over are still eligible for the Glastir Scheme.

## 2.2. Horticulture schemes

The [Horticulture Start Up and Development schemes](#), launched in 2022, are designed to help growers with investment in new equipment and technology. The awarding of these grants has not been subject to a minimum cultivated area, so they have been available to small-scale and market gardeners. The Welsh Government's letter on this petition says they enable horticultural businesses to sustainably expand production, diversify into new crops, improve production efficiency and enhance product quality.

## 2.3. Sustainable Farming Scheme

The Welsh Government is developing a new agricultural policy to replace the CAP system of support. The proposed [Sustainable Farming Scheme](#) (SFS) will be subject to a final public consultation at the end of 2023. It has not been published at the time of writing this briefing. The SFS is expected to be introduced in 2025.

The Welsh Government is proposing to fundamentally change farm payments to support wider sustainable land management, moving away from payment for food production in its own right (which has been the case under the CAP). Farmers entering the SFS would be required to deliver the scheme's 'universal actions' which give predominantly environmental outcomes. This would qualify them for the most basic payment. 'Optional' and 'collaborative' actions would then be available for additional reward. The Welsh Government's letter on this petition highlights a proposed optional action "support for the start up of new

horticultural businesses or new horticultural enterprises within established farm businesses". It says this optional action is unlikely to be available immediately when the SFS commences in 2025, however it will be integrated in the scheme during the transition period. It goes on to say:

Anecdotal feedback from horticultural stakeholders suggest some would not be able to meet the SFS Universal Actions other businesses would be required to meet as it would not be feasible to deliver actions on habitat or woodland creation on small plots. We have advised the horticultural sector to respond to SFS consultation with suggestions of how their sector could be supported within the SFS model, or if there is potential for clusters of horticultural businesses to be supported via the Collaborative layer of the SFS.

The *Agriculture (Wales) Act 2023* provides the legal framework for the SFS. However the Act does not set out the minimum size of farms eligible for payments. This will be stipulated in the final SFS.

The last draft of the SFS (published for consultation in 2022) set out proposed eligibility criteria where applicants must:

- be a farmer undertaking agricultural activities;
- be able to actively perform, at least the applicable universal actions throughout the duration of the contract;
- apply actions to agricultural land in Wales; and
- farm a minimum of **three hectares** of eligible agricultural land.

The draft SFS includes reference to the horticultural sector, highlighting:

... the horticulture sector in Wales takes up a small area of agricultural land and contains a relatively small number of businesses. There is potential for us to grow more of the vegetables we eat here in Wales and the Scheme will support this with investment targeted at expanding and developing skills in this sector.

The analysis of consultation responses said:

Reducing land coverage requirement from 3ha to 1ha was a popular suggested change to eligibility requirements as the current minimum land area of 3ha excludes many horticultural businesses.

...

Overall, the general perspective was that the eligibility and contract requirements should be made flexible to enable as many farmers as possible to participate.

The Welsh Government carried out a co-design consultation exercise with farmers on the SFS. On eligibility criteria, the resulting co-design report stated:

Most participants did not understand the decision behind the 3ha criteria, particularly as it is set at 5ha in BPS and felt like this limit was too small as it would allow what they perceived as ‘hobby farmers’ to enter the scheme. There were thoughts from some participants that this should be raised to 5 or 10ha.

However, some participants suggested that for particular sectors, such as horticulture, there should be an exemption on this requirement. Additionally, some asked whether farmers under 3ha could combine together and join the scheme so that they could reach the 3ha requirement, as they were concerned that some vegetable farmers would be forgotten about if the 3ha minimum limit was set.

However, the report highlights under representation of small farms in the survey sample:

In the survey sample 14% of respondents indicated they had a farm of 20 Ha or less, and 63% respondents indicated a farm size of 50ha and above (Figure 2.4). However, the average farm size in Wales is 45 Ha with 54% of holdings under 20ha in size. This suggests there is an underrepresentation of smaller farms (20 Ha and below) and an overrepresentation of larger farms (50ha and above) in the survey sample.

### 3. Welsh Parliament action

The Economy, Trade and Rural Affairs Committee scrutinised the *Agriculture (Wales) Act 2023*. As discussed, eligibility criteria are not set in the Act, but will be detailed in the SFS. The Committee took evidence from the Land Workers’ Alliance Cymru (LWA Cymru) during Stage 1 of the legislative process. LWA Cymru was concerned about eligibility criteria for future support saying the three hectare requirement of the draft SFS would “exclude many excellent sustainable farms, particularly fruit and vegetable farms.” It said there is a misunderstanding about horticulture costs and turnover and said the “eligibility criteria appears to assume

that small farms are ‘hobby farms’, rather than commercial businesses providing rural employment”. The Committee recommended in its [Stage 1 report](#):

The Minister is invited to consider the evidence from stakeholders for the Bill to be strengthened further to promote horticulture and maximise opportunities for diversification

The Minister for Rural Affairs, North Wales, and Trefnydd responded:

The Bill allows for support for horticulture and other forms of diversification through their inclusion in the definition of agriculture which means that supporting horticulture is possible under the power to provide support.

However this does not address the minimum farm size eligibility requirement.

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



Eich cyf/Your ref P-06-1378  
Ein cyf/Our ref LG/00680/23

Jack Sargeant MS  
Chair - Petitions committee

23 November 2023

Dear Jack,

Thank you for your letter of 24 October, regarding Petition P-06-1378 titled 'We want farm subsidies to be extended to small scale and market gardeners.'

The Welsh Government recognises the importance of this sector and already provides support to enable its development. The Horticulture Start Up and Development schemes, launched in 2022, are designed to help growers with investment in new equipment and technology. They enable horticultural businesses to sustainably expand production, diversify into new crops, improve production efficiency and enhance product quality. The awarding of these grants has not been subject to a minimum cultivated area, so they have benefitted small-scale and market gardeners.

The future Sustainable Farming Scheme (SFS) is being designed to be applicable to the majority of farming businesses across multiple sectors in Wales. Feedback to previous consultations confirms the industries agreement with the fundamental scheme structure comprising of a set of Universal Actions applicable to all in exchange for a Baseline Payment, with Optional and Collaborative Options available to those who wish to go further.

The proposed eligibility for the SFS includes a minimum of three eligible hectares, reduced from five hectares under the Basic Payment scheme to make the scheme accessible for smaller scale producers such as market gardeners. For businesses which can meet these criteria, proposals for Optional Actions includes *support for the start up of new horticultural businesses or new horticultural enterprises within established farm businesses*. This Optional Action is unlikely to be available immediately when the SFS commences in 2025, however will be integrated in the scheme during the transition period.

Anecdotal feedback from horticultural stakeholders suggest some would not be able to meet the SFS Universal Actions other businesses would be required to meet as it would not be feasible to deliver actions on habitat or woodland creation on small plots. We have advised

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

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

the horticultural sector to respond to SFS consultation with suggestions of how their sector could be supported within the SFS model, or if there is potential for clusters of horticultural businesses to be supported via the Collaborative layer of the SFS.

No final design decisions will be made on the SFS until the conclusion of the final consultation due to be published shortly.

A handwritten signature in cursive script that reads "Lesley Griffiths".

**Lesley Griffiths AS/MS**

**Y Gweinidog Materion Gwledig a Gogledd Cymru, a'r Trefnydd  
Minister for Rural Affairs and North Wales, and Trefnydd**

# P-06-1379 Ban the sale of single-use vapes

Y Pwyllgor Deisebau | 11 Rhagfyr 2023  
Petitions Committee | 11 December 2023

Reference: SR23/7337-1

Petition Number: P-06-1379

Petition title: Ban the sale of single-use vapes

Text of petition: Single-use vapes are becoming increasingly popular, particularly amongst younger people & there is an increasing trend of these being disposed of incorrectly. Whilst the components are recyclable, they are typically, at best, thrown into general waste & more often than not are left as litter in public areas, causing problems for the local environment.





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# 1. Background

In July 2023, the Local Government Association (LGA), representing councils in England and Wales, called for the UK Government to ban the sale and manufacture of disposable/single-use vapes by 2024. The LGA provided further detail on its policy position in October 2023.

A YouGov poll from July 2023 shows that 77% of people in Wales somewhat or strongly support a ban on disposable vapes.

## 1.1. Environmental concerns

It is reported that nearly 5 million disposable single-use vapes are being thrown away per week (8 per second) in the UK in 2023, four times the amount for 2022. When disposed of, single-use vapes become Waste Electrical and Electronic Equipment (WEEE) and require specific treatment in the waste stream. An independent NGO working on the use and recyclability of electricals, Material Focus, says:

Producers, importers, distributors and retailers of single-use vapes need to do a lot more than they are currently doing to meet their legal and financial responsibilities under UK waste electrical (WEEE) and portable battery regulations.

The Institute of Environmental Management and Assessment (IEMA) highlighted the difficulty of recycling disposable vapes in the UK, and the safety risk from lithium batteries inside vapes. The insurer Zurich Municipal also emphasised this risk, reporting a 62% rise in bin lorry blazes and a 108% increase in house fires sparked by vapes in the two years before the release of their report in July 2023. Zurich Municipal's research also showed that three single-use vapes are disposed of incorrectly in the UK each second, three out of four users are unaware of how to dispose of the vapes correctly, and a similar proportion is not aware the vapes contain lithium batteries.

The RSCPA has also called for a ban on disposable vapes due to the "significant risks to animals both domesticated and wild". These risks include fire, ingestion, poisoning, and choking hazards.

## 1.2. Health concerns and impacts on children and young people

Public Health Wales (PHW) highlighted the health risks of vaping, especially for children and young people. While vaping is considered less harmful than smoking, it isn't risk free and the long-term effects aren't known. PHW also reported that nicotine dependency impacts mental health and well-being. The Royal College of Paediatrics and Child Health (RCPCH) says that there's growing evidence that young non-smokers who use vapes are more likely than non-users to take up smoking.

PHW especially warned against disposable vapes that are often cheaper and hence widely sold to young people. PHW also published guidance to address vaping among secondary school-age learners.

The Action on Smoking and Health (ASH) Smokefree GB adult and youth surveys for 2023 show that vapes chosen by children are mostly disposable, and that:

- the proportion of children who tried vaping once or twice increased by 50% in 2023, reaching 11.6%;
- the proportion of children vaping regularly increased by 150% in 2022, and then by 20% in 2023, reaching 3.7%; and
- the proportion of children vaping occasionally (less than once a week) almost doubled in 2022 and stayed constant in 2023, at 3.9%.

The Royal College of Paediatrics and Child Health (RCPCH) called on the UK Government to ban disposable e-cigarettes (another term to describe electronic nicotine delivery systems (ENDS)) due to:

(...) disproportionate use among children and young people and their detrimental impact on the environment.

## 1.3. Potential risks of a ban?

The UK Vaping Industry Association (UKVIA) recognised the need to address children vaping, and proposed higher fines for retailers selling vapes to children. However, UKVIA rejected stricter regulations, claiming it would have a negative effect on people trying to quit smoking and foster the growth of an unregulated black market.

The LGA rejected the argument that a ‘black market’ would develop following a ban on disposable vapes, saying there is no evidence suggesting this, and that a black market already exists.

## 1.4. Actions in other countries

Several European countries are considering or implementing bans on single-use vapes. In France, a dedicated Bill has been adopted in the National Assembly. In Ireland, a consultation on the topic has been launched. Germany and Hungary passed laws to respectively ban single-use vapes, and ban disposable vapes of the brand Elf Bar and flavoured tobacco products. The Council of the European Union adopted a new regulation on batteries and waste batteries, requiring all portable batteries to be “removable and replaceable” by 2027.

Some countries, such as Denmark, Estonia, and Finland, have banned certain flavours. Further information on regulatory controls on flavoured vapes as of August 2023, is published by Physicians for a Smoke Free Canada (PSC).

Australia is planning to ban vapes except on prescription. New Zealand reduced the nicotine levels authorised in single-use vapes. As of August 2023, more than thirty countries, including Brazil, Japan and Uganda, were banning vapes altogether.

The LGA said:

If the EU becomes a less attractive market for international producers it may lead to stocks of non-compliant vapes being dumped on less-regulated markets, e.g. the UK.

## 2. Welsh Government action

In October 2023, a four nation joint public consultation to create a ‘smokefree generation’ was launched. The consultation is asking for opinions about restrictions on the supply and sale of disposable vaping products. This followed a youth vaping call for evidence carried out between April and June 2023..

The Minister for Climate Change, Julie James MS (“the Climate Change Minister”) highlighted the need for a UK-wide approach, and met with Ministers and senior officials across the UK in September 2023. She said:

We will be talking with the UK Government about accelerating both the consultation and, then, the outright ban on single-use e-cigarettes, actually, not just vapes—there are slightly different products on the market—because of both the public health and the environmentally wasteful, highly damaging and dangerous nature of this product.

The Welsh Government has also been working with the other UK nations to include vapes in the new extended producer responsibility (EPR) reforms.

In addition, the Climate Change Minister mentioned the work carried out with Trading Standards Wales to support their work on illegal vaping products.

### 3. Welsh Parliament action

In December 2022, Rhys ab Owen MS moved amendments to add disposable vapes to the Schedule of the (then) Environmental Protection (Single-use Plastic Products) (Wales) Bill (“the Single-use Plastic Bill”). The amendments would have meant a ban on disposable vapes and e-cigarettes. The amendments were rejected. The Climate Change Minister said more evidence was needed for a ban. She also highlighted the importance of e-cigarettes to help smokers quit smoking.

In September 2023, the Climate Change, Environment, and Infrastructure (CCEI) Committee held evidence sessions for the then Single-use Plastic Bill. The Institute of Welsh Affairs emphasised the need to be consistent across the UK for new single-use plastics coming on the market, for example disposable vapes. Keep Wales Tidy highlighted an increase in disposable vapes in street litter. The Welsh LGA mentioned that local authorities are highlighting the issue of disposable vapes “very strongly”.

In Plenary in September 2023, Vikki Howells MS asked the Minister for Rural Affairs and North Wales, and Trefnydd, Lesley Griffiths MS (“the Trefnydd”) about Welsh Government actions to reduce underage vaping. The Trefnydd replied:

We are very clear that e-cigarettes should never be used by children, by young people or by non-smokers. Whilst it is recognised, of course, that vapes are safer than smoking and are used by some people to help quit smoking, we think the evidence on their long-term health effects is limited and it's still emerging. And, as part of our tobacco strategy, we are looking very closely at our policy position on e-cigarettes in Wales.

In September 2023, Rhys ab Owen MS tabled a question about the action of the Welsh Government to ban the advertisement of nicotine products with flavours and colours that are attractive to children. The Deputy Minister for Mental Health and Wellbeing, Lynne Neagle MS (“the Health Deputy Minister”), replied in October 2023 that she is working with governments across the UK and added:

I await the outcome of the UK Government’s call to evidence on youth vaping and have written to the Minister for Primary Care and Public Health in the UK Government to make clear my support for the introduction of much stronger evidence-based restrictions on the vaping industry, particularly in relation to their marketing and placement in shops.

During First Minister Questions in October 2023, the First Minister, Mark Drakeford MS, replied to a question by Ken Skates MS on actions to protect young people from the effect of vaping:

The proposals that were made by the Prime Minister are ones that we will support, and we will align ourselves with the consultation that we expect the UK Government to develop (...).

Darren Millar MS also asked about the work done by the Welsh Government to help provide smokers with e-cigarettes as part of the NHS smoking cessation services. In reply, the First Minister highlighted that the benefits of vaping are contested and medical views differ.

In Plenary in October 2023, a short debate on the impact of vaping across Wales was held and presented by John Griffiths MS, with contributions from Jayne Bryant MS and Joel James MS. The Health Deputy Minister The Health Deputy Minister replied by emphasising the work carried out with other UK nations to tackle the issue of single-use vapes and the work with local authorities to support enforcement and seizure of illegal products. She also highlighted the work carried out by PHW to produce evidence-based guidance for schools and their ongoing work to support people with nicotine addiction.

In Plenary in November 2023, the Senedd debated a legislative proposal from Jenny Rathbone MS for a Bill to prevent the sale of single-use vapes. The motion was noted.

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

Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1379  
Ein cyf/Our ref JJ/02927/23

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
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21 November 2023

Dear Jack Sargeant,

Thank you for your letter of 26 October regarding Petition P-06-1379 in relation to the ban of single-use vapes in Wales.

I share the concerns raised in this petition and agree action is needed on single-use vapes to protect public health, prevent the wasteful use of resources and stop these products being littered in our environment. This is why the Welsh Government is currently consulting with the other UK nations on proposals to create a smokefree generation by raising the age of sale for tobacco. As part of this consultation, we are seeking views on proposals to restrict the supply and sale of disposable vaping products. The consultation is due to close on 6 December and can be accessed via the UK Government's website.

[Creating a smokefree generation and tackling youth vaping: your views - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

I believe a collaborative, UK wide approach is essential for tackling such products and I recently met with Ministers and senior officials from across the UK in September to discuss how best to achieve this. It was agreed we would work together to tackle the impacts of single-use vapes, up to and including a ban. A UK wide working group has now been established to help gather evidence and develop our proposals.

The Welsh Government is also participating in a four nations consultation on Extended Producer Responsibility Reforms. This recognises the environmental impact of vapes and proposes a new category of equipment for vapes to ensure producers fully finance the cost of collection and treatment. I fully support this approach and would like to see the new Producer Responsibility controls introduced as quickly as possible.

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

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

The Welsh Government is clear the regulatory landscape in relation to vapes must change and I can assure you the Welsh Government will do all it can to address this issue.

Yours sincerely,

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive, flowing style.

**Julie James AS/MS**  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



# P-06-1380 Make Blue Badge applications lifelong for individuals who have a lifelong diagnosis

Y Pwyllgor Deisebau | 11 December 2023  
Petitions Committee | 11 Rhagfyr 2023

Reference: SR23/7337-1

Petition Number: P-06-1380

Petition title: Make Blue badge applications lifelong for individuals who have a lifelong diagnosis

Text of petition: Not all disabilities are the same, some are life long, meaning they do not change over time.

Unfortunately, current guidelines require individuals with lifelong diagnoses, which include learning disabilities or profound and complex needs, to reapply for a blue badge every three years. This process can be very frustrating and time consuming for both individuals and their caregivers and focus heavily on the negative aspects of an individual's abilities

The Equality Act 2010, states, a disability is a physical or mental condition that has a substantial and long-term impact on a person's ability to do normal day-to-day activities, it states it allows for the better or more favourable treatment of people with impairments based on the evidence given, to provide equality of opportunity.

We believe that the process should be updated to better support those with disabilities by making life easier for those with lifelong conditions.



We are therefore proposing a change, we are calling for the Welsh Government to change their current process when applying for blue badges, to give what's right and to support disabled people.

The change would be, that if a person applies for a blue badge due to a lifelong medical condition that is not expected to change, and their supporting health notes confirm this, then a blue badge should be granted for their lifetime.

## 1. Background

The Blue Badge (Disabled Persons' Parking) scheme was introduced in 1971 under section 21 of the Chronically Sick and Disabled Persons Act 1970. In 2000 the Disabled Persons (Badges for Motor Vehicles) (Wales) Regulations 2000 introduced the Blue Badges scheme for disabled people in Wales.

The Blue Badge scheme provides a national arrangement of parking concessions for people who meet the eligibility criteria and operates throughout the UK. Blue Badges are free in Wales. The Welsh Government is responsible for the scheme, while local authorities are responsible for the day-to-day administration and enforcement of the scheme.

According to Blue Badge scheme guidance, an individual in Wales can qualify for a Blue Badge in one of the following categories:

- **Automatic qualification** – an individual may be eligible for a badge without the need for an assessment if they receive a listed disability benefit or have sight impairment.
- **Discretionary qualification** – certain circumstances might make an individual eligible even though they do not receive the benefits listed.
- **Temporary qualification** – an individual can apply for a temporary 12 month badge if they are recovering from, or awaiting treatment for, serious illness or injury.

Blue Badges are valid for up to 3 years. Registered holders of a Blue Badge must reapply up to 12 weeks before their Blue Badge expires. This application process is

administered by local authorities, or applicants can apply online through the **Blue Badge Digital Service (BBDS)**. BBDS has been available since February 2019.

## 2. Welsh Parliament action

In April 2019, the Equality, Local Government and Communities Committee conducted an inquiry into the eligibility and implementation of the Blue Badge Scheme in Wales. The inquiry heard evidence that the renewal process can be ‘very stressful for a person reliant on that badge’ and this is particularly the case for those with life-long or deteriorating health conditions.

In evidence to the Committee, both Disability Wales and Alzheimers Society Cymru highlighted inconsistencies in the reapplication process, with some applicants with life-long health conditions having to undergo a full assessment when applying for a renewal. The Committee’s report recommended that:

The Welsh Government works with the Welsh Local Government Association to develop a process to enable those suffering with a life-long or deteriorating condition to renew their blue badge automatically, without further assessment.

The Welsh Government rejected this recommendation. The Minister for Economy and Transport accepted that a full-reapplication process for eligible badge holders is a ‘burden’ but argued that BBDS has developed ‘a function where local authorities can flag on the system if a Blue Badge is awarded for life and therefore will not require reassessment.’ The Minister said that the Welsh Government would ‘remind local authorities of this function.’

## 3. Welsh Government action

Since 2002, the Blue Badge scheme has been subject to a number of reviews, consultations, and reports, which have looked at various aspects of the scheme. Most recently, the Welsh Government has undertaken the following work to review and update the administration of the Blue Badge scheme in Wales:

- Public consultations on changes to the scheme were carried out in 2008, 2010, 2011, 2012, 2013 and 2016.
- Two expert groups were set up in 2013 and 2015 to consider ways to improve the scheme.
- The eligibility criteria were last amended in 2017, when cognitive and temporary impairment criteria were included.

In correspondence to the Committee, the Deputy Minister for Climate Change, Lee Waters, said 'statutory eligibility criteria are based on challenges to mobility in line with the social model of disability as adopted by Welsh Government.' He said that 'Wales has one of the widest eligibilities in the UK.'

Since the introduction of the BBDS, when a local authority is satisfied that an applicant will permanently meet the eligibility criteria, a mark can be added to their digital record to flag that a Blue Badge has been awarded for life and to shorten the renewal process. Those who are subject to this streamlined process still need to reapply for a Blue Badge every 3 years, but do not need to go through a full reassessment.

In his letter to the Committee, the Deputy Minister for Climate Change described this reapplication process as 'essential' to verify applicants' identity and proof of residence and 'to protect against fraudulent applications and abuse of the scheme.' He said:

If badges were valued for a longer period, then there is more opportunity for people to misuse and abuse this scheme, which is a concern Audit Wales have expressed previously.

Audit Wales monitor abuse of the Blue Badge scheme as part of the National Fraud Initiative. The National Fraud Initiative can identify when a Blue Badge is being used or renewed after the registered holder has died. The 2020-21 National Fraud Initiative identified 2,717 cases of fraudulent Blue Badges. Audit Wales estimate that the value of these cases is £1.4 million, based on 'a calculation of the annual estimated cost of lost parking revenue and the likelihood of these blue badges being misused.'

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that

these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Lee Waters AS/MS  
Y Dirprwy Weinidog Newid Hinsawdd  
Deputy Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1380  
Ein cyf/Our ref LW/02763/23

Jack Sargeant MS  
Chair - Petitions committee

16 November 2023

Dear Jack,

Thank you for your letter of 26 October on behalf of STAND NW CIC regarding Petition P-06-1380 make Blue Badge applications lifelong for individuals who have a lifelong diagnosis.

As you are aware, the Blue Badge Scheme provides parking concessions for people who experience the greatest barriers to their mobility to enable them to access services and facilities thus enabling them to live independently. The primary legislation is the Chronically Sick and Disabled Act 1970 which places duties on local authorities to deliver the scheme in their area. The secondary legislation is the Disabled Persons (Badges for Motor Vehicles) (Wales) Regulations 2000 as amended, which sets out requirements such as the eligibility criteria, form of badge, and issue period.

The statutory eligibility criteria are based on challenges to mobility in line with the social model of disability as adopted by Welsh Government. Eligibility is not generally linked to diagnosed medical conditions as these can demonstrate a wide range of symptoms. Further research on eligibility has been undertaken on a national basis and specifically for Welsh Government since 2012. We also undertook a number of public consultations to seek views on extending eligibility. Wales has one of the widest eligibilities in the UK. The eligibility legislation was last amended in 2017 when the cognitive and temporary impairment criteria were included.

The period of issue of a Blue Badge is stated in the regulations and is for a period of 3 years from date of issue or for the length of time their benefit award has been given up to a maximum of 3 years. If an applicant is applying under the temporary eligibility criteria in Wales the badge will be issued 12 months.

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

The Blue Badge Digital Service (BBDS) has the ability for local authorities to flag up on the system if a badge should be awarded for life. Also, if a local authority refers an application to be reviewed by the Independent Advisory Service (IAS), they will advise the local authority of their recommendation and if it should be awarded for life. However, an application would still need to be made every three years, but no further assessment would be needed by the local authority. Applicants would still need to verify their identity and proof of residence which is essential, to protect against fraudulent applications and abuse of the scheme. The three years to re-apply for a badge is stated in regulations and helps to assess and monitor applicants' continued eligibility for the scheme. If badges were valued for a longer period, then there is more opportunity for people to misuse and abuse this scheme, which is a concern Audit Wales have expressed previously.

Welsh Government officials have previously held a workshop for local authorities on the social model of disability to raise awareness of barriers applicants may face. The trainer used their own personal experience of an impairment and barriers they had faced.

If applicants are having difficulties re-applying for a badge, they can either contact their local authority to ask for assistance or a friend/ family member/ advocate could apply on their behalf online if they wish to use the BBDS. Please see the attached link: <https://www.gov.uk/apply-blue-badge>.

As I have mentioned previously if a local authority decided to award for life, then this can be flagged on the Blue Badge Digital System and future re-applications can then be streamlined helping the applicant.

I hope this information is helpful

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lee', is centered on a light grey rectangular background.

**Lee Waters AS/MS**

Y Dirprwy Weinidog Newid Hinsawdd  
Deputy Minister for Climate Change

## **P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis, Correspondence – Petitioner to Committee, 01.12.23**

### P-06-1380 Eich deiseb / Your petition

We appreciate the feedback in the attached letter, but we do not feel that it is adequately addressing the issues raised and you have added more confusion to the situation, raising more questions. As we have only just received this information, we have no time before the 5<sup>th</sup> December to look into this further. It has certainly highlighted that there are inconsistencies

We have reached out to various Local Authorities, we asked about

- The letter stating “The Blue Badge Digital Service (BBDS) allows local authorities to mark on the system if a badge should be granted for life.”
- Qualifications of desk based assessors
- IAS process (The Independent Assessment Services).

#### Life award

- We have received inconsistent answers, with one LA saying ‘they never give anyone a Life award’
- No LA’s can provide data on how many people have received a Life award
- No Parent we have talked to has been given or informed that there is a possibility of a life award
- No information is given on LA website or application form regarding Life award

#### Qualifications/Training

According to the guidance, the local authority must conduct a thorough assessment based on the evidence from healthcare professionals, such as reports, letters (not appointment letters), summaries and assessments by relevant healthcare professionals involved in an applicant’s care. However, we found that this was not the case in practice.

Local authorities in different counties could not tell us what qualifications or training their desk-based assessors had in health, ALN or disability. How can they make informed decisions about complex needs without having the appropriate expertise? The decision makers need to have some kind of medical knowledge

#### IAS

- We received varied answers to whether IAS is an appeal process or part of the application process.
- LAs could not provide any data on how many cases were referred to the IAS process or how many were successful in obtaining a blue badge.
- There is no information on the website or on the application form about IAS.

#### Parents responses

- I don’t find the response particularly useful in addressing the issues that we have raised. It sets out the political timeline for the different discussions held regarding mobility and blue badges but doesn’t consider the actual practice and the problems faced by families of children with learning disabilities



- It simply states that it is for 3 years without explaining or examining the reasons for it being 3 years. My daughters DLA was issued for a longer period than 3 years why doesn't it align to the period of the award?
- I have never been informed about a badge being awarded for life. Why is this not signposted within the application process? It may be within the policy but as with many political or legal documents if they aren't promoted then they aren't used by those in need.
- It fails to address our comments regarding consistencies within local authorities. It does not address my concerns regarding training of those councils in carrying out their role in issuing blue badges particularly in case involving cognitive rather than physical disabilities.
- I don't understand why blue badge eligibility helps assess and monitor applicants continued eligibility. If it is based upon the actual award ie if we are issued with DLA for a period of 5 years why does it not cover the length DLA has been awarded? It is suggesting that the DLA assessment process is flawed and not to be trusted.
- I don't believe that the system of awarding blue badges should be devised to prevent misuse or abuse. The process should be based upon need, accessibility and designed to be transparent and easy to access. Is the system specifically designed to reduce the number of blue badges being issues? IF this is the starting point then barriers may be subconsciously put up by those issuing

It fails to provide any adequate reasons why he considers that blue badges can not be issued for a longer period than 3 years. He simply states avoid misuse or abuse. Does he have any evidence to support this assertion? Why 3 years? why not 5 years? why not 10 years, this could include photo ID?

- He has not addressed the issue around life long conditions
- He has not addressed the issue surrounding lack of consistency and lack of knowledge around appeals or support in making applications

- 
- My son was awarded his blue badge in January 2023. He is 15 years years old, non-verbal, cognitive disabilities, adhd, myoclonic and atonic seizures and charcot marie tooth. All of which are lifelong and are life limiting for him. He is on the lower rate of mobility, but we were fortunate to have a blue badge issued. Which has transformed our life, making every day trips so much easier for both him and myself. I have learnt that the blue badge can be awarded for life. Lee stated in his letter 'The Blue Badge Digital Service (BBDS) has the ability for local authorities to flag up on the system if a badge should be awarded for life.'

How do I go about this? There is no information regarding this process on your website, and I can't find this on Gov.uk website either. I have not been notified of this when we received my sons Blue Badge and the information booklet that was with the Blue Badge. Surely this information should be included in the notes of eligibility in the applying

process!! There must be thousands of people, who like my son have lifelong conditions and would welcome not having to 'reapply' every 3 years.

My sons conditions are lifelong. He is 15years old and has no awareness of danger, he could not plan a route or follow a route that was planned for him. Coupled with his ADHD which leads him to be spontaneous and a flight risk. Along with him being non-verbal, so can't ask for help. This is a very dangerous situation for him and people around him. Charcot Marie Tooth is a genetic muscle wasting disease, there is no cure to it. He is effected everyday by the CMT. He has poor fine and gross motors skill, a wide gape and he can't run, instead he skips, due to his muscle tone.

I look forward to your reply and receiving the information regarding how I go about getting my sons blue badge awarded for life.

## Questions

- Have the Welsh Government undertaken any research as to whether that training in relation social model of disability is working.

Evidence from our working group suggests that there is inconsistencies within local authorities; there is not transparency within the process and people don't know about their rights to appeal or the Independent Advisory system. Feedback from our discussions would suggest that more needs to be done to improve understanding of some conditions such as cognitive impairment and better information about the process needs to be disseminated by the council.

- IF they do not support our proposed changes - can the system be simplified for those who are reapplying who have lifelong conditions.
- What assessments have been carried out to ensure that there is consistency within local governments in processing blue badges.
- The legislation is broadly worded in relation to cognitive disability and will often depend upon the individual's own interpretation of 'danger' etc. What training is provided to ensure that councils have real life understanding of what this means to individual families who children have learning difficulties.

The current blue badge system is unfair and distressing for people with ALN or Disabilities. They have to go through a lengthy and exhausting process that often does not take into account their specific needs or circumstances and in some instances their disabilities are not going to go away or improve. In some instances, mobility cars have been removed leaving individuals isolated. This is not only a problem in North Wales, but across the whole country. The existing guidance is flawed and inefficient, wasting the Welsh government's resources. There is an urgent need for change and to grant people with lifelong disabilities a blue badge for life

Please see article written by IWA who has interviewed individuals and professionals across Wales, please use to support our case

<https://www.iwa.wales/agenda/2023/11/the-blue-badge-application-process-an-inconsistent-and-harrowing-process/>

**Is there anything additional that you would like the Committee to know at this stage,**

Some parents from Our STAND for change groups have agreed to share their stories and explain how the blue badge helps them with their daily challenges and how a life time award would take one stress away from their lives. They hope that you will listen to them and understand their situations.

# Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included

Y Pwyllgor Deisebau | 11 Rhaglan 2023  
Petitions Committee | 11 December 2023

Reference: SR237337-5

**Petition Number:** P-06-1383

**Petition title:** Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included

**Text of petition:**

To prevent widescale and needless damage to the Welsh countryside, we call upon the Welsh Government to place a temporary moratorium on all onshore wind and ground based solar developments over 10MW, until Future Wales 2040 and the Welsh Government's renewable energy targets are updated and incorporated with Wales Marine Energy to ensure that the full potential of offshore wind, rooftop solar, and other emerging energy sources is recognised as a critical priority to combat climate change.

Wales presently produces 30 Terra Watt hours (TWh) of energy (55% of that from renewables) whilst using only 14TWh, however, demand is estimated to increase to 45TWh by 2050.

Wales has massive potential for far offshore wind (both fixed and floating) with projects proposed for offshore wind projects, in the Irish and Celtic Sea combined forecast to generate at least 100 TWh of energy.

Estimates also calculate that up to 50% of Wales energy consumption could be met through rooftop solar on houses, businesses, and covered car parks.

Yet neither the full potential of offshore wind nor rooftop solar is being calculated into Welsh Government policy. The Minister for Climate Change admitted to CPRW it wasn't, stating that their policy document, Future Wales,



had not been updated in three years. We call for policy to be updated to include the full potential of offshore wind, rooftop solar and other emerging technologies to ensure we sacrifice the least amount of countryside and farmland.

## 1. Background

### 1.1. Current picture of renewable energy generation

The Welsh Government published its strategy to decarbonise the energy sector and accelerate renewable energy development, the [Net Zero Wales Carbon Budget 2 \(2021-25\)](#) (“the Net Zero Plan”), on 28 October 2021. The Net Zero Plan outlines actions the Welsh Government (and others) need to take, over the next five years, to reduce reliance on fossil fuels and drastically reduce greenhouse gas emissions from the energy sector. It also takes a longer term view, looking towards the net zero by 2050 target.

In 2022, there were 95,047 renewable energy projects in Wales, and [approximately 59% of Wales’ electricity demand](#) was met from Welsh renewable energy sources. There was 897MW of locally owned renewable energy capacity in Wales, almost 90% of the 1GW target. The [Welsh Government’s Energy Generation in Wales 2022 report](#) gives further information. Annual [Energy Generation in Wales reports](#) are available from 2016.

### 1.2. Offshore wind

Offshore wind is an [established and proven renewable energy technology](#). There are three operational offshore wind farms off the North Wales coast: Gwynt y Mor, Rhyl Flats and North Hoyle.

[Floating offshore wind](#) (FLOW) technologies combine the platform technology used in the oil and gas industry, and wind turbines. This means wind turbines can move into deeper waters with higher wind speeds, and have less visual impact. The UK Government wants to develop 5GW of FLOW by 2030 as part of the [British Energy Security Strategy](#).

The Celtic Sea, the area between south Wales, Ireland and Cornwall, is incredibly windy, but too deep for traditional fixed-bottom turbines. Marine Energy Wales is facilitating the development of FLOW in the Celtic Sea, saying it can deliver 24GW of energy and thousands of jobs. It highlights that FLOW development should be “rapid” to meet net zero ambitions, as such the Crown Estate is offering leasing opportunities in the Celtic Sea for FLOW projects.

### 1.3. Rooftop solar

The UK Climate Change Committee’s June 2023 progress report on reducing emissions in Wales found that Welsh renewables capacity has increased over time, but the rate of solar power installation has slowed since 2016.

Permitted development rights allow for the installation of micro-generation equipment, including rooftop solar panels on domestic and non-domestic properties in Wales, without having to make a planning application. Where certain criteria are not met a planning application would be required.

Senedd Research has published a small-scale renewable energy schemes planning quick guide which provides further information.

### 1.4. The planning framework

Future Wales, published in 2021, is Wales’ National Development Framework and has development plan status. It sets out the Welsh Government’s strategic planning policies on a range of topics including renewable energy.

Planning Policy Wales (PPW) remains the Welsh Government’s primary statement of planning policy and continues to apply to all aspects of the planning process. Future Wales applies the key principles of PPW and establishes where in Wales development should take place and how.

Future Wales can be revised at any time, however there’s a statutory requirement for a review at least every five years. It’s produced under the Planning and Compulsory Purchase Act 2004 (as amended by the Planning (Wales) Act 2015) which extends to the land only in Wales, down to the low water mark. **Future Wales is therefore unable to refer to offshore wind.** The Welsh National Marine Plan sets policy for the sustainable use of the sea.

## 1.5. Consenting energy infrastructure

The [Net Zero Plan](#) states the Welsh Government will “improve and unify” the consenting of energy generation projects in Wales to provide a quicker and more proportionate energy infrastructure consenting regime.

The [Infrastructure \(Wales\) Bill](#) was introduced into the Senedd on 12 June 2023. The Bill reforms how infrastructure is consented in Wales by establishing a unified process, known as an Infrastructure Consent (IC), for specific types of major infrastructure called Significant Infrastructure Projects (SIPs). These include energy projects on land and in the sea around Wales (known as the ‘[Welsh marine area](#)’).

Key Senedd Research publications to support scrutiny of the Bill can be [found on this page](#), which will be updated as the Bill makes its way through the [Senedd’s legislative process](#).

## 2. Welsh Government action

### 2.1. Renewable energy targets

In September 2017, the Welsh Government [set renewable energy targets](#):

- Wales to generate 70% of its electricity consumption from renewable energy by 2030;
- 1 GW of renewable electricity capacity in Wales to be locally owned by 2030; and
- New renewable energy projects to have at least an element of local ownership.

Additionally, the [Programme for Government 2021-26](#) includes a commitment to “expand renewable energy generation by public bodies and community groups in Wales by over 100 MW by 2026”.

Earlier in 2023, the Welsh Government consulted on a [review of its renewable energy targets](#). In response to this petition, the Minister for Climate Change, Julie James MS, referenced the evidence base supporting the consultation, which made clear “that we cannot rely on one type of renewable energy source to support our long-term energy needs”, saying:

Wind energy, along with solar are the most mature technolog[ies] and these are likely to make the most significant contribution to our energy

needs in the short to medium term. We anticipate much of this will be offshore, but we will need further onshore generation

Following the consultation, the Minister for Climate Change announced the Welsh Government's intention to adopt a target for Wales to meet the equivalent of 100% of annual electricity consumption from renewable sources by 2035. The Wales Net Zero 2035 challenge group has since been set up to examine potential pathways to net zero by 2035.

In October 2022, the Welsh Government announced its intention to set up a publicly owned renewable energy developer, to develop wind energy projects on the Welsh Government woodland estate.

## 2.2. Renewable energy deep dive

In October 2021, the Welsh Government announced it would be undertaking a Deep Dive into renewable energy to identify barriers to significantly scaling up renewable energy in Wales and steps to overcome them. The outcome of the Deep Dive, including a series of recommendations, was published in December 2021. The Welsh Government has subsequently published two biannual updates on recommendations from the deep dive.

## 2.3. Responding to the petition

In response to this petition, the Minister for Climate Change, says restricting the freedom for anyone to “submit a planning application for whatever proposed development... is not the best way forward”. As such the Minister does “not support the call for a moratorium on onshore wind or solar farms as they still have an important role in the future energy mix”.

The Minister also highlights that:

...a number of key levers that the offshore wind industry need lie in the hands of the UK Government. Without a supportive framework from the UK Government, I have concerns that the offshore wind sector will not provide the electricity generation and economic opportunities we know it can.



### 3. Welsh Parliament action

In late 2021 the Senedd Climate Change, Environment and Infrastructure (CCEI) Committee's undertook a [short inquiry into renewable energy](#). This [Senedd Research article](#) provides an overview of the Committee's findings, and an [update on the Deep Dive recommendations](#).

Also in late 2021, the CCEI Committee considered marine energy development as part of its [inquiry into marine environment management](#). The CCEI Committee is currently undertaking scrutiny of the [Infrastructure \(Wales\) Bill](#).

You recently considered petition '[P-06-1339 Require all new Welsh homes to be fitted with solar panels as a condition of planning permission](#)'.

In June 2023, the Minister [referred to the issue](#) of requiring solar panels in response to questions from Senedd Members on the UK Climate Change Committee progress report referenced earlier in this briefing.

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

Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1383  
Ein cyf/Our ref JJ/02932/23

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

15 November 2023

Dear Jack

Thank you for your letter of 27 October, informing me of Petition P-06-1383 from Carys Matthews. I am aware the petition has already attracted a lot of interest and will be discussed by the Petitions Committee.

It is clear from your email, and the petition that many people feel strongly about this matter. During this climate emergency, which is a serious threat, we need to ensure that we bring to an end the burning of fossil fuels. To achieve this, we need to harness the renewable potential of Wales for our energy needs.

Our recent consultation on our renewable energy targets analysed our energy needs and that we will need a range of renewable technologies of different types and scales to address the climate crisis and meet our energy targets. Wind energy, along with solar are the most mature technology and these are likely to make the most significant contribution to our energy needs in the short to medium term. We anticipate much of this will be offshore, but we will need further onshore generation. What the evidence base supporting our consultation made clear is that we cannot rely on one type of renewable energy source to support our long-term energy needs. While offshore wind will contribute to our electricity needs in the future, without the addition of a range of other renewable energy sources, including onshore wind, we will have insufficient renewable electricity generation to meet the equivalent of our needs.

Offshore wind is already contributing to our energy mix, and the potential for floating offshore offers a huge economic opportunity for local suppliers and our coastal communities. An economic opportunity I am determined that Welsh Government will do all it can to seize. However, a number of key levers that the offshore wind industry need lie in the hands of the UK Government. Without a supportive framework from the UK Government, I have concerns that the offshore wind sector will not provide the electricity generation and economic opportunities we know it can. We have made clear that the UK Government, and the Crown Estate that more work is needed to provide greater levels of certainty to the industry.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Julie.James@llyw.cymru](mailto:Gohebiaeth.Julie.James@llyw.cymru)  
[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

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

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

We have a robust planning framework, with our strategic position outlined in Future Wales and Planning Policy Wales. Future Wales, which was published in 2021, has development plan status and sets out the Welsh Government's strategic planning policies on a range of topics including renewable energy. Future Wales supports the Government's overall ambition to decarbonise our economy and has specifically identified pre-assessed areas where there would be a presumption in favour of onshore wind developments. All planning decisions for renewable technology, including onshore wind, are required to take into account environmental factors and public feedback. Anyone is free to submit a planning application for whatever proposed development and restricting this freedom is not the best way forward, and I do not support the call for a moratorium on onshore wind or solar farms as they still have an important role in the future energy mix.

Thank you again for your letter and bringing the petition to my attention.

Yours sincerely



**Julie James AS/MS**  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

**P-06-1383 Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included, Correspondence – Petitioner to Committee, 05.12.23**



Petitions Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN  
[petitions@senedd.wales](mailto:petitions@senedd.wales)

5<sup>th</sup> December 2023

Dear Jack Sargeant MS, Chair of the Petitions Committee

**Re: Petition P-06-1383: Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included.**

**Supplementary contribution**

CPRW is grateful for the opportunity to provide this additional information to support our petition and provide feedback on the Minister’s written correspondence to the Committee Chair dated the 15 November 2023.

**Rational behind our petition**

To reach net zero, Wales needs, in addition to currently built renewable generation, a further 6 GW installed capacity in the Irish Sea off north Wales (after Mona), and 3 GW in the Celtic Sea (derived from “Review of Wales’ Renewable Energy Targets” Welsh Government consultation document and “Future Energy Scenarios” by the Electricity System Operator). This is less than the total capacity possible. Obviously less is needed (ca 3.5 GW) to meet the Welsh Government’s 2035 target of 100% consumption from renewables, and this level of generation should be possible by 2035 given sufficient political will. This level of generation is not possible from onshore wind alone, and there is already a significant dependence on offshore wind.

With the revised U.K. National Policy Statements (particularly EN-1)<sup>1</sup>, including classifying offshore wind as a “critical national priority”, given the highest level of support in the U.K. planning system, and the U.K. Government’s target of 50 GW offshore wind by 2030 and 5 GW floating offshore wind in the Celtic Sea by 2035, it is clear that the UK Government is reliant on offshore wind.

Offshore wind is more popular with the public (see DESNZ Public Attitude Tracker)<sup>2</sup>, as well as being more efficient, and there is currently little experience of onshore wind of the size proposed in Future Wales<sup>3</sup> in either England or Wales, and so onshore wind may further decrease in popularity, fuelling

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<sup>1</sup> Overarching National Policy Statement for Energy (EN-1), UK Government Department for Energy Security and Net Zero (March 2023) : [https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS\\_EN-1.pdf](https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf)

<sup>2</sup> UK Government department for Business and Trade DESNZ Attitude Tracker: <https://www.gov.uk/government/collections/public-attitudes-tracking-survey>

<sup>3</sup> Future Wales: A National Plan 2040: <https://www.gov.wales/future-wales-national-plan-2040#FutureWales:TheNationalPlan2040>

climate crisis scepticism, when more people become aware of the size of turbines (up to 250 m blade tip height).

The analysis behind Future Wales did not conduct a specific evaluation of ability of the landscape to accommodate change within the pre Assessed Areas, but did give an opinion that the landscape would have to accept change. The renewables energy policies were “shoe horned” into Future Wales at the last minute, and public engagement was minimal. The current rollout of projects does not align in any way with the recommendations recently given by the National Infrastructure Commission for Wales (NICW).<sup>4</sup> For example, the NICW report recommends engaging the public to co-design “future energy landscapes” before developers get involved, representing the opposite of what is happening in practice.<sup>5</sup>

### **Feedback on the Minister’s letter**

We agree with the Minister that the climate change emergency is a serious threat and that we need to ensure that we bring an end to the burning of fossil fuels. We also agree that we need to harness the renewable potential of Wales for our energy needs, that we need a range of renewable technologies of different types and scales, and that wind energy, along with solar are the most mature technology and these are likely to make the most significant contribution to our energy needs. We acknowledge and understand that a number of key levers that the offshore wind industry need lie in the hands of the UK Government.

However, we do not agree with the level or scale and cumulative impact (installed MW and height) of onshore wind that Future Wales proposes. We have concerns regarding the criteria used to select appropriate locations, and the fact that HM Treasury “green book”<sup>6</sup> analysis is not used to determine the impact on “consumed” public assets (primarily visual amenity). We are also concerned that support from impacted communities is not required.

Whilst acknowledging the climate crisis the Minister’s letter fails to mention the nature emergency. We do not believe that the right balance is currently being struck between addressing the need for renewable energy developments whilst taking proper account of their environmental impacts, individually and cumulatively. Their impact on landscape, forestry, farmland, habitat and biodiversity loss is not being properly considered and we are seeing multiple applications for developments in inappropriate locations.

The Minister’s letter states that there is a robust planning framework. While all planning decisions for renewable technology, including onshore wind, are required to take into account environmental factors and public feedback, ultimately it is a single Minister who makes the decision, who is not required to take regard of any advice and who has no publicly accepted guidance or criteria to draw

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<sup>4</sup> Preparing Wales for a Renewable Energy 2050 A report from the National Infrastructure Commission for Wales (NICW) October 2023: <https://nationalinfrastructurecommission.wales/wp-content/uploads/2023/10/NICW-renewable-energy-report-English.pdf>

<sup>5</sup> ‘Future Energy Landscapes’ (FEL) methodology to engage with communities: <https://www.cse.org.uk/my-community/community-projects/future-energy-landscapes-community-consultation-method/>

<sup>6</sup> The Green Book Guidance, HM Treasury (2022): <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>

upon. The recently published “Designing for Renewable Energy in Wales” by The Design Commission for Wales<sup>7</sup> does not provide this (and does not attempt to).

As raised in evidence to the Climate Change, Environment and Infrastructure Committee on the Infrastructure Bill on the 28<sup>th</sup> of September<sup>8</sup>, and highlighted in the media<sup>9</sup>, we are concerned that Natural Resources Wales is unable to fulfil its duties and functions in relation to its role as a statutory consultee in the planning process, due to resource constraints.

The Minister’s letter states that she does not support the call for a moratorium on onshore wind or solar farms. CPRW are not asking for a cessation or ban on all onshore wind, merely a pause while the enormous potential of offshore wind is properly assessed and planned for, with smaller scale, community schemes given a focus onshore.

We would ask the Minister to consider again, particularly in light of the revised National Policy Statements<sup>10</sup> and National Infrastructure Commission for Wales (NICW) report, neither of which were available when this petition was launched, but we feel further support our request. We also ask that the Minister can assure us that HM Treasury “green book” analysis will be used to help inform all planning decisions.

Yours sincerely

Dr Jonathan Dean

Campaign for the Protection of Rural Wales

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<sup>7</sup> Designing for Renewable Energy in Wales, Design Commission for Wales (November 2023):  
<https://dcfw.org/wp-content/uploads/2023/11/Designing-for-Renewable-Energy-in-Wales-1.pdf>

<sup>8</sup> Record of proceedings. Senedd Climate Change Environment and Infrastructure Committee, 28<sup>th</sup> September 2023: <https://record.assembly.wales/Committee/13470>

<sup>9</sup> Natural Resources Wales doesn’t have the resources to do its job properly, Nation Cymru article:  
<https://nation.cymru/news/natural-resources-wales-doesnt-have-the-resources-to-do-its-job-properly/>

<sup>10</sup> Addressing the nature emergency through the planning system - Updated National Planning Policy for Chapter 6 of Planning Policy Wales. Letter to Planning Authorities from the Minister for Climate Change Julie James 11 October 2023: <https://www.gov.wales/sites/default/files/publications/2023-10/addressing-the-nature-emergency-through-the-planning-system.pdf>

**Annex 1: Petition P-06-1383: Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included.**<sup>11</sup>

To prevent widescale and needless damage to the Welsh countryside, we call upon the Welsh Government to place a temporary moratorium on all onshore wind and ground based solar developments over 10MW, until Future Wales 2040 and the Welsh Government's renewable energy targets are updated and incorporated with Wales Marine Energy to ensure that the full potential of offshore wind, rooftop solar, and other emerging energy sources is recognised as a critical priority to combat climate change

Wales presently produces 30 Terra Watt hours (TWh) of energy (55% of that from renewables) whilst using only 14TWh, however, demand is estimated to increase to 45TWh by 2050.

Wales has massive potential for far offshore wind (both fixed and floating) with projects proposed for offshore wind projects, in the Irish and Celtic Sea combined forecast to generate at least 100 TWh of energy.

Estimates also calculate that up to 50% of Wales energy consumption could be met through rooftop solar on houses, businesses, and covered car parks. Yet neither the full potential of offshore wind nor rooftop solar is being calculated into Welsh Government policy. The Minister for Climate Change admitted to CPRW it wasn't, stating that their policy document, Future Wales, had not been updated in three years. We call for policy to be updated to include the full potential of offshore wind, rooftop solar and other emerging technologies to ensure we sacrifice the least amount of countryside and farmland.

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<sup>11</sup> Petition P-06-1383: Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included: <https://petitions.senedd.wales/petitions/245471>



Web: [www.renewableuk-cymru.com](http://www.renewableuk-cymru.com)

Email: [cymru@RenewableUK.com](mailto:cymru@RenewableUK.com)

4th December 2023

Jack Sargeant MS,  
Chair of the Petitions Committee,  
Senedd Cymru  
Welsh Parliament,  
Cardiff Bay,  
Cardiff.  
CF99 1SN

Dear Mr Sargeant,

I am writing from RenewableUK Cymru – the voice of the Welsh renewables sector - to provide evidence against the petition 'Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included'.

We are in the midst of a climate, biodiversity and land degradation crisis in Wales that is threatening our very way of life. The Welsh Government has set a target for all of Wales' electricity consumption to come from renewable sources by 2035<sup>[1]</sup> – a key milestone in our transition away from fossil fuels and our journey towards net zero. Electrification will transform all our lives and the 'electrification shift' to a very different energy system requires true strategic leadership.

### **Are we building enough clean power to meet this critical target?**

Regrettably, Wales' performance and delivery to date in clean energy generation is disconcerting. According to the Welsh Government's latest Energy Generation in Wales 2022 report<sup>[2]</sup>, our increase in renewable energy capacity last year was only 43MW - a mere fraction compared to Scotland's deployment of 1,621MW. Wales is trailing behind because of low consenting rates, an under-resourced planning regime and a lack of grid infrastructure – all leading to significant delays in renewable energy projects being built and generating clean energy.

From a climate perspective, onshore wind is one of the quickest and cheapest way to cut carbon emissions. The current pipeline of onshore wind and solar projects in Wales is essential for speeding up our decarbonisation journey and developing the Welsh skills and supply chain needed for offshore wind in the Celtic Sea over the next ten years.

In RenewableUK Cymru's latest report, '[The Critical Role of Welsh Wind Power](#)'<sup>[3]</sup> our data analysts provide a snapshot of the current and future energy generation pipeline from onshore and offshore wind. Wales currently has almost 2GW of



wind power projects up and running. To meet our net zero targets we estimate we will need to quadruple this wind capacity from 2 to 9GW in just over a decade.

The estimated electricity demand for Wales by 2035 has been set at 29TWh in the Welsh Government's recent consultation[4]. However, when compared to the technology projections for each of the National Grid ESO's Future Energy Scenarios[5], this 29TWh is most closely aligned with the 'falling short' scenario. For this reason it should be considered a minimum target.

Our collated data suggests that onshore wind is essential to meeting this target and could deliver in excess of 3GW of clean power by 2035. Coupled with the predicted capacity from fixed offshore wind in North Wales and floating offshore wind in the Celtic Sea, Wales has the potential to generate 9GW of wind power, producing 27.5TWh of electricity a year to meet the predicted Welsh demand.

However, this capacity and potential will only be realised if we adopt a bold and ambitious delivery plan now to enable projects to proceed at scale and pace. Further delays, as advocated for in this petition, work against the interests of current and future generations in addressing the climate emergency.

The transition to renewables is also an opportunity to promote social and environmental benefits. Our recent report [Onshore Wind in Wales: How our sector works with communities](#)[6] demonstrates how different regions in Wales stand to gain far more than just clean energy from the pipeline of onshore wind projects. The onshore wind sector already contributes more than £6.5 million a year to Welsh communities and could grow to £20 million with the current projected pipeline.

There is also a particular opportunity for onshore wind to promote nature restoration and recovery. Onshore wind farms are typically situated in remote highland areas which often contain degraded peatlands. Onshore wind developers are already working to restore damaged peatland, to secure its value as a carbon store and ecological habitat for rare species. Developers represent important partners to provide a reliable and consistent source of additional funding, helping to meet the Welsh Government's National Peatland Action Programme restoration targets and reducing the burden on taxpayers.

RenewableUK Cymru's members are building our future energy system, powered by clean electricity. A future which is better for industry, billpayers, and the environment. On their behalf, we strongly urge you to dismiss this petition and work with us to support a clear delivery plan for Wales.

Yours Sincerely,



Jess Hooper,

Director, RenewableUK Cymru

[1] [Wales aims to meet 100% of its electricity needs from renewable sources by 2035 | GOV.WALES](#)

[2] [Energy Generation in Wales: 2022 \(gov.wales\)](#)

[3] [Future-Energy-Wales-The-Critical-Role-of-Welsh-Wind-Power.pdf \(renewableuk-cymru.com\)](#)

[4] [Future Energy Grids for Wales: Insights report \(gov.wales\)](#)

[5] [Future Energy Scenarios | ESO \(nationalgrideso.com\)](#)

[6] [How-onshore-wind-works-with-communities-WALES-1.pdf \(renewableuk-cymru.com\)](#)

# Agenda Item 5.1

**P-06-1247 We call on the Welsh Government to lead the way by supporting trials of a four-day week in Wales**

This petition was submitted by Mark Hooper, having collected a total of 1,619 signatures.

## **Text of Petition:**

Moving to a four-day working week boosts productivity & workers' wellbeing.

After successful trials of a shorter working week in Iceland - with no reduction in pay - governments in Scotland, Ireland & Spain are all devising their own four-day week pilots that are scheduled to begin next year.

There's also serious moves towards a four-day week taking place in Belgium, New Zealand, Germany & Japan.

We call on the Welsh Government to lead the way by supporting trials of a four-day week in Wales.

## **Additional Information:**

When Microsoft trialled a four-day week with no loss of pay in their Japan office, productivity went up by 40%.

(<https://www.theguardian.com/technology/2019/nov/04/microsoft-japan-four-day-work-week-productivity>)

According to the Health & Safety Executive, 55% of all sick days taken last year were a direct result of work-related stress, depression or anxiety.

Moving to a four-day week would dramatically reduce mental health issues in Wales.

A study by the environmental organisation Platform London found that the introduction of a four-day week with no loss of pay would shrink the UK's carbon emissions by 127m tonnes, a reduction of more than 20%.

(<https://www.theguardian.com/environment/2021/may/27/four-day-working-week-would-slash-uk-carbon-footprint-report>)

Four-day week 'an overwhelming success' in Iceland

<https://www.bbc.com/news/business-57724779>.

## **Senedd Constituency and Region**

- Vale of Glamorgan

- South Wales Central



Jack Sargeant MS  
Chair, Senedd Petitions Committee  
[Petitions@senedd.wales](mailto:Petitions@senedd.wales)

26 October 2023

Dear Jack,

In my response to the Petitions Committee report published on 24 January and titled “From Five to Four”, I explained I would establish a social partnership working group on the 4-day week. I am writing to provide you with an update on progress.

In April 2023, I established a Working Group under the auspices of the Workforce Partnership Council (WPC) to consider issues relating to a four-day week. The Working Group is a social partnership response to calls for a pilot of the 4-day week in devolved public services and is a vehicle through which the practical, people, and service delivery implications can be explored.

The remit of the Working Group is to:

- Consider the strength of the underpinning rationale and evidence base for a four-day working week pilot in the devolved public sector.
- Define its understanding of a four-day working week.
- Evaluate the opportunities, risks and barriers to a four-day working week pilot, including potential unintended consequences and impact on service delivery, productivity, work intensity and resourcing.
- Assess whether a four-day working week is best advanced through negotiations at a local level (individual employer and workforce negotiations) rather than through a national pilot.
- Make recommendations on the feasibility, suitability and acceptability of a four-day working week pilot in a devolved public service or services in Wales.

The Working Group has representatives from the Welsh Government, Unison, GMB, PCS, Powys, Flintshire and the Vale of Glamorgan councils, Natural Resources Wales, Hywel

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

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[Correspondence.Hannah.Blythyn@gov.wales](mailto:Correspondence.Hannah.Blythyn@gov.wales)

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

Dda University Health Board and Velindre NHS Trust. It has met four times on 26 April, 26 May, 6 July and 28 September.

At its April meeting, the Working Group refined its terms of reference and discussed a range of topics related to the four-day week. It agreed to develop a shared definition of a four-day working week and identify workstreams to frame and steer the group's approach.

At its May meeting, it considered different models and approaches and agreed its own bespoke definition as follows:

*“A four-day working week means no loss of pay or benefits, combined with a 20% reduction to normal contracted hours, while maintaining current levels of service delivery.”*

The Working Group also agreed a work programme shaped by four broad workstreams:

- Implications for workers
- Implications for employers and service delivery
- Fairness, equity and optics
- Pilot design and evaluation framework.

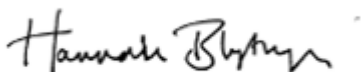
At its July meeting, the Working Group discussed the formation of sub-groups to take forward each workstream. The sub-groups on implications for workers, implications for employers and service delivery, and on fairness, equity and optics met for the first time in September. They have committed to meeting monthly. The subgroup on pilot development and evaluation is deferred pending inputs from other subgroups and further considerations from the working group.

At its most recent meeting in September, the Working Group received an update from each of the sub-groups and took stock of progress. The Working Group agreed this is a complex piece of work, with many interdependencies and the potential for some unintended consequences. It has concluded more time will be needed to complete its work. The Working Group and its sub-groups will continue to meet over the autumn and into the first quarter of 2024. I am grateful to all of our social partners who are engaged in this work.

At this stage, all options remain open, including the potential development of a national pilot; organisations choosing to take forward their own individual pilots; or action short of a pilot, such as producing Workforce Partnership Council advice and guidance.

I will keep you informed as this work develops.

Yours sincerely



**Hannah Blythyn AS/MS**  
Y Dirprwy Weinidog Partneriaeth Gymdeithasol  
Deputy Minister for Social Partnership

# Agenda Item 5.2

## **P-06-1294 Don't leave metastatic breast cancer patients in Wales behind**

This petition was submitted by Tassia Haines, having collected a total of 14,106 signatures.

### **Text of Petition:**

People living with metastatic breast cancer (MBC) in Wales are being badly let down by the system. Currently, Wales has just one dedicated secondary breast cancer clinical nurse specialist (CNS), a situation that leaves potentially hundreds of people without adequate support. We need to know how many people are living with MBC to improve services. And we want improve quality of life outcomes by raising awareness of MBC red flag symptoms.

### **Additional Information:**

We are calling for:

1. Every person with Metastatic breast cancer (MBC) in Wales to have access to a dedicated secondary breast cancer clinical nurse specialist.
2. A collection of data of those living and being treated for MBC in Wales.

We have written an open letter to the Minister for Health and Social Services on behalf of metastatic breast cancer patients and their carers to show the need for improved quality of life and more support for those living with MBC.

### **Senedd Constituency and Region**

- Aberavon
- South Wales West

## **P-06-1294 Dont leave metastatic breast cancer patients in Wales behind, Correspondence – Petitioner to Committee, 04.12.23**

Dear Jack and committee members,

Firstly, thank you to Jack Sargent for applying pressure for me to meet with the Health Minister. I am pleased to report it was a positive interaction and her support for the points raised have massively aided our work moving forward and I sincerely hope the engagement will continue. Also, thank you to the committee team members for the continued support for improving metastatic breast cancer (MBC) In Wales. After 6 months since the petition was discussed, we have managed to make many strides forward. However, we are still disappointed with the lack of transparency, urgency and collaboration from the Welsh Executive.

On September 19<sup>th</sup> we hosted an awareness 'launch' event for patients and Senedd members. We promoted the MBC 'Red flag' infographics for use in Welsh and English and launched Wales's first MBC pathway, which included an end of treatment (EoT) summary, including the infographics for increased awareness of the risk of MBC. There was a delay in approving the MBC pathway from the Cancer board and it was due to be approved on November 24<sup>th</sup>, but we are yet to hear of the outcomes. The Wales Executive website does not include the meeting minutes which lead to the pathway rejection on September 12<sup>th</sup>, nor does it include the new pathway or meeting minutes from November 24<sup>th</sup>. How can we empower patient voices when we do not have the information readily available? What can the Government do to ensure better transparency from the Cancer board and achieve the outcomes from these meetings?

Over the past few months, I have had the privilege to meet with a few cancer board members and I am extremely disturbed by the lack of communication and consistency within the group. For example, I met with Bethan Hawke (Lead nurse for patient experience and engagement) on November 22<sup>nd</sup> and was advised the best way to get the EoT implemented was to go through the Cancer Site Group (CSG). As far as I am aware the EoT summary had already been signed off by the CSG on July 12<sup>th</sup> as part of the MBC pathway which I believe Bethan was working on. How are members of the Cancer board unaware of such important information? Patients are concerned how the EoT and MBC symptom infographics will be implemented within the NHS when top level executives are unaware of them, despite our tireless awareness efforts. Communication is just one of the reasons patients share a lack of trust of the system. What can the petitions committee do to ensure the knowledge within the Cancer board is consistent and they are all adequately informed?

Additionally, the Health Minister shared our excitement for the 28-day target within the pathway from point of suspicion (PoS) to start of treatment in our meeting. Unfortunately, Professor Tom Crosby announced during the patient lead MBC conference that the Cancer board had removed the number of target days from PoS from the MBC pathway so 'they' would approve it (After the CSG had approved it with the 28 day target). I was led to believe the Cancer board are answerable to the Welsh Government. Which leads to my next question, who are the 'they' the board members are referring to for approval? And when will the target number of days return to the pathway if it was approved? There needs to be a target, as it stands this reaffirms to us patients that our lives still do not matter.

The Health Minister shares our sentiment for allowing third sector support for SBC CNS's access to every patient, as does Bethan. Bethan confirmed they will work with Marguerite Holloway (Head of



MBC Wales MacMillan) to approach lead nurses with the case for 3<sup>rd</sup> sector support within their Health Boards to allow MBC patients access to a dedicated SBC CNS. What can the government do to ensure these meetings will take place urgently?

There is growing concern as the post for overseeing the national audit in Wales remains unfilled since the departure of Marianne Dillon at least 3 months ago. The lack of urgency to fill this position is extremely concerning as Wales has nobody to represent us on the board of the audit from the Royal College of Surgeons, overseeing the data collection for MBC patients. How can the government ensure this role will be filled as a matter of urgency as the mandate for data collection on MBC patients has been failed to be met for many years now? Without a lead, we will not achieve this, and this shows we are moving backwards on progression with data. Furthermore, what evidence do we have that the implementation of the 'new CaNISC' has been proven more effective for data collection thus far?

As petitioner, I am willing to expand on any points raised from my experience over the last 6 months to any representative from the health and social team. As reported, there is a clear communication blockage between the patients and government which is slowing down progress. I hope the petitions committee will be able to continue to aid us in seeking the answers to the points above. I would like to politely enquire if we can expect to have some of the answers above by January 2024? On the day-to-day experience from the patient there has still been little tangible change for us, and we are running out of time. Please help us.

Yours sincerely, Tassia Haines

# Agenda Item 5.3

## **P-06-1348 Commission suitable NHS services in Wales for people with EDS or hypermobility spectrum disorders**

This petition was submitted by Natasha Evans-Jones, having collected a total of 1,125 signatures.

### **Text of Petition:**

Historically those showing signs of Ehlers-Danlos syndromes (EDS) or HSD have been referred to rheumatology departments. In 2021, they were directed to stop seeing these patients in favour of their diagnosis and management in primary care, which is not currently equipped for this role. A unique tertiary service in England has also closed to out of area patients. This situation has led to inequalities in access to healthcare for those with EDS and HSD in Wales resulting in unacceptable suffering.

### **Additional Information:**

Ehlers-Danlos syndromes are genetic connective tissue disorders with body-wide symptoms which can be disabling, affecting all aspects of life. One type is life-threatening. Symptoms of most types include musculoskeletal problems, chronic pain and fatigue, gastrointestinal disturbance, fragile skin, pelvic and bladder problems, autonomic dysfunction and anxiety. Twelve of the 13 classified types can be diagnosed via genetic testing. There is no single test for the most common type (hEDS) or for the related hypermobility spectrum disorders (HSD) which makes diagnosis challenging. Together, hEDS and HSD are fairly common. A study in 2019 using data from Welsh hospitals and GP records found that 1 in 500 people are affected (Demmler et al, <https://bmjopen.bmj.com/content/9/11/e031365>).

The situation in Wales is causing suffering for those waiting for diagnosis, those on inappropriate treatment pathways, and their families.

### **Senedd Constituency and Region**

- Vale of Clwyd
- North Wales

**Eluned Morgan AS/MS**  
**Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol**  
**Minister for Health and Social Services**



**Llywodraeth Cymru**  
**Welsh Government**

Eich cyf/Your ref P-06-1348  
Ein cyf/Our ref EM/02688/23

Jack Sargeant MS  
Chair - Petitions Committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

20 November 2023

Dear Jack,

Thank you for your further letter of 6 October on behalf of the Petitions Committee regarding the inequalities in accessing healthcare for those with Ehlers-Danlos syndromes (EDS) and Hypermobility spectrum disorders (HSD) in Wales.

I was sorry to read about the difficulties highlighted by Ehlers Danloss Support UK regarding obtaining access to healthcare for EDS and HSD patients.

We are meeting with relevant leads throughout November with an aim to respond formally before Christmas. I will ask my officials to share the feedback received to the relevant leads for both rare diseases and musculoskeletal conditions within the NHS Executive and ask them to collectively compare their understanding of current services and the issues raised. We will look to provide a response to the Committee regarding this work and ask how the NHS intends to support people living with these conditions.

I hope this information is helpful.

Yours sincerely,

**Eluned Morgan AS/MS**  
**Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol**  
**Minister for Health and Social Services**

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Caerdydd • Cardiff  
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[Correspondence.Eluned.Morgan@gov.wales](mailto:Correspondence.Eluned.Morgan@gov.wales)

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

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



Eich cyf/Your ref P-06-1348  
Ein cyf/Our ref EM/01941/23

5 December 2023

Dear Eluned,

Thank you for your letter concerning our petition for better care for those with Ehlers-Danlos syndrome/hypermobility spectrum disorder (EDS/ HSD). I would like to thank you for taking our concerns seriously- we are delighted that a review will be taking place and are very keen to see the outcome of your investigation.

We would like to ask who the leads are that you will be speaking to? There are 13 types of EDS, 12 are rare, and the hypermobile EDS/HSD types are known to be more common affecting 1 in 500 people in Wales (Demmler et al 2019 <https://pubmed.ncbi.nlm.nih.gov/31685485/>). This study demonstrates that hEDS/HSD is a common condition, and it also demonstrates that it does not only affect the musculoskeletal system and soft tissues. There are many co-morbidities as this chronic condition affects the connective tissue throughout the body. Therefore, we would like to know if the leads that are to be consulted in your review will also include experts from other specialities to provide a true reflection of the issues faced by people with EDS in Wales? We have a medical advisory panel of specialists in EDS/ HSD and are happy to ask them for their input on this issue.

We would also like to ask how many referrals from GPs to rheumatology are being refused across Wales? Those with EDS/ HSD in Wales are still being routinely being denied care under rheumatology. We know from our members that nearly all referrals are bounced back to GPs. Therefore, most people if they can afford it, pay to see a rheumatologist privately. This is the same for physiotherapy and other Musculoskeletal (MSK) services. The Getting It Right First Time Rheumatology report of 2021 recommended that people with non-inflammatory conditions (such as EDS/HSD) are cared for in primary or community care. EDS is not an inflammatory condition, but it is a connective tissue disorder (CTD) and musculoskeletal (MSK) condition causing multi-systemic issues. Both MSK and CTD conditions normally fall under the remit of rheumatology.

We would also like to ask how many people in Wales with the rarer types of EDS are being funded to access treatment in England? We know that the types of EDS that have a genetic marker are able to be referred to specialist centres in Sheffield and London. We would like to know how well this is working and are all GPs in Wales aware that this is an option?

There is no clear pathway for anyone with any type of EDS in Wales. There are diagnostic difficulties with hEDS/HSD in particular as there is no genetic test for them. Across the UK it is estimated that it takes around 19 years from symptoms beginning to diagnosis, this is being exacerbated by rheumatology refusing to see anyone with hypermobility in Cymru. Therefore how will primary and community care be supported in making accurate diagnosis and providing good treatment plans? The only toolkit we are aware of is our own GP toolkit. <https://gptoolkit.ehlers-danlos.org/> Will your investigation include what guidance and advice is in place to support healthcare professionals across a range of specialties to diagnose and manage EDS/HSD effectively?

The Ehlers-Danlos Support UK is a Charity registered in England and Wales (No. 1157027) and Scotland (SCO46712). Registered Company No. 8924646. Registered Address: Devonshire House, Manor Way, Borehamwood, Hertfordshire WD6 1QQ

I met with Joel James MS recently and he is also supporting us to have a drop in the Senedd to open up discussions about the inequalities experienced by Welsh patients. Joel has also stated that he will be contacting each health board in Cymru to see their reasoning behind not seeing those with hypermobility. We are currently waiting for an update on these approaches and a date for the drop in. We hope that these questions will help to shape your investigation and we would be willing to help in any way possible. People with EDS/HSD in Wales desperately need a proper plan and resource in place to support them living with this painful and debilitating condition. We look forward to hearing from you soon.

Yours sincerely,

Natasha Evans-Jones (She/-her)  
Lead engagement and community volunteer for Wales  
Area coordinator for North Wales  
The Ehlers-Danlos Support UK  
t: 0208 736 5604 | m: 07376008068 | w: [www.ehlers-danlos.org](http://www.ehlers-danlos.org) | Helpline: 0800 907 8518

# Agenda Item 5.4

## **P-06-1341 Accessible guidance for parents and schools to help develop plans to support children with additional learning needs**

This petition was submitted by Zoe Beasley, having collected a total of 347 signatures.

### **Text of Petition:**

There are around 1,400 children and young people with type 1 diabetes in Wales. Children living with such disabilities need support in school to manage their condition and ensure they reach their full potential. As a mother, I'm one of many parents whose type 1 diabetic children don't receive the support they need because of a lack of understanding of funding to support the care required in school. I and others have experienced a deficiency of care support, and I am seeking to change this.

### **Additional Information:**

I'm frustrated with the lack of access for dedicated support; without it, type 1 diabetes can have life-threatening complications. The Equality Act 2010 legally defines children with diabetes as people living with a disability. Education Institutions such as schools must ensure that students living with diabetes are not disadvantaged.

No matter how confident the child is, children are not able to be trained on insulin pumps until the age of eleven, and with children being diagnosed from birth onwards, support between Nursery to Primary School is even more essential to help manage their diabetes.

Additional Learning Needs and Education Tribunal (Wales) 2018 Act is a welcomed step; however, it is only now being implemented. The new legislation has brought in a statutory measure called Individual Development Plans to support students by developing a supportive framework to ensure that their academic, physical, and support needs are met.

I'm asking our Government to review current guidance for the new ALN legislation to increase school/Local Authority participation by creating accessible format guides and support that reduces the barrier to access.

### **Senedd Constituency and Region**

- Cardiff South and Penarth
- South Wales Central

Jack Sargeant MS  
Chair, Petitions Committee

20 November 2023

Dear Jack,

Petition P-06-1341 Accessible guidance for parents and schools to help develop plans to support children with additional learning needs

Thank you for your letter dated 6<sup>th</sup> October, it was noted and discussed at our meeting on 25<sup>th</sup> October.

Members were grateful to you for bringing this petition to our attention. As you are aware we are conducting an inquiry into equal access to childcare and education for disabled children and young people. The issues raised by the petitioner have been raised throughout our evidence gathering. We agreed that this evidence should be considered as part of the evidence for the inquiry.

If the petitioner is content for you to share their contact information with us, we can advise them how they can submit further information to our inquiry.

Thank you again for bringing this petition to our attention.

Yours sincerely,



Jayne Bryant MS


Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

**P-06-1341 Accessible guidance for parents and schools to help develop plans to support children with additional learning needs, Correspondence – Petitioner to Committee, 05.12.23**

Zoe Beasley

  
5<sup>th</sup> of December 2023

Chair of the Petitions Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

[petitions@senedd.wales](mailto:petitions@senedd.wales)

CC Diabetes UK Cymru,  
[Wales@diabetes.org.uk](mailto:Wales@diabetes.org.uk)

Dear Mr Jack Sergeant.

I write ahead of your consideration of my petition P-06-1341, “Accessible guidance for parents and schools to help develop plans to support children with additional learning needs”, on the 11th of December, 2023.

First, I would like to thank the Committee for considering my petition and for writing to the Children and Young People and Education (CYPE) Committee on the 6th of October, 2023.

Secondly, in review of the response from the CYPE Committee dated the 20<sup>th</sup> of November 2023, I welcome the opportunity for my petition and further thoughts to form part of the evidence of their ongoing inquiry into “Accessible guidance for parents and schools to help develop plans to support children with additional learning needs”.

I have since contacted the CYPE Committee and confirmed that I am happy for my petition to be included. I will seek to include an additional response for the Committee to consider that wasn’t covered in my initial petition.

After the inquiry's conclusion, I have been informed that a report will most likely be drafted with recommendations for the Welsh Government to consider.

Lastly, if the Committee would allow, I would like this committee to grant me the opportunity to review the recommendations and subsequent response from the Welsh Government in the new year. After the Welsh Government has made their response to this inquiry known, I’d welcome the opportunity to address the Committee with my thoughts and considerations regarding whether my petition calls have been handled. If so, I would then be satisfied for this petition to close; if not, I would welcome a further opportunity to seek a means of addressing my concerns.

Thank you for taking the time to review my petition; I hope we can develop positive changes that can help my son and other children living with long-term health conditions like diabetes.

Kind regards,

Zoe Beasley.



# Agenda Item 5.5

## **P-06-1350 Re-open Dyfi Ward at Tywyn Hospital now**

This petition was submitted by Jane Eleanor Seddon Barraclough, having collected, 1,314 signatures online and 4,214 signatures on paper, making for a total of 5,528 signatures.

### **Text of Petition:**

We are devastated by Betsi Cadwaladr's decision to 'temporarily' close the inpatient ward at Tywyn Hospital. We want it reopened now.

The action to close this ward without any consultation or notice is premeditated and lacks transparency; it is a misappropriation of our community's public service.

Please show us support by signing the petition. Diolch am eich cefnogaeth.

### **Additional Information:**

Staff and patients were told on Thursday that they would be moved to Dolgellau hospital by Tuesday.

No notice, no consultation, no discussion, no rationale.

If staff didn't want to move to Dolgellau they would not have a job. Tywyn is a new hospital which has excellent equipment and facilities. Our hospital has superb staff working there. Our relatives and friends have been provided with the best possible care you could wish for.

The health board have said that it is unable to recruit sufficient staff to fill posts. We want to see what evidence the health board have to show that they ever actively recruited staff for our hospital.

This hospital is a vital resource in our community. Please support our cause.

### **Senedd Constituency and Region**

- Dwyfor Meirionnydd
- Mid and West Wales



Bwrdd Iechyd Prifysgol  
Betsi Cadwaladr  
University Health Board

Bloc 5, Llys Carlton, Parc Busnes Llanelwy,  
Llanelwy, LL17 0JG

Block 5, Carlton Court, St Asaph Business  
Park, St Asaph, LL17 0JG

Jack Sargeant, MS  
Welsh Parliament,  
Cardiff Bay,  
Cardiff,  
CF99 1SN

**Ein cyf / Our ref:** CS/EH/CE23-L1004

**Eich cyf / Your ref:** P-06-1350

**☎:** 01745 586382

**Gofynnwch am / Ask for:** Emma Hughes

**E-bost / Email:** [BCU.CEO@wales.nhs.uk](mailto:BCU.CEO@wales.nhs.uk)

**Dyddiad / Date:** 11/10/2023

Dear Mr Sargeant,

**Re: Petition P-06-1350 Re-open Dyfi Ward at Tywyn Hospital now.**

Thank you for your letter of 2<sup>nd</sup> October, sent in your capacity as Chair of the Senedd Petitions Committee, regarding the above petition.

I am grateful for the opportunity to set out the rationale for the decision to temporarily close the inpatient ward at Tywyn Hospital, as well as the range of actions we have taken to recruit into the positions required to enable us to safely reopen the ward.

It is as a last resort that a decision was taken to temporarily close Dyfi Ward at Tywyn Hospital in April 2023. This decision was taken to ensure the safety of patients and staff as safe nurse staffing levels could not be provided to operate a 24/7 inpatient ward facility at both Tywyn and Dolgellau Hospitals.

Whilst recruitment of registered nursing staff is a problem across the UK, it is often felt much more acutely in very rural areas, including the communities that Tywyn Hospital serves.

In the months leading up to the temporary closure significant work to recruit new nurses from the surrounding area and from further afield to work at Tywyn hospital took place. However, at the point of temporary closure there was a deficit of four Registered Nurses, one Deputy Ward Manager and one Ward Manager post. As a consequence, a safe inpatient clinical environment which provided round the clock care could not be secured. I would wish to be clear that this was a safety decision rather than a financial decision. The health board fully intends to reopen once recruitment is complete, when the safety of patients can be assured.

I am pleased to report that some progress in recruitment has been made, appointing one Registered Nurse and a Deputy Ward Manager, who have both commenced in post. However, a date for the re-opening of Dyfi Ward cannot be established until there is recruitment to the remaining three Registered Nursing posts and the Ward Manager post, for which the recruitment adverts remain open.

Recruitment to these posts is essential to ensure a safe clinical environment. I would like to assure you that the health board is continuing to pursue all possible recruitment avenues, including nursing candidates from overseas.

In the interim, additional beds have opened in Dolgellau Hospital to support any patients from the Tywyn area. To date there have been a total of 19 patients from the Tywyn area who have required an inpatient bed in Dolgellau Hospital. At the time of writing, less than five patients from the Tywyn area are currently receiving inpatient care in Dolgellau Hospital.

The health board recognises how difficult this situation has been for affected staff at Tywyn Hospital and, together with our Trade Union partners, is working to ensure they feel well supported during this time. This included discussion with a small number of affected as to how they could support other health services in the local area that have not been impacted by the temporary ward closure.

As a result of these discussions, a small number of staff were redeployed to support the additional beds required in Dolgellau. Other staff chose to remain in Tywyn and have been working to develop additional services for the local population.

These services include:

- Tuag Adref/Homeward Bound service, which has received 40 new patient referrals since May. Home visits by the Tuag Adref team have supported these patients to remain at home, avoiding preventable hospital admissions as well as supporting earlier discharge from hospital, with low level support and rehabilitation provided at home following discharge.
- Treatment Room; providing a range of wound care and dressings amongst other treatments, with a plan to expand the service offer as staff training and competencies develop. Since the treatment room has opened there have been 425 attendances through this service to date.
- Same Day Urgent Care: Currently operating under the banner of Minor Injury Unit (MIU), which reopened on 18<sup>th</sup> July 2023 and is now operating five days per week. To date, 200 patients have been treated through this service since opening. The same day urgent care service will be an integrated service which will provide MIU and Urgent Primary Care (UPCC) services. Recruitment is ongoing for the remaining staff to support the UPCC element of the integrated same day urgent care model.



Bwrdd Iechyd Prifysgol  
Betsi Cadwaladr  
University Health Board

These services have been welcomed by the community and have worked extremely well. I hope the above developments provide assurance as to our commitment to develop and expand the range of services provided to the people of Tywyn through the introduction of an innovative new model of service.

Finally, I recognise that the temporary ward closure has caused considerable concern to the communities that Tywyn Hospital serves, as evidenced in the significant number of signatories to the above petition. The health board fully appreciates the value that local people attach to their local hospital and the ability to access safe and effective care close to their home. I know that this is especially true in more rural communities.

Since the temporary closure was announced, there has been regular dialogue with local councillors and other elected representatives; the Tywyn Hospital Action Group; Tywyn Town Council; and Llais. This has provided valuable opportunities to update on recruitment efforts, as well as discussing any other issues or concerns about local healthcare services.

I have made a commitment, along with the Chair, to attend the next public meeting of the Tywyn Hospital Action Group, with other partners including Llais so we can discuss a rounded picture of the role all services play in providing health and social care in the community.

If you require any further information, please do not hesitate to contact me again.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Carol Shillabeer'.

---

**Carol Shillabeer**  
**Interim Chief Executive / Prif Weithredwr Dros Dro**

4th December 2023

Mr Jack Sargeant MS  
Chair –Petitions Committee  
Senedd Cymru.  
Cardiff  
CF99 1SN

[Redacted]

Tel : [Redacted]  
Mob: [Redacted]  
e-mail: [Redacted]

## **P-06-1350 Re-open Dyfi Ward at Tywyn Hospital now**

Dear Mr Sargeant,

The Tywyn Hospital Action Group has been informed by your Committee’s deputy clerk that their petition, as above, is to be considered once again by your committee on Monday 11<sup>th</sup> December. This follows the public meeting in Tywyn with senior officers of Betsi Cadwaladr University Health Board.

The Tywyn Hospital Action Group has invited me to make a further submission to you on their behalf.

For health reasons I was unable to personally attend the public meeting on November 21st. However, I have spoken to several people who were present and read the meeting reports from various sources.

The Community Hospital Association is asked by community hospital supporters, three or four times each year, for advice and assistance when local health services are unavailable for unreasonable lengths of time. The evidence is overwhelming that community hospitals play a crucial part in delivering patient pathway care that maximises the patient’s outcome prospects and minimises their subsequent readmissions to acute care. Residents of Tywyn, Meirionnydd, consider that they have suffered for too long with inadequate healthcare service provision.

Prof Marcus Longley, when researching his Mid Wales Healthcare Study Report of September 2014 for the Welsh Government, studied Tywyn as one of his key rural areas. In a direct reference to Tywyn, Prof Langley stated (Page 107) :

“As a defined care component, community hospitals offer:

- a setting to which patients leaving District General Hospitals can be sent when they no longer need that hospital's treatment capability, but still need a period of recovery before going home;



- a means by which GPs can directly provide inpatient care for their patients where appropriate - bridging the primary/secondary care settings;
- a base at which visiting consultants from both English and Welsh hospitals provide outpatient consultations;
- a base from which some diagnostic services operate – e.g. X-ray and endoscopy;
- a facility from which many aspects of telecare can be used;
- a minor injuries service;
- support for palliative and end-of-life care; and
- a base from which both health and social care can be jointly planned and delivered.”

The healthcare services which Prof Longley applauded, was matched by the then service pattern at Tywyn as recorded in his Report (Page 169). Sadly, the service pattern has diminished substantially since that time and many residents at the November 21<sup>st</sup> meeting, recorded how they were personally suffering from the diminished service.

On its website the Welsh Government states “The Welsh Government is the devolved Government for Wales. We are working to help improve the lives of people in Wales and make our nation a better place in which to live and work”.

The Welsh Government “working to help improve the lives of people” is not evident to the residents of Tywyn and the Dyfi estuary area. Prof Longley’s report forecast that staffing problems would arise in Mid Wales Rural Areas, due to staff age profiles, and those staffing problems have duly arisen, but they have not been addressed.

There is common ground between Betsi Cadwaladr UHB and the Tywyn community that there isn’t a pool of nurses available in the South Meirionnydd area from whom to seek to recruit. During the past year, Betsi Cadwaladr has advertised for at least 12 different types of nursing posts in South Meirionnydd and their success rate has been disappointingly low. Betsi Cadwaladr faces the same problem that other health bodies supporting rural healthcare have faced. Recruitment from out of area is essential.

## A WAY FORWARD

I would encourage the Petitions Committee to use its influence to arrange a plenary debate based around the Tywyn petition. The issue that the Tywyn area staffing deficit raises is a





policy one, regarding public body interworking and pooled financing in health and social care.

In any healthcare setting nurses are “key workers”. Within the Community Hospitals Association, we have observed that out of area recruitment of “key workers” has been successful when the healthcare body and the local authority have worked closely together to address the challenge. We know of examples in both England and Scotland where “key workers” have been recruited from urban conurbations to relocate to rural areas through health body and local authority joint working.

Attracting out of area key workers often requires more than just placing an advert. For example, Bishops Castle community hospital has recently attracted key nurses by offering a £3,000 additional payment after a period of service.

Many nurses working in the West Midlands will be familiar with South Meirionnydd from having visited on holiday. They may be encouraged to consider relocation if they know that vacancies exist, and that support in terms of relocation costs, plus as necessary also affordable housing, access to schooling etc., is being taken care of. We have seen elsewhere that a local authority has worked closely with the healthcare body to retain a recruiting organisation in an urban area and to ensure that the relocation task, for suitable candidates, is eased.

Despite the Welsh Government’s enthusiasm for Regional Partnership Boards where it says “RPBs bring together health boards, local authorities and the third sector to meet the care and support needs of people in their area”, there is a shortfall of evidence of Betsi Cadwaladr UHB and Cyngor Gwynedd close interworking to solve the Tywyn recruitment problem.

North Wales has a Regional Integration Fund (RIF) to support health and social care effective integration. In 2022-23 the RIF fund had access to £41million of funding. Over £2 million of this was allocated for step-up, step down activities. That is the very role in which community hospitals excel. A modest one off sum from the North Wales RIF budget may solve the Tywyn problem. Engaging a West Midlands recruitment agency to find suitable staff, refunding travel expenses etc for interview, plus material support with moving domicile to South Meirionnydd, may produce the desired results.

Is there a need for much more robust Welsh Government policy guidance to be issued, so as to do more that “bring together health boards and local authorities” and but also to require them to work actively together? It appears that there is.

Betsi Cadwaladr UHB has used ordinary recruitment procedures to seek to recruit nursing staff. But after failing for at least 8 months in their ‘ordinary’ endeavours, there may now be a recognition that extraordinary efforts are needed and that “nominal” partners in the North Wales Regional Partnership Board need to proactively lend their support.



No community deserves sub-standard healthcare. I trust that the Petitions Committee will address the plea from Tywyn by affording it the support it deserves.

Yours sincerely

Tom Brooks

Committee Member for Wales

Community Hospitals Association



**P-06-1350 Reopen Dyfi Ward at Tywyn Hospital now**

**Comments from the Tywyn Hospital Action Group – December 2023**

Thank you for sending the letter from the Interim Chief Executive of Betsi Cadwaladr Health Board to us to respond to. Thank you also for delaying the discussion of our petition until the public meeting had been held.

Over 120 people attended the public meeting held in Tywyn on 21<sup>st</sup> November, also attended by four senior members of Betsi Cadwaladr University Health Board, and two representatives from 'Llais'. Local speakers conveyed heartfelt, personal experiences to the audience. These included moving accounts about the support and care received by relatives as inpatients when the ward was open, we also heard reports about current problems facing patients and their health services in this area. BCUHB were asked questions and provided with concerns of the issues relating to the closure of the ward. Reference was made to the pioneering work of the late Morgan Vaughan, a renowned councillor from Tywyn, who fought tirelessly for millions to be raised and spent on the hospital to be refurbished and extended, which was opened in 2016. A first-hand account of care in the local community also described what life is like for the most vulnerable and least visible, many of whom would not have been able to attend the meeting. These truthful and hard-hitting reports struck a chord with everyone in the audience. Attached is a compilation of supporting letters and emails the group has received, in support of the campaign, as well as the statements from those that spoke at the meeting.

Disappointingly, at the meeting, BCUHB staff were unable to follow up on many of the matters that they had stated and discussed at the council meeting they attended in Tywyn in May, which was also joined by many locals. The board reiterated that they wish to work together with the local community on staff recruitment; but had not followed up on many of the initiatives that they had promised in May. The board have said and continue to say that a barrier to recruitment is the availability of suitable accommodation in Tywyn; and yet the community have provided the health board with up-to-date lists of good quality alternative and affordable accommodation, generously offered by locals, and questions were asked at the meeting why these had not been shared with prospective staff. The board had said in May that arranging an attractive package for staff to come to Tywyn was a priority, and although this was reiterated by the board once more at the public meeting, this has not been actioned. Staffing and recruitment have been a challenge, but at the same time, when nurses were appointed from overseas, in August, they were placed in Dolgellau not Tywyn. Training, retaining and promoting staff currently working at the hospital was discussed at the meeting in May, but initiatives have not been carried out. Retention of staff is an issue, when we know that locally based staff have chosen to go to work for other health boards. Once the ward was closed, it was always going to destabilise the situation for Tywyn hospital, not only because the health board is now trying to recruit to a hospital ward that it closed, but that the health board itself is in special measures. No dates for the planned reopening of the ward were provided at the public meeting. After the meeting, many individuals shared and expressed their upset and disappointment that we are no further on with the opening of the ward since it was closed 8 months ago.

Ms Shillibeer's letter to the petitions committee reiterates many of the points covered previously in the group's reply to the petitions committee from September, which still stand. In addition, freedom of information documents show that the board had been planning the closure of the ward since February and had been looking at the reasons why one or other of Dolgellau or Tywyn would have to be closed. These documents also show that only 15 beds at both hospitals were ever considered, despite BCUHB consistently maintaining that Dolgellau have more beds and was a key issue cited in keeping Dolgellau open over Tywyn. Other factors we see that the board looked at were availability of doctors, the distance to and from where staff would have to travel, which of the board's own main hospitals would be affected (Ysbyty Gwynedd Bangor and Wrexham Maelor), the political impact, and the fact that patients being returned to Tywyn come from Bronglais, Abersytwyth, which is in a different health board. No real analysis or references to matters on the effects impacting actual patients were considered. On 28/04/23 BCUHB notes show that 'End of life and hospice care to be considered as an option for beds at Tywyn Hospital' – this reinforces what many locals have said about BCUHB having an alternative plan for our hospital.

Disappointingly, the health board declined to answer questions from the Tywyn Hospital Action Group at their board meeting on 30/11/23, stating that the policy for asking questions is being changed, despite BCUHB's website still saying that the public can ask questions, in writing submitted beforehand. Asking questions of the board, at their full board meetings, has enabled the group to maintain momentum with the campaign and ensures that questions and replies are recorded formally and are available for all to access in the public domain at any time. However, the reply received from the Chair of the health board, the day before the meeting was held, stated:

*'We announced previously that we were reviewing the Questions item on the Board agenda and would be replacing it with something that would be more meaningful. I'm hoping this will involve capturing evidence from patient experience – from various sources, including the public – which will then be arranged in themes and evidence presented in a way that will identify issues and outline improvement. I'm hoping that Llais can be involved in this work, and all will be in the public domain. All this is very much work in progress and we hope to include this new approach in our next Board meeting, January 2024. Therefore the series of questions you presented will not be on our agenda for tomorrow's Board Meeting*

*We understand that you may wish to raise issues, and I repeat my previous statements that you can of course contact us at anytime to request information. We also attended the public meeting in Tywyn recently where there was opportunity to ask questions. I would suggest that an opportunity to discuss any issues directly might be more fruitful and informative. Please let mw know if you wish to consider this'*

Announcements of not being able to submit questions had not been received, neither does it say this on the board's own website page relating to questions from the public, see the screenshot attached. The group asked questions in this instance specifically in pursuit of facts and evidence relating to the campaign to reopen the ward, and these questions evolved following the public meeting, because matters were not answered by the health board at the public meeting. The reply also states that questions can be asked at any time, but our questions have not been answered.

These are the questions that were submitted on 24/11/23 to the health board for their meeting of 30/11/23, which remain unanswered:

- Following up from the answer provided at the last meeting, in reference to the appointment of overseas nurses to Dolgellau, and not to Tywyn, why weren't more nurses employed there and then to fulfil all the vacant roles at both Tywyn and Dolgellau? Also how many nurses from overseas have been appointed to Betsi Cadwaladr health board's facilities in total in 2023, and when, and where were those nurses deployed?  
We note that at the meeting of Tywyn Town Council in May, attended by BCUHB, the concept of building a community of overseas nurses in Tywyn, offered by BCUHB as a means to alleviate staffing issues at Tywyn hospital was enthusiastically received by locals. If the two overseas nurses were offered the choice to come to Tywyn or Dolgellau, as stated, then were those nurses invited to Tywyn to meet locals and look at the facilities, which BCUHB staff said would happen at the meeting in May?
- Lack of accommodation continues to be used by BCUHB as a barrier to recruitment. However, up to date lists of suitable, affordable and available accommodation have been shared with BCUHB. Why is the health board still saying that accommodation is a problem? At the meeting in May, BCUHB staff also stated that the health board would consider renting properties on behalf of employees, as we know other health boards do. Why is the health board now saying that is not an option?
- Please can you confirm up to date lists of dates of adverts for posts from the last closing date listed in the answer at the last board meeting, which was: 'July 23 - closing date of 16/08/23 - no suitable candidates'. You mention flyers, posters and banners being distributed locally, please can you tell us where these are located. In your reply you also state that leaflets were distributed at the Race the Train event in Tywyn which was held on 18/08/23, when it appears that there were no live adverts. The health board say that they wish to work with the local population on recruitment, and up to date adverts and any other initiatives which were suggested at the meeting in May, need to be shared and implemented. When and how will this happen?
- What training is in place for current staff at bands 2 and 3 to fulfil the roles of higher bands? BCUHB stated in May that they were working on this. In addition, what is the board doing to ensure that the staff they already have are retained at Tywyn? Nurses and doctors, who are still living locally, have gone to work for other health boards.
- Please provide the answer to the question posed at the last meeting, referring to the chart showing the differences in health services in Dolgellau and Tywyn in 2017 to 2023, based on data from Cyngor Gwynedd Scrutiny Committee and Community Healthcare Services from BCUHB, and asking for dates for their reinstatement. You said you would respond in full.
- The group have been asked often about the employment of permanent Doctors at Tywyn Health Centre. This was also a subject asked about at the meeting in May. Please can you confirm the current up to date position regarding Doctors at Tywyn Health Centre? In addition, what plans do you have for Doctors covering the inpatient ward?

BCUHB need to be accountable for the decisions they make on providing healthcare in the Tywyn area. We trust that the petitions committee appreciates the legitimacy of our campaign and uses its influence to ensure that our health services are reinstated to a high standard. We have a right to an efficient and effective health service, which puts patients first.

Yours sincerely  
Jane Barraclough  
Tywyn Hospital Action Group

# Agenda Item 5.6

## **P-06-1356 Introduce comprehensive safety measures at the A477 'Fingerpost' junction**

This petition was submitted by Elliott Morrison, having collected a total of 10,310 signatures.

### **Text of Petition:**

On Saturday 13 May 2023 Ashley Thomas Rogers tragically lost his life at the A477 'Fingerpost' junction travelling towards Pembroke. His death marked the third fatality on that stretch of road within the space of 12 years. Further, there have been innumerable near misses on what is known locally as a 'black spot' for road traffic accidents. Enough is enough. This petition calls upon the Welsh Government to do the right thing and prioritise human life over trivial budgeting pressure.

### **Senedd Constituency and Region**

- Carmarthen West and South Pembrokeshire
- Mid and West Wales

**P-06-1356 Introduce comprehensive safety measures at the A477 Fingerpost junction, Correspondence – Petitioner to Committee, 04.12.23**

Dear all

Thank you for your email, my comments are as follows:-

I have been overwhelmed by the support that this petition has garnered, especially from the local community.

I echo the comments of Mr Jack Sargeant MS, who flagged the fact that over 80% of the 10,300 signatories stem from the two Pembrokeshire constituencies, which is a good indication of the feelings held by people in the county.

As the Senedd knows, this petition was borne out of the most tragic of circumstances imaginable for the friends and family of Ashley Rogers, whose unique personality is missed every day by all who knew him.

I am therefore extremely pleased to see members of the Senedd providing their support to the need for substantive change at this dangerous junction in recognition of the fact that further similar, avoidable, tragedies may be avoided.

I will leave the appropriate method for correcting the road layout - whether that be the installation of traffic lights or the construction of a roundabout - to those with appropriate expertise. In my opinion, both strategies are welcomed and the long term plan including the installation of a roundabout certainly seems sensible.

The goal of this petition had one sole purpose, which was to prevent further avoidable loss of life along this stretch of road, and it now seems that this outcome will surely be achieved.

Thank you all

Elliott

# Agenda Item 5.7

## **P-06-1359 Offer Welsh working parents the same financial support for childcare as England**

This petition was submitted by Jade Richards, having collected a total of 10,820 signatures.

### **Text of Petition:**

In England from April 24 all working parents of 2 year olds get 15 hours free childcare. From September 24 this will be extended to parents of 9 months old +. From September 25 the free hours will be extended to 30.

In comparison Wales will take until September 25 to provide 12.5 hours to all 2 year olds. With no plan in place for 9 months + or increasing the hours to 15 or 30.

We're in a cost of living crisis where the Welsh Gov have the ability to support working parents but aren't.

### **Additional Information:**

The Welsh Government are choosing not to roll out the 12.5 hours to 2 year olds like the current 30 hours free childcare for 3 year olds scheme. Instead they're getting Flying Start to lead. This is more complicated because it means you have to wait for your postcode to be eligible rather than it being universal. And childcare providers have to register with Flying Start before they can receive the 12.5 hours.

The thinking behind this is that Flying Start will make childcare providers provide higher quality care to produce better outcomes for all children. But all registered childcare providers have regular inspections and the outcomes are available online, so you can find out about the quality before applying to the setting.

Additionally children from "disadvantaged" areas of Wales that need it have always been covered by Flying Start and therefore eligible for the childcare offer when 2 to help improve their outcomes.

### **Senedd Constituency and Region**

- Vale of Glamorgan
- South Wales Central

Julie Morgan AS/MS  
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol  
Deputy Minister for Social Services



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1359 & P-06-1362  
Ein cyf/Our ref JMSS/00678/23 & JMSS/00681/23

Jack Sargeant MS  
Member of the Senedd for Alyn & Deeside  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
Jack.Sargeant@senedd.wales

19 November 2023

Dear Jack,

Thank you for your further correspondence of 26 October 2023 regarding the petitions from Jade Richards and Madelaine Hallam asking the Welsh Government to expand childcare support in Wales to match the proposals that the Chancellor announced in his Spring Budget. I understand that both petitioners have requested further information following my first response, and that the Committee has also received representation from Oxfam Cymru regarding the content of those petitions.

Developing high quality support for children and families in the early years has been a long-standing priority for the Welsh Government. High quality learning and care in the early years supports child development and plays an important role in supporting school readiness and addressing the attainment gap to maximise child development outcomes to support the best start in life, particularly for our most disadvantaged children.

In 2021, Welsh Ministers published the Programme for Government which reflected our strong commitment to children. The Children and Young People's Plan, launched on 1st March 2022, shows what the Welsh Government will do to make these commitments a reality for children. The plan sets out Welsh Government's ambition for children and young people to:

- have the best start in life.
- be treated fairly.
- be supported through education and training and beyond.
- be supported to help them feel mentally and emotionally strong.
- be supported to have a fair chance in life.
- have a good and secure home to live in.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Julie.Morgan@llyw.cymru](mailto:Gohebiaeth.Julie.Morgan@llyw.cymru)  
[Correspondence.Julie.Morgan@gov.wales](mailto:Correspondence.Julie.Morgan@gov.wales)

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

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



- receive the support they need to stay together or come back together with their family, if possible.

The Plan is important because Welsh Ministers want the best for children in Wales no matter what their backgrounds are, where they come from or where they live. This means making Wales a happy, healthy, and safe place to grow up, live and to work, now and in the future - a place where children feel listened to and valued.

The Children and Young People's Plan acknowledges how the Welsh Government's plans affect children and their rights. The plan includes policies about education, safeguarding, and how Welsh Government listens to children. This means one clear vision for what Welsh Government's most senior decision makers will do to make sure children's rights are recognised and respected.

Within the updated Programme for Government (PfG) and following the Co-operation Agreement the Welsh Government has committed to:

- maintain the Flying Start programme; and
- deliver a phased expansion of early years provision to include all two year olds in Wales, with a particular emphasis on strengthening Welsh medium provision.

Flying Start continues to make a real difference to the lives of children in some of our most disadvantaged communities. From independent evaluation evidence, we can see the Flying Start programme is having a positive impact on families' lives and has been life-changing for some families in greatest need. There is also a strong body of evidence showing us that access to high-quality early years provision supports child development and helps to ensure that every child has the best start in life and enjoys and fulfils their potential. The provision of funded, high quality, part-time childcare for 2-3 year olds is integral to Flying Start and this is why we have chosen to focus on expanding the provision of early years childcare services via this programme

The Welsh Government and its partners are making significant progress in realising these aims. Phase 1 of the expansion (offering all four elements of Flying Start) is now complete. As at the end of March 2023, 127%, or 3,178 children of the target number of 2,500 additional beneficiaries had been reached across Wales. This included 772 children who have been offered a childcare place.

Phase 2 of the expansion programme began in April 2023 and is focussing specifically on expansion of Flying Start childcare to more 2 year olds. During 2023-24 and 2024-25 we are investing £46m in expanding Flying Start childcare to support long-term, positive impacts on the lives of those children and families across Wales facing the greatest challenges. We expect to support more than 9,500 extra two-year-olds across Wales to access quality Flying Start childcare during Phase 2 during 2023-24 and 2024-25. By the end of September 2023, over 3,200 additional 2-year-old childcare places had been offered to parents in Wales. This equates to 66% of the Phase 2 target for 2023-24.

We know that deprivation can take many forms. Focusing resources on our most disadvantaged communities, in the first instance, ensures that support reaches families in greatest need at the earliest opportunity. Ultimately, our ambition is for Flying Start childcare services to be available for all 2 year olds in Wales and we would ideally like to go further and faster in the rollout of services. We are working with the sector to gradually build capacity to ensure that any increase to provision is sustainable.

Expansion guidance issued to local authorities to inform their expansion plans provided flexibility for prospective childcare providers to work towards the enhanced standards expected of Flying Start provision. This flexibility was written into the guidance to recognise the ambitious timescales for delivering the expansion and to ensure that as many providers as possible were in scope of the expansion of Flying Start childcare services in Wales.

The Flying Start Childcare Guidance also stipulates that, where possible, settings should be within “pram pushing” distance of the child’s home. For practical reasons this is considered to be a walk of around 10-15 minutes. Local solutions must be identified and agreed by the Welsh Government where this isn’t possible. If a family lives in a Flying Start area there will be a list of registered Flying Start childcare settings which can be found by contacting the Family Information Service. Flying Start childcare providers are expected to offer higher quality childcare provision than most childcare provision.

Ms Hallam raised a query about whether a Welsh parent can access the support provided by the Childcare Offer for Wales if they use a setting in England due to a possible lack of provision in their Local Authority. This is permissible under the Childcare Offer, however, the setting must be registered with OFSTED and also register as a provider on the Childcare Offer for Wales National Digital Service. Those parents will only be able to access provision in line with the scope of the Childcare Offer for Wales and will not be able to access any expansion to the English Childcare Offer as this is determined by rules set by the UK Government.

The Welsh Government is facing the toughest financial situation we have faced since devolution. This means we need to prioritise the finite resources we have. You will be aware of the written statement, which was issued by the First Minister in early August, about the significant financial pressures Welsh Government is currently facing. Unfortunately, this means that we are not currently in a position to confirm any new developments to childcare and how we will support families with childcare costs in the future.

We drew on all our available resources to protect frontline services and provide targeted cost-of-living support to people when we set the budget for this financial year (2023-24). Our settlement in 2023-24 was worth considerably less in real terms than expected at the time it was first set in October 2021 (over £900m and is worth £2bn less than it would have been if it had grown in line with GDP since 2010).

We had £12.1m in 2023-24 and £128.4m in 2024-25 in consequentials as part of the UK Spring Statement. Changes to funding in England on programmes which are devolved in Wales result in changes to our block grant via the Barnett formula. However, those changes do not determine what the block grant should be spent on. It is for Welsh Ministers, with the Senedd’s approval, to decide how to allocate the Welsh Government’s budget which includes funding from the block grant, devolved taxes, and capital borrowing. Where there is a case for using the consequential funding for similar purposes, Welsh Ministers will deploy in line with its priorities.

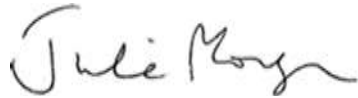
The 2023-24 consequentials were included in the Welsh Government’s spending plans published in the first supplementary budget in June 2023. The allocations for 2024-25 will be managed through the Draft Budget which will be published on the 19<sup>th</sup> of December.

While I recognise that parents may struggle to afford childcare in the current financial climate, in the last evaluation of the Childcare Offer (September 2012 – August 2022) over a third of respondents (37%) noted that without the Offer they would be working fewer hours and a further 10% said they would be in a job with fewer career progression opportunities. The same proportion, 10%, said they would not be working at all and a further nine per cent

thought they would be working in a job with lower pay, so the support that the Welsh Government is providing is having a real, positive impact on many families.

The Welsh Government continues to face significant financial pressure but remains committed to supporting parents with childcare costs and continue to review how we can best deliver this to have the greatest impact for families in Wales.

Yours sincerely,

A handwritten signature in black ink that reads "Julie Morgan". The signature is written in a cursive style with a large initial 'J'.

**Julie Morgan AS/MS**

Y Dirprwy Weinidog Gwasanaethau Cymdeithasol  
Deputy Minister for Social Services

## **P-06-1359 Offer Welsh working parents the same financial support for childcare as England, Correspondence – Petitioner to Committee, 29.11.23**

Good morning,

Mrs Morgan has quoted the evaluation of Childcare Offer statistics, but an independent more representative study has recently been conducted by Oxfam Cymru and found that -

- Over two in five (43%) say they haven't been able to pay other essential costs after paying for childcare;
- Two-thirds (67%) report having to reduce their working hours due to a lack of childcare;
- Over half (53%) of respondents say that after paying for childcare costs, it doesn't make financial sense for them to go to work;

The findings concluded that the current system is pushing children in Wales into poverty. So the flying start scheme is not working in lifting children out of poverty. This is a crisis in itself and it is outstanding that the majority of parents are telling the Welsh Government this scheme is not working and we're being ignored.

Mrs Morgan states "Focusing resources on our most disadvantaged communities, in the first instance, ensures that support reaches families in greatest need at the earliest opportunity" which is factually incorrect. When Flying Start was first introduced it did, but the extension of flying start through a postcode lottery role out has meant that families who are not classed as disadvantaged eligible for the funding, leaving other families facing deprivation without access. In my last response I quoted specific areas highlighting where this has happened.

The figures regarding the consequential would allow every 2 year old in wales to access 12.5 hours so why are they still selecting which children they want to help? It would be more beneficial to give parents the 12.5 hours and allow them to spend it wherever is best for their children, i.e childminders, non flying start settings, flying start settings. I know there's

Once again it's also being claimed Flying Start is expected to provide higher quality care. In my last response I explained why this is unfair and had quotes from a childcare provider also explaining why this is a further barrier for both childcare providers and users. I also explained that flying start settings may not be the best fit for the individual child, it's up to the parent to decide where the best fit is. This has not been addressed yet.

In fact, none of my points have been addressed or questions have been answered. With that in mind can you please include this response in addition to my previous response as that still stands?

Many thanks  
Jade

# Agenda Item 5.8

## **P-06-1362 Match the new childcare offer in England of 15 hours for 2 year old's from April 2024**

This petition was submitted by Madelaine Hallam, having collected a total of 407 signatures.

### **Text of Petition:**

The UK Government have announced that from April 2024 all working parents of two-year-olds will be able to access 15 hours of free childcare.

However, this benefit will not apply to all working families in Wales, as the equivalent "flying start" program will not expand to all areas. This leaves Welsh families thousands of pounds worse off than English counterparts, despite claims from the first minister that the welsh offer is "better" as its 48 weeks instead of 38 for 3 and 4 year olds.

### **Additional Information:**

A link to the English offer;

<https://educationhub.blog.gov.uk/2023/03/16/budget-2023-everything-you-need-to-know-about-childcare-support/>

When Mark Drayford was questioned on the topic

<https://www.bbc.co.uk/news/uk-wales-politics-65026019>.

### **Senedd Constituency and Region**

- Clwyd South
- North Wales

Julie Morgan AS/MS  
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol  
Deputy Minister for Social Services



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1359 & P-06-1362  
Ein cyf/Our ref JMSS/00678/23 & JMSS/00681/23

Jack Sargeant MS  
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19 November 2023

Dear Jack,

Thank you for your further correspondence of 26 October 2023 regarding the petitions from Jade Richards and Madelaine Hallam asking the Welsh Government to expand childcare support in Wales to match the proposals that the Chancellor announced in his Spring Budget. I understand that both petitioners have requested further information following my first response, and that the Committee has also received representation from Oxfam Cymru regarding the content of those petitions.

Developing high quality support for children and families in the early years has been a long-standing priority for the Welsh Government. High quality learning and care in the early years supports child development and plays an important role in supporting school readiness and addressing the attainment gap to maximise child development outcomes to support the best start in life, particularly for our most disadvantaged children.

In 2021, Welsh Ministers published the Programme for Government which reflected our strong commitment to children. The Children and Young People's Plan, launched on 1st March 2022, shows what the Welsh Government will do to make these commitments a reality for children. The plan sets out Welsh Government's ambition for children and young people to:

- have the best start in life.
- be treated fairly.
- be supported through education and training and beyond.
- be supported to help them feel mentally and emotionally strong.
- be supported to have a fair chance in life.
- have a good and secure home to live in.

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

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

- receive the support they need to stay together or come back together with their family, if possible.

The Plan is important because Welsh Ministers want the best for children in Wales no matter what their backgrounds are, where they come from or where they live. This means making Wales a happy, healthy, and safe place to grow up, live and to work, now and in the future - a place where children feel listened to and valued.

The Children and Young People's Plan acknowledges how the Welsh Government's plans affect children and their rights. The plan includes policies about education, safeguarding, and how Welsh Government listens to children. This means one clear vision for what Welsh Government's most senior decision makers will do to make sure children's rights are recognised and respected.

Within the updated Programme for Government (PfG) and following the Co-operation Agreement the Welsh Government has committed to:

- maintain the Flying Start programme; and
- deliver a phased expansion of early years provision to include all two year olds in Wales, with a particular emphasis on strengthening Welsh medium provision.

Flying Start continues to make a real difference to the lives of children in some of our most disadvantaged communities. From independent evaluation evidence, we can see the Flying Start programme is having a positive impact on families' lives and has been life-changing for some families in greatest need. There is also a strong body of evidence showing us that access to high-quality early years provision supports child development and helps to ensure that every child has the best start in life and enjoys and fulfils their potential. The provision of funded, high quality, part-time childcare for 2-3 year olds is integral to Flying Start and this is why we have chosen to focus on expanding the provision of early years childcare services via this programme

The Welsh Government and its partners are making significant progress in realising these aims. Phase 1 of the expansion (offering all four elements of Flying Start) is now complete. As at the end of March 2023, 127%, or 3,178 children of the target number of 2,500 additional beneficiaries had been reached across Wales. This included 772 children who have been offered a childcare place.

Phase 2 of the expansion programme began in April 2023 and is focussing specifically on expansion of Flying Start childcare to more 2 year olds. During 2023-24 and 2024-25 we are investing £46m in expanding Flying Start childcare to support long-term, positive impacts on the lives of those children and families across Wales facing the greatest challenges. We expect to support more than 9,500 extra two-year-olds across Wales to access quality Flying Start childcare during Phase 2 during 2023-24 and 2024-25. By the end of September 2023, over 3,200 additional 2-year-old childcare places had been offered to parents in Wales. This equates to 66% of the Phase 2 target for 2023-24.

We know that deprivation can take many forms. Focusing resources on our most disadvantaged communities, in the first instance, ensures that support reaches families in greatest need at the earliest opportunity. Ultimately, our ambition is for Flying Start childcare services to be available for all 2 year olds in Wales and we would ideally like to go further and faster in the rollout of services. We are working with the sector to gradually build capacity to ensure that any increase to provision is sustainable.

Expansion guidance issued to local authorities to inform their expansion plans provided flexibility for prospective childcare providers to work towards the enhanced standards expected of Flying Start provision. This flexibility was written into the guidance to recognise the ambitious timescales for delivering the expansion and to ensure that as many providers as possible were in scope of the expansion of Flying Start childcare services in Wales.

The Flying Start Childcare Guidance also stipulates that, where possible, settings should be within “pram pushing” distance of the child’s home. For practical reasons this is considered to be a walk of around 10-15 minutes. Local solutions must be identified and agreed by the Welsh Government where this isn’t possible. If a family lives in a Flying Start area there will be a list of registered Flying Start childcare settings which can be found by contacting the Family Information Service. Flying Start childcare providers are expected to offer higher quality childcare provision than most childcare provision.

Ms Hallam raised a query about whether a Welsh parent can access the support provided by the Childcare Offer for Wales if they use a setting in England due to a possible lack of provision in their Local Authority. This is permissible under the Childcare Offer, however, the setting must be registered with OFSTED and also register as a provider on the Childcare Offer for Wales National Digital Service. Those parents will only be able to access provision in line with the scope of the Childcare Offer for Wales and will not be able to access any expansion to the English Childcare Offer as this is determined by rules set by the UK Government.

The Welsh Government is facing the toughest financial situation we have faced since devolution. This means we need to prioritise the finite resources we have. You will be aware of the written statement, which was issued by the First Minister in early August, about the significant financial pressures Welsh Government is currently facing. Unfortunately, this means that we are not currently in a position to confirm any new developments to childcare and how we will support families with childcare costs in the future.

We drew on all our available resources to protect frontline services and provide targeted cost-of-living support to people when we set the budget for this financial year (2023-24). Our settlement in 2023-24 was worth considerably less in real terms than expected at the time it was first set in October 2021 (over £900m and is worth £2bn less than it would have been if it had grown in line with GDP since 2010).

We had £12.1m in 2023-24 and £128.4m in 2024-25 in consequentials as part of the UK Spring Statement. Changes to funding in England on programmes which are devolved in Wales result in changes to our block grant via the Barnett formula. However, those changes do not determine what the block grant should be spent on. It is for Welsh Ministers, with the Senedd’s approval, to decide how to allocate the Welsh Government’s budget which includes funding from the block grant, devolved taxes, and capital borrowing. Where there is a case for using the consequential funding for similar purposes, Welsh Ministers will deploy in line with its priorities.

The 2023-24 consequentials were included in the Welsh Government’s spending plans published in the first supplementary budget in June 2023. The allocations for 2024-25 will be managed through the Draft Budget which will be published on the 19<sup>th</sup> of December.

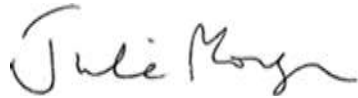
While I recognise that parents may struggle to afford childcare in the current financial climate, in the last evaluation of the Childcare Offer (September 2012 – August 2022) over a third of respondents (37%) noted that without the Offer they would be working fewer hours and a further 10% said they would be in a job with fewer career progression opportunities. The same proportion, 10%, said they would not be working at all and a further nine per cent



thought they would be working in a job with lower pay, so the support that the Welsh Government is providing is having a real, positive impact on many families.

The Welsh Government continues to face significant financial pressure but remains committed to supporting parents with childcare costs and continue to review how we can best deliver this to have the greatest impact for families in Wales.

Yours sincerely,

A handwritten signature in black ink that reads "Julie Morgan". The signature is written in a cursive style with a large initial 'J'.

**Julie Morgan AS/MS**

Y Dirprwy Weinidog Gwasanaethau Cymdeithasol  
Deputy Minister for Social Services

## **P-06-1362 Match the new childcare offer in England of 15 hours for 2 year olds from April 2024, Correspondence – Petitioner to Committee, 30.11.23**

Thank you for sharing the letter from the deputy minister for social services. The letter is extremely disappointing as it refers heavily to flying start, and does not refer to working parents/families at all until the final paragraph about the existing offer. Once again it does not adequately address the issues raised. Let me draw attention to a statement from the UK government;

Hundreds of thousands more working parents living in the United Kingdom will be supported through an extension of the free childcare currently on offer, more than doubling the current support in place. This will help mums in particular to stay in work and keep the economy growing. The UK government know that childcare is one of the biggest costs facing working households, which is why they want to make it cheaper and more accessible, to reduce the barriers preventing some parents from going back to work. They are expanding the scheme so that working parents of all children over the age of nine months are also entitled to free 30 hours of childcare. This is a transformational change that will make a difference to families across the country.

The Welsh government are choosing not to implement this, and to invest in deprived area's instead via flying start, which subject to postcode lottery does not help working families or encourage mums to stay in work. We want to know why this discrimination is happening? It is particularly hard in the border counties with neighbouring working parents in England benefiting disproportionately from the UK offer and families living in Wales being denied.

### Questions

- 1) In paragraph 5, Julie refers to expanding early years provision. How are the Welsh government doing this – in practise? In truth Wales is suffering from devastating losses with closing provisions, 300,000 less places in Aug 2023 than 12 months prior. What is your response to this? Are you denying this is the case?
- 2) In Paragraph 10 Julie mentions the local authorities have been informed about flying start expansion plans. Gary Major, Planning and Performance Manager at Denbighshire County Council said "Recently, Welsh Government has asked us to expand the childcare element of Flying Start into new areas – with the prospect that in the future, we will be supporting all 2-year-olds in Denbighshire. However, we don't yet have a clear timescale or guidance for this." When are you going to provide this information to local authorities?
- 3) In paragraph 12, it is said that parents will only be able to access provision in line with the scope of the Childcare Offer for Wales and will not be able to access any expansion to the English Childcare Offer as this is determined by rules set by the UK Government. Is this not postcode discrimination? I thought we were a "United" Kingdom. Why are Wales separating off and choosing to act in isolation from the other united nations?
- 4) In paragraph 11 you mention prioritising provisions in "pram pushing" distance in flying start area's where not many parents work. However In areas with heavy % of working parents in desperate need of any form of childcare within DRIVING distance, i.e. here in Llangollen there is no

provision at all for 0-2. With no local childcare provision, how are we supposed to work? How are our children supposed to attend education hours when there is no wrap around childcare? Children are suffering and the childcare system is crumbling.

5) The figures in the consequential would be enough to provide 12.5 hours to 2 year olds, so is it not the case that money provided by the UK govt. has been invested in flying start instead? It is not lack of funding, as you've said it is how it is "allocated" and the Welsh ministers have chosen to turn their back on struggling working tax- paying parents and mums in particular.

6) My final and most pressing question would be, never mind flying start, what about WORKING parents who keep the economy turning? 10,000 plus are in agreement with us.

As a working mum it would make more financial and practical sense for me to quit my well paid job, stay at home with my children and claim benefits. Is this what the Welsh government would like us to do? Soon we will be left with no choice. It is what many mums I know in this area have had to do since their childcare provision closed.

Childcare for working parents is in absolute crisis in Wales. Provisions closing, schools lack of wrap around care or lack of space, lack of under 2 provisions, to name but a few.

We need financial support as much as people living in England, if not more, and we need it now.

Please address this and what you are doing to help us, before it's too late.

Kind Regards,

Madelaine Hallam