

## Agenda – Petitions Committee

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Meeting Venue:

Committee Room 1 – Senedd

Meeting date: 8 July 2024

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

(Pages 1 – 29)

### 2 New Petitions

2.1 P-06-1422 Rescind the 20mph limit on TRA4076 at Johnston Pembrokeshire  
(Pages 30 – 40)

2.2 P-06-1428 Stop the flooding in Caenant Terrace, Skewen NOW!  
(Pages 41 – 50)

2.3 P-06-1436 Withdraw plans to change the structure of the school year  
(Pages 51 – 57)

2.4 P-06-1442 Extend Universal Free School Meals to secondary schools  
(Pages 58 – 67)

2.5 P-05-1443 Re-instate core funding for TRAC Cymru (Music Traditions Wales / Traddodiadau Cerdd Cymru)  
(Pages 68 – 69)

2.6 P-06-1445 Change Land Transaction Tax for First Time Buyers in Wales to be in line with the UK Government  
(Pages 70 – 77)

2.7 P-06-1447 Stop Natural Resources Wales closing the visitor centre at Ynyslas National Nature Reserve  
(Pages 78 – 83)

2.8 P-06-1448 Stop pollution at Watchtower Bay and Ogmore by Sea  
(Pages 84 – 89)



- 2.9 P-06-1456 I demand a full public enquiry into the closure of Welsh Air Ambulance bases in mid and North Wales  
(Pages 90 – 92)

### **3 Updates to previous petitions**

- 3.1 P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Wales  
(Pages 93 – 94)
- 3.2 P-06-1374 Bring Wales in line with England by allowing landowners 60 days tent and campervan camping a year  
(Pages 95 – 98)
- 3.3 P-06-1398 To act to increase the effectiveness of Natural Resources Wales in halting pollution on the Teifi  
(Pages 99 – 111)
- 3.4 P-06-1335 Welsh Government should take steps to ensure vulnerable adults without bank cards can pay with cash  
(Page 112)
- 3.5 P-06-1437 Increase, don't cut, funding for the National Library, Amgueddfa Cymru and the Royal Commission  
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### **4 Paper to Note**

- 4.1 P-06-1368 The Welsh Govt should take steps to save the Environmental Information Regulations in relation to Wales  
(Pages 114 – 126)
- 4.2 P-06-1408 Make safe the access to the Secret Garden A4042 Goytre Fawr for both pedestrians and vehicles  
(Page 127)

- 5 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting
  
- 6 Update on Annual Report and Eisteddfod

Document is Restricted

## P-06-1422 Rescind the 20mph limit on TRA4076 at Johnston Pembrokeshire

Y Pwyllgor Deisebau | 8 Gorffennhaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8458 - 12

**Petition Number:** P-06-1422

**Petition title:** Rescind the 20mph limit on TRA4076 at Johnston Pembrokeshire

**Text of petition:** Welsh Government guidance for reduction of limits to 20mph said that “generally” A and B classified roads should be exempted.

TRA4076 through Johnston Pembrokeshire forms part of a principle urban network linking the south of our county to our county town and hospital. It is an urban clear way with no on street parking, footpaths both sides and two light controlled pedestrian crossings. There is no justification for this stretch of road being reduced to 20mph.

### 1. Background

In 2019 the Welsh Government set up a task and finish group to consider whether 20mph should become the default speed limit in residential areas. The Welsh Government accepted the group's recommendations, including that the default



speed limit on restricted roads – those with street lights no more than 200 yards apart - should be reduced from 30mph to 20mph.

Following [public consultation](#) and a [pilot scheme across eight communities](#), the Welsh Government laid the [Restricted Roads \(20 mph Speed Limit\) \(Wales\) Order](#) in June 2022. The draft Order was [passed by the Senedd](#) in July 2022 and came into force on 17 September 2023 when the change was implemented.

The A4076 is a 9 mile [trunk road](#) in Pembrokeshire. The Welsh Strategic Road Network (the trunk and motorway network) is the responsibility of the Welsh Government, with day to day management delegated to two trunk road agents. The [South Wales Trunk Road Agent](#) is responsible for the A4076.

Local authorities are responsible for the remainder of the road network, where the majority of the restricted roads affected by the speed limit change are located.

## 2. Welsh Government action

In preparation for the implementation of the 20mph speed limit on restricted roads, the Welsh Government published guidance on [setting exceptions to the 20mph default speed limit for restricted roads](#) (the ‘exceptions guidance’). This is an addendum to [Setting Local Speed Limits in Wales](#), published in 2009.

The guidance is intended to be used by highway authorities to identify where exceptions to the new 20 mph restricted road speed limit should be made. These exceptions remain at 30mph.

There has been significant variation in the application of exceptions across Wales. [Analysis by Senedd Research](#) shows that 3% of roads by length are 30mph and after the change, there is a wide variation across Wales. For example, in Swansea, 10.3% of the road network remained at 30mph, compared to 0.6% in Denbighshire. These figures include restricted and non-restricted 30mph limited roads, and both trunk and local roads.

Following a significant public reaction to the implementation of the policy, on 24 January the Welsh Government [announced a review](#) of the approach to exceptions. The [terms of reference](#) for the review made clear that it would “examine the application of guidance given to highway authorities in setting exceptions to the default 20mph limit”. The [final report of the exceptions guidance review](#) was published on 24 May.

There's since been a change in First Minister, and a change in transport Minister. During his leadership campaign, the new First Minister, Vaughan Gething MS, said the Welsh Government had “got some of the communication side wrong” around the policy.

In setting out his priorities for transport in the Senedd, the new Cabinet Secretary for North Wales and Transport, Ken Skates MS, said that while the Welsh Government “continues to believe that 20 mph is the right speed limit in places such as near schools, hospitals, nurseries, community centres, play areas and in built-up residential areas” it is “pressing ahead with refining the policy”.

The Cabinet Secretary set out plans to engage with the public and stakeholders to achieve “the right speeds on the right roads”. This includes reviewing how its guidance to highway authorities on setting exceptions to the limit has been applied. While the Welsh Government had already committed to this, with work well underway, he said he has now asked for the review to be brought to a “rapid conclusion” and committed to publishing the report.

The letter from the Cabinet Secretary to the Chair on this petition outlines the approach to the review process.

Police collision data published on 6 June shows casualties and collisions have reduced in 20mph and 30mph areas.

The accompanying statement published by the Cabinet Secretary highlighted that quarter 4 2023 (October to December) casualties on 20mph and 30mph roads reduced by 218 from 681 in 2022 to 463 in 2023, the “lowest quarterly figure on record [in 20mph and 30mph areas] outside the Covid pandemic period”.

### 3. Welsh Parliament action

While the 20mph policy has been discussed extensively throughout the Senedd, the speed limit on the A4076 at Johnston, Pembrokeshire does not appear to have been raised.

More generally, the Petitions Committee has considered a number of petitions on 20mph, most recently the largest petition in Senedd history opposing the policy, and a smaller counter petition:

- P-06-1407 We want the Welsh Government to rescind and remove the disastrous 20mph law; and
- P-06-1412 We want the Welsh Government to keep the excellent 20mph law.

These were both considered at the Petitions Committee meeting on 22 April. The Committee referred petition P-06-1407 for a Plenary Debate which took place on 22 May.

On 17 April the Senedd rejected a motion calling for the policy to be reversed, instead it agreed an amendment welcoming “the Welsh Government’s recognition of the need to refine the implementation”. During the debate, the Cabinet Secretary suggested there was a “need to make sure 20 mph is truly targeted” in places “where children and the elderly are at risk”.

As noted above, the Cabinet Secretary set out his priorities for transport, including the 20mph policy, in Plenary on 23 April 2024.

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-06-1422  
Ein cyf/Our ref LW/00562/24

Jack Sargeant MS  
Chair - Petitions committee

[Government.Committee.Business@gov.wales](mailto:Government.Committee.Business@gov.wales)

14 June 2024

Dear Jack,

Thank you for your letter of 19 March providing details of Petition P-06-1422 Rescind the 20mph limit on TRA4076 at Johnston Pembrokeshire.

The primary goal of the 20mph default policy is to save lives and reduce casualties on our roads. I want to build from the consensus that 20mph is the right speed limit near schools, hospitals, nurseries, community centres, play areas and in built-up residential areas.

However, we cannot escape the fact that 20mph has served to polarise some of the people and communities we serve. Against that backdrop, I felt we should take a step back and listen to the views of everyone involved.

To support the National Listening Programme I have instigated, we have published a [webpage](#) to help signpost people towards the relevant highway authority where they want to feedback on specific speed limits.

Through the drumbeat of regional meetings we are putting in place with the support of Transport for Wales, and with the help of the County Surveyors' Society Wales, we want to co-create a framework that supports highway authorities to make the right decisions for local roads – particularly when those calls are finely balanced.

That framework will be published before summer recess. After the summer break, we will continue to support highway authorities in the implementation phase of assessing roads, making of traffic regulation orders and finally in the implementation of changes on the ground. We acknowledge that it may take several months from September onwards before we see any changes on the ground.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Lee.Waters@llyw.cymru](mailto:Gohebiaeth.Lee.Waters@llyw.cymru)  
[Correspondence.Lee.Waters@gov.wales](mailto:Correspondence.Lee.Waters@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.

My officials will then focus on prioritising guidance for other speed limits where people live.

Further information, including an updated FAQ page, can be found at:

[Introducing 20mph speed limits: frequently asked questions | GOV.WALES](#)  
[20mph speed limits | Sub-topic | GOV.WALES](#)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken', written in a cursive style.

**Ken Skates AS/MS**

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru  
Cabinet Secretary for North Wales and Transport

**P-06-1422 Rescind the 20mph limit on TRA4076 at Johnston Pembrokeshire  
- Correspondence from the Petitioner to the Committee, 25 June 2024**

I have written to Trunk20mph on 3rd of May.

The reasons for excepting this road are laid out in the petition which are in keeping with the original exception guidance issued.

I would argue with the cabinet minister that the 20mph zones were introduced to manage demand and motivate a shift away from private car use as stated in WG transport strategy....and the legislation introduced by the deputy climate change minister suggests this was the priority rather than safety.

A House of Lords report on Behaviour change for climate and environmental goals also stated the measures that could dissuade private vehicle use would include reduced speed limits.

Every sensible person applauds lower limits near schools however imposing a 20mph limit on what is a main arterial route through the county is not sensible.

Thank you for your consideration of this petition.



Closed petition

## Rescind the 20mph limit on TRA4076 at Johnston Pembrokeshire

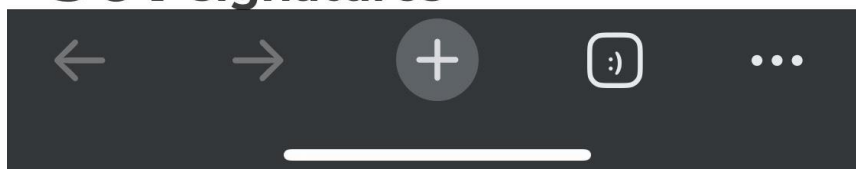
Welsh Government guidance for reduction of limits to 20mph said that “generally” A and B classified roads should be exempted.

TRA4076 through Johnston Pembrokeshire forms part of a principle urban network linking the south of our county to our county town and hospital. It is an urban clear way with no on street parking, footpaths both sides and two light controlled pedestrian crossings. There is no justification for this stretch of road being reduced to 20mph.

**This petition is now under consideration by the Petitions Committee**

Petitions that collect more than 250 signatures are discussed by the Petitions Committee

**301** signatures





to book cycle hire as one leg of a sustainable public transport journey. Our future plans include more e-bike and e-cargo bike loan and hire schemes. Building on existing pilots we have allocated further funding over the next three years to develop further schemes.

- **Addressing pavement parking and road obstruction** - we will create places where pedestrians can walk freely without having to step into the carriageway because a vehicle is parked on the pavement. In 2023, we are intending to introduce new civil enforcement powers that will enable local authorities to address pavement parking in their areas. A working group involving all stakeholders is will draft enforcement guidance for local authorities before the legislation comes into force to help ensure a consistent approach is taken across Wales.
- **Introduce a national default 20mph speed limit on restricted roads** - decreasing speeds reduces collisions, saves lives and helps improve quality of life - making our streets and communities a safer and more welcoming

sustainable transport, we will introduce:

- **Welsh language standards** - for those who provide bus services in Wales and ensure there is training in place to ensure that drivers make everybody feel welcome and safe. Customer focussed and Welsh language training programmes as well as improved passenger communications will continue to be rolled out on the rail network.
- **Safety training** - We will continue to support the safety of our pupils with school-based training. This will include child pedestrian training and improving consistency of cycle training delivery through the introduction of the [Bikeability National Standards](#) into Wales. We will increasingly encourage the expansion of training outside of school. This will include the provision of inclusive training opportunities within our communities for all adults as well as children.

3. What we will deliver – key priorities

3.3.3. Motivation to make a shift away from private car use

We will work with partners to develop education, marketing and other tools to transform the image of walking, cycling and public transport – this will include further support to expand TW’s community engagement role to include travel planning, supporting partners and other organisations to deliver facilities and programmes which encourage modal shift.

In 2022 we delivered a Public Transport Recovery Campaign to help address the challenges of attracting people back to using public transport. The first phase of this was launched in April as ‘the real social network’.

Working with our partners we will use our future campaigns and marketing materials to build on our investments in walking, cycling and public transport to transform their image and become the natural choice for everyday journeys. We will refresh these campaigns as behaviours change to maintain the momentum and embed sustainable choices for the future.

To be motivated to a sustainable choice it is vital that people feel safe, welcome, comfortable and confident when using public transport and other sustainable travel modes. We have a wide range of projects across each mode and sector to transform customer experiences, from developing national

standards for taxis to improving accessibility, facilities and signage at our rail stations.

For customers to be confident to use our sustainable transport services they must be reliable. Our investment in vehicles and rolling stock, the redesign of bus networks and prioritising road space for sustainable transport will support this reliability and build the confidence that services will be there when needed.

Our work on integrated ticketing and journey planning outlined in priority 2, above, is essential to improving the customer experience of sustainable transport by making it easy and affordable to use for door-to-door journeys.

We will also motivate people away from private car use through **demand management** - the Wales Transport Strategy includes a commitment to develop a national road user charging framework. Further work will be undertaken to develop a fair and equitable road user charging framework, including how local authorities can borrow against these future revenue streams to fund transport improvements; and also consider other alternatives such as workplace car parking levies and road space reallocation.

# 4. What we will deliver: transport modes and sectors



- (d) Revised planning processes which prioritise shorter distances between housing and amenities and active travel infrastructure, and supporting local amenities to reduce the need for longer journeys.<sup>280</sup>
- (e) Investment into behaviour change campaigns and education, though while some witnesses stressed the importance of these activities several others argued that measures like improving infrastructure should be a higher priority.<sup>281</sup>

170. The measures that could dissuade private vehicle use include:

- (a) Changing rules on the use of roads, such as reduced speed limits, school streets, low traffic neighbourhoods and other measures which prioritise access for other road users over private cars. Witnesses said some local government bodies did not have the necessary powers to deliver some of these measures effectively.<sup>282</sup>
- (b) Road pricing, congestion charging, low emission zones, higher parking costs, workplace parking levies and other charges levied for private vehicle use. Some witnesses suggested charges could perform a dual function of disincentivising car use and raising funds for improvements to active travel infrastructure and public transport.<sup>283</sup>

171. More widely, Prof Anable called for the Government to establish an overall car traffic reduction target—similar to that adopted by the Scottish Government of a 20 per cent reduction by 2030—and to develop a delivery plan against this.<sup>284</sup> Ms Berge explained that the Scottish Government published in January 2022 a “route map to reduce car use by a fifth by 2030 (against a 2019 baseline)”,<sup>285</sup> which includes a commitment to spend 10 per cent of the transport budget annually on active travel from 2024–25.<sup>286</sup>

*Government position*

172. In his evidence to the Committee, Mr Hands referred to the Government’s commitment to phase out new petrol and diesel cars by 2030,<sup>287</sup> while Andrew Jackson, Deputy Director of 25 Year Environment Strategy Team for Defra, said: “Look also in transport at the decarbonisation that we have had and *The Road to Zero Strategy*, where we have made electric vehicles more affordable. The uptake of electric vehicles through grant schemes starts to then trickle down into second-hand markets. That again facilitates choice for the customer.”<sup>288</sup> In relation to EV charging infrastructure, Mr Hands told us:



# P-06-1428 Stop the flooding in Caenant Terrace, Skewen NOW!

Y Pwyllgor Deisebau | 8 Gorffennaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8813-1

**Petition Number:** P-06-1428

**Petition title:** Stop the flooding in Caenant Terrace, Skewen NOW!

**Text of petition:**

For the last 40 or so years, Caenant has regularly suffered flooding because the culvert and the drainage system can't cope with the amount of water and again, the terrace has been turned into a river with thousands of gallons of water pouring down the road and back lane. One house has suffered substantial flooding in this latest breach.

The council have been telling us residents for years that it will be fixed, but we've now had enough and are petitioning to ensure that:

1. Neath-Port Talbot Council to agree a solution that eliminates the risk of this regular flooding occurring again; and
2. The Welsh Government ensures that funding is provided to deliver the work as soon as possible.

The drainage officer stated yesterday that the system isn't fit for purpose, and we urge all responsible bodies to take action now.





# 1. Background

This [Senedd research briefing](#) provides an overview of flooding and coastal erosion in Wales. It sets out the legislative and policy context, and outlines the funding arrangements to address flooding.

The [Flood and Water Management Act 2010](#) legislates flooding and coastal erosion in England and Wales. [Section 6 of the Act](#) defines the roles and responsibilities of Risk Management Authorities (RMAs). In Wales these are Natural Resources Wales (NRW), all local authorities (who act as lead local flood authorities (LLFAs)), highway authorities and water and sewerage companies. There are other bodies that have a non-statutory role in flood and coastal erosion risk management (FCERM), including private landowners and owners of infrastructure assets.

The Act also places a duty on local authorities to develop and implement Local Flood Risk Management Strategies. The local strategies set objectives for managing local flood risk from surface water, groundwater and ordinary watercourses, and must align with the [Welsh Government's National Strategy](#). Neath Port Talbot Council (NPTC) is the LLFA for Caenant Terrace, and [published its Local Flood Risk Management Strategy](#) in 2013.

Property owners are generally responsible for private drainage pipes inside their home and within the boundary of their property. Local authorities are responsible for drain blockages on properties they manage, highway drains, and gulleys. These responsibilities are detailed on [Dŵr Cymru Welsh Water's website](#).

## 1.1. Flooding on Caenant Terrace

In NPTC's Local Flood Risk Management Strategy 2013, [Caenant Terrace is listed](#) as a location with specific flood risk concerns affecting 33 properties. The cause of flooding is cited as "Inability of ex storm drainage system to cope with flows from intense and sustained rainfall".

In October 2023, [ITV reported](#) that floodwater on Caenant Terrace, Skewen was:

...coming from an underground waterpipe located between two houses on the street... a manhole cover in the lane which conceals the culvert is unable to cope with excess rainfall and is dislodged during heavy

downpours. That allows water to escape from the pipe and flood the area.

Regarding responsibility for the flooding in October 2023 and actions taken by NPTC council, a [spokesperson was quoted by Wales Online](#) saying:

Responsibility for piped watercourses within an associated piece of land transfers with sale of the property... This is the situation regarding these two properties in Caenant Terrace. There has been a problem with a pipe carrying a watercourse across their land and a blockage has occurred, which the owners have legal responsibility to address. The property owners in this case have had many opportunities to address the problem but have not done so.

...The council has served a legal notice served on the landowners to take action and in the absence of a response and in the interests of local residents, it arranged for a contractor to undertake works to repair the land drainage pipe.

This has been undertaken without prejudice, as, by law, the drainage at this location is owned by the residents of the said properties and is not a council asset nor a council responsibility. The works are now virtually completed.

Skewen was previously flooded [in January 2021](#), when an underground blockage caused mine water to flow to the surface. This flood led to the evacuation of 80 homes, mainly on Dynevor Road, which is separated from Caenant Terrace by a railway line.

## 2. Welsh Government action

The Welsh Government awards funding annually to RMAs through the [FCERM Programme](#). RMAs may bid for funds “to deliver a programme of capital works to reduce the risk of flooding and coastal erosion to communities across Wales”. NPTC is the RMA for Skewen and has been awarded £329,151.28 since 2021 for works on Caenant Terrace, detailed in the table below. For 2022-23, 2023-24, and 2024-25 the phase of work listed for these projects was ‘Detailed Design and/or Full Business Case (FBC)’.

Year	FCERM Funding allocated
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<u>2024-25</u>	£104,126
<u>2023-24</u>	£163,750
<u>2022-23</u>	£34,127
<u>2021-22</u>	£27,148.28

In his response to the petition, the Cabinet Secretary for Climate Change and Rural Affairs, Huw Irranca-Davies MS, said the “Welsh Government is providing 100% funding to the RMA to carry out Detailed Design and draft a Full Business Case” and that NPTC “intend to complete the design and apply for construction funding in early 2025.”

Following flooding on Caenant Terrace in October 2023, a Welsh Government spokesperson told ITV:

We have provided Neath Port Talbot County Borough Council with £765,000 to develop a scheme for Caenant Terrace, and they are currently working on a scheme that will benefit the wider community of Skewen.

Once this is completed, the local authority will need to submit a bid for construction funding.

The Cabinet Secretary’s response also stated the:

...scope of the scheme has grown as the RMA has sought to address all sources of flooding. The scheme area also experience flooding from a historic mine audit in January 2021, which required further consideration within the scheme scope.

### 3. Welsh Parliament action

There has been no Senedd activity regarding the flooding of Caenant Terrace, but the Skewen mine water flood was discussed following a topical question by David Rees MS to the then Minister for Housing and Local Government, Julie James MS, on 27 January 2021.

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-06-1428  
Ein cyf/Our ref HIDCC/05533/24

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
[Government.Committee.Business@gov.wales](mailto:Government.Committee.Business@gov.wales)

21 June 2024

Dear Jack,

Thank you for your correspondence in regard to the petition P-06-1428 Stop the flooding in Caenant Terrace, Skewen.

The Welsh Government funds our Risk Management Authorities (RMAs) to deliver flood and coastal erosion schemes in Wales. This is delivered through the Flood and Coastal Erosion Risk Management (FCERM) Programme. Neath Port Talbot County Borough Council is the RMA undertaking the scheme at Caenant Terrace, Skewen.

Welsh Government is providing 100% funding to the RMA to carry out Detailed Design and draft a Full Business Case. My officials have been advised by the RMA that they intend to complete the design and apply for construction funding in early 2025.

The flooding at Caenant Terrace is a complex issue. The scope of the scheme has grown as the RMA has sought to address all sources of flooding. The scheme area also experienced flooding from an historic mine audit in January 2021, which required further consideration within the scheme scope.

I hope this helps for the moment, sorry I'm not able to provide a definitive response just yet.

Yours sincerely

**Huw Irranca-Davies AS/MS**  
Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion Gwledig  
Cabinet Secretary for Climate Change & Rural Affairs

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

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

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

**P-06-1428 Stop the flooding in Caenant Terrace, Skewen NOW, Correspondence from Petitioner to Committee, 1 July 2024**

Good morning Ms Imperato

Many thanks for the update on the above position and the attached document from Huw Irranca-Davies regarding NPTCBC's plans.

My responses to the following:

- What are your thoughts on the attached document? The council have been promising for decades that they will resolve the issues we face many times per year. The flooding has been happening since the 1950s, I attach for the Senedd's information, a copy of a newspaper article dating back to 2001 when we were promised a solution. Sadly, we no longer believe a word that the council tells us.
- Does it adequately address the issues that you raised? No, due to the historical information we had, prior to purchasing our adapted bungalow (I am in a wheelchair), we undertook a flood report and the analysis plots exactly the course of the flooding caused by the culvert which can't cope with the amount of water that runs through it, I attach a copy of the relevant page which shows the high risk of flooding from the culvert and the risk of flooding at the bottom of the Terrace is affected by issues with the mine workings, which is what happened when the mine shaft collapsed. I also attach a copy of an e-mail received from NPTCBC who state that there was flooding in 1997 - in many face-to-face meetings the council has denied that there has ever been any flooding!
- Do you have further questions in response? If this proposal isn't accepted, will there be work done just on our street or will we have to wait many more years for a new proposal?
- Is there anything additional that you would like the Committee to know at this stage, either in response to this document or as an update to the Committee? Please could they see the attached videos showing what we have to suffer from in our street.

Regards SMKerslake

FW: Caenant Terrace

Glen Watkins

Mon 21/03/2016 15:41

Info:

To: 'smk1@hotmail.co.uk' <smk1@hotmail.co.uk>

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**From:** Glen Watkins  
**Sent:** 18 March 2016 14:54  
**To:** 'smk1@hotmail.com'  
**Subject:** Caenant Terrace

Dear Mrs Kerlake

Further to your recent telephone conversation and the risk associated with flooding at No.42 Caenant terrace I can report as follows:-

There is a history of flooding affecting properties in Caenant Terrace with the last flood being recorded in 1997 (where the rear wall of 38 collapsed under pressure of flood water between the railway embankment and the property). The flooding threat is associated with a culvert in various ownerships (private where it passes beneath land in private ownership and NPT where it lies beneath the highway), the threat being associated with the capacity of the culvert and concerns over its condition. Whilst the authority has permissive powers which may be used to undertake repair and upgrading works on private land, it is not bound to do so (ultimate liability for private sections lying with the landowner) and can only undertake work where funding permits. Funding is dependent upon grant funding from Welsh Government being match funded by authority capital funds. A study has been undertaken and it has been identified that it would cost in the region of £800k to implement a flood relief scheme for Caenant Terrace. At present no funding is forthcoming. The authority currently cleans the inlet grid (on private land on a without prejudice basis) to the rear of the snooker hall car Park (this being in the interests of the authority and residents to do so). Some minor improvement works were undertaken here in 2011 so as to make the grid easier to maintain and reduce the risk of flooding. It should be noted that this work is not the ultimate solution and there remains a risk to those properties in the area. (including for no.42).

Regards

Glenn Watkins

# Underground investigation to try to solve culvert problem Residents' flooding misery may be over



By PAUL LEWIS

RESIDENTS of a Skewen street who have endured years of flooding have had their first glimpse of a possible end to their misery.

Neath Port Talbot Council is taking the first steps towards what people living in Caenant Terrace hope will be a permanent solution.

A culvert in the street is unable to cope when the weather is particularly bad leading to serious problems in the area.

But now the council has agreed to pay for an underground investigation to find out why water in the culvert frequently backs up.

Skewen councillor Glaslyn Morgan said he, along with colleague Betsan Powell, had been calling for action for years.

### Weather

"Every time the weather is bad there is a great deal of anxiety in Caenant Terrace," said Councillor Morgan today.

"There has been some terrible flooding there in recent years and I can fully understand the misery this causes for residents."

Councillor Morgan said he had explained to the people of Caenant Terrace that the authority only had money available for a survey.

"Whatever remedial work is required is likely to be very expensive and the council is short of resources," he added.

"But at least we will know what needs doing and how much it will cost and then it is a matter of trying to find the money."

"Because of the limited budget there cannot be an overnight solution but at last this is a very welcome step in the right direction."

## Chocolate treasure to hunt

THE Easter Bunny will be busy in Swansea's Eastside this week.

He has decided to extend his working hours to tomorrow so he can hide Easter eggs in Bontawe House for its Grand Easter Eggstravaganza.

The house's first-ever Easter egg hunt in Talfan Road, Bonymaen, will provide an opportunity for children under 10 to explore the community facility and hopefully find some chocolate treasure.

The hunt will be held between 10.30am and 12.30pm and for more information ring Bontawe House on Swansea 301851.

## Recruitment top in country

SOUTH Wales Police had the best recruiting record of any force in the country in the final three months of last year, Home Office statistics have revealed.

The force recruited 116 new officers and lost 24 during the period.

Dyfed-POWYS Police recruited 36 during the time while 18 officers left the force.

## Jewels stolen in burglary

A CARRIAGE clock, jewels, an Alfa hi-fi and an Olympus camera were stolen from a mid-terrace house in Gwyllfa Road, Towhill, Swansea, by thieves who forced the back door some time during the day on Friday.

Have you got a story - ring 01792 514606



# JBA Surface Water (Pluvial) Flood Map



JBA Surface Water Flood Legend

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# Withdraw plans to change the structure of the school year

Y Pwyllgor Deisebau | 8 Gorffennaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8622-4

**Petition Number:** [P-06-1436](#)

**Petition title:** Withdraw plans to change the structure of the school year

**Text of petition:** The Welsh Government's evidence base is not sufficiently robust to justify the changes, which will cause significant disruption in our schools, and across the agricultural and tourism sectors in Wales.

We believe that now is not the time to change the structure of the school year, and remove time from the summer holidays. The education sector in Wales has seen significant changes, which have caused substantial impacts in terms of workload and wellbeing for our workforce.

We already have amongst the shortest summer holidays in Europe. Primary and secondary school students in Italy, Portugal, and Spain benefit from lengthy summer holidays of 12 to 13 weeks. In Sweden, it's 10 weeks, France and Norway 8 weeks, Germany 7 weeks. All these countries performed better than Wales in the latest PISA results.

Further still, the plans do not replace sufficient support for disadvantaged children and their families, such as opportunities to access free school meals during the holidays, and funded sporting and creative activities.

<https://www.oecd-ilibrary.org/sites/9149c2f5-en/index.html?itemId=/content/component/9149c2f5-en>



## 1. Background

In December 2017, the Welsh Government commissioned an independent review of school teachers' terms and conditions. The review panel's report, [Teaching: A valued profession](#) (September 2018), recommended that a Commission should be established to 're-imagine schooling in Wales'. This would include considering whether the rhythm of the school year, the pattern of terms and holidays and the shape of the school day should be rethought.

An Expert Panel was appointed in 2019 to undertake the first phase of the work. It was due to submit its report to the Welsh Government by September 2019.. However, in January 2021, Kirsty Williams, then Minister for Education said that this work had been 'partly derailed' by COVID 19.

The Welsh Government's [Programme for Government 2021-2026](#) included a commitment to consider reforming the structure of the school day and the school year. Building on that, the [Co-operation Agreement](#) between the Welsh Government and Plaid Cymru stated that:

to narrow educational inequalities and support learner and staff well-being, we will look to radically reform school term dates to bring them more in line with contemporary patterns of family life and employment.

[On 4 June 2024, Lynne Neagle, the Cabinet Secretary for Education](#) said any changes to the pattern of the school year **would not be implemented within this Senedd term.**

## 2. Welsh Government Action

In January 2022, the Welsh Government published '[Effects of changes to the school year and alternative school calendars: review of evidence a summary of the main findings and recommendations of a Rapid Evidence Assessment](#)'. The review looked at literature including studies from Wales, the wider UK, and the USA. It found that evidence in relation to changing the school year was "mixed and inconclusive". The review recommended ensuring high quality, focussed evidence gathering and evaluation be built in to any proposed programme of school calendar change from the outset.

Included in the findings from further research, [Reform of the school year: perceptions and experiences of the current school calendar](#) (3 October 2023) were:

- The 6-week break causes learning loss for all learners but there is minimal lasting effect with recovery soon after the start of the autumn term.
- Learners with additional learning needs (ALN) are the most affected by the current school calendar. Those from socially and economically disadvantaged backgrounds are also more affected in terms of progression and attainment.
- Inconsistent term lengths increase levels of fatigue at specific points of the year and affect engagement with learning at key points such as the end of the autumn and summer terms. The shortest breaks are seen to have little effect in addressing levels of fatigue and wellbeing with two weeks being seen as more beneficial than one. There are rises in disruptive behaviour as fatigue increases.

## 2.1. Consultation

A Welsh Government [consultation](#) on proposals ran between November 2023 and February 2024. The Welsh Government stated that changes to the school year would support learners and the education workforce in terms of addressing disadvantage, supporting learning and well-being, and reflecting how people live and work now. The proposals include:

- Terms of more equal length;
- The redistribution of break periods; and
- A reduction in the length of the summer break.

There would be no change to the overall number of teaching days or to the overall number of school breaks, and the summer break will not be reduced to fewer than four weeks. The consultation [received over 16,000 responses](#).

## 2.2. The proposals

The consultation set out three core proposals:

- Option 1: To maintain the status quo;
- Option 2: A five-week summer break, a two-week break in the autumn, and the flexibility to decouple the Easter end-of-term break from the Easter festival;

- Option 3: Building on from Option 2 , a four-week summer; a two-week break in May, and arrange for AS, A-level and GCSE results to issue on the same day.

In announcing that the reforms would not be implemented in this Senedd term, the Cabinet Secretary for Education said:

Over the remainder of this Senedd term, I intend to continue exploring the proposals set out in our second option in the consultation: a five-week summer, a two-week break in the autumn, and the flexibility to decouple the Easter end-of-term break from the Easter festival. However, getting reform right means ensuring it is properly planned out and has the time and space to succeed. I want to take this time to discuss with children and young people, parents, the workforce and other partners both what these changes might mean and when would be the right time for them. No final decisions will be taken in this Senedd term, as I feel strongly that we need to remain focused on our existing and ambitious programme of reform over this period, and I am acutely aware we are already asking a lot of teachers and schools.

### 3. Response from tourism and agriculture and education unions

In a [joint open letter](#) (January 2024) to Jeremy Miles, then Minister for Education and Welsh Language, teaching and school staff unions, farming unions and tourism bodies called upon the Welsh Government to withdraw its proposals to reform the school year. They argued:

- The educational reasons that the Welsh Government give for the reforms are not substantiated by research.
- The proposed change to the summer break will lead to some visitor attractions closing and jobs being lost. Many attractions take over 45% of their entire annual income in the current summer holidays.
- The tourism industry employs many school- aged young people during the summer break period.
- Many farming businesses that have diversified into the tourism sector benefit from a six-week peak season where the weather is more favourable.

The proposal that the summer break could be reduced by one week, means that schools would be open during the Royal Welsh Show. The Royal Welsh Agricultural Society said that it is 'strongly opposed' to the proposals which would mean that schools would be open during the Royal Welsh Show. They estimate this would cost them at least £1m in lost income.

## 4. Other countries

The European Education and Culture Executive Agency report, the [Organisation of School Time in Europe 2023/24](#), provides information on the the timing and length of school holidays. Across Europe, there are five main periods of school holidays: autumn; Christmas and New Year; winter/carnival; spring/Easter; and summer. The school year generally finishes between the end of May and the second half of July. The length of the summer holidays varies significantly between countries: from 6 weeks in some areas of Germany to between 11 and 14 weeks in Italy and Portugal.

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.

Lynne Neagle AS/MS  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref: Petition P-06-1436

Ein cyf/Our ref: LN/05417/24

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

19 June 2024

Dear Jack,

Thank you for your letter dated 23 May 2024, as Chair of the Petitions Committee, regarding Petition P-06-1436 Withdraw plans to change the structure of the school year.

I acknowledge the petition and am grateful to you for sharing it. Over the past two years, we have engaged with the education workforce unions, the school's workforce more generally, children and young people, families, and representatives from other sectors in developing the proposals presented as part of the recent Consultation on the School Year.

That consultation ended on 12 February and provided an opportunity for individuals and groups across Wales to provide their input on the proposals.

I note the points set out in the petition text and additional information.

As I set out in my Oral Statement of 4 June, I have fully assessed the responses to that consultation, which numbered over 16,000, including those from children and young people, families, those working within the education system and other stakeholders. Those responses were very mixed and equivocal. This is in line with the wider discussion on the issue and the evidence base.

As such, I confirmed that decisions on the implementation of any change to the school year would not happen during this Senedd term. This will also allow other reforms, such as the

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Lynne.Neagle@llyw.cymru](mailto:Gohebiaeth.Lynne.Neagle@llyw.cymru)  
[Correspondence.Lynne.Neagle@gov.wales](mailto:Correspondence.Lynne.Neagle@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.

New Curriculum for Wales and reforms around Additional Learning Needs to be fully implemented and rolled out before any changes are considered.

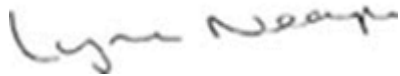
Links to the findings of the consultation can be found here:

<https://www.llyw.cymru/strwythur-y-flwyddyn-ysgol>

<https://www.gov.wales/structure-school-year>

I welcome the Committee's continued work on these important issues.

Yours sincerely



**Lynne Neagle AS/MS**

Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education





Jack Sargent MS  
Chair  
Petitions Committee  
Senedd Cymru  
By email

3<sup>rd</sup> July 2024

Dear Chair,

We note the letter from the Cabinet Secretary, dated 19<sup>th</sup> June '24, with regard to our petition "Withdraw plans to change the structure of the school year".

We further note and welcome what the Cabinet Secretary said in the Senedd, during the debate on this critical issue, on the 4<sup>th</sup> June '24:

*"This is not about reactionary forces. This is about me making a decision based on a 16,000-plus consultation and what I am hearing on the ground about a school system that is struggling and overwhelmed with reform, that is finding it challenging to raise attainment, and which is also struggling for funding. So, that is what I am prioritising, and I make no apologies for that decision."*<sup>1</sup>

As education unions, we are pleased that the Cabinet Secretary has listened to our members' concerns, and hope this can be an opportunity to reset discussions with the education unions with regard to the school year.

---

<sup>1</sup> <https://record.senedd.wales/Plenary/13945#A88371>

We look forward to hearing from the Cabinet Secretary to this end.

Yours sincerely,

Eithne Hughes, ASCL Cymru

Nicola Savage, GMB

Neil Butler, NASUWT Cymru

Laura Doel, NAHT Cymru

Nicola Fitzpatrick, NEU Cymru

Ioan Rhys-Jones, UCAC

Rosie Lewis, Unison Cymru

Cc: Lynne Neagle MS, Cabinet Secretary for Education

## Universal free secondary school meals

Y Pwyllgor Deisebau | 8 Gorffennaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8813

Petition Number: [P-06-1442](#)

Petition title: Extend Universal Free School Meals to secondary schools

Text of petition: We call for:

Implementing Universal Free School Meals in secondary schools, for all pupils regardless of dietary requirements for allergic, religious, or personal reasons.

Ensuring as far as possible that these Free School Meals are ethically and sustainably sourced, including protecting workers' rights in the supply chain.

Encouraging in all schools, high-quality in-house kitchens making fresh food whenever possible, and when not possible that providers use fresh and local produce.

As part of the Co-operation Agreement between the Welsh Government and Plaid Cymru in 2021, Universal Free School Meals were rolled out in primary schools. This has fed tens of thousands of young children many of whom are in poverty, and massively reduced the stigma behind taking these meals. Feeding children must always be a political priority.

It's time for this to go ahead. According to Child Poverty Action Group, 19% of children in poverty still don't have access to Free School Meals due to the means testing in secondary schools, that's approximately 25,000. Not only are they at risk of going hungry, but the Trussell Trust estimate 20% of adults in Wales experience food insecurity.



Additionally, we believe that Universal Free School Meals can and must be used to educate, including teaching home economics in Wales especially promoting value for money, healthy diets, with local, ethical, and sustainable sourcing as part of the Curriculum for Wales.

## 1. Background

### 1.1. Free school meal entitlement

Free school meals are available to eligible learners who attend a maintained school full-time. Pupils are eligible for free school meals if their parent (or the learner in their own right) receives certain benefits:

- Income Support
- Income-based Jobseeker's Allowance
- Income-related Employment and Support Allowance
- Support under Part VI of the Immigration and Asylum Act 1999
- Guaranteed element of Pension Credit
- Child Tax Credit (as long as parents do not also get Working Tax Credit and their annual income is £16,190 or less before tax)
- Working Tax Credit run-on (paid for 4 weeks after parents stop qualifying for Working Tax Credit)
- Universal Credit (as long as the annual net earned household income is less than £7,400, not including benefits).

At January 2023, 44,530 secondary school pupils (25.5%) were in receipt of free school meals (including those no longer eligible other than through receiving transitional protection). This figure relates to those learners who are eligible, and have applied for, free school meals. Families have to apply for free school meals and there may be learners whose families may be eligible but have not taken up their entitlement.

## 1.2. Ethical Employment in Supply Chains

In 2017, the Welsh Government introduced the [Code of Practice on Ethical Employment in Supply Chains](#) with the aim of ensuring that workers in public sector supply chains are employed ethically and in compliance with UK, EU, and international laws. It covers employment issues, including modern slavery and human rights abuses, blacklisting, and false self-employment (that is, functioning as an employee but without a contract of employment). All local authorities in Wales have signed up to the Code.

## 2. Welsh Government Action

From September 2022, as part of the Co-operation Agreement between the Welsh Government and Plaid Cymru, the Welsh Government began funding local authorities to roll out their offer of [universal free primary school meals \(UFPSM\)](#), starting with the learners in Reception classes. All primary school children and more than 6,000 nursery-age pupils attending a maintained school will be eligible for free school meals by 2024. The Cabinet Secretary's letter states that 20 of the 222 local authorities have completed the roll out and the other two (Bridgend and Swansea) will complete it by extending to Year 6 from this September.

The [Welsh Government has allocated £200 million revenue](#) over three years (£40m for 2022-23, £70m for 2023-24 and £90m in 2024-25) to support the scheme. It has also allocated £60 million capital over two years (£25m in 2021-22 and £35m in 2022-23) to support improvements to school kitchen facilities, including purchasing equipment and updating digital systems. [Plaid Cymru wanted to extend](#) universal free school meals to secondary schools, although this never formed part of the Co-operation Agreement as the then Leader explained to the [Committee for the Scrutiny of the First Committee in December 2022](#). However, it was noted in [the joint paper on the 2024-25 budget](#) as a priority area for Plaid Cymru in the event of any further funding from the UK Government.

## 3. Senedd Action

Between September 2021 and January 2022, the Petitions Committee considered petition [P-06-1178 Free school meals for all pupils in Wales](#). The

Committee congratulated the petitioner on a successful outcome as the Welsh Government in co-operation with Plaid Cymru had made a commitment to provide free school meals for all primary school children. The Committee recognised that the petitioner's overarching call was for all school pupils to be provided with free school meals, and suggested that this was a significant step in achieving that ambition. The Petition was therefore closed.

## 4. Further information

Universal entitlement to free school meals was introduced across Scotland in 2015, for all pupils in Primary 1 to Primary 3 year groups. This was extended to all pupils in P4 in August 2021, and then to all pupils in P5 in January 2022. The scheme includes learners aged 5–9 years old. In England, universal free school meals are currently provided for all children in reception up to and including Year Two (aged 4–7 years).

As universal free school meals has been limited to younger children, there is little literature on the feasibility and implementation for older students. A [small scale research project](#) was undertaken in two secondary schools in the London Borough of Hammersmith and Fulham in 2020 to consider the potential benefits pupils and their households, and potential barriers. It did not look at the effectiveness or cost effectiveness of universal free school meals.

The research found that universal free school meals in secondary schools is a feasible and acceptable intervention, with increased access to a healthy meal, reduced food insecurity and better nutrition. Potential barriers to implementation included limited school kitchen and dining infrastructure, meal quality and choice, and increased queuing times.

The [Bevan Foundation published research in 2021](#) about the feasibility and benefits of extending eligibility for free school meals.

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.

Lynne Neagle AS/MS  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1442  
Ein cyf/Our ref LN/05451/24

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

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

26 June 2024

Dear Jack,

**Petition P-06-1442 Extend Universal Free School Meals to secondary schools.**

Thank you for your letter dated 23 May 2024 regarding the petition from Unite Community Cardiff and Area Branch calling for Universal Free School Meals in secondary schools.

I am delighted that twenty local authorities have now completed the rollout of Universal Primary Free School Meals (UPFSM) to all learners in Reception to Year 6, including those who provide meals to full-time nursery learners. The two remaining local authorities, Swansea, and Bridgend plan to deliver to Year 6 from September 2024.

As a government, we are using every lever available to us to support families that need it most. Our immediate focus, and the focus of our partners, is on extending entitlement through the delivery of UPFSM. In delivering this commitment we are learning valuable lessons, including issues such as special diets, and what further support and guidance may be required to help schools fully support learners with healthcare needs. This will inform any further changes to our free school meal offer, should budget become available in the future.

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

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Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Lynne.Neagle@llyw.cymru](mailto:Gohebiaeth.Lynne.Neagle@llyw.cymru)  
[Correspondence.Lynne.Neagle@gov.wales](mailto:Correspondence.Lynne.Neagle@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.

However, unfortunately, our current budget will only go so far due the fact the UK Government has not provided an adequate funding settlement for Wales. Overall, our budget is worth £700m less in real terms than when it was set in 2021 and we must make some very difficult choices to ease the extraordinary pressures on the budget. Despite this, we continue to prioritise support to those who need it most. During 2022-23 and 2023-24, we have allocated support worth more than £3.3billion through programmes which go towards helping protect disadvantaged households and support putting money back into families' pockets.

Additionally, our Child Poverty Strategy will set out our ambitions for the longer term and will outline how we will work across Government and with partners to maximise the impact of the levers available to us to reduce child poverty and to mitigate the worst effects of child poverty.

We continue to encourage all families and individuals in Wales to claim what they are entitled to, particularly as cost-of-living rises continue to impact. Our communication and marketing campaigns continue to promote take-up of eligible free school meals (eFSM), encouraging parents to check their eligibility for free school meals and the School Essentials Grant. The campaign also promotes and encourages the uptake of the UPFSM offer, which is a demand led grant.

Rolling out our UPFSM commitment at the same time as our new curriculum provides us with an exciting opportunity to shift our food culture and reiterate the importance of supporting the procurement and promotion of local, sustainable, and healthy food.

Regarding fair work, local authorities in Wales have all signed up to the Code of Practice on Ethical Employment in Supply Chains, first published in 2017, and in doing so have committed to addressing risks of slavery and exploitation in supply chains.

The first piece of primary legislation on public procurement was passed in the Senedd last year. The Social Partnership and Public Procurement Act (Wales) 2023 includes duties on socially responsible procurement. When these duties come into force, local authorities will be required to collect information and report annually on how they are achieving well-being outcomes through procurement. This will include embedding the principles of fair work and global responsibility in procurement and contract management processes.

For learners, the new Curriculum already includes mandatory statements of what matters for the Humanities Area with explicit references to sustainability and the environment, to ensure engagement with challenges around our impact on the natural world across the curriculum.

Learners are encouraged to understand their own impact on the natural world. This empowers schools to consider food production and consumption on a local and global scale to understand the causes, consequences and significance of their actions allowing learners to engage with questions about food sustainability and sources.

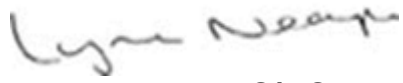
Further, the Eco-Schools programme in Wales run by Keep Wales Tidy operates in over 90% of schools and aims to help children and young people engage directly with their environment, learn about climate change and the value of our natural resources, and develop sustainable behaviours. Many schools engage with food growing projects as part of their ECO-schools' journey.

And lastly, Chapter 1 of the [Healthy Eating in maintained schools: statutory guidance](#) focuses on the role of the school governing body and the local authority in promoting



healthy eating and drinking, under the Healthy Eating in Schools (Wales) Measure. We will shortly be reviewing this guidance ensuring the latest evidence is considered and we encourage all partners to engage with the process in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lynne Neagle', written in a cursive style.

**Lynne Neagle AS/MS**

Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education

Dear Petitions Committee,

You don't have to look very far to see the number of children in poverty in the UK.<sup>1</sup> Nor the number of people in food poverty in Wales and its brutal consequences.<sup>2</sup>

The Welsh Government's budgetary constraints will always be a factor in its responses to justified demands to address child / household poverty. But that shouldn't be used as an argument against making commitments - which are about choices and priorities. Actually, we've learned that the roll out of free school meals in primary schools has had the problems of capacity, caused by previous directions in sourcing, procurement and standards, kitchens, and eating spaces, where the Welsh Government must commit to provide a lead to, and support to, councils for long term planning of school meals provision.<sup>3</sup> Meanwhile, the Welsh Government has consistently lacked ambition and political commitment, reversing its decision to provide FSM (Free School Meals) in school holidays, and forcing local authorities to pick up the bill without breaking its moral and legal duties under the United Nations Convention on the Rights of the Child.<sup>4</sup> This decision by the Welsh Government was later ruled illegal by the High Court and continues to this day to be a moral scourge that must be rectified immediately.<sup>5 6</sup> We want to know if the Cabinet Secretary has any plans to reverse this decision.

The Cabinet Secretary's reply not only contains no commitments but says nothing whatsoever about bringing pressure to bear on the next UK government regarding regional funding and providing the publicly funded services - UFSM (Universal Free School Meals) and others - that are so desperately needed. The Welsh Government simply cannot continue to use the Barnett formula as an excuse while it holds tax-raising powers, if it will not directly address its plans to lobby the UK government into reforming it, and what the Welsh Government's preferred system would be instead. The need is on us right now, not at some distant future point where a benevolent UK

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1

<https://cpag.org.uk/news/child-poverty-reaches-record-high-failure-tackle-it-will-be-betrayal-britains-children>

2

<https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/06/2023-Hunger-in-Wales-report.pdf>

3

<https://www.voice.wales/cardiff-council-must-roll-out-free-school-meals-faster-say-anti-poverty-campaigners/>

<sup>4</sup> <https://www.walesonline.co.uk/news/education/second-welsh-council-agrees-fund-27344035>

<sup>5</sup> <https://www.bevanfoundation.org/views/welsh-government-free-school-meals/>

6

<https://childrenslegalcentre.wales/the-free-school-meals-challenge-in-wales-a-case-for-optimism/>

government will kindly bestow upon us a slight increase in funding<sup>7</sup>, devolution requires decisions about Wales to be made in Wales and our government to be held accountable. If we limit ourselves to what arbitrary fiscal rules allow, then we accept that children will go hungry. The wealth is there but in the wrong hands, and new tax-raising schemes such as the council tax surcharge for empty and second homes shows the innovation required to find those funds, it may be a challenge but that does not mean we can reject our collective responsibility. While these are wider issues for the Welsh Government, we call for consideration of ways for Wales to directly fund extension of UFSM to secondary schools instead of waiting for money to arrive via Barnett consequentials.

While we do acknowledge that funding constraints have hampered the Welsh Government's ability to provide all the resources needed here, we believe that it would be worthwhile for there to be a bolder and clearer statement of Welsh Government's vision and future intentions regarding policies aimed at eradicating child poverty, in particular the universal provision of free school meals at all levels of education. One with secure targets and scrutiny mechanisms, unlike the current version of the document.<sup>8</sup> This document must also include the extension of Universal Free School Meals at its heart, particularly in reducing food poverty. In essence, the Welsh Government continues to maintain its position that the extension of UFSM is to occur once it has the budget, but is simply not attempting to find or fight for that budget at this time. Simultaneously, with every year of delay Wales' secondary school children are missing out on the immense benefits of universalism in Free School Meals<sup>9</sup> which the Welsh Government promotes, and approximately 25,000 children in poverty in Wales continue to go without Free School Meals.<sup>10</sup>

Furthermore, claiming communication and marketing campaigns to get families to sign up to FSM as a success is disappointing, as this money could be used to get FSM to more hungry children rather than spent on advertising. This highlights the failed prioritisation of resources regarding FSM from the Welsh Government at this time, why does the Cabinet Secretary not agree with this assessment?

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7

<https://www.theguardian.com/business/2024/mar/07/ifs-warns-of-labour-and-tory-conspiracy-of-silence-over-future-tax-and-spending-plans>

<sup>8</sup> <https://www.bbc.co.uk/news/uk-wales-politics-68056286>

<sup>9</sup> <https://cpag.org.uk/news/universalism-multiplier>

<sup>10</sup>

<https://cpag.org.uk/sites/default/files/2023-08/Free%20school%20meals-%20third%20of%20kids%20in%20poverty%20miss%20out.pdf>

We do agree that the roll out of the new Curriculum for Wales during the UFSM in primary schools is a great opportunity, and we hope that in order to realise that potential more resources could be provided to schools to encourage embedding local, sustainable, and healthy food. If the Cabinet Secretary could provide examples of collaboration with local authority education departments or work directly with schools by the Welsh Government to provide these resources, we would welcome it, as to see this ambition put into practice requires work at all levels of government.

As the Cabinet Secretary will know we are yet to see the impact of the Social Partnership and Public Procurement Act (Wales) 2023, but the level of control local authorities hold over schools' catering decisions is often limited and especially so under current budget constraints. Not to mention that the provisions held within the act are broad in scope, and more guidance regarding school catering would be welcomed to put pressure on schools to bring catering provision in-house or ethically sourced where possible, and expand capacity through capital funding to prevent the same delays which slowed down the rollout for primary schools such as in Cardiff. It must also be noted that at this time carbon reporting in schools only considers cost as a way of measuring carbon emissions through Tier 1 spend methods rather than wider mitigating factors, this incentivises local authorities and schools to focus on a cost-only approach when choosing catering providers.<sup>11</sup>

Finally, we would like to highlight the continuing problem of young people reporting continuing hunger after receiving a school meal across Wales.<sup>12</sup> We call on the Welsh Government to publish its new consultation on school meals portion sizes as quickly as possible so schools can put larger portions into practice as soon as possible.

We hope the Petitions Committee will work collaboratively with us in the pursuit of our goal to let no child go hungry in Wales, and that the Welsh Government reconsiders its current position on Universal Free School Meals both in secondary schools and school holidays. Let us reignite the debate which is as crucial now as ever, with a cost-of-living crisis, mental health crisis, and climate crisis holding the children of Wales back.

Yours faithfully,  
Ewan Goodjohn,  
Chair, Unite Community Cardiff and Area

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<sup>11</sup>

<https://www.gov.wales/sites/default/files/publications/2024-06/welsh-public-sector-net-zero-carbon-reporting-guide.pdf>

<sup>12</sup>

<https://www.itv.com/news/wales/2024-04-29/it-doesnt-fill-you-up-children-say-they-are-going-hungry-after-school-meals>

# Agenda Item 2.5

**Petitioner:** Owen Shiers

**Start Date:** 23/11/23

**End Date:** 23/05/24

## **Background**

Re-instate core funding for TRAC Cymru (Music Traditions Wales / Traddodiadau Cerdd Cymru)

## **Action:**

TRAC was formed to promote and draw attention to Wales' folk music and dance traditions, so that they might be supported on a par with other classical and contemporary music and cultural genres.

Great strides have been made in recent decades to nurture Welsh folk culture and promote Wales on an international level. Despite this, Arts Council Wales have decided to remove TRAC's core funding, rendering them unable to carry on their vital work. We demand that this funding be re-instated.

## **Additional Information:**

Wales' traditional arts are a foundation stone in our nation's identity. Our music, song, dance, and storytelling carry and express our distinctive culture and way of life. These are traditions which have been kept alive for centuries by the every day folk of Wales, with very little recognition or support from central government.

TRAC was founded in 1997 by a group of folk musicians and supporters who shared a belief in the importance & value of our traditional culture, an awareness of its continuing relevance to the present, and a passion for sharing what music traditions have to offer.

Without support, these traditional forms loose out investment and focus to classical and contemporary forms of music making, and are in danger of becoming museum pieces rather than a living folk tradition which informs our contemporary culture and sense of identity.

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Much progress has been made in recent decades to redress the balance, but the removal of TRAC's core funding presents a real threat.

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Eich cyf/Your ref P-06-1443  
Ein cyf/Our ref LG/05304/24

Jack Sargeant MS  
Chair - Petitions committee

[Government.Committee.Business@gov.wales](mailto:Government.Committee.Business@gov.wales)

18 June 2024

Dear Jack,

Thank you for your correspondence of 23 May as Chair of the Petitions Committee regarding funding for Trac Cymru.

Under the arm's-length funding principle, the Investment Review is an issue for the Arts Council of Wales (ACW) and the Welsh Government does not interfere in its funding decisions.

As a direct response to the learning gathered and decisions made as a part of the Investment Review process, ACW has committed to undertake strategic interventions across a number of artistic disciplines this year, to assess the provision needed for each discipline. One of the strategic interventions announced was a review of traditional music in Wales, which is at an early stage. ACW has recently advertised for a project manager and commissioner to lead this intervention. The deadline for submissions is 24 June.

ACW took a number of steps throughout the development, application and assessment stages of the Investment Review to ensure the process was equitable and appropriate. ACW undertook an extensive consultation process on the proposed new approach to the Investment Review, the application process and the appeals process. ACW sought to get as broad a range of representations as possible, with consultation sessions held on Zoom and opportunities for the sector to respond via an online survey and email. Throughout this period, ACW actively promoted the consultation through a variety of networks, social media, newsletters and direct mailings, receiving 81 responses.

Whilst, for fairness and transparency, ACW applied the same application and assessment process to all applicants, the approach and proposals were designed in a way to accommodate organisations of all sizes, resources and experience of investment Reviews. ACW published its Investment Review Consultation Response, its Investment Review 2023 Guidance and its Appeals Process ahead of the opening for applications on 9 January 2023.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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

[Gohebiaeth.Lesley.Griffiths@llyw.cymru](mailto:Gohebiaeth.Lesley.Griffiths@llyw.cymru)  
[Correspondence.Lesley.Griffiths@gov.wales](mailto:Correspondence.Lesley.Griffiths@gov.wales)

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

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

ACW also offered support during the application window, with the opportunity to have a guided conversation with an ACW Officer. Whilst these conversations did not provide any further detail than the published Guidance, they were available to assist applicants on specific questions. ACW also maintained FAQs to further assist organisations and ensure that all potential applicants had access to the same information at the same time.

ACW undertook a robust assessment process in line with the published guidance, focused on six principles: Creativity, Widening Engagement, Welsh Language, Climate Justice, Nurturing Talent, and Transformation. ACW also applied five balancing factors to take a wider view. Following the announcement of indicative funding decision in September, an independent appeals process then opened to organisations who were unsuccessful. This concluded in December 2023. Trac Cymru appealed its Investment Review decision but was unsuccessful at the initial Independent Review stage.

ACW arranged for its internal audit service provider to undertake its own scrutiny of its proposals, through a series of internal audits throughout the project. These examined a number of areas, including the Investment Review Guidance, the Appeals process and the assessment process, details of which were also included in the published Guidance. These internal audits were commissioned to provide the Council with an independent opinion and additional assurance on the key stages of the Investment Review. All audits returned a rating of Substantial Assurance.

In line with ACW's published Guidance, ACW offered Transition Support to former Arts Portfolio Wales organisations who were unsuccessful in their application to this Investment Review. Trac Cymru was awarded £30k in transition support by ACW. In addition to financial support, ACW offered additional specific advice and expertise to help the organisations adjust to no longer receiving their core annual funding.

Additionally, organisations who were unsuccessful in their application to the Investment Review 2023 continue to be eligible to apply to ACW through its published National Lottery programmes for funding for specific project activity.

Trac Cymru has recently had funding discussions with officials in Creative Wales and been advised to consider applying for a competitive funding scheme due to open in the coming weeks.

Yours sincerely,

A handwritten signature in grey ink that reads "Lesley Griffiths". The signature is written in a cursive style with a large, sweeping flourish at the end.

**Lesley Griffiths AS/MS**

Ysgrifennydd y Cabinet dros Ddiwylliant a Chyfiawnder Cymdeithasol  
Cabinet Secretary for Culture and Social Justice



# Change Land Transaction Tax for first time buyers in Wales to be in line with the UK Government

Y Pwyllgor Deisebau | 8 Gorffnaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8933-1

**Petition Number:** P-05-1445

**Petition title:** Change Land Transaction Tax for first time buyers in Wales to be in line with the UK Government.

**Text of petition:** The UK Government have removed stamp duty for first time buyers who purchase properties under £425K in England and NI. The Welsh Government needs to follow suit by reducing LTT to the same rate for first time buyers in Wales. Currently there is no preferential rate for first time buyers in Wales, it is just a flat rate of under £225K for every house bought here. With rapid rising property prices it is becoming increasingly difficult to find decent properties under the WG threshold of £225K.

Purchasing a first home has become increasingly more difficult for first time buyers, with the current cost of living crisis and rising mortgage rates, and it is made even more difficult in Wales by the Welsh Government by not adding an extra incentive, like the UK Government have. By not removing this tax it will add to people left stuck renting in Wales, unable to get onto the housing market or even buying outside of Wales. Why limit the help and choice for first time buyers in Wales? I believe as much help as possible should be offered to get people onto the property ladder.



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# 1. Background

Land Transaction Tax (LTT) replaced Stamp Duty Land Tax (SDLT) in Wales from 1 April 2018. The Welsh Government sets the rates and bands for LTT, and the Welsh Revenue Authority (WRA) collects and manages the tax for the Welsh Government. There are a number of differences between LTT in Wales and SDLT in England and Northern Ireland.

Purchasers of property or land in Wales must pay LTT over a price threshold of £225,000. There is no rate relief for first time buyers. LTT is set at 6% for properties valued over £225,000 and up to and including £400,000.

SDLT rates and bands for England and Northern Ireland are set by the UK Government. The 0% band currently applies to purchases up to £250,000. For first time buyers there is a threshold of £425,000 under which no SDLT is payable.

## 1.1. House prices in Wales

The Welsh LTT threshold is higher than the average house price in Wales. According to the HM Land Registry UK House Price Index Wales, the average house price was £211,000 in February 2024, having reduced 1.2 per cent in the last year. The average first time buyer paid £183,000 for their first home.

## 1.2. Factors affecting first time buyers

According to the 2024 UK Housing Review, the UK is seeing 'very evident strains in the homeownership market' with a 19 per cent reduction in transactions between 2022 and 2023. The Review states that cost-of-living pressures and rising private rents have affected the ability of first time buyers to save for a deposit. Although fixed rate mortgage pricing has come down a little, rates are still much higher than they were three years ago. These factors are exacerbating a long-term decline in the number of first time buyer mortgages: in 2023 there were 12,600 mortgages provided to first time buyers in Wales, compared with 17,300 in 2021 and 30,300 in 2001.

Mortgage rates have been volatile during early 2024 due to competition between lenders together with uncertainty about cuts to the base rate. The Bank of England has signalled a potential cut to the base rate this summer, which would have a positive impact on the affordability of first time buyer mortgages.

## 2. Welsh Government action

After the implementation of LTT, the Finance Minister Rebecca Evans MS mentioned that the Office of Budget Responsibility had assessed first time buyers' relief as being ineffective. The OBR had concluded that rate relief for first time buyers would increase house prices and result in few additional purchases.

The Welsh Government commissioned an independent review of LTT. A summary of the review was published in February 2023. A main finding was:

'There is no evidence to suggest that the absence of relief for first time buyers has had any substantial impact on access to home ownership in Wales.'

The Welsh Government has made other help available for first time buyers:

- Help to Buy: a shared equity loan of up to 20 per cent loan to value (LTV) for buyers who have a 5 per cent deposit, on new build homes only
- Homebuy Wales: an equity loan of 30 to 50 per cent LTV for those who meet specific criteria, to assist with purchasing an existing property. The Welsh Government website states that there are 17 participating social landlords in Wales. The Welsh Government has made £8.5 million available over three years to support Homebuy in Dwyfor.
- Shared Ownership Wales: part-ownership, part-renting, with the ability to 'staircase' to full ownership. Currently offered by six housing associations in Wales with Welsh Government funding. Other social landlords may offer their own schemes not funded by the Welsh Government.
- Rent to Own Wales: the Welsh Government website states that although Rent to Own is no longer funded, some properties are still being built and therefore may be available to new applicants. The website states that there are ten participating housing associations in Wales.
- Self Build Wales: loans to fund up to 100% of build costs and 75% of land costs for self-built or custom-built homes. Administered by the Development Bank for Wales and supported by the Welsh Government.

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.

Rebecca Evans AS/MS  
Ysgrifennydd y Cabinet dros Gyllid, y Cyfansoddiad  
a Swyddfa'r Cabinet  
Cabinet Secretary for Finance, Constitution & Cabinet Office



Eich cyf/Your ref P-06-1445  
Ein cyf/Our ref RE/05076/24

Llywodraeth Cymru  
Welsh Government

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru

27 June 2024

Dear Jack,

Thank you for your letter to the Cabinet Secretary for Housing, Local Government & Planning regarding Petition P-06-1445, ('Change Land Transaction Tax for First Time Buyers in Wales to be in line with the UK Government'). As the matter relates to land transaction tax (LTT), your letter has been passed to me to reply.

The Land Transaction Tax and Anti-avoidance of Devolved Taxes (Wales) Act 2017 did not provide a first-time buyers relief when it was passed by the Senedd. The Welsh Government considers that the absence of such a LTT relief aligns with the Welsh Government's principle that Welsh taxes should raise revenue to fund public services as fairly as possible, and that taxation is fairer when it is progressive. Therefore, those buying the most expensive properties should pay the greatest share of tax. The Welsh Government considers that these aims and principles apply to all property transactions, whether they are first-time purchases or otherwise, and that those buying homes in the lower to middle range of our housing market should not pay any tax when buying their homes.

When LTT first came into force in April 2018 the main residential rates zero rate threshold was set at £180,000. This meant that at that time around 60% of transactions in Wales, including most first-time buyers, paid no tax on their home purchases.

In response to subsequent house price increases, on 10 October 2022 the Senedd approved regulations to raise the lowest point at which the LTT main residential rates are paid from £180,000 to £225,000. This change recognised house price increases that had occurred in intervening years and again meant that around 60% of homebuyers would pay no tax, including again the majority of first-time buyers.

LTT rates and bands are kept under review to ensure they are set appropriately, with consideration to the shape of the Welsh property market. This means there are differences between LTT rates and bands in Wales and those set for stamp duty land tax (SDLT) in England and Northern Ireland. The Office for National Statistics data for

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Correspondence.Rebecca.Evans@gov.wales](mailto:Correspondence.Rebecca.Evans@gov.wales)  
[Gohebiaeth.Rebecca.Evans@llyw.cymru](mailto:Gohebiaeth.Rebecca.Evans@llyw.cymru)

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

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March 2024 indicates that the average house price in Wales is £214,000, and the average first-time purchase costs £185,000.

The current rates and bands for SDLT first time buyers' relief provides full relief from SDLT on homes costing up to £425,000, and a reduction in the amount of SDLT payable of £8,750 on properties costing up to £625,000. In a Welsh context a home costing over £425,000 would be in the top 7%, and a home costing over £625,000 would be in the top 2% of residential transactions, by cost.

The Welsh Government would not provide a higher zero-rate threshold in line with the SDLT rates and bands for first-time buyers, because that would support some purchases well above our average house price, in preference to supporting those buying less expensive properties, for example for those taking their second steps on the property ladder as their families grow.

Thank you for contacting us to raise awareness of the petition.

Yours sincerely,

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

**Rebecca Evans AS/MS**

Ysgrifennydd y Cabinet dros Gyllid, y Cyfansoddiad a Swyddfa'r Cabinet  
Cabinet Secretary for Finance, Constitution & Cabinet Office

## **P-06-1445 Change Land Transaction Tax for First Time Buyers in Wales to be in line with the UK Government – Correspondence from Petitioner to Committee, 2 July 2024**

Dear Members of the Petitions Committee,

Thank you for the opportunity to respond to the Welsh Government's position on my petition P-06-1445. I appreciate the detailed explanation provided. Here are my thoughts and further points for consideration.

### **Thoughts on the Document**

While the rationale for maintaining a progressive tax system is clear, the document does not fully address the unique challenges faced by first-time buyers in Wales. Increasing the LTT zero-rate threshold to £225,000 was a positive step, but it does not reflect the rapid rise in property prices in many areas.

### **Addressing the Issues**

The Welsh Government notes that around 60% of transactions, including most first-time buyers, are tax-free under the current threshold. However, many first-time buyers are still priced out of the market, especially in higher-priced areas.

### **Further Questions**

1. **Regional Disparities:** How does the Welsh Government plan to support first-time buyers in regions where property prices exceed £225,000?
2. **Long-Term Strategy:** Is there a strategy to periodically review and adjust LTT thresholds to match market conditions?
3. **Impact Analysis:** Has the impact of the current LTT structure on first-time buyers compared to those in England and Northern Ireland been analysed?
4. **Percentage of First-Time Buyers:** What exact percentage of the transactions under the £225,000 threshold are first-time buyers? You mention most of the 60% are first-time buyers, but knowing the exact figures would help quantify the impact.

### **Additional Points**

1. **Economic Disparities:** Wales is the poorest country in the UK, exacerbating the challenges for first-time buyers. The current LTT structure does not adequately address this disparity.
2. **Local Economic Impact:** Savings on LTT could be used by first-time buyers for home improvements instead, supporting local tradespeople and boosting the local economy.
3. **Challenges in Expensive Areas:** Why should those growing up in more expensive areas be penalised by a generalised tax scheme? This proposed change would provide crucial one-time help, enabling these individuals to remain within their communities.
4. **Comparative Analysis:** The SDLT relief in England and Northern Ireland for first-time buyers purchasing properties up to £425,000 significantly aids their ability to afford homes, even in higher-priced areas. Adopting a similar relief in Wales, adjusted for local market conditions, would provide equitable support for first-time buyers.

5. **Economic and Social Benefits:** Increasing the LTT threshold for first-time buyers could have positive economic and social impacts, such as reducing the rental market pressure, increasing home ownership rates, and enhancing community stability.
6. **Progressive Yet Supportive:** While progressive taxation is important, ensuring that first-time buyers receive adequate support can be balanced within a progressive framework by setting appropriate limits that reflect the realities of the Welsh property market.

## **Conclusion**

While I understand the principles behind the current LTT, the unique challenges faced by first-time buyers in Wales necessitate a review. Aligning LTT relief with SDLT relief in England and Northern Ireland, adjusted for Welsh market conditions, would provide significant support to first-time buyers and have positive economic and social impacts.

Thank you for considering my views. I look forward to the upcoming debate and hope for a constructive discussion that leads to meaningful support for first-time buyers in Wales.

**Sincerely,**

Taylor Reynish



# Stop Natural Resources Wales closing the visitor centre at Ynyslas National Nature Reserve

Y Pwyllgor Deisebau | 8 Gorffennaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8973-1

**Petition Number:** P-05-1447

**Petition title:** Stop Natural Resources Wales closing the visitor centre at Ynyslas National Nature Reserve

**Text of petition:** It has come to the attention of the local community that NRW are planning to close the Visitor Centre at Ynyslas at the end of this year. This is taking place with no consultation, no provision of alternative protection for the nature reserve and the loss of local jobs.

NRW is the organisation that should be protecting our wildlife and communities not destroying them.

The visitor centre at Ynyslas is critical in managing the 400,000 visitors a year that use the site. The wildlife and the habitats of the nature reserve are fragile and need protecting from this large number of visitors, vehicles and dogs if we are to avoid further biodiversity loss in Wales.

The year round presence of NRW staff at the reserve mean that there is a natural deterrent to antisocial behaviour (lighting of fires, fly tipping, vehicle access) and that any incidents that do occur are dealt with quickly and efficiently.

The centre provides information and education to all visitor so that they understand why the place is special and what impacts their actions have on it. It is also a place of social contact for the local community and is a place where nature is accessible to those with limited mobility.



Effective visitor management at Ynyslas is essential for the protection of the Nature Reserve and its wildlife.

## 1. Background

Ynyslas visitor centre is operated by Natural Resources Wales (NRW) in the Dyfi National Nature Reserve (NNR) near Borth, Ceredigion. The visitor centre contains an exhibition informing visitors about the reserve, toilets, cafe and a shop.

It was reported in December 2023 that NRW was considering closing its Ynyslas, Bwlch Nant yr Arian and Coed y Brenin visitor centres. An NRW official told the Cambrian News:

...we are having to look across all of our remit and critically review what we can and must continue to do, what we stop and what we slow...

Our visitor centres are part of this review, but no decision has yet been made on how they will operate in the future.

Over the coming months we'll be drawing up options and recommendations for the future and the final decisions for 2024/25 will be made by our board before the end of March.

Referring to visitor centres at the 2 February 2024 NRW board meeting, it was said that:

The budget for 2024/25 was not yet finalised and the Board had not been asked to approve any decisions on visitor centres. Management information was being collated for a decision by the end of March. It was important to avoid conflating the level of services and the ability of the public to access land. Public access to the land would be maintained but what sort of services provided there was being considered. Where NRW could not continue to provide those services, it would be looking for others to take those on.

In March 2024, the Cambrian News reported that representatives of NRW attended a public meeting in Borth to discuss Ynyslas visitor centre. An NRW

official reported that the visitor centre would not be closing at the end of March 2024, and that:

We are looking to keep things running for as long as we can, but it is difficult and we want to work with people to find a long term solution.

There is no secret plan, and no decisions have been made yet. But the reality is these visitor centres were built in a time of plenty, when we had funding we don't have now.

The Cambrian News also reported that Ynyslas visitor centre makes “a loss of about £50,000 a year”, and that NRW was looking to work with local people and enterprises who might be interested in running the visitor centre café and shop.

The NRW Board most recently met on 23 May 2024. Although the final minutes of this meeting were not publicly available at the time of writing, among the items discussed was the draft NRW Recreation Strategy. The draft strategy includes the statement “By 2030 the Strategy will have provided the direction to, for example: Enable third parties to step in and deliver intense tourism based activity such as mountain biking and Visitor Centres”.

## 2. Welsh Government action

NRW is a Welsh Government-Sponsored Body. Its roles include managing 7% of land in Wales (including Dyfi NNR and 55 other NNRs), maintaining flood defences, responding to environmental incidents, and advising public bodies. The Welsh Government provides the majority of NRW's funding through Grant in Aid and other grants. In 2022/23 59% of NRW's income came from the Welsh Government, with the remainder raised through charges (17%), commercial/other income (21%), and European/external funding (2%). Its total expenditure of £272m in 2022/23 exceeded its income of £234m, implying a £38m deficit.

Then First Minister Mark Drakeford answered Mabon ap Gwynfor's question on potential closures of NRW's Visitor Centres, including Ynyslas, during Plenary on 2 January 2024, saying:

Natural Resources Wales, like every service here in Wales, is under financial pressures. There will be difficult choices for them to make, just as we have had to make over the past few years, but I'm sure that when that agency makes those decisions, they will listen to the points that the Member has made and the other issues that local people want to raise.

Huw Irranca-Davies, Cabinet Secretary for Climate Change and Rural Affairs, reiterated this position in his response to this petition. He highlighted NRW's budgetary pressures and its priority to deliver core functions and statutory duties. Regarding visitor centres, he said NRW is considering future options "including provision of opportunities to local businesses, partnership working with social and community groups", but that any final decisions will be made by the NRW Board.

### 3. Welsh Parliament action

Clare Pilman, Chief Executive of NRW, directly addressed concerns about the closure of visitor centres during the annual NRW scrutiny session by the Senedd Climate Change, Environment and Infrastructure (CCEI) Committee in January 2024. She told the committee that no decisions had been made regarding closures, but that NRW had to consider all options. In its subsequent May 2024 report, the CCEI Committee suggested, with regard to visitor centres, that "NRW should do all it can to ensure their continued operation" and recommended NRW "report to the Committee on the status of visitor centres within the next six months".

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-06-1447  
Ein cyf/Our ref HIDCC/05514/24

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
[Government.Committee.Business@gov.wales](mailto:Government.Committee.Business@gov.wales)

21 June 2024

Dear Jack,

**Petition P-06-1447 Stop Natural Resources Wales closing the visitor centre at Ynyslas National Nature Reserve**

Thank you for your letter of 24 May seeking my views on issues raised in Petition P-06-1447, asking to - "Stop NRW closing the visitor centre at Ynyslas National Nature Reserve".

As the Senedd Petition Committee will be aware the budgetary pressures for 2024-25 are well documented and no organisations are exempt from the extremely tough budgetary conversations and decisions that will have to be made. Accordingly, NRW is considering its remit and critically reviewing all activities, recognising that delivery of its core functions and statutory duties take priority.

With specific regard to the future of its visitor centres, NRW is considering a raft of possible options including provision of opportunities to local businesses, partnership working with social and community groups to investigate the feasibility of future management of these centres, etc.

Ultimately, the responsibility for making the final decision on the future of its visitor centres lies with NRW's Board. I understand that NRW has initiated conversations with relevant communities regarding future options for these centres.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

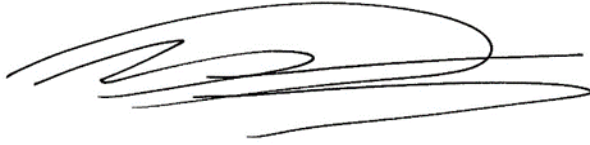
[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

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.

Once again, thank you for writing to me regarding this. I hope this information is helpful to you in your role as Petitions' Committee Chair.

Yours sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and horizontal strokes, positioned above the printed name.

**Huw Irranca-Davies AS/MS**

Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion Gwledig  
Cabinet Secretary for Climate Change & Rural Affairs

**P-06-1447 Stop Natural Resources Wales closing the visitor centre at Ynyslas National Nature Reserve - Correspondence from the Petitioner to the Committee, 30 June 2024**

Dear Petitions Committee

I am writing as a member of the grassroots group Save Our Centre - Ynyslas - Achubwch Ein Canolfan. We set the group up when we the centre staff told us they had been informed the centre was closing on December 31st 2023. NRW have subsequently denied making this decision, despite us having obtained a copy of the communication via an FOI request.

As a group of centre users, we are very concerned with the way in which NRW have treated the public and we have made a formal complaint which is now at 'level 2'.

We do not believe NRW are being honest with the public or with the Senedd. In the letter from the Minister, he says that he understands NRW are exploring commercial and local partnerships.

"NRW is considering a raft of possible options including provision of opportunities to local businesses, partnership working with social and community groups to investigate the feasibility of future management of these centres, etc."

However, we can confirm that NRW have made almost no attempt to engage with our group, Borth's County Councillor nor Community Council. They attended a public meeting in March 2024 and failed to answer most of the questions posed in advance. The transcript of the meeting makes it clear that they agreed to a follow up meeting, but they are now refusing set a date or even commit to that meeting.

Below is a recent communication one of our group has received from Elsie Grace, where she clearly states they will not consult with the public.

Dear Elizabeth

Thank you for getting in touch and sharing your concerns regarding Ynyslas and Natural Resources Wales's current strategy. I appreciate you taking the time to write to me and Sir David as all feedback is welcomed. Sir David has asked me to respond on his behalf, I have copied him into my reply to you.

I apologise that I was unable to attend the public meeting at Borth on the 1st of March as I was unwell. My colleagues who attended were able to share questions raised and whilst time has moved on there has been no change and no decision has been made.

The Visitor Centres' work is part of a larger exercise to review all our activities. We're assessing what we can and must continue to do, what to slow down, what to change, and what to stop, in order to live within our financial means. Once the NRW Board approves these proposals, we will communicate clearly with partners, stakeholders, and customers to explain the impact of changes on the services we can deliver. This will not be a public consultation, because it is for us to decide on our priorities and how we adapt to live within our financial means.

To clarify, it is the option to outsource that is being considered and not private-only options. The wider review will fundamentally influence our potential offer to market. We

won't hold another public meeting until staff have been informed of any outcome. We are currently looking at all the possible implications of such a change, but there is no decision at the moment.

If you have any more questions, please don't hesitate to get in touch.

Yours Sincerely  
Elsie Grace

As Kim said in her response to you, Ynyslas is financially viable and NRW keep vacillating between whether it is a financial or another (undisclosed) reason. I would be very happy to have a meeting or phone conversation with the relevant elected representative to discuss my concerns, but they are mostly about NRW appearing to be unaccountable to anyone. We do not understand how this is acceptable.

I am attaching a copy of a letter I sent to all the Non-Executive Board Members and The Chair before the last Board Meeting. I have had NO response at all to this. It has a clear timeline of our concerns. I also attach the VC Futures Briefing Document from November 2023 where they laid out the following information to their staff:

Ynyslas - Key Messages:

- o The café and shop should not be opened in 2024, however the toilet facilities should remain open.
  
- o Ynyslas VC staff to transfer to Bwlch Nant yr Arian VC.
  
- o The VC should be offered to the community for use as a social enterprise or other community use. Commercial Team to progress discussions to ascertain interest.
  
- o Next steps would be to work with VC staff on site, Facilities, the Land and Place Management Teams. This to include how we should approach the operational practicalities of the proposed removal of carparking on the beach front.

NRW now claim the Futures Briefing Document was a miscommunication. I really hope someone at the Senedd takes this seriously.

Kind regards

Polly Ernest



## Save Our Centre – Ynyslas – Achubwch Ein Canolfan



FAO All Non-Executive NRW Board Members

Dr Rosie Plumber,  
Professor Steve Ormerod,  
Geraint Davies,  
Professor Calvin Jones,  
Mark McKenna,  
Dr Peter Fox,  
Kathleen Palmer,  
Helen Pittaway,  
Professor Rhys Jones,  
Lesley Jones,

Natural Resources Wales  
Rivers House  
St Mellons Business Park  
St Mellons  
Cardiff  
CF3 0EY

May 14th 2024

Dear NRW Board Member

I am writing to you as a founding member of Save our Centre – Ynyslas – Achubwch our Canolfan. This unincorporated action group was set up last year in response to news that Natural Resources Wales was proposing to close the Ynyslas Visitor Centre and restrict car parking on the beach. The group has over 600 members on Facebook, holds regular meetings and has garnered over 2,200 signatures on a Senedd Petition (<https://petitions.senedd.wales/petitions/245961>) and almost 5,000 on a [Change.org petition](https://www.change.org/p/prevent-the-closure-of-ynyslas-visitor-centre) (<https://www.change.org/p/prevent-the-closure-of-ynyslas-visitor-centre>) in an attempt to keep the Centre open, save staff jobs and ensure the public can continue to park at and access the site at Ynyslas. We were not sure if our messages were getting through to the Non-Executive Board Meetings and have therefore decided to write to you.

I am very concerned with the way in which a publicly funded organisation is treating the public, and appears to be totally unaccountable or truthful. When we first heard that the staff had been advised the Centre was closing, we immediately contacted our elected representatives, who were, at the time, in the dark about it. Once our Senedd Member, MP and County Councillor made representations, they were informed that there had never been a proposal to close the Centre at the end of 2023 and that this was a 'miscommunication'.



Our initial idea was to try to speak to the executive to understand how the decision had been made and why. I felt strongly that Ynyslas Visitor Centre had been lumped in with larger, more commercially viable operations in being moved to the Commercial Department and should probably be transferred back to Operations. It is nearly impossible to commercialise the operation at Ynyslas further because there are few opportunities other than car parking. The beach is not a swimming beach due to dangerous currents, so despite space, it would not be possible to promote a surfing or wakeboarding business there. In addition, there is lots of unexploded ordinance and rare flora and fauna. The Centre is an excellent interactive education hub that informs visitors from a diverse catchment area about the importance of the dunes.

However, rather than meeting with us, the officers on NRW have actively avoided us. This includes cancelling a pre-arranged meeting with members of SoC Ynyslas AeC, with virtually no notice. That meeting with Elsie Grace was scheduled via Elin Jones's (Senedd Member) office, and I rescheduled my work diary to attend. The meeting has never been reconvened. Until I wrote to the Chair's Office I was unable to get any contact with the relevant people. Even now, Elsie Grace has responded to my queries but has not provided satisfactory answers.

Here is a rough timeline of what has happened:

- Staff were told in writing in December that the Visitor Centre was closing. (Official briefing document attached)
- When the public got on board to try and save the Centre, we were then told (via our political representatives) that there had been a communication error and that there had never been a plan to close the Centre.
- We were advised that a decision would be made about the Centre's future by the end of the 2023 financial year.
- A decision has not been made.
- It was initially intimated that the Centre was closing due to it losing money.
- A senior person within NRW described it as 'A room with a coffee machine'.
- As a public group, we had a meeting arranged (via Elin Jones Senedd Member) on February 14th with Elsie Grace at Ynyslas Visitor Centre. I rearranged my work schedule to attend. The meeting was cancelled at the last minute.
- A large public meeting was convened for March 1st at Borth Community Hall. We submitted questions in advance. At the last minute, it was announced that Elsie Grace could not attend the meeting, but Sarah Jennings could. Sarah Jennings had not seen any of the questions and could barely answer the ones posed. The acoustics in the hall were



terrible, and the sound system was inadequate. She had no visual aids or real explanations. Around 150 people attended and received no concrete answers. Sarah Jennings claimed that up to 3,000 cars were parked at the site on busy days, which is an impossible number. Last Saturday was super busy, and there were 250 cars.

- NRW advised that despite a recruitment ban, they were bringing on temporary staff via an Agency to keep the Centre open until September
- After the meeting, group members started to get responses that contradicted what had been said in the meeting. NRW was now claiming it was not considering closing the Centre on financial grounds but on environmental ones.
- All the communications sent contradict each other.
- Our Senedd member (Elin Jones) has sent us a message to say NRW are in conversation with Borth Community Council
- When we asked Borth Community Council about this, they said they could not get any response or feedback from NRW – despite promises of a follow-up meeting in April.
- The country councillor has also been unable to get any commitment to a future meeting.
- Yesterday, I sent a Freedom of Information request asking for the Ynyslas -Centre Futures Staff Briefing Note issued on November 29th and received it by return email. (enclosed)

As you can see, the Ynyslas -Centre Futures Staff Briefing Note lays out a clear proposal to close Ynyslas, which is in complete contradiction to everything we have been told. See example of a question response sent after the Borth Public Meeting at which Sarah Jennings repeatedly told the public that there was no proposal to close the Centre at the end of last year. (I can send a transcript of the meeting if required).

Was there a proposal to close Ynyslas VC on the 31<sup>st</sup> December 2023? If so who decided not to pursue this plan and why?

- There was no proposal put forward to close the VC on this date. There was a miscommunication that resulted in a belief that a decision had been made to close the VC by the end of the year. This mistake was rectified and the review of Ynyslas is ongoing.

I wonder if this is behaviour that you would expect of a publicly funded organisation, one of which you are a non-executive director. Having been a non-executive director of an Arts Council-funded organisation in the past, I know I would want answers to questions and proper accountability if I were in your shoes.

Thank you for taking the time to read this letter, and I look forward to hearing from you and getting feedback. I have submitted questions to the Board Meeting about this matter and raised an official (level 2) complaint.

**Save Our Centre – Ynyslas – Achubwch Ein Canolfan**



Yours sincerely

Polly Ernest

On behalf of Save our Centre – Ynyslas – Achubwch ein Canolfan

Cc Sir David Henshaw – Chair, NRW  
Clare Pillman – CEO, NRW  
Vaughn Gething – First Minister, Senedd  
Irranca-Davies - Cabinet Secretary for Climate Change and Rural Affairs,  
Senedd

## Stop pollution at Watchtower Bay and Ogmore by Sea

Y Pwyllgor Deisebau | 8 Gorffennaf 2024  
Petitions Committee | 8 July 2024

Reference: SR24/8973-1

**Petition Number:** P-05-1448

**Petition title:** Stop pollution at Watchtower Bay and Ogmore by Sea

**Text of petition:** Watch House Bay [also known locally as Watchtower Bay] and Ogmore by Sea were both classified as new designated bathing waters in 2023.

Now both beaches have not met the minimum requirements for bathing water quality and were the only two bathing sites in Wales to be classified as 'poor' in what the Welsh Government has described as "disappointing". Rather than putting up signs warning people not to swim at these beaches, the Council, Welsh Water and Welsh Government should be taking action to prevent this pollution.

We have been campaigning for a number of years about the sewage pollution entering the Old Harbour and Watchtower Bay in Barry. We have identified human sewage outfall pipes and the outfall pipe from the Knap lake, which has a large resident population of swans and geese, as probably being the main cause of this pollution.

This water needs to be treated in retention tanks before releasing into the marine environment.

We need action to stop the pollution on both Watchtower Bay and Ogmore by Sea... just stop the crap!



We will be ending this petition on World Oceans Day on Saturday 8th June 2024...we desperately need to protect our Oceans!

## 1. Background

Two Senedd Research briefings provide a comprehensive background to this topic:

- [A guide to water quality in Wales](#) outlines how water quality standards are implemented, monitored and upheld, and who's responsible. It also discusses some of the main challenges to water quality in Wales, and what the Welsh Government has been doing to tackle them.
- [Storm overflows in Wales](#) looks at how water company storm overflows are being managed, how well they're understood, and how they're impacting water quality.

### Bathing water quality sampling and 2023 results

There are [109 bathing waters in Wales](#), designated under the [Bathing Water Regulations 2013](#). Further information on bathing water designation and classification can be found in this [Senedd Research article](#).

In response to this petition, the Welsh Government says the aim of a designation is to “protect bathers’ health against pollution and provide information to the public to enable them to make informed decisions about where and when they bathe”.

Natural Resources Wales (NRW) is responsible for monitoring designated bathing waters and communicating the results to the public. NRW’s [2023 Wales bathing water report](#) shows that 107 out of the 109 designated waters met the standards set by the Regulations, with Watch House Bay and Ogmore by Sea the non-compliant bathing waters. Both beaches were newly designated by the Welsh Government for 2023, and the NRW report explains that classifications are typically based on four years of bathing water quality data, however 2023 data only is used. The data showed:

At Watch House Bay four out of twenty samples had elevated bacteria levels, these were all taken during or following periods of wet weather.

...

At Ogmore by Sea six out of twenty samples had elevated levels of bacteria. Rainfall and river level data for the River Ogmore and River Ewenny catchments was assessed against the bathing water sample results. This showed poorer water quality following rainfall and elevated river levels.

The effect of this sampling meant that the bathing waters were classified as ‘poor’. In reply to this petition, the Cabinet Secretary for Climate Change and Rural Affairs, Huw Irranca-Davies MS, says that “significant increase in rainfall over the 2023 bathing season has meant an increase in pollution incidents from a variety of sources”.

NRW says there are many likely sources of pollutants in both catchments, “from diffuse pollution from urban drainage, misconnections, rural land use and wildlife”. It highlights that further monitoring in future bathing water seasons will give a better understanding, and that it will:

... work with the Vale of Glamorgan Council, Shared Regulatory Services and Dŵr Cymru to investigate the reasons behind these failures and to work towards improving the results in future years.

## Welsh Government action

In response to the increasing pressure on Wales’s aquatic environments, the Welsh Government set up the Better River Quality Taskforce (the taskforce), to evaluate the current approach to managing and regulating overflows. The taskforce identified five areas for change and improvement requiring action.

In October 2023 the Taskforce published the Storm Overflow Evidence for Wales (SOEfw) Report under its Environmental Regulation of Overflows Action Plan. The report compares the costs and benefits of different policy options for the regulation of Combined Storm Overflows (CSOs). The then Minister for Climate Change, Julie James MS, said the taskforce will “consider carefully the report and identify next steps”.

In his reply to this petition, the Cabinet Secretary says it’s “disappointing” that Watch House Bay and Ogmore by Sea received ‘poor’ classifications in 2023. He highlights investigative work being undertaken by NRW to understand the reasons for the failures, and says:

... these investigations are progressing well but are complex and require significant time and expense to fully work through, and often rely on supporting action from wider sectors.

## 2. Welsh Parliament action

The Senedd's Climate Change, Environment and Infrastructure Committee undertook an investigation into [sewage discharges, and their impact on water quality](#) in early 2022. The Committee's findings are discussed in this [Senedd Research article](#). It has since undertaken [scrutiny of Dwr Cymru's environmental performance](#) and "illegal spillages of untreated sewage" from several of its Wastewater Treatment Works. It published its [Report on performance of Dŵr Cymru](#) in February 2024.

Prior to this, a [Plenary debate took place in March 2022](#) on a Member's legislative proposal for a Bill to reduce the adverse impact of storm overflows. The motion was agreed.

In December 2023, the then Minister for Climate Change, Julie James MS, delivered a [statement to Plenary on water quality](#), where storm overflows and bathing water quality were discussed.

The Petitions Committee has considered the following recent petitions within this subject area:

- [P-06-1281 Urgently stop raw sewage discharges into Barry's Old Harbour and Watchtower Bays](#) (closed petition); and
- [P-06-1398: To act to increase the effectiveness of Natural Resources Wales in halting pollution on the Teifi](#) (under consideration).

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-06-1448  
Ein cyf/Our ref HIDCC/05515/24

Jack Sargeant MS  
Chair - Petitions committee  
[Government.Committee.Business@gov.wales](mailto:Government.Committee.Business@gov.wales)

14 June 2024

Dear Jack,

Thank you for your letter of 24 May on behalf of the Petitions Committee regarding petition *P-06-1446 Stop pollution at Watchtower Bay and Ogmore by Sea*.

Ensuring our water is of the highest quality is a vital part of making Wales a prosperous, happy, and healthy place to live in and visit. High bathing water quality is a priority for the Welsh Government as we continue to see outdoor swimming and water-based recreational activities grow in popularity in Wales. In our Programme for Government, we have made a commitment to begin to designate more of Wales' inland waters for recreation and have strengthened water quality monitoring.

The main purpose of [the Bathing Water Regulations 2013](#) is to identify popular bathing sites for designation and to monitor water quality at these sites during the most popular times. The aim is to protect bathers' health against pollution and provide information to the public to enable them to make informed decisions about where and when they bathe. Significant increase in rainfall over the 2023 bathing season has meant an increase in pollution incidents from a variety of sources including diffuse pollution from agricultural runoff, highway runoff, wastewater discharges, discharges from combined storm overflows and industrial pollution.

Therefore, whilst I fully agree it is disappointing that our two newly designated bathing waters received 'poor' classifications in 2023, Natural Resources Wales (NRW) are taking robust action to understand and address the water quality issues in both locations and this in fact demonstrates the bathing water programme is working as it is designed to.

At Watch House Bay, the surrounding catchment is a large complex urban catchment with several storm overflows and two large sewage treatment works. NRW are undertaking several strands of investigation to better understand the relative importance of pollution sources impacting Watch House Bay. This includes, but is not limited to:

- Undertaking compliance reviews of the nearby storm overflow on Harbour Road and Cog Moors wastewater treatment works.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

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

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

- Reviewing an investigation report on the Barry Town SPS Short Sea outfall (SSO) trigger event in August 2023. This was provided to NRW by Dŵr Cymru Welsh Water (DCWW) on 30 May 2024 in line with the current guidance and permit requirements. NRW can now assess the submission and compliance of the asset with permit conditions.
- Prioritising the permitted discharges in the catchment for further audits in the compliance programme 2024-5. This comprises of a combination of site inspections, monitoring reviews and data audits.

In April, NRW undertook a joint visit to Watch House Bay with the local authority and DCWW to carry out pre-season checks and confirmed that relevant signage had been installed by the local authority, which is a requirement of the Bathing Water Regulations.

Meanwhile, NRW's preliminary investigations into the Ogmore catchment area note the wider catchment is large and there is likely to be diffuse pollution from urban drainage, misconnections and rural land use. There is a large bird population in the lower estuary, grazing livestock as well as regular river crossings from the local stables. Furthermore, there are numerous water company assets in the catchment including sewage treatment works and storm overflows, and several domestic properties with private sewerage arrangements in the estuary. Ogmore received a particularly high sample result on 14 August 2023, but this is not uncommon and there were numerous high level results in 2023, primarily linked to wet weather events.

Similarly to Watch House Bay, NRW are also undertaking several strands of investigation to understand and tackle the pollution sources impacting the Ogmore bathing water. This includes but is not limited to:

- Assessing the storm discharge at nearby Eweny pumping station, which has been identified under the Storm Overflow Assessment Framework (SOAF) programme.
- Reviewing a report from DCWW on nearby Penybont wastewater treatment works, following an event in August 2023 which exceeded the trigger. NRW are also responding to a more recent pollution incident from Penybont in May 2024.
- Working closely with DCWW and local authorities to identify and address misconnections within the catchment.
- Supporting the Vale of Glamorgan Council's work to review and consult on the Public Space Protection Orders covering dog restrictions, following studies proving the impact of dog faeces on beach water quality.
- Prioritising the permitted discharges in the catchment for further audits in the compliance programme 2024-5. This again comprises of a combination of site inspections, monitoring reviews and data audits.

It is worth noting that the nearest surrounding beaches to Ogmore, namely Southerndown, Trecco Bay, Sandy Bay and Rest Bay all achieved 'Excellent' classifications in 2023.

As I am sure the Committee will appreciate, these investigations are progressing well but are complex and require significant time and expense to fully work through, and often rely on supporting action from wider sectors. We expect this work will continue into the next water company Asset Management Period (AMP) and as part of ongoing Price Review process, NRW has stated it requires DCWW to investigate all failing bathing waters during AMP8 (2025-30). The details of what this will specifically entail are currently being finalised and are subject to Ofwat's final determinations due later this year.

The Committee may also be aware of the ongoing investigation into pollution sources in the Ogmore river catchment following the recent pollution incident at Penybont wastewater treatment works in May. Whilst the investigation has not yet concluded, it highlights the crucial role of Bathing Water Designation and the Bathing Water Regulations 2013. This

designation empowered NRW and the Local Authority to swiftly respond, safeguarding bathers' health by declaring an Abnormal Situation (AS). Without this designation, NRW and the Local Authority would not have been able to take such proactive measures when faced with potential pollution or other environmental issues, including providing public notices about potential risks and implementing necessary measures to address the problem. This underscores the effectiveness of the Regulations in protecting public health. As a precautionary measure, an AS was declared at Ogmored-by-Sea beach, emphasising the Regulations' role in prompt response and risk mitigation, thereby ensuring public safety until the situation is resolved.

To conclude, our bathing water programme is designed to identify poor bathing water quality and put measures in place so that locations can meet our expectations with classifications produced on an annual basis. A 'poor' classification in 2023 does not automatically preclude Watch House Bay or Ogmored from meeting the standards in future years once water quality issues are addressed. For example, Marine Lake bathing water had been designated 'poor' in 2022 but following collaborative working between NRW, DCWW and Denbighshire Council, Marine Lake met our stringent standards in 2023.

I hope this comprehensive reply is of use and many thanks for raising this important matter with me.

Yours sincerely,



**Huw Irranca-Davies AS/MS**

Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion Gwledig  
Cabinet Secretary for Climate Change & Rural Affairs

**P-06-1448 Stop pollution at Watchtower Bay and Ogmore by Sea –  
Correspondence from the Petitioner, 02 July 2024**

Dear Petitions Committee,

We would like to thank the Minister for his reply but we wish to bring the following to the attention of the members of the Petitions Committee:

1. Testing of water quality only takes place during the summer months, yet the rise in popularity of cold water swimming means that our rivers and seas are used throughout the year. Therefore to ensure that our marine and river wildlife, as well as swimmers and water sports people, are appropriately protected we believe that the testing should be carried out throughout the year.

2. The Knap lake has a large resident population of swans and other waterfowl and this water exits onto Watchtower beach. Therefore it seems sensible to ensure that this water is treated, which we presume is the responsibility of the Vale of Glamorgan Council.

Finally I would also update members that Barry Action for Nature and the Watchtower Waders have recently held a demonstration at the Watchtower to highlight their call for action, using the slogan "Just stop the crap!".

We hope your committee will support us to ensure that action is urgently taken to improve the water quality at both these locations in the Vale of Glamorgan.

Regards  
Rob Curtis



# Agenda Item 2.9

## **P-05-1456 I demand a full public enquiry into the closure of Welsh Air Ambulance bases in mid and North Wales**

This petition was submitted by Karl Ciz, having collected a total of 10,426 signatures.

### **Text of Petition:**

Recent announcement by Welsh Air Ambulance to close two bases and centralise its operations leaves whole swathes of Mid and Northwest Wales with inferior coverage. I believe the public need, and public opinion on the matter has not been listened to, and appeal to Welsh Government to intervene.

A full public enquiry should be launched.

### **Additional details:**

Many of us feel our rights to Air Ambulance coverage will be eroded, and especially those of us in the mid and Northwest of Wales where the distances to nearest Accident and Emergency facilities are often very distant. This is a lifeline for many of us and it must not be removed without a full public enquiry.

### **Senedd Constituency and Region**

- Dwyfor Meirionnydd
- Mid and West Wales



Eich cyf/Your ref P-06-1456  
Ein cyf/Our ref EM/05901/24

Jack Sargeant MS  
Chair  
Petitions Committee  
Senedd Cymru

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

03 July 2024

Dear Jack Sargeant MS,

Thank you for your letter of 13 June about Petition P-06-1456 calling for a public enquiry into the consolidation of the Emergency Medical Retrieval and Transfer Services (EMRTS) bases in Mid and North West Wales.

I acknowledge the strength of feeling among communities in Mid and North Wales about this issue.

The decision to consolidate services at a new base was made by the NHS Wales Joint Commissioning Committee with the intention to enable more people to receive the specialised critical care response provided by EMRTS when they need it and to enable people to be transferred as quickly as possible to the right clinicians to optimise their survival chances and outcomes. This aligns to our policy expectation for provision of the right care, in the right place, first time. We have been assured that this will enable more people across Wales, including in Powys and North Wales, to receive the specialised critical care response provided by EMRTS, if they need it.

I have been assured that this decision will also enable EMRTS to provide greater night coverage to people in North and Mid Wales who require their services, thus improving chances of better outcomes for people with life threatening conditions. This builds on current arrangements where night coverage is provided only from a base in Cardiff.

The experts involved in planning and delivering these services – the clinical director of EMRTS and the Wales Air Ambulance Charity – agree that consolidation of services is the right decision for the people of Wales.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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

[Gohebiaeth.Eluned.Morgan@llyw.cymru](mailto:Gohebiaeth.Eluned.Morgan@llyw.cymru)  
[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.

Assurance was provided in detail at the NHS Wales Joint Commissioning Committee meeting on 23 April 2024 about the quality of data used, the length and rigour of the engagement process and the value added by consolidating services.

The decision was – and should remain – the responsibility of the NHS Wales Joint Commissioning Committee. The committee was established for the purposes of jointly carrying out the function of planning, securing and commissioning of a range of specialist services, including EMRTS. It is not a decision for the Welsh Government to make and nor should an operational decision of this nature be one for Ministers to make.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. E. Morgan'.

**Eluned Morgan AS/MS**

Cabinet Secretary for Health and Social Care

Ysgrifennydd y Cabinet dros Iechyd a Gofal Cymdeithasol

# Agenda Item 3.1

## **P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Wales**

This petition was submitted by Dr Linda Evelyn Joyce-Jones, having collected a total of 308 signatures.

### **Text of Petition:**

In 1999 legislation was changed by the UK Government which allowed veterinary practices to be owned not just by qualified veterinary surgeons. This paved the way for private equity stakeholder corporates to buy into this market. These profit driven organisations have changed the profession so that it is barely recognisable. In many parts of Wales, it is virtually impossible to find an independently run veterinary practice. The corporate buyout now extends to out of hours provision, referral practices as well as general practice. The corporates also own laboratories, drug companies, pet crematorium as well as shares in many pets' food companies. Such a monopoly makes the few remaining independently run practices presence virtually untenable. From vet school to recruitment through to practice the corporates have the advantage. Set in this context their influence on bodies such as the RCVS and BVA is predicable.

### **Additional Information:**

For those of us with companion animals this monopoly has had devastating consequences. From lack of choice in finding an independent practice, seeing the same Veterinary Surgeon for continuity of care through to cost. But most of all clinical decisions being made with the policies of the corporate's taking centre stage.

My experience with My Cat Rosa sadly means I will always mistrust some within the profession. Companion animals are part of people's families. Covid, the isolation and mental health issues have made these relationships even more precious.

I dread to think (but have been informed) how the animal rescue sector in Wales copes. Because they must deal with some of the most abused and clinically challenged animals who have significant and often complex medical needs.



Despite numerous petitions to the UK Government, Department for Environment Food & Rural Affairs etc have failed to take any action whatsoever. Cymru has led the way before on animals and their welfare, so we ask our Senedd to do so again.

**Senedd Constituency and Region**

- Ynys Môn
- North Wales

# Agenda Item 3.2

## **P-06-1374 Bring Wales in line with England by allowing landowners 60 days tent and campervan camping a year**

This petition was submitted by Andrew Richard Walton, having collected a total of 430 signatures.

### **Text of Petition:**

During Covid Wales extended landowners' rights to allow tent and campervan/motor home camping from 28 days pa to 56. In 2022 it reverted to 28 days but a consultation was held around making 56 days law. A recent announcement by the Senedd put any permanent change on hold. As of July 2023 England has 60 days of permitted camping, putting Welsh landowners at a disadvantage. I urge the Senedd to look at the Town and Country Planning Order 2023 amendments and consider bringing them into Welsh law.

### **Additional Information:**

The new amendment passed in England in July 2023 allowing landowners 60 days of up to 50 tents and campervan/motor home camping per year, subject to some new regulations:

<https://www.legislation.gov.uk/ukxi/2023/747/article/3/made>

The Senedd response that the consultation in Wales had concluded and that changes to the pop-up campsite rules would be looked at in a future update of the planning permitted rights rules:

<https://record.senedd.wales/WrittenQuestion/87749>

I urge that this review is held now, and tries to be as consistent as possible with the English amendments so as not to disadvantage Welsh landowners like myself who want to diversify the use of their land in order to maintain an income in these difficult times for everyone.

### **Senedd Constituency and Region**

- Ceredigion
- Mid and West Wales

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



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

Eich cyf/Your ref P-06-1374  
Ein cyf/Our ref JJ/03356/23

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

petitions@senedd.wales

18 June 2024

Dear Jack

Thank you for your letter regarding petition P-06-1374. I have considered the petitioner's further correspondence.

Analysis of the 2022 consultation responses is ongoing, although my officials advise me that respondents were divided on the issue of retention of the extended permitted development rights for caravanning and camping introduced during the COVID pandemic. Consultation responses identified some important issues for consideration. These include the effect on local residents of additional exposure to noise, smoke and other disturbance through the year, and also road safety concerns about increased traffic on unsuitable rural lanes for a longer period.

Consideration of a 56-day temporary period for camping, subject to appropriate safeguards, continues as part of a broader package of permitted development right changes. Policy is still being developed for these changes and consultation will follow later this year.

Yours sincerely,

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

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.

**P-06-1374 Bring Wales in line with England by allowing landowners 60 days tent and campervan camping a year – Correspondence from Petitioner to Chair, 2 July 2024**

Good morning

Many thanks for letting me have the chance to respond to the letter from the Minister. Obviously I am very disappointed by the amount of time it has taken to get this far – the petition was last year, and it then took 6 months for a response from the Minister and even then the response was forced by the need to answer an FOI request, so I don't hold out much hope that the timescales quoted in the response (for a consultation on changes to permitted rights in Wales to be issued this year) will actually be adhered to.

I also want to return to the points made in the response about disruption, extra traffic on rural roads, noise and pollution.

I have looked through all the responses and the majority of the 118 responses which answered this question are in favour of the 56 days for pop-up camping being made permanent (I made it by around a factor of 2 to 1 in favour).

Something which gains such support must be deemed to be worth pursuing, after all, many politicians are elected on 35% support, and Brexit was delivered with 51% support.

As a land owner who operates under 28 days permitted rights I believe that extending to 56 days of operation a year will not instantly double the number of people camping, it will actually mean that sites like my own won't have to cram everyone possible onto the site to make money over 28 days, we can instead have a reduced number of people on site over 56 days, so the impact on any individual day on traffic and pollution should be reduced, and move evenly spread across the season – which will in turn help local businesses selling food and tourism attractions as well as, at the moment the 28 days allowed often covers Easter, 2 May bank holidays and the August Bank holiday period leaving no other weekends available in the season throughout June, July and August.

We must also remember that Wales has the most to gain from a change in the rules, with data from Visit Britain showing that 34% of holidays in Wales involve camping or caravanning compared to 20% in England and 21% in Scotland so there is a big opportunity to boost tourism and help the farming sector with this change. On Pitch-up.com pop-up campsites in Wales achieve a 9.2/10 rating compared with 9.1 out of 10 for regular sites so the pop-up sector is a quality alternative giving people value for money.

I urge the Minister to push forward with the proposed changes and get to a consultation as soon as possible so that businesses like mine can have some certainty ahead of the Easter 2025 season openings.

Many thanks  
Andrew Walton  
Tynrhos Camping and Fishing

# Agenda Item 3.3

## **P-06-1398 To act to increase the effectiveness of Natural Resources Wales in halting pollution on the Teifi**

This petition was submitted by Moira Williams, having collected a total of 1,321 signatures.

### **Text of Petition:**

The river Teifi is dying due to levels of pollution.

We call on the Senedd to increase the funding to Natural Resources Wales to enable it to fulfil its obligations in relation to the monitoring of the health of the river and the enforcement of legal requirements.

We also call upon the Senedd to ensure that Natural Resources Wales is held to account for its performance. This would help to safeguard the Teifi for future generations as proposed in The Wellbeing of Future Generations Act 2015.

### **Additional Information:**

Levels of pollution on the Teifi are high. Numbers of salmon, otter and other aquatic life are in serious decline.

The Teifi is a Special Area of Conservation that is under threat from pollution and climate change. Data provided by Natural Resources Wales indicate that its poor water quality means 78% of the water bodies in the catchment are classified as poor or moderate under the Water Framework Assessment.

Similarly, large sections of the river are failing phosphate target levels and a study by Natural Resources Wales indicates the Salmon and Lamprey populations are at risk of extinction in the next 15 years.

Climate change has resulted in low water levels in spring and higher water temperatures which have enhanced the growth of algal blooms and depleted oxygen levels in the water.

In 2022 the river experienced 1,889 sewage spills from combined sewage outfalls which lasted 14,079 hours, the 6th worst river in England and Wales for sewage spill duration.

### **Senedd Constituency and Region**

- Carmarthen East and Dinefwr
- Mid and West Wales

Jack Sargeant MS  
Petitions Committee Chair  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

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

14 June 2024

Dear Mr Sargeant

## **Petition P-061398 To act to increase the effectiveness of Natural Resources Wales in halting pollution on the Teifi**

Further to the Petitions Committee's consideration of this petition and your subsequent letter of 15 May, Natural Resources Wales (NRW) welcomes the opportunity to provide further information in relation to the question:

*"... what impact the budget settlement will have on your planned work to improve water quality and fulfil your obligations in relation to the monitoring of the health of the river and the enforcement of legal requirements."*

Public funding is exceptionally tight across the whole of the UK. As such, we are having to look across all of our remit and critically review what we can and must continue to do, what we stop, and what we slow or do differently to fulfil our [Corporate Plan](#) ambitions. This is no different to any other public sector body at the moment.

We have already taken significant steps to reduce our financial pressures, such as tighter recruitment controls and reducing use of agency and temporary contracts, and this is helping to safeguard permanent roles.

We are currently looking at options for managing our remaining pressures and this includes our staffing structure. We are aiming to mitigate job losses as much as possible. Despite this we have been able to set an overall budget of between £260m and £270m for this year, with which we can make substantial progress on the priorities we have set out in our Corporate Plan, including those related to improving water quality.

Over the last four years NRW has invested approximately £65m, received from Welsh Government, in targeting its fight against the Nature and Climate Emergencies (NaCE). The NaCE programme has delivered a range of projects across Wales aimed at improving our National Nature Reserves, protecting and enhancing SSSIs, restoring peatlands (by significantly reducing carbon emissions and actively storing more carbon from the environment) as well as looking to improve water quality from pollutants such as metal mines and land use, which will result in improving the habitat within our rivers for Salmon and Sea Trout. This is just the tip of the iceberg as there is more to do across Wales, not only to reduce the impact of the climate and nature emergencies but to start reversing the decline.

NRW is forecasting a further spend of £28m in 2024-25 and has prepared a planned programme up to 2030, subject to Welsh Government agreement and funding.

The Petitions Committee have been informed of NRW's key water quality projects and other work in the Teifi Catchment from the information provided in the [Research Brief](#) and [correspondence from the Minister for Climate Change](#). The following sections set out the funding source(s) of this planned work and any potential impact on delivery due to our current financial / resource pressures.

### **Teifi Demonstrator Catchment**

As stated in the [correspondence from the Petitioner to Committee](#), unfortunately our entry to Ofwat's Water Breakthrough Challenge 4 (catalyst stream) competition – supported by sixteen partner organisations – was unsuccessful. However, we remain committed to this innovative project and we are utilising funding from Dŵr Cymru Welsh Water (DCWW) to continue development and start delivery of the project this year. We have ringfenced a small number of key posts to lead the work.

DCWW have committed to lead an entry to Ofwat's Water Breakthrough Challenge 5 (transform stream) competition on behalf of the Teifi Partnership and NRW will be submitting other collaborative funding bids to supplement this and deliver other initiatives that emerged from the hackathon event in February.

The project has already started to deliver benefits to the catchment, including an evidence report, a data visualisation / story map proof of concept and alignment of other projects. Whilst progress has been made, delivery of the overall concept over the medium to long term is dependent on successful funding applications to Ofwat and others.

### **Monitoring**

NRW's water quality monitoring programmes are strictly prioritised following changes to staffing in 2019. The 2024 monitoring programme has been planned to be a similar size to the 2023 programme, but some elements of the invertebrate ecology and fish monitoring programmes will be reduced because of delays and limitations on our ability to recruit staff ie the recruitment controls referenced earlier. The document in Annexe 1 provides an overview.



NRW supports the development of citizen science through our work with the UK Environmental Observation Framework [Citizen Science resources](#) (UKEOF) and the Joint Nature Conservation Committee (JNCC). The JNCC website provides a useful summary of existing well established citizen science schemes: [Citizen science survey methods and tools | JNCC - Adviser to Government on Nature Conservation](#).

NRW asks groups seeking further advice in relation to undertaking citizen science projects to complete a simple online form which is designed to enable support to be allocated fairly across projects and groups: [Evaluation of external citizen science partnership proposals - Natural Resources Wales Citizen Space - Citizen Space \(cyfoethnaturiol.cymru\)](#)

### **Control of Agricultural Pollution Regulations (CoAPR)**

NRW has secured a funded Service Level Agreement (SLA) with Welsh Government specifically to undertake a programme of compliance and enforcement inspections on sites across Wales, where higher risk agricultural activities are carried out. This SLA has been funded initially for two years.

Higher risk activities are considered to be:

- Cattle farms with over 200 cattle – dairy and beef
- Poultry units with over 1000 birds
- Pig units over 50
- Any farms importing organic manures as defined under CoAPR, which includes livestock manures, digestate, biosolids and wastes recovered to land
- Notification of intent to participate in the Enhanced Nutrient Management Approach
- Farms which have been identified as a result of a recent pollution incident investigation and pose a risk to environment

Sites within the Teifi catchment where higher risk agricultural activities are carried out are included within this programme and will be inspected for compliance with the regulations during the lifetime of the SLA.

Other relevant planned work includes the following:

### **4 Rivers for LIFE**

This is a £9m project with 60% funding from the EU and the remainder from Welsh Government and a number of partners. The project started in 2021 and ends in December 2026 and covers the Teifi, Tywi, Cleddau and Usk catchments. Because of the ringfenced nature of the funding, we do not anticipate that NRW's 2024-25 budget settlement will have any significant impact on the project.

### **SAC Rivers Project**

The SAC Rivers Project has moved to a transitional phase where we will be ultimately (by April 2026) responding to the issue through our day-to-day activities rather than a dedicated project. We remain committed to our actions in the First Minister's [Relieving](#)

[pressures on Special Areas of Conservation \(SAC\) river catchments to support delivery of affordable housing: action plan \[HTML\] | GOV.WALES](#)

We have already delivered on several actions including publishing the NRW position on Constructed Wetlands, a Mitigation Measures Menu and clarifying acceptability of citizen science data. The Review of Permits is due to be completed by the end of July this year. This includes varying 27 DCWW permits within the Teifi catchment to include a phosphorus limit, of which 22 have already been amended.

NRW is also a member of the Nutrient Management Boards for each of the SAC Rivers including the Teifi with local staff representing NRW on the Board, the Technical Advice Group and the Stakeholder Group.

### **Wales Better River Quality Taskforce**

We continue to work with the Better River Quality Taskforce to develop action plans to gather greater evidence on the impact of [storm overflows](#) on our rivers, to reduce the impacts they cause, to improve regulation and to educate the public on sewer misuse.

### **Water Company Business Plans**

Our work to improve water quality in the Teifi and across Wales involves using evidence of the impact of a range of sectors to influence action. Informed by our evidence, water companies submitted their Price Review 2024 (PR24) business plans to Ofwat on 2 October 2023. These plans include investment to address the impact and risks that their operations place on the environment. Ofwat is now reviewing the submissions and will issue draft determinations on 11 July 2024 following the General Election, before final determination in December 2024.

We also undertake assessments of the water companies' environmental performance and publish this information to drive improvements.

### **Metal Mine Remediation Projects**

The Metal Mines Programme continues this year with ringfenced budget from Welsh Government, under NaCE referenced earlier, in line with the settlement of the previous year. The two significant mines on the Teifi – Abbey Consols and Esgair Mwyn – remain priorities within the programme and will be progressed appropriately within the available budget.

### **Fisheries Habitat Restoration**

The Inland Fisheries Habitat Restoration Programme is continuing this year. West Wales Rivers Trust has been awarded a NRW Strategic Allocated Fund (SAF) grant to deliver this work in west Wales, including for the River Teifi. The objective of this fund is to address the habitat degradation and barrier to migration pressures that are implicated in the decline of salmon and sea trout populations in Welsh rivers.

The source of this SAF grant is the NaCE funding from Welsh Government, which is ringfenced via a grant offer letter.

I trust that this provides assurance that our planned work in the Teifi catchment is progressing this financial year. We continue to carry out our roles in regulation, enforcement and incident response in the Teifi catchment. We always look to improve our performance on compliance assessment and prioritise our responses to enable us to take action on the most potentially harmful incidents reported to us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Clare Pillman', with a horizontal line underneath.

Clare Pillman

**Prif Weithredwr, Cyfoeth Naturiol Cymru**  
**Chief Executive, Natural Resources Wales**

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.  
Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

## Overview of NRW Water Quality Monitoring

Below is a table summarising NRW's current water quality monitoring across Wales under the Water Environment (Water Framework Directive) Regulations 2017 and related regulations.

Additional information is available at [Water Watch Wales \(naturalresourceswales.gov.uk\)](https://naturalresourceswales.gov.uk).

This monitoring is compliant with the Water Environment (Water Framework Directive) Regulations and in line with the standards set out by the UK Technical Advisory Group on the Water Framework Directive.

Also included in the table are other non-Water Framework Directive monitoring programmes. In addition, we run an annual programme of investigative monitoring. In 2024, across Wales this includes 409 sites monitored for water chemistry, 35 sites monitored for ecology and six sites for fish as part of 49 investigations.

NRW also carries out sampling as required as part of our response to individual pollution incidents.

**Number of sampling sites and frequency of sampling for the primary river monitoring programmes in Wales**

Status	Status component	Water body type	No. sampling sites (approx.)	Variable type	Frequency
Water Environment (Water Framework Directive) Ecological Status	Biology	Rivers	750 (total number: not all listed variables are recorded at all sites)	Macrophytes Diatoms Macro-invertebrates Fish	1x every (1 or) 3 years 2x every (1 or) 3 years 2x every year 1x every (1or) 6 years
	Phys-chem	Rivers	465	pH Ammonia Nitrate Nitrite Orthophosphate Dissolved oxygen Temperature Specific pollutants	Quarterly
Water Environment (Water Framework Directive) Chemical Status		Rivers	135	Nonylphenols, tributyl tin, pH, hardness, dissolved organic carbon, As, Ca, Cd, Cr, Cu Fe, Mn, Mg, Ni, Pb, Zn (not all listed variables are recorded at all sites)	Monthly or quarterly every year
Habitats Regulations		Rivers	103	BOD Ammonia Nitrate Orthophosphate Dissolved oxygen pH Temperature	Monthly
Regulatory		Permitted discharges to rivers	300	Temperature BOD Ammonia Suspended solids Oil and Grease	Variable (annual to monthly)



Eich cyf/Your ref P-06-1398  
Ein cyf/Our ref HIDCC/05546/24

Jack Sargeant MS  
Chair - Petitions committee

25 June 2024

Dear Jack,

Thank you for your letter of 30 May that highlighted additional issues raised by the Save the Teifi Community Group

I am pleased that Ofwat has agreed to work with NRW to develop and shape a future bid to their Innovation Fund, following the disappointing outcome of the Teifi Demonstrator bid. This funding would help amplify the work already taking place within the Teifi catchment.

Notwithstanding this, we have taken the issue of funding water quality improvements very seriously. Since 2022, Welsh Government has provided NRW with £40m capital funding to address water quality problems across Wales. This has included projects in the Teifi catchment.

Like the petitioners, I am pleased with how Dwr Cymru/Welsh Water (DCWW) are actively working towards reducing phosphorus in effluent from their operations in the Teifi. However, I recognise that phosphorus pollution can come from many different sources, including runoff from rural areas and businesses, wastewater infrastructure (including storm overflows and or sewage treatment works), misconnections from faulty plumbing and small private septic tanks and sewage treatment plants.

The causes, contributors and impacts of water pollution across Wales' rivers are varied and complex and as a result of this, each river requires different interventions. You will be aware that the former First Minister established the River Summit process and Rivers Action Plan in recognition of this and with the objective of bringing together the stakeholders with the relevant levers to enable a cross-sector approach to improving our rivers.

The Welsh Government has made nearly £1.5m available to Nutrient Management Boards, who are commissioned as locally led and democratically accountable boards to assess the extent and sources of pollution in each of their affected Special Area of Conservation (SAC) rivers, and to identify and support the delivery of targeted solutions. Each board is in the process of developing a nutrient management plan to address the challenges associated with phosphorus levels in their river. The work of the Teifi Nutrient Management Board is

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@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.

expected to give us a better understanding of nutrient levels in the river – a major cause of poor water quality – and help us to identify medium to the longer-term interventions required to support the restoration and improvement of our SAC rivers.

For many SAC rivers impacted by phosphorus pollution, rural land use has been identified as the main contributor. The Welsh Government's Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAP Regulations) are one tool the Welsh Government has put in place to address and mitigate the risks of water pollution from agricultural activities. Implementation has been spread over almost four years, with the final measures coming into force by the end of this year. This was done to give affected farm businesses more time to comply with one of the more challenging requirements.

To support the intended outcomes from the CoAP Regulations, we have offered over £31m of direct support towards on-farm infrastructure investments to help farmers meet the requirements. This investment has supported:

- the Nutrient Management Investment Scheme in 2022
- the Yard Covering Scheme via our Small Grants Offering
- the delivery of a Service Level Agreement (SLA) by NRW for the support and enforcement of the COAP Regulations,
- the Sustainable Production Grant (SPG).

We have also made an additional £20m of extra funding available across Wales to support compliance with these regulations.

Measures are already in place to limit the practice of bare over-wintered fields. Farmers in receipt of Basic Payments must adhere to cross compliance verifiable standards, which include requirements to provide minimum soil cover (GAEC 4) and for land to be managed in a way which limits soil erosion (GAEC 5). Additionally, the Enhanced Nutrient Management approach for the 2024 calendar year has introduced similar soil protection measures into the CoAP Regulations for farms undertaking the approach. This requires soils to be protected by ensuring that all land is covered by crops, stubbles, residues or other vegetation at all times, except where establishing such cover would create a significant risk of soil erosion and significant risk of nitrogen and phosphorus getting into surface water.

The CoAP Regulations require a review to be undertaken every 4 years on the effectiveness of the measures imposed by the Regulations as a means of reducing or preventing water pollution from agricultural sources and if necessary revise them. This review must be completed by April 2025 and it will provide an opportunity for the issues of bare soils and soil protection to be considered.

The Welsh Government has supported innovation in the relation to manure management, including supporting the Tywi Farm Nutrient Partnership management as well as a recent £1m Small Business Research Initiative addressing ammonia emissions from agriculture.

Legislative measures to limit rainwater from entering the existing sewer system have been in place since 7 January 2019. It is a requirement for all new developments in Wales with a construction area of 100 square metres or more to include Sustainable Drainage Systems (SuDS). The implementation of mandatory SuDS is already delivering multiple benefits. As befits a sustainable approach to managing drainage, SuDS relieve the ever-increasing pressure on the sewerage network. It also helps improve water quality by managing pollution at source, rather than relying on downstream interception or treatment. By slowing down the rate at which rainwater might enter the existing sewerage network, SuDS can also make a difference to the frequency of spills from Combined Storm Overflows (CSOs).

Following a criminal conviction of an environmental crime prosecuted under the Regulatory Enforcement and Sanctions Act 2008, Section 59 of the Act requires payment of any penalties (and interest etc) to be made to the the UK Treasury. However, where the law allows, the regulator Natural Resources Wales (NRW) will always seek to recover the costs of investigation and enforcement proceedings. Where NRW have carried out remedial works, they will seek to recover the full costs incurred from those responsible in accordance with the 'polluter pays' principle. Many of the regimes that NRW enforce already contain powers to serve specific notices that require the recipient to stop offending, to restore or remediate an affected environment or to come into compliance with regulatory requirements. These existing provisions may be used wherever appropriate. For example, regulation 57 'Remediation powers' of the Environmental Permitting Regulations 2010 (EP Regulations) grants NRW the 'power to prevent or remedy pollution and recover costs.

I along with NRW recognise the potential of citizen science to contribute to our evidence base on river pollution and am always open to novel proposals for ways to reach and capitalise on the input of volunteers across Wales.

Once again, thank you for writing to me on this important topic. I hope this information is helpful to the Committee and petitioner.

Yours sincerely,



**Huw Irranca-Davies AS/MS**

Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion Gwledig  
Cabinet Secretary for Climate Change & Rural Affairs



**P-06-1398 To act to increase the effectiveness of Natural Resources Wales in halting pollution on the Teifi – Correspondence from Petitioner to Committee, 2 July 2024**



Petitions Committee Chair  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

1 July 2024

Dear Petitions Committee members

We thank Natural Resources Wales and the Cabinet Secretary for Climate Change and Rural Affairs for their further responses to our petition of last year, and also the Petitions Committee for a chance to respond.

We continue to have concerns regarding funding of our regulator. The Demonstrator Project is a case in point. Time is slipping and the river does not have the time. We need action now. Biodiversity is still in decline – there appeared to be much promise of innovative and agile systems to tackle the situation on this and other failing SAC rivers, but at glacial speed. Another 6 months of waiting after the initial rejection of funding from Ofwat.

It has taken nearly a year for Ofwat to sign off DCWW's latest round of spending which includes the updated treatment plant at Cardigan, and that's before the building work even starts.

DCWW, although not by any means perfect, are starting to tackle the phosphate overload – albeit as some of our supporters say a little too late – and we hope their increasing transparency in working practice continues. We also trust that NRW will continue to hold them to account for breaches of permit and other pollution incidents, and will not cut corners on this.

We are pleased to hear that regulations of the agricultural sector are being strengthened – after DCWW this is the leading culprit for pollution in the Teifi. We strongly welcome financial incentives for farmers to move away from bare over-wintering fields and limit soil erosion into the river – this sediment issue is a big part of the problem around the loss of biodiversity. Increased inspections at high-risk farms are also welcomed, along with looking at innovative ways to dispose of slurry. However, an increase in peer-to-peer farmer-led change is essential if positive progress is to be achieved.

The Nutrient Management Boards, funded by the Welsh Government, would appear to be another cog in the wheel of agricultural change, with plans currently being drawn up, but again all happening too slowly. We all know change is needed but we fear Welsh Government doesn't have the will to tackle the farming bodies. The climb-down on the issue of 10% tree cover in the SFS is a case in point. Will the NMBs be another feasibility study when what we need is action now?

The concerns around NRW funding remain. They are continually having to cut contracts and re-fill posts due to financial constraints – at a time when they are needed more than ever. Our regulator needs teeth to conduct testing and inspections as well as enforce the existing regulations but it seems teeth are being removed. This is bound to have an impact on the planned delivery of scheduled water quality work – as seen in the timescale and frequency of testing for the Water Framework Directive. However, it is pleasing to know that the funding for the fish habitat restoration scheme and the 4 Rivers for Life project is ringfenced.

Is it too simplistic to believe that more NRW staff on the ground is the obvious way forward to mitigate the issues facing the Teifi? The regulations are in place. They need enforcing.

Save the Teifi citizen science volunteers are trying to fill in the gaps left by Welsh Government's lack of robust funding for NRW. We are working closely with West Wales Rivers Trust, the Nutrient Management Board and Ceredigion County Council on habitat/visual pollution monitoring as well as water quality testing. The Council is being proactive by providing equipment and indicating where additional data is required. Whilst we recognise that NRW have put in place a process to recognise citizen science projects we feel that a more proactive approach would provide them with greater support. They should indicate what data and which locations would support their activities and provide training (or outsource training) and equipment to deliver the work. The range of expertise within citizen science groups is considerable. People power works, but surely the issue is that our regulator needs to be working smarter?

In summary, the responses are all making the right noises but we continue to be concerned that meaningful action is too long in coming. The Teifi has no time to wait.

DCWW and the agricultural industry should have been tackled a very long time ago. Our rivers are suffering as a result. We continue to feel that the water companies, regulatory bodies and Welsh Government have failed in their responsibilities to this and future generations and must act faster to reverse the consequences of this inaction.

Save the Teifi community group.

# Agenda Item 3.4

**P-06-1335 Welsh Government should take steps to ensure vulnerable adults without bank cards can pay with cash**

This petition was submitted by Mencap Cymru, having collected 1,926 signatures online and 578 signatures on paper, making for a total of 2,504 signatures.

**Text of Petition:**

Mencap Cymru is concerned that the move to a cashless society will leave behind disabled people who cannot have access to electronic forms of payment.

In recent months people with a learning disability have been unable to pay for goods and services and have had to leave businesses empty-handed. Support workers are not permitted to use their own cards, and nor should they be.

This means they do not have equal access to goods and services with many businesses and organisations moving to cashless transactions.

**Senedd Constituency and Region**

- Cynon Valley
- South Wales Central

# Agenda Item 3.5

## **P-06-1437 Increase, don't cut, funding for the National Library, Amgueddfa Cymru and the Royal Commission**

This petition was submitted by Susan Jane Jones davies, having collected a total of 12,075 signatures.

### **Text of Petition:**

We call upon the Welsh Government to increase spending on institutions that safeguard the heritage and history of Wales – the National Library of Wales, Amgueddfa Cymru and the Royal Commission – instead of cutting funding by between 10.5 per cent and 22.3 per cent.

These institutions protect the historical and cultural legacy of our nation, by collecting and preserving it, and then showcasing it to everyone who lives in Wales. They also provide the world with a window to our unique history.

### **Additional details:**

Bearing in mind that every £1 invested in the sector leads to £5 worth of economic growth, the 0.02 per cent saving made in the national budget makes little sense.

Amid severe cuts to school budgets, and with Welsh society facing challenges in the context of poverty and failings in the provision of health and care services, holding on to the institutions that sustain and grow our country and our communities, thereby allowing future generations to build on the solid foundations of past successes, is as important as ever.

### **Senedd Constituency and Region**

- Ceredigion
- Mid and West Wales

# Agenda Item 4.1



Pro Bono and  
Employability

Pro Bono ac  
Cyflogadwyedd

**Cardiff University**

Law Building  
Museum Avenue  
Cardiff, CF10 3AX  
Wales, UK  
Tel +44(0)29 2087 6705  
[www.cardiff.ac.uk/law-politics](http://www.cardiff.ac.uk/law-politics)

**Prifysgol Caerdydd**

Adeilad y Gyfraith  
Rhodfa'r Amgueddfa  
Caerdydd, CF10 3AX  
Cymru, DU  
Tel +44(0)29 2087 6705  
[www.caerdydd.ac.uk/cy/law-politics](http://www.caerdydd.ac.uk/cy/law-politics)

Please reply to: [ProBono@cardiff.ac.uk](mailto:ProBono@cardiff.ac.uk)

11 April 2024

Land, Nature and Forestry Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ  
By email only [environmental.governance@gov.wales](mailto:environmental.governance@gov.wales)

Dear Welsh Government

**Consultation on the White Paper Securing a Sustainable Future - Environmental Principles, Governance and Biodiversity Targets for a Greener Wales**

The Environment Project is a pro bono extra-curricular project for law students at the School of Law and Politics at Cardiff University. The Project is not formally part of the assessment for any degree or professional course and the students volunteering on the Project range from second-year undergraduates to postgraduates to those on solicitor and barrister professional courses.

From 2022 into 2024, we have examined freedom of information, particularly the Environmental Information Regulations 2004, the rights they underpin, from which European and international law and convention they derive, how are they administered in the UK and how they might be reviewed in Wales to enhance their effectiveness.

Last year, we were very grateful to the Senedd Petitions Committee for considering its petition - [The Welsh Govt should take steps to save the Environmental Information Regulations in relation to Wales - Petitions \(senedd.wales\)](#) - which addressed the threat that arose in 2023, that the Retained EU Law Bill, as initially introduced in Westminster, would have 'sunset' the Environmental Information Regulations 2004, including in Wales.

As it happened, after the petition was opened, changes made on amendment during the passage of the Retained EU Law Bill, now enacted as the Retained EU Law (Revocation and Reform) Act 2023, took much of the 'sting' out of the Bill and the threat it posed to the Environmental Information Regulations 2004. However, the petition was a very useful exercise, and we are grateful to Jack Sargeant, the Chair of the Petitions Committee, the other Members of the Committee and to the Clerks.

As part of that petition process, a short Project report - *The Environmental Information Regulations 2004: Report of the Freedom of Information sub-group of the pro bono Climate and Environment Project of Cardiff University's School of Law and Politics 2022/2023* – was submitted to the Petitions Committee and shared by that Committee in November/ December 2023 with other Senedd Committees and with the Minister. That Report dealt with how the Environmental Information Regulations 2004 might be amended to improve them, by and for Wales. We received responses from the Chair of the Legislation, Justice and Constitution Committee, Mr Irranca-Davies, and the Minister for Climate Change, Julie James, both acknowledging the efforts made to assist the Welsh Government. The Report is appended to this letter for ease of reference

Turning to the White Paper, we have noted with some disappointment that it is entirely silent on the right of access to environmental information.

One of the main reasons for our disappointment is that the March 2020 *Report for the Environmental Governance Stakeholder Group – Environmental Governance in Wales Post-Exit From the European Union* recommended (Recommendation 4) that “the Aarhus Convention rights should be articulated and highlighted in any forthcoming legislation so that the Commission<sup>1</sup> could oversee the working of these rights in Wales” (at 3.4 of the Report, relevant extract at Annex 1 to this letter). The right of access to environmental information is, of course, one of the ‘three pillars’ of the Aarhus Convention.

Further, we had noted the Written Statement of the then Minister for Environment, Energy and Rural Affairs, Lesley Griffiths, which had expressly accepted Recommendation 4 - [Written Statement: Environmental Governance Stakeholder Task Group Report \(19 November 2020\) | GOV.WALES](#).

We understand the informal intention to keep the scope of the White Paper tight and not to allow ‘mission creep’. However, we do consider that for Welsh Ministers to take powers, perhaps closely analogous to those taken by Scottish Ministers in the Freedom of Information (Scotland) Act 2002, would enable Wales to ‘keep the door open’ for the Welsh Government, at some stage in the future, to pass Wales’ own Environmental Information (Wales) Regulations, to amend and improve upon the UK Regulations that currently apply in Wales (hopefully, with any future Welsh Regulations addressing some or all of the issues and suggestions identified in the attached Report).

Similarly, we consider that the Environment Governance Bill is the perfect vehicle to use to put on the statute book the provisions that would be required to establish a Welsh Information Commissioner, potentially akin to that in Scotland, to deal with access to environmental information in Wales. Again, that would enable Welsh Ministers to keep the door open to deal with such matters in Wales, information rights not being a ‘reserved matter’.

Importantly, neither the taking of requisite powers by Welsh Ministers, nor the making of provisions for the Senedd to nominate an Information Commissioner for Wales, while being entirely in line with the maturity of devolved government in Wales, would necessarily require Welsh Ministers or the Senedd to act immediately on either. For example, there would be no bar on postponing commencement of the relevant provisions, thereby allowing for plenty of time to consult widely on either matter at a later date.

However, it would be entirely in line with Lesley Griffiths’ response to the Stakeholder Group that the Environmental Governance Bill is the vehicle to use to make such provision, in advance of any future

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<sup>1</sup> Currently, the Interim Environmental Protection Assessor for Wales

work that may be done in Wales to continue the successful divergence of Welsh law on matters of the environment.

Conversely, we fear that if this Bill is not used, it is very unlikely that another appropriate Bill will find sufficient Senedd time for many years.

To that end, taking into account Welsh legislative drafting guidance, and drawing on the useful 'precedents' found in the Freedom of Information (Scotland) Act 2002, we have drafted appropriate clauses and draft Explanatory Notes, and we put these forward for the Welsh Government to consider when drawing up the Bill that is expected to follow the White Paper.

These are at Annex 2 to this letter.

The Environment Project at the School of Law and Politics at Cardiff University stands ready to assist further if that would be considered useful. Please do not hesitate to contact us at any stage.

We look forward to hearing from you. Please reply to: [ProBono@cardiff.ac.uk](mailto:ProBono@cardiff.ac.uk)

Yours faithfully,

Rosie Guzel  
Matilda Perkins  
Millie-Beth Conlin  
Oliver James  
Martha Regan  
Amreet Kaur Gill  
Thimoshi Don Menuwelge Perera  
Aleksander Ignacuik  
Gabriel Hill  
Luca North  
Jasmine Thomas  
Emily Jowitt  
Emily Safe  
Myles Thain  
Finna de Greef  
Lucy White  
William Collins  
Ysabel Vieira Pestana  
Alexander Coltas  
Hannah Matthews  
Olivia Russell  
Jolene Ng  
Shivendra Kanagasabai

Guy Linley-Adams  
Lecturer in Law  
Environment Project  
Pro Bono Unit  
Cardiff University School of Law and Politics



## Annex 1:

Extract from the Report from the Environmental Governance Stakeholder Group

<https://www.gov.wales/sites/default/files/publications/2020-11/report-from-the-environmental-governance-stakeholder-group.pdf>

“3.4

### **The pillars of the Aarhus Convention**

3.4.1 One final issue that sits between governance and principles but which the Group placed under the Governance heading are the rights under the Aarhus Convention. This UNECE Convention relating to environmental governance is usually referred to as the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (1998). Article 1 of the Aarhus Convention states that: “In order to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well being, each party shall guarantee the rights of

- access to information,
- public participation in decision-making, and
- access to justice

in environmental matters in accordance with the provisions of this Convention.”

3.4.2 This list contains what is widely referred to as the three pillars of the Aarhus Convention and they are not as such principles but rather rights conferred on citizens. The Aarhus Convention was signed by the EU on behalf of member states and certain of its provisions, particularly on information and participation, now appear in (retained) EU environmental law. The UK ratified this Convention in February 2005. As we have seen above, the EU (Withdrawal) Act and the draft Environment (Governance and Principles) Bill included these rights within the set of principles to be included in the statement of environmental principles though they do not now appear in the 2020 Bill. Arguably inclusion is not necessary since the UK has Treaty obligations to ensure that these rights are extended to citizens. Nonetheless, the question arises as to whether there may be value in rearticulating the three pillars in the context of a new governance framework for Wales. The new governance structures explained above are very much about the provision of environmental information, encouraging participation in environmental decision making and offering remedial measures as necessary. Consequently the group felt that **the Aarhus Convention rights should be articulated and highlighted in any forthcoming legislation so that the Commission could oversee the working of these rights in Wales.**”

## **Annex 2:**

### **Draft clauses drawing on 'precedents' in the Freedom of Information (Scotland) Act 2002**

#### **Clause [XYZ] - The Welsh Information Commissioner**

- (1) An officer known as the Welsh Information Commissioner (in this Act referred to as the "Commissioner") is established who is to be an individual appointed by His Majesty on the nomination of the Senedd.*
- (2) Subject to subsection (3), an individual is ineligible for appointment as the Commissioner at any time if—*
- (a) the person is or holds office in, or is an employee of, another Welsh public authority;*
  - (b) the person has held office as the Commissioner.*
- (3) The Senedd Commission may determine the terms and conditions upon which the Commissioner is to hold office, which may—*
- (a) prohibit the Commissioner from holding any other office, employment or appointment or engaging in any other occupation as specified in the terms and conditions of office or within a description so specified,*
  - (b) provide that the Commissioner's holdings of any such office, employment, or appointment or engagement in any such occupation is subject to the approval of the Senedd Commission.*
- (4) The Commissioner is entitled to—*
- (a) a salary of such amount; and*
  - (b) such allowances, as the Senedd Commission may determine.*
- (5) Subject to subsection (6), the Commissioner is to hold office for such period not exceeding eight years as the Senedd Commission, at the time of appointment, may determine.*
- (6) The Commissioner may be removed from office by His Majesty where the officer makes such a request as to be relieved.*
- (7) The Commissioner may be removed from office by His Majesty where –*
- (a) the Senedd Commission is satisfied that the Commissioner has breached the terms and conditions of office and the Senedd resolves that the Commissioner should be removed from office for that breach, or*
  - (b) the Senedd resolves that it has lost confidence in the Commissioner's willingness, suitability or ability to perform the functions of the Commissioner,*
- and, in either case, the resolution is voted by a number of members of the Senedd not fewer than two thirds of the total number of members.*
- (8) The validity of any actions of the Commissioner is not affected by a defect in the nomination by the Senedd for that officer's appointment.*
- (8) The Commissioner, in the exercise of that officer's functions (except the function of preparing accounts), is not subject to the direction or control of the Senedd Commission, of any member of the Welsh Government or of the Senedd.*

*(9) Where the office of Commissioner is vacant, the Senedd Commission may appoint a person (who may or may not be a member of the Commissioner's staff) to discharge the functions of that office until a new Commissioner is appointed, who—*

*(a) may be relieved of that appointment at that person's request;*

*(b) may be removed from office by the Senedd Commission by notice in writing given by them;*

*(c) in other respects, holds office on such terms and conditions as the Senedd Commission may determine; and*

*(d) while holding that appointment, is to be treated for all purposes as the Commissioner, except those of subsections [XYZ] to [XYZ] and those of paragraph [XYZ] of schedule [XYZ]. [relating to provision for a pension]*

*(10) The Commissioner may—*

*(a) obtain advice, assistance or any other service from any person who, in the opinion of the Commissioner, is qualified to give it; and*

*(b) Subject to subsection (c), the Commissioner may pay to that person such fees and allowances as the Commissioner determines; and*

*(c) Any payment is subject to the approval of the Senedd Commission.*

*(11) Any function of the Commissioner may be exercised on behalf of that officer by any person (whether or not a member of that officer's staff) authorised by the Commissioner to do so (and to the extent so authorised).*

*(12) The Senedd Commission is to pay—*

*(a) the salary and allowances of the Commissioner;*

*(b) Subject to subsection (13), any expenses properly incurred by that officer in the exercise of functions under this Act so far as those expenses are not met out of sums received and applied by that officer under this section; and*

*(c) any sums payable by virtue of subsections [XYZ] to, or in respect of, a person who—*

*(i) is appointed under subsection (9); or*

*(ii) has ceased to hold office by virtue of having been so appointed.*

*(13) The Senedd Commission is not required to, but may, pay any expenses incurred by the Commissioner, which do not exceed or are otherwise not covered by a budget, or as the case may be, revised budget approved budget under para XYZ of schedule XYZ.*

*(14) The Senedd Commission is to indemnify the Commissioner in respect of any liabilities incurred by the Commissioner in the exercise of the Commissioner's functions under this Act.*

*(15) Schedule [XYZ] to this Act has effect with respect to the Commissioner.*

**Explanatory Note to clause [XYZ] – The Welsh Information Commissioner**

XYZ .This clause provides as to the appointment of the Welsh Information Commissioner and the basis on which that office is held.

XYZ .Under clause [XYZ] the Commissioner will be appointed by His Majesty on the nomination of the Senedd. The Senedd Commission will determine the Commissioner’s salary, allowances and other terms and conditions. The Commissioner will hold office for a term not exceeding 8 years and for no longer than 2 terms unless re-appointment for a third is desirable in the public interest. The Commissioner retires at the end of the calendar year in which the age of 65 is reached, and can be removed from office by His Majesty following a resolution of the Senedd passed by a majority of no less than two thirds of the total number of members of the Senedd.

XYZ .Under clause [XYZ] the Commissioner is not subject to the direction or control of the Senedd, the Senedd Commission or any member of the Welsh Government, except in relation to the preparation of accounts which must be in accordance with any directions provided by the Senedd Commission and the appointment of staff which requires the approval of the Senedd Commission.

## **Schedule [XYZ] - The Welsh Information Commissioner**

### *Status*

1.

*(1) The Commissioner and that officer's staff are not to be regarded as servants or agents of the Crown or as having any status, immunity or privilege of the Crown; and the Commissioner's property is not to be regarded as property of, or property held on behalf of, the Crown.*

*(2) The Commissioner is, as such, to be regarded as a juristic person distinct from the natural person holding the office.*

### *Pensions, allowances etc*

2.

*(1) The Senedd Commission may arrange the payment of pensions, allowances or gratuities to, or in respect of, any person who has ceased to hold the office of Commissioner and (without prejudice to that generality) may—*

*(a) make contributions or payments towards provision for such pensions, allowances or gratuities; and*

*(b) establish and administer pension schemes.*

*(2) The references to pensions, allowances, and gratuities in sub-paragraph (1) could include pensions, allowances, or gratuities by way of compensation for loss of office.*

### *Staff*

3.

*(1) The Commissioner may appoint such staff, on such terms and conditions, as that officer may determine.*

*(2) The Commissioner may make arrangements for the payment of pensions, allowances or gratuities to, or in respect of, any person who has ceased to be a member of such staff and (without prejudice to that generality) may—*

*(a) make contributions or payments towards provision for such pensions, allowances or gratuities; and*

*(b) for the purposes of this sub-paragraph, establish and administer one or more pension schemes.*

*(3) The references in sub-paragraph (2) to pensions, allowances and gratuities include references to, as the case may be, pensions, allowances or gratuities by way of compensation for loss of employment.*

*(4) The exercise of a power in sub-paragraph (1) or (2) is subject to the approval of the Senedd Commission.*

### *Accountable officer*

4.

*(1)The Senedd Commission is to designate the Commissioner or a member of that officer’s staff as the accountable officer for the purposes of this paragraph.*

*(2)The functions of the accountable officer are—*

*(a)those specified in sub-paragraph (3); and*

*(b)where the accountable officer is not the Commissioner, the duty set out in sub-paragraph (4),and the accountable officer is answerable to the Senedd for the exercise of those functions.*

*(3)The functions referred to in sub-paragraph (2)(a) are—*

*(a)signing the accounts of the expenditure and receipts of the Commissioner;*

*(b)ensuring the propriety and regularity of the finances of the Commissioner; and*

*(c)ensuring that the resources of the Commissioner are used economically, efficiently and effectively.*

*(4)The duty referred to in sub-paragraph (2)(b) is a duty, where the accountable officer is required to act in some way but considers that to do so would be inconsistent with the proper performance of the functions specified in sub-paragraph (3), to—*

*(a)obtain written authority from the Commissioner before taking the action; and*

*(b)send a copy of that authority as soon as possible to the Auditor General.*

#### *Budget*

*5.*

*(1) The Commissioner must prepare a budget to lay out use of funds before the start of each financial year. This budget must be sent to Welsh ministers for approval by the date determined by them.*

*(2) The Commissioner may prepare a revised budget during a financial year, which would cover the remainder of the financial year. This must be sent to Welsh ministers for approval.*

*(3) In preparing a budget or revised budget, the Commissioner must ensure that their resources will be used economically, efficiently, and effectively; and*

*(4) All budgets and revised budgets must contain a statement confirming that the Commissioner has complied with sub-paragraph (3).*

#### *Accounts*

*6.*

*(1)The Commissioner must—*

*(a)keep accounts; and*

*(b)prepare annual accounts in respect of each financial year,*

*in accordance with such directions as the Scottish Ministers may give that officer.*

*(2)The Commissioner must send a copy of the annual accounts to the Auditor General for Wales for auditing.*

*(3)The financial year of the Commissioner is—*

*(a)the period beginning with the date on which the Commissioner is appointed and ending with 31st March next following that date; and*

*(b)each successive period of twelve months ending with 31st March.*

*(4)If requested by any person, the Commissioner must make available at any reasonable time, without charge, in printed or in electronic form, the audited accounts, so that they may be inspected by that person.*

#### *General powers*

*7.*

*(1) The Commissioner may do anything which appears necessary or expedient for the purpose of, or in connection with, or which appears conducive to, the exercise of that officer's functions; and without prejudice to that generality, may in particular—*

*(a)acquire and dispose of land and other property; and*

*(b)enter into contracts.*

*(2)The exercise of the power to acquire or dispose of land is subject to the approval of the Senedd Commission.*

#### *Location of office*

*8.*

*The Commissioner must comply with any direction given by the Senedd Commission as to the location of the Commissioner's office.*

#### *Sharing of premises, staff, services and other resources*

*9.*

*The Commissioner must comply with any direction given by the Senedd Commission as to the sharing of premises, staff, services or other resources with any other officeholder or any public body.*

#### *Restrictions on subsequent appointments etc.*

*10.*

*(1)A person who has ceased being the Commissioner may not, without the approval of the Senedd Commission—*

*(a)be employed or appointed in any other capacity by the Commissioner,*

*(b)be a Welsh public authority or hold office in, or be an employee or appointee of, a Welsh public authority, or*

*(c)hold any other office, employment or appointment or engage in any other occupation, being an office, employment, appointment or occupation which, by virtue of section [XYZ], that person could not have held or, as the case may be, engaged in when Commissioner.*

*(2)The restriction in sub-paragraph (1)—*

*(a)starts when the person ceases to be the Commissioner, and*

*(b)ends on the expiry of the financial year next following the one in which it started.*

**Explanatory Note to Schedule [XYZ] – The Welsh Information Commissioner**

XYZ. This schedule sets out various matters relating to the Welsh Information Commissioner.

XYZ. Paragraph 1 provides that the Commissioner, and his or her staff and property, are independent of the Crown and do not have any status, immunity or privileges of the Crow

XYZ. Paragraph 2 provides that the Senedd Commission may make arrangements for the payment of pensions, allowances or gratuities to former Commissioners (including compensation for loss of office).

XYZ. Paragraph 3 provides that the Commissioner may appoint staff, on such terms and conditions as that officer may determine, and(2) may make arrangements for the payment of pensions, allowances or gratuities to former members of staff (including compensation for loss of employment). However, the Commissioner will require the approval of the Senedd Commission in these matters.

XYZ. Paragraph 4 provides that the Commissioner, or a member of his or her staff, will be designated by the Senedd Commission as accountable officer for the office of the Commissioner. The functions of the accountable officer are to sign accounts, ensure propriety and regularity of finances, and ensure that resources are used economically, efficiently and effectively. The accountable officer is answerable to the Parliament for the exercise of the functions provided for under this paragraph.

XYZ. Paragraph 6 provides that the Commissioner must prepare and keep accounts, in accordance with any directions the Senedd Commission may give, and send a copy of the annual accounts to the Auditor General for Wales for auditing. The Commissioner’s audited accounts must be made publicly available, subject to certain conditions. The Commissioner’s financial year runs from 1<sup>st</sup> April to 31<sup>st</sup> March.

XYZ. The Commissioner is provided with powers in paragraph 7 to do anything which appears necessary or expedient for the purpose of, or in connection with, or which appears conducive to, the exercise of the functions of the Commissioner, and in particular may acquire or dispose of land and other property, and enter into contracts

[check para numbers]



## **Clause XYZ - Power to make provision relating to environmental information**

*(1) In this section “the Aarhus Convention” means the Convention on Access to Information, Public Participation in Decision making and Access to Justice in Environmental Matters signed at Aarhus on 25th June 1998.*

*(2) For the purposes of this section, “the information provisions” of the Aarhus Convention are Article 4, together with Articles 3 and 9 so far as relating to that Article.*

*(3) The Welsh Ministers may, in relation to information held by or requested from any Welsh public authority, by regulations make such provision as they consider appropriate—*

*(a) for the purpose of implementing the information provisions of the Aarhus Convention or any amendment of those provisions made in accordance with Article 14 of the Convention; and*

*(b) for the purpose of dealing with matters arising out of, or related to, the implementation of those provisions or of any such amendment.*

*(4) Regulations under subsection (3) may in particular—*

*(a) enable charges to be made for making information available in accordance with the regulations;*

*(b) provide that any obligation imposed by the regulations in relation to the disclosure of information is to have effect notwithstanding any enactment or rule of law;*

*(c) make provision for the issue by the Welsh Ministers of a code of practice;*

*(d) provide for the general functions of the Commissioner and recommendations as to good practice to apply in relation to such a code with such modifications as may be specified in the regulations;*

*(e) provide for enforcement of compliance with any requirement of the regulations; and*

*(f) contain such transitional or consequential provision (including provision modifying any enactment) as the Welsh Ministers consider appropriate.*

## **Explanatory Notes to clause XYZ - Power to make provision relating to environmental information**

This clause provides that the Welsh Ministers may make regulations to implement the “Aarhus Convention” – a United Nations Economic Commission for Europe (UNECE) Convention, which the UK (and all other European Union Member States) signed at Aarhus in Denmark in 1998.

The Convention deals with access to information, public participation in decision-making and access to justice in environmental matters. To meet the requirements of the Convention in Wales, Welsh regulations may be made. It should be noted that these regulations will implement only those provisions of the Aarhus Convention which relate to access to environmental information.

This clause will allow the creation of a revised free-standing access regime in Wales for environmental information, replacing the current EIRs (the Environmental Information Regulations

2004). Clause [XYZ] gives the Welsh Ministers power to make regulations to implement those Articles of the Aarhus Convention which relate to the provision of access to environmental information. The regulations may include provisions for the purpose of dealing with matters arising from those Articles, or amendments to them. This clause permits the regulations to include provisions enabling charges to be made in connection with the disclosure of environmental information.

Clause [XYZ] also gives Welsh Ministers power to make provision for enforcement of the regulations. The regulations may also make provision for a code of practice to be issued by the Welsh Ministers to apply to any authority, persons or body (as defined in the Convention) subject to the regulations. The regulations may also make provision for any transitional or consequential provisions that are appropriate.

Ken Skates AS/MS  
Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru  
Cabinet Secretary for North Wales and Transport



Eich cyf/Your ref P-06-1408  
Ein cyf/Our ref KSNWT/05202/24

Llywodraeth Cymru  
Welsh Government

Jack Sargeant MS  
Chair - Petitions committee  
Government.Committee.Business@gov.wales

14 June 2024

Dear Jack,

Thank you for your letter of 8 April regarding Petition P-06-1408 Make safe the access to the Secret Garden A4042 Goytre Fawr for both pedestrians and vehicles.

I have passed your letter to my officials and asked them to consider the further points and questions raised by the petitioner which are all relevant to the design process at the Secret Garden.

It is recognised that the bus stops identified lack accessibility. There is a desire to improve this with footway connections to these on both sides of the carriageway. We take highway safety very seriously and any design will be accompanied with appropriate signs. As a further check on safety, all schemes are required to follow the relevant stages of the Road Safety Audit process.

With regard to Active Travel links on the A4042 corridor at this location, Transport for Wales are leading with their Pathfinder Project which is seeking to bring highway authorities and stakeholders together for the overall aspirations of a Pontypool to Usk link. Subject to funding and prioritisation, it is likely that the first phase of this would be on the A4042 corridor and it would make sense where possible, to connect local points of interest such as the Secret Garden.

As for the public right of way, although this is not part of the A4042 corridor, the scheme would seek to maximise accessibility and therefore be likely to facilitate connection opportunities.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken', is written over a light blue horizontal line.

**Ken Skates AS/MS**  
Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru  
Cabinet Secretary for North Wales and Transport

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Ken.Skates@llyw.cymru](mailto:Gohebiaeth.Ken.Skates@llyw.cymru)  
[Correspondence.Ken.Skates@gov.wales](mailto:Correspondence.Ken.Skates@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.