

Agenda – Petitions Committee

Meeting Venue:

Committee Room 1 – Senedd

Hybrid

Meeting date: 28 April 2025

Meeting time: 14.00

For further information contact:

Gareth Price – Committee Clerk

0300 200 6565

Petitions@senedd.wales

1 Introductions, apologies, substitutions and declarations of interest

2 New Petitions

2.1 P-06-1497 End Welsh Govt funding of animal experiments and divert funds to modern, human-relevant technologies

(Pages 1 – 11)

2.2 P-06-1504 Save Pembroke Pool – Improve Don't Remove

(Pages 12 – 20)

2.3 P-06-1509 Fund music education for future generations in the “land of song”

(Pages 21 – 29)

2.4 P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham

(Pages 30 – 63)

3 Updates to previous petitions

3.1 P-06-1184 Immediately ban the use of toxic lead in all ammunition in Wales... lead is killing our wildlife!

(Pages 64 – 67)

3.2 P-06-1242 Improve Endometriosis Healthcare in Wales

(Pages 68 – 74)



- 3.3 P-06-1335 Welsh Government should take steps to ensure vulnerable adults without bank cards can pay with cash
(Pages 75 – 77)
- 3.4 P-06-1350 Re-open Dyfi Ward at Tywyn Hospital now
(Pages 78 – 86)
- 3.5 P-06-1389 Introduce a 30mph limit on the trunk road through the villages of Eglwys Fach and Ffwrnais
(Pages 87 – 90)
- 3.6 P-06-1391 Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners
(Pages 91 – 93)
- 3.7 P-06-1405 We want and need a Mental Health unit for men in North Wales with beds
(Pages 94 – 95)
- 3.8 P-06-1430 Support deaf children by making a financial commitment to restoring Teacher of the Deaf numbers
(Pages 96 – 99)
- 3.9 P-06-1483 Give neighbours their say when holiday let owners start applying for licences
(Pages 100 – 108)
- 3.10 P-06-1494 Welsh Government to protect funding in education from WG and Local Authority cuts
(Pages 109 – 115)

4 Papers to note

- 4.1 P-06-1447 Stop Natural Resources Wales closing the visitor centre at Ynyslas National Nature Reserve
(Pages 116 – 119)
- 4.2 P-06-1474 Stop Natural Resources Wales closing Bwlch Nant yr Arian, Coed y Brenin & Ynyslas visitor centres

5 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the meeting for the remainder of today's business:

6 Petitions on Higher Education funding

(Pages 120 – 121)

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

(Pages 122 – 150)

Document is Restricted

P-06-1497: End Welsh Govt funding of animal experiments and divert funds to modern, human-relevant technologies.

Y Pwyllgor Deisebau | 28 Ebrill 2025
Petitions Committee | 28 April 2025

Reference: SR25/10747-2

Petition Number: P-06-1497

Petition title: End Welsh Govt funding of animal experiments and divert funds to modern, human-relevant technologies.

Text of petition: Over 39,000 animal procedures took place in Wales in 2022, an increase on 2021. However polls show most people oppose animal research, favouring new technologies. (South Wales Argus April 2021)

Four Welsh universities (Aberystwyth, Bangor, Cardiff and Swansea) conduct animal studies. Yet the Welsh Govt is being urged by the Senedd's Cross Party Group on Medical Research (2023 inquiry report) to increase its QR funding to unis and to incentivize the sector in order to accrue economic benefits.

More details

The expansion of medical research without scrutiny of how the money is spent should be a cause of concern to the Welsh people, as public funded research is paid for primarily through taxation. Investment in innovative science such as organ-on-a-chip, 3D bioprinting and computer modelling is called for. It is these technologies, based on human biology, that can boost the economy, strengthen the NHS and deliver for patients. Animal studies, apart from causing immense suffering, are unreliable, costly and block rather than advance medical progress.



Given the Labour Government's manifesto pledge to 'partner with scientists, industry, and civil society as we work towards the phasing out of animal testing' it seems an ideal opportunity to modernise research in Wales. By scrutinising how its financial contribution is used and directing funds to human relevant methods, the Welsh Government can set an example and encourage industry and the charitable sector to follow suit.

1. Background

1.1. Regulation of animal testing

Although animal welfare is a devolved area, scientific testing on animals is reserved to the UK Parliament.

A [House of Commons Library publication](#) (July 2023) provides background to the issue of animal testing in Great Britain, including statistics, trends and the relevant legislation.

The [Animals \(Scientific Procedures\) Act 1986](#) (the '1986 Act') regulates the use of 'protected animals' in any experimental or other scientific procedure which may cause pain, suffering, distress or lasting harm to the animal. Protected animals in the 1986 Act are defined as any living vertebrate (other than humans) and any living cephalopod (marine animals such as octopus and squid).

Licences are required from the Home Office to test on animals protected under the 1986 Act. The UK Government has [produced guidance on these licences and their conditions](#).

1.2. Scale and nature of animal testing in Great Britain

On the scale of animal testing in Great Britain, the 2023 [House of Commons publication states](#):

Pandemic aside, the annual number of procedures has been [falling steadily since 2015](#), a year in which 4.1 million procedures on animals were carried out. The number in 2022 was 33% or around a third lower than this.

Numbers peaked in the 1970s, at around 5.6 million per year, before falling to around 2.7 million per year in the 1990s and early 2000s. The way in which procedures were recorded changed in 1987, which means figures before and after this date are not directly equivalent.

The House of Commons Library publication sets out the experimental procedures and the level of harm caused, and the animals commonly used:

Around four in ten recorded procedures involve the creation or breeding of genetically altered (GA) animals. These procedures are almost all rated 'sub-threshold' or 'mild' in terms of severity, meaning the harm and/or discomfort they cause. The severity rating of a procedure is determined according to criteria set out in ASPA [the Animals (Scientific Procedures) Act 1986].

Most experimental procedures cause some degree of harm (ranked 'mild', 'moderate', or 'severe'). In 4% of procedures carried out in 2022 the animal did not recover.

Four fifths of procedures in 2022 involved rodents, and two thirds of all procedures involved mice. Since 2007, fish have been the second most common animal used; before this it was rats.

1.3. UK Government policy

The UK Government published a policy in 2014 (under the 2010 to 2015 Conservative and Liberal Democrat coalition government) to limit the number of animals used in science through "replacement, reduction, and refinement" of research design - the '3Rs'. This requires licence applicants to demonstrate non-animal alternatives have been considered as far as possible. There is a delivery plan on the 3Rs.

You may wish to be aware of a UK Parliament petition calling for animal experiments to be phased out. It attracted over 100,000 signatures and was debated in the UK Parliament in October 2021. The UK Government response to the petition said:

The Government funds and supports the development of techniques that replace, reduce and refine the use of animals in research (3Rs). This is primarily delivered by the National Centre for the 3Rs.

Another UK Parliament petition, to ban the use of dogs for testing and research purposes in the UK, received over 32,000 signatures. The topic was debated in February 2024. The UK Government responded:

The government does not agree to the proposed ban. Testing would continue in other countries. The UK still requires such data to ensure the safety of medicines before testing in humans.

2. Welsh Government action

2.1. Funding medical research

The petition highlights animal experiments are conducted at Welsh universities.

The Welsh Government's letter on this petition states:

The four Welsh universities which have had staff, premises and experiments licenced under the 1986 Act have all signed up to the 3Rs principles (Reduce, refine, replace) and the Concordat on Openness on Animal Research. These are coordinated by the National Centre for the 3Rs, which has several funding schemes to enhance and increase alternatives to animal testing. One example is the Cardiff University 'micro-lung', developed using human tissue left from operations.

The Welsh Government provides funding to universities via Medr - the Commission for Tertiary Education and Research. Medr is responsible for funding and regulating the tertiary education and research sector in Wales.

Part of the funds are for Quality Related (QR) funding which provides for longer-term strategic investment in an institution's research base. The amount received by each institution is based on a formula linked to their performance in the Research Excellence Framework (REF).

The Welsh Government's letter on this petition highlights that neither the Welsh Government nor Medr specifies how institutions use this funding:

Universities are autonomous institutions, free to decide on their research priorities and therefore how they will use this funding.

Senedd Research is unaware of how much research funding is spent on animal testing.

3. Welsh Parliament action

This issue has not been raised in detail during Senedd business.

The petition references the [Senedd Cross-Party Group on Medical Research 2023 report](#). The report advocated for more spending on medical research, but didn't address the issue of experimenting on animals.

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.

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Your ref P-06-1497
Our ref HIDCC/00214/25

Carolyn Thomas MS
Chair - Petitions committee

petitions@Senedd.wales

31 March 2025

Dear Carolyn,

Thank you for your letter of 3 February concerning the recent Senedd petition on animal experiments. The first point to make is that animal experimentation is not a devolved matter. The Animals (Scientific Procedures) Act 1986 and predecessor legislation has been overseen by the UK's Home Office for many decades.

The four Welsh universities which have had staff, premises and experiments licenced under the 1986 Act have all signed up to the 3Rs principles (Reduce, refine, replace) and the Concordat on Openness on Animal Research. These are coordinated by the National Centre for the 3Rs, which has several funding schemes to enhance and increase alternatives to animal testing. One example is the Cardiff University 'micro-lung', developed using human tissue left from operations.

The Welsh Government provides funding for Medr (and formerly HEFCW). Medr then distributes this funding to universities. Part of the funds will be for Quality Related (QR) funding. This provides stability of funding for longer-term strategic investment in an institution's research base. The amount received by each institution is based on a formula linked to their performance in the Research Excellence Framework (REF).

Neither the Welsh Government nor Medr, however, specify how institutions use this funding. Universities are autonomous institutions, free to decide on their research priorities and therefore how they will use this funding.

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

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

I hope this provides useful context and background on the petition.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name 'Huw Irranca-Davies'.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

P-06-1497 End Welsh Govt funding of animal experiments and divert funds to modern, human-relevant technologies – Correspondence from the Petitioner to the Committee, 13 April 2025

Response to the Deputy First Minister's letter dated 31.3.25 concerning Petition 246343

Please be assured that we are aware that animal experimentation is not devolved to Wales. Our petition did not ask the Welsh Government to end animal experiments as this is not in its gift. Rather, we invited the Welsh Government to take the initiative of ending its own funding of such procedures and thereby encourage industry and the charitable sector to follow suit.

The importance of the biomedical sector to the Welsh economy is not disputed, but we believe that the expansion of the sector as urged by the Senedd Cross Party Group on Medical Research (CPG) requires input from the Welsh Government in terms of direction. It's not simply a question of allowing scientists to determine their own priorities, as expansion would inevitably result in an increase in animal use. This would fly in the face of the UK Government's pledge to 'partner with scientists, industry, and civil society as we work towards the phasing out of animal testing' and would be disastrous on ethical, economic and scientific grounds. A growing body of scientific literature documents the poor reliability and predictive value of animal studies for human health outcomes due to biological species differences. A reliance on animal data can lead to ineffective or harmful treatments in clinical trials and the loss of potential new therapies.

The economic benefits to be accrued by attracting more charity-funded medical research to Wales, as forecast by the CPG, would also be at the cost of increased animal use, as the Association of Medical Research Charities (AMRC) **demands** that members publicly declare support for animal experiments.

We acknowledge that the National Centre for the 3Rs (NC3Rs) was established in 2004 to ensure delivery of the 3Rs principles, as compliance with these principles is a legal requirement in the UK under the Animals (Scientific Procedures) Act 1986. The act states that 'wherever possible, a scientifically satisfactory method or testing strategy not entailing the use of protected animals must be used instead of a regulated procedure'. The 3Rs initiative has served to reassure both the public and policy makers that animals are being adequately protected. However, almost 20 years later in 2023, a report commissioned by the NC3Rs itself was published in recognition of the fact that the oversight mechanisms concerning project licence applications were not working satisfactorily. The report, [The role of review and regulatory approvals processes for animal research in supporting implementation of the 3Rs](#) explained that most academic research involving animals is externally funded from public sector or charitable bodies. It revealed that, despite a costly three-tier review system of project licence applications, the replacement of animals in experimental design was not being adequately observed, clearly contravening the 3Rs principles. The author of the report, Dr Frances Rawle, former Director of Policy, Ethics and Governance at the Medical

Research Council, interviewed/surveyed key stakeholders including chairs of Animal Ethics Bodies, current and former Home Office inspectors, establishment, project and personal licence holders and senior scientists, amongst others. In conducting a 'detailed review of the current 3Rs landscape' Dr Rawle identified several key reasons why replacement often fails to happen.

The reasons cited for animal methods being favoured include: the time and cost involved in setting up new techniques in a laboratory, a lack of expertise on alternative methods, concern by researchers about their chance of being funded or being published and concern for their career prospects. A reluctance on the part of reviewers to find fault with a colleague's application in the knowledge that their own licence would be coming round for review in due course also came to light. Furthermore, the 3-tier project licence review system is skewed in favour of such studies as the Animal Welfare & Ethical review (AWERB) and Regulator reviews take place after funding has been secured. Dr Rawle concludes that challenging the use of animals is rare after the initial funding stage as the reviewers 'do not (and could not)' have the in-depth scientific expertise required to know what alternatives are available. She further acknowledges that project licences are very rarely refused. It is sadly evident, contrary to what those in favour of animal experimentation may say, that sentient animals are being harmed and killed unnecessarily in our universities, in contravention of the law.

Since submitting the petition, we have been keeping abreast of developments connected to the UK Government's manifesto pledge. It has become apparent that some policy makers have accepted the argument that animals are required to observe the effects of an intervention or drug on an entire body system. The phasing out of animal experiments is therefore seen as a long-term goal. But fully utilising alternative methods need not take many years. Researchers have a large toolbox to choose from and human cell technologies such as organ-on-a-chip, combined with in silico methods such as computational modelling and AI can create a complex picture of how drugs or interventions will work in a human body and are thus superior to that of say a mouse model - the *wrong* body system. There are key differences between species, as expressed in anatomy, organ structure and function, metabolism, chemical absorption, genetics, mechanisms of DNA repair, behaviour and lifespan. Many documented cases from around the world reveal the harm and even death of volunteers in clinical trials or at a later stage, despite the drugs having been tested on animals - Vioxx and TGN1412 are 2 well known examples.

As long as funding is available, scientists who have been trained to research using animals and consider animal studies as the 'gold standard' will be reluctant to embrace new methodologies. An 'animal methods bias' will continue to block the progress of modern human relevant approaches. This bias is enabled by the availability of continuing funding streams, a fact brought to light by the APPG on Human Relevant Science in its 2022 Report 'Bringing Back the Human' <https://www.humanrelevantscience.org/wp-content/uploads/APPG-report-March-2022.pdf>. The APPG recommended that the UK Government strategically divert resources away from animal-based research towards new approach methodologies (NAMs). Its report described a UK climate in which limited funding opportunities exist for NAMs, which receive between 0.2% and 0.6% of total biomedical research funding in the UK. Given that the human-specific technologies sector is forecast to

contribute £2.5 billion to UK GDP by 2026 (source: Animal Free Research UK), it follows that modernizing science will bring great economic benefits in addition to better public health outcomes.

Withdrawing funding from animal research here in Wales could have the effect of galvanizing scientists into looking for other methods. After all, when the ban on the sale of animal-tested cosmetics came into force in 2013, scientists found other ways of testing their products.

We acknowledge that the funding allocated to Welsh universities by Medr is in the form of a block grant, to be distributed as individual universities see fit. However, on further researching public funding of medical research, we learned that the Welsh Government works hand in glove with industry, medical research charities and other bodies in pre-clinical research on a number of initiatives. This partnership gives a seal of approval to their activities, which include animal studies. Further, Health and Care Research Wales (HCRW) has some jointly funded projects with charities undertaking research on animals. Partners involve for instance the Stroke Association (Cross-Funder & Partner Scheme) and Alzheimer's Society (Joint Programme for Neurodegenerative Disease research). Furthermore, the Medicines Discovery Institute, based at Cardiff University is part funded by Welsh Government. Publications detailing animal research are to be found on its website. Given that 9 out of 10 drugs found to be effective in animals fail to make it to the market and that liver-on-a chip has an 87% success rate in detecting toxicity, changing to non-animal methods for drug testing would improve human health and save money.

To summarise, the reasons for withdrawing support from animal experiments are many: they are incredibly costly and time consuming; they are poor predictors of human health outcomes and can result in human harm; they block medical progress; despite claims that animals can only be used 'when there is no other way to do the research' (Understanding Animal Research's website), the NC3Rs own report tells quite a different story. There is in addition, a growing moral concern about the use of animals in medical research in the 21st century (as indicated by several recent polls and the number of signatures garnered by our petition).

While the Welsh Government can rightly claim that animal experimentation is not an area for which it has responsibility, it *is* responsible for scrutinising how it spends its limited resources. **We ask that it choose to withhold funds for projects and initiatives which are known to involve animal use.** While partnering with key stakeholders in medical research is no doubt beneficial, doing so without taking a stance in opposition to animal testing is facilitating the continuation of such research. Will Quince, former Minister of State, confirmed in response to a parliamentary question in 2023: 'there is no United Kingdom legislation that mandates animal testing'. Further, the National Institute for Health and Care Research (NIHR) has a policy of not funding 'work involving animals, animal tissue or both'.

Is Wales really going to continue causing suffering and death to sentient beings, irrespective of public opinion, when there is no legal requirement nor scientific basis to do so? Just short of 32,000 'procedures' took place in Wales in 2023 but this figure excludes the animals bred

and not used which are then destroyed. For instance, on its website, Swansea University declares a total of 430 procedures conducted on fish in 2023 but a Freedom of Information request revealed that over 8,000 fish were 'euthanised' at the institution in the same year. (FOI 209/24-25) While NAMs *are* gaining ground in Wales as elsewhere, investment is necessary in order to promote innovation. Diverting funds from animal research can only bring rewards in terms of public health and economic growth.

DD/12.4.25

Save Pembroke Pool - Improve Don't Remove

Y Pwyllgor Deisebau | 28 Ebrill 2025
Petitions Committee | 28 April 2025

Reference: SR25/10583/1

Petition Number: P-06-1504

Petition title: Save Pembroke Pool - Improve Don't Remove

Text of petition: Pembroke Pool is under threat of closure due to huge funding gaps in providing services in Pembrokeshire. Whilst we recognise this is a Pembrokeshire County Council issue, it highlights the need for more funds to reach rural communities from the Senedd. We call on Welsh Government (WG) to provide additional funds, ring-fenced to upgrade our tired leisure services that are such an all important social hub in all our communities. Without a commitment from WG the threat of closure looms over us with every annual budget consultation.



1. Background

Welsh Government funding of culture and sport is largely channelled through arm's-length bodies, such as the Arts Council of Wales, Sport Wales and Amgueddfa Cymru/Museum Wales. Sport Wales distributes funding to community clubs, volunteers, and athletes. It annually distributes capital funding to improve sports facilities (£3.5 million in 2024-25), including local authority facilities.

In 2023-24, local authorities spent £260 million on libraries, culture, heritage, sport and recreation. Since 2013-14 this spending has reduced by 28% in real terms, whilst spending on education and social services has increased substantially.

1.1. Reduced public funding for sport and culture

In 2023-24 the Welsh Government cut the revenue funding of all culture and sport bodies by between 5 and 15% (the Books Council received the highest percentage cut) in a budget that saw funding swinging to health and social services.

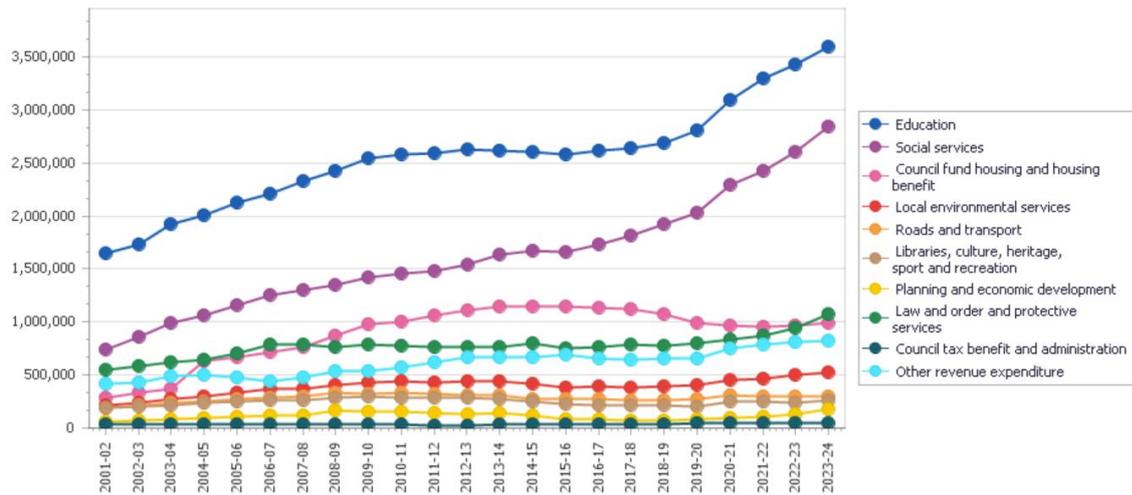
In total, 2024-25 saw the Welsh Government cut revenue funding for culture and sport by 7.7% compared to 2023-24 allocations. Capital funding, which is less than half the value of revenue allocations, increased by 6.3%.

This meant that, by its own calculations, the Welsh Government had cut revenue budgets in these areas by 17% in real-terms over a decade. Over the same period, capital budgets (which are still less than half the size of revenue budgets) almost tripled in size.

Provision of culture, sport and recreation services is mostly discretionary for local authorities. Between 2013-14 and 2023-24, local authority revenue funding of libraries, culture, heritage, sport and recreation reduced by 28% in real terms, whilst spending on education and social services increased substantially.

Local authority revenue outturn by service (£000s) (2001-2 to 2023-24)

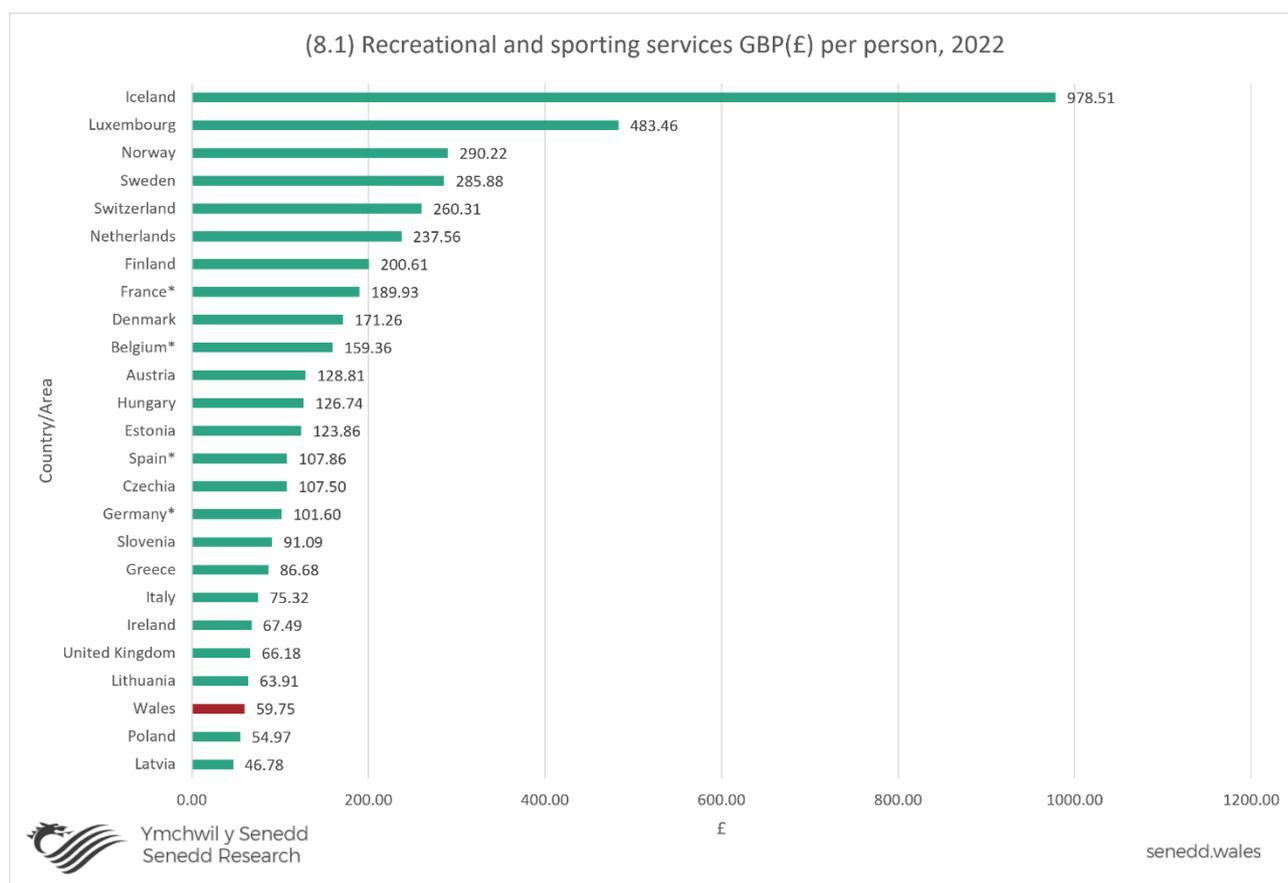
Title:



Source: *Stats Wales*

Following these prolonged real-terms cuts from central and local government, public funding of culture and sport in Wales is among the lowest in Europe. [Analysis from Senedd Research](#) compared public spending on culture and sport with 24 European countries (including the UK as a whole) for which data was available.

The average spend on recreation and sporting services in these countries is £187.74 per person. In Wales the figure is £59.75 per person, or 32% of the average of these countries. This placed Wales third from bottom of the countries under consideration.



Source: Senedd Research analysis of Welsh Government, StatsWales and OECD data

1.2. Increases for culture and sport in the 2025-26 Final Budget

When the Welsh Government published its 2025-26 Draft Budget in December 2024, it had reversed many of the cuts to culture and sport it implemented in the 2023-24 Budget.

In the Final Budget, published in February 2025, culture and sport saw an additional revenue increase of £4.6m. That means a real-terms increase for these areas between 2023-24 and 2025-26 of about 1%.

1.3. Local authority funding increases by 4.5%

In the 2025-26 Final Budget, the Welsh Government increased core funding for local authorities by an average of 4.5%. Pembrokeshire received a 3.8% uplift, or about £8.5 million on a like-for-like comparison with 2024-25.

As part of its budget agreement with Jane Dodds MS, leader of the Welsh Liberal Democrats, the Welsh Government **implemented a funding floor in the Final Local Government Settlement**. This means that no authority will receive less than a 3.8% uplift in its funding for 2025-26. Nine local authorities benefitted from the funding floor, **including Pembrokeshire**. In the provisional local government settlement, the local authority was expecting a 3.5% uplift in its core revenue budget.

The Final Local Government Settlement also sets out **some of the other sources of Welsh Government funding** that local authorities can access. This includes £1.1bn of capital grants, including £200m of general capital funding, which is £20m more than 2024-25. In addition, the Welsh Government has provided as £1.3bn of specific grants to support some of its policy priorities.

The **Cabinet Secretary for Housing and Local Government, Jayne Bryant MS, acknowledges** the “considerable financial pressures faced by local authorities”. Prior to publication of the Draft Budget, the WLGA **estimated pressures on local authority budgets totalling** £559m in 2025-26.

The WLGA talks about two broad categories mainly responsible for the pressure faced by local authorities: inflation (including things like pay increases) and demand. It **says pressures are** “unrelenting” and estimates further pressures of £454m in 2026-27 and £464m in 2027-28.

The **two big individual areas of pressure** are Social Care and Schools. In 2025-26, these service areas make up around 40% and 22% of budget pressures respectively.

Following publication of the Provisional Settlement in December, **a member of the WLGA warned** that without the necessary funding “the ability of our essential local services to fulfil statutory duties, and support residents’ needs will be severely impeded”.

Pembrokeshire County Council has **approved its budget for 2025-26**, including a 9.35% council tax increase, and noting a funding gap of £27 million, which will be met by a combination of budget savings, an increase in Council Tax and use of Council Tax premiums.

2. Welsh Government action

The Welsh Government’s response to this petition notes:

The Welsh Government continues to prioritise frontline public services including local government as far as possible in our budget decisions. Local Government funding for 2025- 2026 in the Welsh Government’s final budget increases by £262m compared to, on a similar basis, to the final settlement for 2024-2025, an average increase of 4.5%. This includes floor funding at 3.8% which benefits Pembrokeshire.

This core funding for local authorities is distributed on a range of factors including sparsity of population, in order to recognise the costs of service delivery in rural areas.

3. Welsh Parliament action

In 2024 the Senedd’s Culture, Communications, Welsh Language, Sport and International Relations Committee conducted an inquiry into the impact of funding reductions on culture and sport.

The Committee heard from Swim Wales that the condition of aquatic facilities in Wales has been “in steady decline for a decade” and that 30 per cent of swimming pools are at risk of closure over the next decade if action is not taken by central and local governments. They said that: “once a facility is closed, the cost of reopening or replacing it is often prohibitive, leading to a lasting reduction in community services.”

Among other things, the Committee called for the Welsh Government to reach parity of funding with similar countries. The Welsh Government accepted this recommendation in principle, and responded with funding increases in the 2025-26 Final Budget. The Committee also recommended:

- The Welsh Government should develop a school swimming strategy to ensure that children leaving primary school have the ability to swim. This strategy should recognise the importance of providing adequate facilities and transport.

The Welsh Government accepted this recommendation in principle, whilst saying:

“Decisions on the level of funding available to schools and to other services are made by each authority as part of their overall budget and council tax setting.”

The Senedd debated the Draft Budget 2025-26 on 4 February 2025, and debated the Final Budget and the Local Government Settlement on 04 March 2025.

Title:

The Local Government and Housing Committee scrutinised the Cabinet Secretary for Housing and Local Government on 15 January 2025. The Committee also took evidence from the Welsh Local Government Association (WLGA) on 08 January 2025. Conclusion 1 of the Committee's report on the draft budget stated:

Conclusion 1. We would like to see a full review of the local government funding formula and that local authorities with an older and ageing population are adequately reflected in the formula.

The Welsh Government accepted the conclusion in principle, noting that:

The fundamental principle of the formula is that this funding is distributed according to relative need. The largest drivers of service expenditure are population levels, deprivation levels and sparsity and over three quarters of the funding is distributed through the local government settlement funding formula relies on data which is updated annually

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-06-1504
Ein cyf/Our ref JB/00027/25

Carolyn Thomas MS
Chair - Petitions committee

4 April 2025

Dear Carolyn Thomas MS,

Thank you for your letter regarding a petition you have received from Rhian Cowen, requesting funding for the public swimming pool in Pembroke.

I have noted the warm endorsement of the value of these local services. I want to assure you we are engaging closely with local authorities on the pressures they are facing. The Welsh Government continues to work with the Welsh Local Government Association and local authorities to better understand the challenges and opportunities in providing and managing leisure facilities.

I know that increased demand for services and cost pressures means all local authorities have had to make difficult decisions on council tax, other income sources, and the services the council provides. Decisions made on the provision of local services are for local authority elected members, within the relevant statutory requirements and following appropriate scrutiny and consultation with local communities. As part of any local decision making, local authorities are responsible for their own assessments of the provision of local services that may impact people in their area.

The Welsh Government continues to prioritise frontline public services including local government as far as possible in our budget decisions. Local Government funding for 2025-2026 in the Welsh Government's final budget increases by £262m compared to, on a similar basis, to the final settlement for 2024-2025, an average increase of 4.5%. This includes floor funding at 3.8% which benefits Pembrokeshire.

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

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

This core funding for local authorities is distributed on a range of factors including sparsity of population, in order to recognise the costs of service delivery in rural areas.

Yours sincerely,

A handwritten signature in black ink that reads "Jayne Bryant". The signature is written in a cursive style with a large, prominent initial 'J'.

Jayne Bryant AS/MS

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government

Fund music education for future generations in the “land of song”

Pwyllgor Deisebau | 28 Ebrill 2025
Petitions Committee | 28 April 2025

Reference: SR25/11030

Petition Number: [P-06-1509](#)

Petition title: Fund music education for future generations in the “land of song”.

Text of petition: Music is an inalienable part of Wales’s cultural identity. Our choirs, bands, orchestras & opera companies are world-class, & contribute to Wales’s international brand & tourist economy.

Over recent years, free instrumental tuition has vanished from our schools. The loan of free instruments to learn on has gone. Now, Wales’s biggest university plans to close its music department due to financial pressures.

Music in Wales is in crisis. Falling student numbers are a direct consequence of the decimation of grass roots music - if pupils in school cannot learn music, they cannot progress to study it at university.

Music teaches discipline, teamwork, concentration and how to perform, literally, under pressure. These skills are vital to a young person’s development, regardless if they go on to be professional musicians.

Cardiff University’s Music Department has trained some of Wales’s most important composers, including Grace Williams, Alun Hoddinott and Karl Jenkins. It now faces a perfect storm created by the destruction of music education in our schools, the underfunding of higher education in Wales more generally and the loss of income from international students driven by changes to visa regulations.



Wales needs a strategy to protect music for future generations, to retain our place as a global force and support the creative industries.

1. Background

1.1. Music in schools

Music is a subject in the current national curriculum and is one of the five disciplines within the **Expressive Arts Area of Learning and Experience** of the Curriculum for Wales. The curriculum was introduced in phases from September 2022 and will be used for all secondary school pupils by the 2026/27 academic year. This is complemented by non-statutory, extra-curricular music provision. Pupils accessing music services in schools are the first level of Wales' 'pyramid' system whereby young musicians can progress to local and regional ensembles up to the **national youth ensembles**. This music tuition has often been provided by local authority music services. However in some areas in Wales there are other models of delivery, such as co-operative arrangements, charitable bodies and independent providers.

In 2015, the then Minister for Education, Huw Lewis established a **Task and Finish Group** to examine the role of local authority music services. This identified challenges in sustaining and developing high quality music services provision and a disparity of existing provision and growing inequality of opportunity to access services.

1.2. Higher education

A number of other universities in Wales are in the process of consulting on reductions in staff and courses in the context of increasing financial pressures.

On **28 January 2025**, **Cardiff University** began a consultation on proposed reduction of 400 (Full Time Equivalent) academic and the possibility of School and subject closures and School mergers. Their proposals include ceasing subjects and programmes in Ancient History, Modern Languages and Translation, Music, Nursing, and Religion and Theology. The consultation will run for three months

and final plans for approval are expected to be considered by University Council in June 2025.

On 17 February 2025, the [Chair of the Children, Young People and Education Committee wrote](#) to the President and Vice-Chancellor of Cardiff University, Professor Wendy Lerner, inviting her to give oral evidence to the Committee once the consultation on restructuring has closed. In [Cardiff University's response](#) (21 March 2025), it said:

For a number of the subjects which we are proposing to discontinue, most notably ancient history, modern languages and translation, music, and religious studies and theology, there is a significant and sustained drop in student demand. Fewer students are choosing to study these subjects to GCSE or A Level and this means that there is likely to be continued pressure on recruitment to those courses across Wales and the UK as a whole.

2. Culture, Welsh Language and Communication Committee inquiry

Between 2017 and 2018, the Fifth Senedd's Culture, Welsh Language and Communication Committee undertook an inquiry into [funding for and access to music services](#). In line with the Task and Finish Group's report, the Committee found that funding pressures had led to variability of access and provision between local authorities and that the current position was "fragile and fragmented".

Among the Committee's recommendations was that the Welsh Government should transfer responsibility for the delivery of music services to an arms-length, national body. It also recommended that the Welsh Government should prepare a National Action Plan for Music to provide strategic direction and ensure consistency throughout Wales. The Welsh Government accepted these recommendations in principle subject to the outcome of a feasibility study.

3. Welsh Government action

3.1. Music in schools

The Welsh Government commissioned [Music Services Feasibility Study](#), was published in January 2020. This considered options for music delivery and the need for a National Plan for Music Education. The report suggested that a National Plan for Music Education could provide greater coherence and drive improvements. It suggested that an option for a national coordinating body or service, would introduce “a way of pooling and providing coherence to the use of governmental funding for Music Education Services”.

The Welsh Government published its [National Plan for Music Education](#) in May 2022. This sets out the Welsh Government priorities for music education. The programmes in the Plan include the First Experiences programme. This aims to give children in primary schools and other settings a minimum of half a term of musical instrument taster sessions. Secondary schools and other settings receive funding for experiences that aim to support young people's health and well-being and their progression to GCSE music.

As part of the National Plan for Music Education, the Welsh Government established the [National Music Service](#) with £13.5 million of funding provided to local authorities and their music services over three years (£4m in 2024-25). The National Music Service is responsible for implementing the [National Music Plan](#). The Welsh Local Government Association (WLGA) is the lead body, responsible for co-ordinating the activities of the service and its work programmes.

3.2. Higher education

In relation to higher education, in a Written Statement on 18 February 2025, Vikki Howells, the Minister for Further and Higher Education announced:

To support our universities, I have already increased the tuition fee cap for 2025/26, providing up to £21.9m in additional income to universities, and I have also provided an additional £10m in grant funding to the sector. In recognition of the significant financial challenges facing higher education, I am pleased to announce today a further £18.5m capital funding this financial year. This additional funding will support universities with estate maintenance and digital projects to reduce

operating costs, while also improving environmental sustainability and ensuring that facilities continue to be suitable for providing a high-quality student experience and delivering world-leading research. I have also asked Medr to report back to me on how this funding has been maximised to make future savings to ease the current financial challenges.

In a [Plenary debate on 5 February 2025](#) on Higher Education, the Minister for Further and Higher Education outlined the financial position of universities in Wales and highlighted that music can be studied at a number of other universities in Wales such as Bangor, the University of Wales Trinity Saint David, the Open University and the Royal Welsh College of Music and Drama.

4. Petitions Committee

There are currently two open Petitions relating to cuts to universities in Wales. Both relate to Cardiff University and both have passed the number of signatures required to be considered by the Petitions Committee:

- [Help Cardiff University to keep their Modern Languages degree courses](#)
- [Enable Cardiff University to keep the Nursing degree course](#)

Between 2019 and 2020, the Petitions Committee considered a Petition, [P-05-880 Wales is Rapidly Losing its Musical Reputation and Heritage](#). This called for the Welsh Government to produce an urgent National Plan for Music Education with dedicated central funding. As the Culture, Welsh Language and Communications Committee was going to be monitoring further progress in relation to funding and delivery of music education services, the Petition was closed.

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-06-1509
Ein cyf/Our ref LN/00284/25

Carolyn Thomas MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
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CF99 1SN

petitions@senedd.wales

31 March 2025

Dear Carolyn,

Petition P-06-1509: Fund music education for future generations in the “land of song”

Thank you for your letter of 4 March, and for the opportunity to provide my comments on the issues highlighted in the above petition, which your Committee has received recently.

I would firstly like to emphasise that the Welsh Government fully recognises the value of music education and indeed has increased its support in this important area, over recent years. In 2022, in line with a Programme for Government commitment, we established the National Music Service, with the aim of supporting children and young people to benefit from opportunities to play a musical instrument, to sing, and to engage in music-making activities.

The progress and impact of the National Music Service is being closely monitored, notably through an ongoing independent evaluation by Arad Research, which is currently at interim stage. Evidence and data indicate that the Service is supporting a major shift in enhancing the approaches to supporting music education and developing joint working with key delivery partners. This in turn is fostering a long-term vision for sustainable and equitable access to quality music education for all children and young people in Wales, regardless of their background

In response to specific areas raised in the petition, I would outline the following points.

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Gohebiaeth.Lynne.Neagle@llyw.cymru
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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

The predominant focus of the Service's work is on supporting music in schools, with specific initiatives including 'First Experiences' in primary schools and 'Music Pathways' in secondary schools. In particular, through 'First Experiences', thousands of learners are receiving six weeks of free musical instrument tuition, which is sometimes the first time they have ever participated in music-making activities.

Another important strand of support is the national instrument, resource and equipment library, enabling teachers and music services to obtain access to a wide range of instruments, including specialist and adaptive instruments, to continue to build on the work of the schools' provision and ensure inclusion for all learners. The library also provides instruments to learners who may not be able to afford their own, ensuring that no child is excluded from participating in music activities, both in school and beyond.

By way of some further context on the funding position of the National Music Service, this is operating in its current phase up to the end of March 2025. It is fully funded by the Welsh Government, with the total support over the period 2022-2025 being £13 million, via a grant to the Welsh Local Government Association (WLGA). Last December, I announced the new Curriculum for Wales Grant Support Programme, to provide focused support to schools and settings, from April 2025 onwards. This strategic approach to grant-funded curriculum support prioritises the National Music Service for forward funding. The WLGA submitted an application for a new phase of the National Music Service programme under this programme, and this has been assessed in detail by my officials. I am currently considering advice on the outcomes of the appraisals process for the Curriculum for Wales Grant Support Programme, and will be announcing further information on the specific grants and funding allocations awarded under this scheme, very shortly.

Turning to the issue raised about funding for higher education, I recognise that this is a difficult time for the sector in Wales and across the UK as a whole. Many higher education institutions are having to take tough decisions in response to financial challenges, and this is causing uncertainty and anxiety to staff and students affected.

Last month, the Minister for Further and Higher Education announced an additional £18.5m capital funding for this financial year in recognition of the significant financial challenges facing higher education. This additional funding will support universities with estate maintenance and digital projects to reduce operating costs, while also improving environmental sustainability and ensuring that facilities continue to be suitable for providing a high-quality student experience and delivering world-leading research. This funding will be allocated shortly by Medr, the Commission for Tertiary Education and Research.

I am aware also that Cardiff University is currently in a period of statutory consultation on proposals for its academic future, in response to its financial position. One of these proposals is the potential closure of its School of Music. Wales's cultural, arts and sporting sectors make a vital social and economic contribution to our society, enriching our communities and inspiring future generations. Every person in Wales has the right to access, create, participate in, and see themselves reflected in the cultural activity of our nation. Our universities play a key role in facilitating this. The Minister for Further and Higher Education is working with the Minister for Culture, Skills and Social Partnership to understand the potential impact the proposals by Cardiff University may have on the sector.

Since the announcement by Cardiff University, the Minister for Further and Higher Education has met with the Vice-Chancellors of every Welsh university, representatives of Universities and Colleges Union, and the National Union of Students, to further understand the pressures facing the sector and explore how the Welsh Government can provide support through this difficult period. The Minister has also held a roundtable discussion with Vice-Chancellors of universities in Wales, leadership of Universities Wales, and the Chief

Executive of Medr, with discussion looking at potential steps to work towards a long-term more sustainable footing for the higher education sector.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Lynne Neagle".

Lynne Neagle AS/MS

Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

Direct NRW to revoke the environmental permit and ensure the closure of Enover't's, Hafod Landfill Site in Wrexham.

Y Pwyllgor Deisebau | 28 Ebrill 2025
Petitions Committee | 28 April 2025

Reference: SR25/11030-3

Petition Number: P-06-1510

Petition title: Direct NRW to revoke the environmental permit and ensure the closure of Enover't's, Hafod Landfill Site in Wrexham.

Text of petition:

The Hafod Landfill Site has caused community distress for 18 years, making it Wales' longest running environmental campaign. Despite efforts by residents and elected representatives, the site continues to emit noxious odours, creating an unacceptable statutory nuisance. NRW are responsible for environmental protection and has failed to take meaningful enforcement action, relying instead on technical justifications and vague assurances. This is not just regulatory inertia, but governance failure.

In 2024, the odour and air pollution reached distressing and crisis levels. Families were unable to open their windows, children are forced to play indoors. If NRW regulatory framework allows a site to emit persistent and overpowering odours whilst remaining compliant, then the regulations are clearly not fit for purpose. Their own last Inspection reported key failings such as a non-operational gas engine, increasing the release of landfill gases. Temporary capping of landfill cells that fail to contain odours. Persistent leaks from multiple area of the site. Delays in infrastructure upgrades, leaving the site vulnerable to excessive emissions. In May 2020, a substantial fire broke out, burning for several days and producing thick black smoke. NRW recorded air pollution levels 14 times above the permitted level. If NRW cannot hold Enover't accountable, and they have failed to do so in 18 years, then an independent inquiry into their effectiveness as a regulatory body is urgently needed.



1. Background

Mersey Waste Holdings was granted permission to operate the former Hafod quarry site as a landfill in 2004 following a public inquiry. Wrexham Council had previously rejected the company's application. Since November 2008, it has been operated by Enovert North Ltd. (formerly Cory Environmental Limited). The landfill operates under an environmental permit (PP3139GB) issued by Natural Resources Wales (NRW). NRW regulates waste sites in line with its regulatory principles.

In a February 2025 newsletter update, NRW explained the circumstances under which it is able to revoke an environmental permit:

Hafod Landfill operates under an Environmental Permit, which sets out the types and amounts of waste that can be accepted at the site. The permitting regulations do not allow us to include restrictions on where waste comes from.

We only revoke permits if we believe the operation poses a serious risk to the environment or human health, and if all other measures to reduce the odour have been exhausted. At present, the operators are still working through a number of actions to address the issues, and we are regulating them closely.

Closing the site would not immediately get rid of the odours, as leachate and landfill gas would still need to be managed to reduce the potential for offsite odours.

Our regulatory actions are guided by our published regulatory principles, ensuring a balanced and proactive approach.

NRW's most recent compliance report for the Hafod landfill was published in February 2025, and details 5 'non-compliances' of environmental permit conditions. These related to leachate management, landfill gas, chloride monitoring, and surface water monitoring. There were 26 instances of landfill methane emissions exceeding the permitted amount during the final quarter of 2024.

An NRW webpage outlines its ongoing regulatory actions for the site, including:

- regular site inspections;
- reviewing Enovert's management procedures and action plans; and
- working with Wrexham Council to ensure air quality and monitoring meets Welsh Government standards.

NRW says it told Enovert to take action to reduce long-term fugitive (unintentional) emissions in late 2024. Its March 2025 update says Enovert has installed new infrastructure to increase the volume of gas being collected from

Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham.

the site, and that further air quality monitoring equipment will be installed in the near future. On odour emissions to residential areas, it says:

Under the conditions of the Environmental Permit, if the operator is taking appropriate measures to control odour, a breach of the permit does not occur, even if some odour is still detectable. The site operator has identified appropriate measures within their odour management plan to manage odour emissions; however, we understand that there continue to be impacts on the community. We are closely reviewing their plan to determine if any additional measures are needed to further mitigate odours.

NRW highlights the Hafod Landfill Stakeholder Group, which had its first meeting on 21 March 2025.

2. Welsh Government action

In his response to the petition, the Cabinet Secretary for Climate Change and Rural Affairs, Huw Irranca-Davies MS, says he met with NRW officials and Enovert senior management to discuss the Hafod landfill site on 19 March 2025. He says the site's issues are regulatory and operational, so NRW is "best placed to determine the appropriate regulatory action and I therefore do not feel it is necessary to direct NRW to revoke the permit."

3. Welsh Parliament action

On 14 January 2025, Gareth Davies MS asked the Trefnydd for a statement related to the site, specifically raising constituent concerns about a large amount of waste being brought from England. He asked:

...could the Cabinet Secretary for climate change outline how the Welsh Government is working with the UK Government and local authorities in England to ensure that residents in north Wales do not have to pay for the failures of local authorities in the north-west of England?

The Trefnydd, Jane Hutt MS, responded:

You've raised a very specific question and issue for the Cabinet Secretary and Deputy First Minister, and he will find an appropriate way to respond to that. Thank you for raising it.

On 28 January 2025, Mark Isherwood MS asked the Trefnydd for a statement on the Hafod landfill, citing Johnstown constituent complaints about smells and

Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham.

NRW's "apparent lack of action in stopping it". The Trefnydd said the point "will be recorded with the Cabinet Secretary for Climate Change and Rural Affairs".

On 10 June 2020, following a fire at the landfill site, Llyr Gryffydd MS asked the then-First Minister, Mark Drakeford MS, for an independent inquiry into the cause of the fire and for the landfill's closure in the meantime. The First Minister said multiple authorities have responsibilities to provide reports about the fire, and "the Welsh Government will consider those reports and then decide what further action may be needed."

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.

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref HIDCC/00449/25

Carolyn Thomas MS
Chair - Petitions committee

02 April 2025

Dear Carolyn,

Thank you for your letter of 4 March regarding the petition received from Steven Gittins seeking Welsh Ministers to direct Natural Resources Wales (NRW) to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham.

As you are aware, NRW is the statutory decision maker responsible for regulating waste sites and they consider their regulatory action in line with their published [regulatory principles](#). All the facts and implications need to be considered before revoking a permit, including the consequences of any action on a company's ability to operate and whether revoking the permit could result in a worse outcome such as the site and waste being abandoned. In deciding what action to take the regulator assesses the risk posed and they work with the operator to bring the site back into compliance. Revoking the permit and closing the site would not immediately resolve the current odour issues, as ongoing management of leachate and landfill gas is required to minimise potential offsite impacts.

On Wednesday 19 March I met with NRW officers and Enover senior management and heard directly about the action being taken by the company to address the issues and the work NRW is doing to safeguard the environment and protect local communities. I was also updated on the work of the stakeholder and residents group which is providing the latest information on the action being taken and gives an important platform for local people to directly engage.

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

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

Whilst Welsh Ministers have the power to direct the regulator in the exercise of their functions, the purpose of this direction-making power is to direct specific action to be taken where it is appropriate in the circumstances for the decision to be taken by Welsh Ministers rather than by NRW. As the issues at Hafod landfill site are regulatory/operational decisions, I am confident that NRW as the regulator are best placed to determine the appropriate regulatory action and I therefore do not feel it is necessary to direct NRW to revoke the permit. NRW has a duty to regulate sites in accordance with the law. If they believe a site is not able to come back into compliance and poses a significant risk to the environment and people's health, the appropriate enforcement action will be taken.

I hope this information is helpful to you.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Huw Irranca-Davies', written in a cursive style.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Additional Information Submission Regarding Petition: Closure of Hafod Landfill and Revocation of Environmental Permit PP3139GB.

Landfill – Flawed Regulatory Oversight, Misguided Closure Concerns, and Ineffective Community Engagement

Dear Petitions Committee,

I am writing in response to your recent letter regarding the petition calling for the revocation of Enovert's environmental permit at Hafod Landfill, and I also refer to correspondence I have exchanged with [REDACTED] Wrexham Council.

At the heart of this issue is a failure of systems designed to protect communities like Johnstown. For 19 years, residents have endured the persistent and worsening impacts of this landfill site. Despite years of committee meetings, reassurances, and regulatory processes, the “stench” continues unabated. NRW's regulatory approach and the associated stakeholder structures have proven consistently inadequate, lacking both authority and urgency.

It is deeply disappointing to see yet another well-rehearsed shrug of responsibility wrapped in bureaucratic jargon, where real leadership and environmental justice are sorely needed. The response from the Minister is not only evasive but also misleading in key areas, and it ignores both the spirit and letter of the law governing environmental permits like that held by Enovert for Hafod Landfill (Permit No. PP3129GB). Let us now deconstruct and respond to some of the core assertions made in that correspondence.

1. Misplaced Concerns Over Site Closure

The claim by Huw Irranca-Davies that revoking the permit might lead to site abandonment and deterioration is not only misplaced, it is fear-mongering dressed up as pragmatism. The Environmental Permitting (England and Wales) Regulations 2016 make clear that operators remain legally bound to fulfil closure and aftercare duties even after revocation. Permit PP3129GB mandates site restoration and post-closure obligations such as gas control and leachate management, these are not optional or contingent on the permit being active.

✦ Legal Reference:

Under Schedule 5, Regulation 22 of the 2016 Regulations, permits may be revoked where there is persistent non-compliance. Additionally, Schedule 2 of the permit outlines binding duties that survive revocation.

To suggest that closing the site might cause greater harm implies that residents must accept ongoing exposure to foul odours and associated health risks simply to avoid enforcing the law. This is a staggering position that sets a dangerous precedent, one where a permitted operator may breach environmental standards with impunity because enforcement might be “too risky.” If NRW cannot enforce closure obligations that is an indictment of the regulator, not a justification for continued harm.

2. Documented Failures in Infrastructure and Monitoring

The most recent Hafod Landfill Gas Audit Report (LERP), referenced in Compliance Assessment Report CAR_NRW0045947, reveals a litany of technical and structural failures that fundamentally undermine confidence in site management. These include:

- Wells with missing or poorly installed bentonite seals;

Additional Information Submission Regarding Petition: Closure of Hafod Landfill and Revocation of Environmental Permit PP3139GB.

- Poor weld joints on temporary capping;
- Suction pressures at ~100mbar — suggesting over-extraction and instability;
- Inadequate sealing of leachate wells and towers;
- Leachate breakouts on Cells 4 and 5b — highlighting elevated, uncontrolled levels.

These are not isolated incidents. They point to systemic failings in operational integrity and regulatory enforcement. How, and why, should such a situation be allowed to persist for another three decades? This is not a temporary problem. It is structural, chronic, and worsening.

3. Complicity by Inaction — Not Collaboration

The suggestion that NRW is “working with the operator to bring the site into compliance” is a tired script we’ve heard for over a decade. And the outcome? Continued odour nuisance, health concerns, and a landfill operating long beyond its anticipated closure timeline. At what point does “working with the operator” become complicity by inaction?

Legal Reference:

Under Regulation 22 of the EPR 2016, revocation is a valid and necessary enforcement tool when the operator fails or is unlikely to comply. Continuing to “collaborate” under the current regime only prolongs the harms residents are experiencing.

If a builder ignores safety standards and your roof is on fire, you don’t just schedule another meeting, or create another committee. You shut the site down and fix the problem.

4. Flawed Community Engagement Structures

Equally troubling is the dysfunctional nature of the Hafod Landfill Liaison and Stakeholder Groups. [REDACTED] describes them as non-decision-making forums. Yet the minutes from 2024 reveal an appalling pattern of trivialisation, deflection, and blame-shifting, including attributing odours to unrelated sources like chicken farms or nearby factories and industrial Estate.

The distinctive “rotten egg” smell of Hydrogen Sulphide is unmistakable. Residents know exactly what they’re breathing. Suggesting otherwise is not only insulting, it erodes public trust.

Worse still, the suggestion that simultaneous complaints from different neighbourhoods somehow undermine credibility implies that residents are conspiring. The reality is simpler: the odour travels widely and is affected by weather patterns. In winter months and during high rainfall, conditions worsen, as does the leachate burden, exacerbated further by climate change and rainfall intensity.

These committees appear designed less for transparency than for perception management. They offer no real power to residents and no accountability for outcomes. A committee member advised me to submit a Freedom of Information to NRW to simply to trace previous meeting outcomes, as no other committee member or council representative had decided to record any minutes in-house, which is a damning indictment of the group’s purpose.

5. The Need for Ministerial Oversight and Intervention

Additional Information Submission Regarding Petition: Closure of Hafod Landfill and Revocation of Environmental Permit PP3139GB.

The idea that regulatory decisions should rest solely with NRW ignores the democratic oversight provisions built into the law. NRW is not an untouchable entity beyond Ministerial direction.

Legal Reference:

Section 40(1) of the Environment Act 1995 empowers Welsh Ministers to direct NRW in the public interest, including revocation of permits or other enforcement actions where NRW has failed to act effectively.

The situation at Hafod is no longer a routine regulatory matter. It is a public health, environmental, and accountability crisis, one that warrants Ministerial intervention.

Legal and Policy Grounds to Revoke Permit PP3129GB

- **Persistent Non-Compliance:** Ongoing odour breaches and technical failings are well-documented in NRW's own reports.
- **Clear Enforcement Powers:** Regulation 22 allows revocation for repeated breaches; Regulation 37 supports restoration enforcement post-revocation.
- **Mandatory Restoration Duties:** The permit contains enforceable requirements for site restoration and gas/leachate control — revocation does not negate these obligations.
- **Ministerial Direction in the Public Interest:** Section 40 of the Environment Act provides clear authority for the Welsh Government to act when NRW will not.

Final Thought

The people of Johnstown and surrounding areas deserve clean air, not political gaslighting. The narrative that revocation could “make things worse” is not just wrong it's a disservice to environmental law, public health, and common sense.

The Against Hafod Landfill Campaign Group calls for the immediate revocation of Environmental Permit PP3129GB, and the closure of the site without further delay. This call is grounded not in speculation but in law, evidence, and lived experience.

We do not ask for special treatment only that the law be enforced, and that justice for communities like Johnstown be prioritised over corporate comfort. Until that happens, we will continue to press, petition, and protest — with growing support.

I look forward to your considered response.

Yours sincerely,
Steve Gittins

[REDACTED]

(Office of Public Protection)

A National Disgrace!
**Air Particulate Pollution vs. Noxious Odour
Pollution: The Unaddressed Issue**

Dear [REDACTED]

As we await the published details of the recent Hafod Stakeholder Group Meeting with great anticipation, I am prompted by a recent Facebook post announcing the installation of real-time monitoring at Hafod and Johnstown. I am dismayed to discover and highlight **fundamental failures by NRW** and associated authorities in the approach to noxious odours as a statutory nuisance in our communities, as covered under Environmental Act 1990, and detailed within that is the confirmation that : **‘A statutory nuisance is a nuisance defined by law (usually under public health and/or environmental legislation) that significantly affects people’s health, safety, or enjoyment of their property’.**

NRW and local authorities have a duty to investigate complaints about statutory nuisances and can take enforcement action against those responsible for:

- **Odour – Strong and persistent smells from waste sites, agriculture, or industry.**
- **Common Law of Nuisance:** In a notable 2012 Court of Appeal decision, it was established that waste management companies cannot rely solely on compliance with environmental permits as a defence against nuisance claims related to odour emissions. This means that even if a landfill operates within the terms of its permit, it can still be subject to legal action if odour emissions cause a nuisance to local residents.

This very same issue has left our community suffering from the stench of hydrogen sulphide (H₂S) from Hafod Landfill for two decades, with three more decades pending.

Despite years of protests and complaints, we remain trapped in a cycle of inaction because the distinction between particulate pollution and odour pollution has not been properly recognised.

Originally, I believed that the promise of real-time air monitoring may be the answer to identifying and addressing this problem and subsequent compliance. However, I have recently campaigned and documented my disagreement of claims of compliance, citing stench over particulate, being the definitive issue. I am staggered to discover, following my research over the last few days, that air particulate monitoring and odour monitoring are two massively different issues. Frankly, I am also shocked that the agencies and individuals

responsible for policing and monitoring such operations over the past nineteen years have either ignored or not recognised this important distinction and acted accordingly.

The reliance on real-time air monitoring for particulate matter (PM10, PM2.5) as a supposed solution to an **odour problem** is a massive misjudgement, one that effectively sidesteps the true issue while allowing authorities make to the **delusional claims, such as : “we are addressing public concerns and take these matters very seriously.”**

The Critical Difference: Particulate Compliance vs. Odour Nuisance

It is essential to understand that particulate pollution and odour pollution are two separate issues both legally and scientifically:

1. Particulate Pollution (PM10, PM2.5) and Health Risks

- Particulate monitoring is designed to measure tiny solid and liquid particles suspended in the air, such as dust, soot, and aerosols, and rightly so.
- Compliance with PM standards addresses concerns about long-term respiratory and cardiovascular health risks, and long may that continue.
- However, compliance with PM levels does not equate to an area being free from other forms of pollution, especially odorous and toxic gases.

2. Odour Pollution: The Overlooked Crisis

- The unbearable stench from Hafod Landfill is caused by gaseous emissions, including hydrogen sulfide (H₂S), volatile organic compounds (VOCs), and ammonia (NH₃).
- These gases are NOT particles and are therefore **not detected by standard air quality monitors used for particulate matter.**
- Odour pollution is not just a distressful nuisance—it is a statutory issue under environmental law and a serious threat to quality of life.

A Regulatory Loophole Allowing Inaction

By focusing on particulate compliance, authorities can claim that air quality is "within safe limits" while ignoring the reality that residents are being poisoned by noxious odours. This is not just a failure of enforcement, it is a fundamental failure of environmental governance.

The awkward reality and glaring issue is NOXIOUS ODOURS and real-time monitoring of particulates will not address this issue. Yet the response thus far has been to kick the can down the road with platitudes, meaningless rhetoric, bureaucratic lip service, and irrelevant air quality monitoring promises that serve no purpose in solving the root cause.

Key devices for odour monitoring should include Gas Sensors, E-noses, and Dynamic Olfactory (EN13725) systems involving air samples tested in laboratories, not an NRW guy wandering the streets of our community carrying out ‘subjective’ sniff tests. These technologies exist. It is self evident that these statutory nuisance odours are above acceptable levels, given the fact that they can be detected three mile away from the site.

These issues are prevalent with Landfill Sites all over the UK, and it is a national disgrace, and shame on all out UK Environmental Agencies.

This failure to act is not a matter of ignorance; it is a matter of negligence. I urge NRW and all relevant authorities to acknowledge this regulatory blind spot and implement proper odour monitoring without further delay.

Finally, the recent claim from elected officials suggesting complaints have decreased slightly this month, is no defence or justification to suggest 'there is nothing to see here'. The residents are sick and tired, and frankly exhausted, about having to complain to an NRW, when their apathetic recommendation is that if they experience the stench 3 times a day....report it three times a day. This is an organisation whose own 'report logging and management' has already been questioned, as to its accuracy and reliability.



Cllr Hugh Jones

Lead Member for Public Protection
Wrexham County Borough Council
The Guildhall
Wrexham, LL11 1AY

Subject: Urgent Action Required on Persistent Landfill Odour Nuisance and Regulatory Compliance

Dear Cllr Jones,

Following the recent unanimous vote to increase scrutiny of Hafod Landfill Site, residents are encouraged by the motion's approval, and we extend our particular thanks to Councillor David A Bithell, Councillor Steve Jones, Councillor Paul Pemberton, Councillor John Phillips, Councillor Mark Pritchard, Councillor Fred Roberts, and Councillor Alison Tynan for their support.

However, the Council will understand that we are fearful this may be another 'false dawn.' We therefore seek further assurance and information on the implementation process and time scales, enabling residents to scrutinise key milestones and track progress.

I also write to emphasise the importance of item 2 of the motion:

Review and demand ongoing robust evidence of appropriate environmental monitoring and emissions regulation:

- Review and examine all monitoring evidence to ensure compliance with the Environmental Permitting (England and Wales) Regulations 2016.

Your statement referenced the installation of real-time monitoring equipment to assess odours and record weather data. However, key details regarding equipment, methodology, parameters, and compliance benchmarks remain unclear.

Regulatory Failure and the Need for Stronger Enforcement

The Dilution-to-Threshold (D/T) methodology provides a scientifically robust measure of odour impact. Given that landfill odours are detected over three miles from the site, it is evident that:

- **D/T \geq 7:1** signifies a significant odour event.
- **D/T \geq 10:1** is typically considered a statutory nuisance.
- **NRW and the Environment Agency intervene** when D/T exceeds **5:1–10:1** near residential areas.

This strongly suggests a fundamental failure in landfill gas and leachate management. The issue is not the identification of odour events—they are widely documented through

complaints, site observations, and lived experience over 18 years—but the consistent failure to enforce regulatory standards and hold the operator accountable for repeated breaches.

Flawed Permit Framework

If the site is operating within permit thresholds, then those thresholds are clearly inadequate—as evidenced by the widespread impact on residents’ health, quality of life, and property values.

Hydrogen sulphide (H₂S), a primary landfill emission, is:

- Detectable by the human nose at **0.47 ppb**.
- Associated with odour nuisance and health effects above **7 ppb**.

If real-time monitoring suggests compliance yet odours persist at such great distances, it demonstrates that the permit framework is fundamentally unfit for purpose in protecting public well-being.

Immediate Action Required

The current situation is unacceptable and must not be allowed to continue for another 37 years. I would urge Wrexham Council to call for a **review of the permit thresholds** and regulatory enforcement mechanisms by the NRW.

I look forward to your prompt response.

Steve Gittins



Complaints Dept.
Natural Resources Wales
Maer Y Ffynnon
Penrhosgarnedd
Bangor
LL57 2DW

24th March 2025

Dear Sir/Madam,

I am writing to formally challenge the adequacy of the **5 µg/m³ (micrograms per cubic metre) threshold** for **Hydrogen Sulphide (H₂S) emissions** in relation to odour nuisance and its severe impact on the local community.

The continued operation of **Hafod Landfill** under these conditions is **wholly unacceptable**, and we are demanding that the site be **immediately closed until effective odour controls are implemented** to protect residents.

Statement on the Failure of the EPA Permit to Address Noxious Odours from Hafod Landfill

It is **fundamentally flawed** that the **Environmental Permit for Hafod Landfill** **disproportionately prioritises particulate pollution while effectively disregarding the severe and persistent nuisance of noxious odours.**

While particulate pollution is undeniably a serious environmental and health concern, it is entirely unjustifiable that **odour pollution—which directly impacts the daily lives, well-being, and mental health of residents—is not given the same level of regulatory attention and enforcement.**

The Regulatory Blind Spot: Why Odour is Being Ignored

The EPA permit framework focuses on easily measurable pollutants like PM_{2.5} and PM₁₀, while **odour, despite its immediate and severe impact on communities it is sidelined as a secondary issue.** This regulatory failure stems from the fact that:

1. **Odour thresholds are based on health risks, and rightly so, but not nuisance impact.** The **5 µg/m³ limit for Hydrogen Sulphide (H₂S) is entirely inadequate** in addressing odour concerns, as people can detect it at levels as low as **0.5 to 1 µg/m³**, long before it reaches the regulatory threshold.
2. **Compliance with particulate limits does nothing to alleviate the distress caused by odour.** A landfill could fully comply with air quality standards while still subjecting nearby communities to **unbearable stench that make daily life intolerable.**
3. **Odour complaints are dismissed as "subjective," despite the fact that residents suffer tangible, repeated distress.** Just because odour is not easily quantified in the same way as particulates, does not mean it is any less of a public nuisance or environmental injustice.

Misleading Dismissal of Odour Transience

A common excuse used to downplay odour complaints is the argument that **odours are transient**, implying that because they do not persist 24/7, they are not a significant issue. The stench is ecer-lasting, and the only variance is weather and wind direction. This argument is both **misleading and dismissive**, failing to recognize that:

- **Even intermittent (but regular) exposure can make an area unlivable.** The unpredictability of odour pollution means residents are forced to endure **constant uncertainty, stress, and disruption** in their daily lives.
- **Odour pollution does not need to be constant every day to be unbearable.** The fact that it occurs several days a week, whether **four, five or seven days a week** is irrelevant, because it is the repeated intrusion into people's lives that makes it unacceptable.

Analogy: The Neighbour with Screeching Music

Imagine if you lived next door to a **neighbour who blasted loud, screeching music at regular but random times throughout the week.**

- Some days it lasts for hours, sometimes all day, other days it's brief, and sometimes you get a break—but you never know when it will happen.
- Even if it only happens **four or five days a week**, it still ruins your peace, disrupts your life, and makes your home an unbearable place to be.

The same principle applies to odour pollution. Whether it happens **four, five or seven days a week**, its presence is still disruptive, distressing, and entirely unacceptable.

Conclusion: The EPA Permit Must Address Odour as a Serious Environmental Nuisance

The **current approach to regulatory compliance is failing local communities.** A landfill can be fully compliant with particulate limits while still **ruining the quality of life for residents through uncontrolled odour emissions.** The EPA permit must be reformed to give odour pollution the same level of scrutiny as particulate pollution, with:

1. **A revised, lower intervention threshold for Hydrogen Sulphide** that reflects actual odour perception, not just health risks.
2. **Real-time odour monitoring requirements** that hold landfill operators accountable for their emissions.
3. **Stronger enforcement mechanisms** to prevent persistent odour nuisance from being dismissed as a mere inconvenience.

The ongoing failure to regulate odour pollution is not just a **bureaucratic oversight**—it is a **blatant environmental injustice** that must be addressed immediately.

Failure to Account for Public Distress & Quality of Life

This is not just a **regulatory issue**—it is a **serious environmental and social injustice** that is having profound consequences on residents:

- **Quality of life is being destroyed** due to persistent, unbearable odours.
- **Mental and physical health is being harmed**, with reports of **nausea, headaches, breathing difficulties, and anxiety.**
- **Disabled residents are disproportionately affected**, as they are often less able to relocate or escape the odour exposure.

- **Recent social media comments suggest house purchases are being abandoned** due to the stench and the deteriorating reputation of the area.
- **House prices will inevitably fall**, impacting residents financially due to **devaluation caused by ongoing odour issues**.

Adding Insult to Injury – Importing Waste from England

To **add insult to injury**, the waste being **dumped at Hafod Landfill is not even from Wales**. The landfill is being used primarily for waste originating from the **North West of England**, meaning local residents are being forced to **suffer the consequences of England’s waste disposal policies**, while receiving none of the supposed benefits. This situation is entirely **unacceptable and unjustifiable**.

Immediate Demand for Site Closure Until Odour is Controlled

Given the **continued failure** to control odour emissions, I am demanding that:

1. **Hafod Landfill is immediately shut down until adequate odour controls are implemented** and proven effective in eliminating nuisance odours from the site.
2. **NRW and Wrexham Council urgently review the inadequacy of the 5 µg/m³ threshold** in addressing odour nuisance and implement a **lower, more appropriate intervention level**.
3. **Enovert puts forward a detailed and measurable plan** on how they will **permanently eliminate the odour nuisance before operations can resume**.
4. **Regulatory bodies enforce strict compliance and real-time monitoring** to ensure **odour levels never reach detectable levels in residential areas**.
5. **An independent impact assessment is carried out** on the effect of odour pollution on **house prices, disability rights, and the economic viability** of living in the affected areas.

It is not enough to claim that the site is “compliant” when the reality is that **residents continue to suffer daily**. Compliance should not mean **ignoring the real-world impact of this ongoing nuisance**.

Request for Formal Response

I request and expect a **formal response outlining the immediate steps being taken to address this issue**. Failure to act will only lead to further **public outcry, potential legal challenges, and greater scrutiny of the regulatory bodies responsible** for protecting public wellbeing.

Yours sincerely,

Steve Gittins
Resident of Johnstown
Member of ‘**Against Hafod Landfill**’ campaign
[REDACTED]

Copies to:

- **Enovert Ltd, 3 – 5 Greyfriars Business Park, Frank Foley Way, Stafford, ST16 2ST**
- **Wrexham County Council, Office of Public Protection, The Guildhall, LL11 1AY**
- **Huw Irranca-Davies, Deputy First Minister, Unit 2, 112-113 Commercial St, Maesteg, CF34 9DL**

Note to Huw Irranca Davies – Deputy First Minister

We, the residents of Johnstown, were extremely disappointed when our peaceful protest at Hafod Landfill Site on Friday, 21st March, at 4:30 PM was met with avoidance rather than engagement. We had hoped for an opportunity to approach you in good faith and discuss our long-standing, well-documented concerns regarding Hafod Landfill. However, it appears that we were sidestepped by a hastily rescheduled earlier visit.

We urge you to engage with us on this distressing issue for all residents or at the very least acknowledge this message with a positive response. It is both frustrating and laughable that your pre-arranged visit allowed Enover to stage-manage the site—clean roads, litter-free hedgerows, and freshly arranged landfill capping, all presenting an artificial image of compliance.

This isn't about how tidy the site looks for a fleeting moment; it's about the persistent, unbearable stench that has plagued our community for 19 years.

We fear that these managed visits do not provide you with a true reflection of the daily reality for residents, who have endured this misery for nearly two decades, and we are extremely concerned for our children and grandchildren when this horrendous site has capacity and licence to continue for a further three decades.

We ask that you look beyond these carefully presented moments and truly engage with those affected for the reasons detailed in my letter to NRW. Landfill issues up and down the country are becoming a National disgrace.

We deserve better. Will you finally listen?

ENOUGH IS ENOUGH !!

'Against Hafod Landfill' campaigners.

Petitioner to Natural Resources Wales and NRW response, 3 April 2025

Dear [REDACTED]

Thank you for your response dated 25 March.

While I acknowledge your detailed reply and your assurance that NRW is dedicating resources to address the ongoing odour nuisance from Hafod Landfill, I must respectfully express strong disagreement with the rationale set out in your letter, particularly around the odour assessment methodology and NRW's enforcement approach.

1. The "Sniff Test" — Subjective and Insufficient

Your reliance on a 0–6 "odour intensity" scale as the basis for regulatory action is inherently flawed due to its extreme subjectivity. Classifying odour impact based on how an individual officer perceives it, without consistent, community-informed, or scientifically objective benchmarks, renders the process unreliable and open to serious bias. What one officer considers a "3" (distinct) may be unbearable to residents, yet still fall short of NRW's threshold for intervention.

In practical terms, the "sniff test" fails to reflect the daily lived experience of residents affected by noxious and persistent odours. This approach undermines public trust and offers little reassurance that the regulatory system is either responsive or evidence-based.

2. NRW's Paradoxical Enforcement Logic

You state that action can only be taken where the operator is both causing pollution *and* not taking "all appropriate measures." However, the recent Compliance Assessment Report (CAR), issued following the October 2024 audit and released in February 2025, identified **43 non-compliances** at Hafod, a staggering number which directly contradicts any suggestion that appropriate measures are currently in place.

It is deeply concerning that NRW insists it can not intervene until a breach is substantiated while simultaneously acknowledging in official documentation that the operator has already breached conditions multiple times. This position is not only logically inconsistent, it effectively shields the operator from meaningful accountability and prolongs harm to the public.

3. Pattern of Prevarication

This response reflects a wider pattern of regulatory prevarication. There is a repeated cycle of:

1. Acknowledging the odour issue;
2. Expressing confidence in the operator's ongoing works;
3. Delaying meaningful enforcement while communities continue to suffer.

This has now persisted for years with no meaningful or permanent solution in sight. At what point does the pattern of "temporary measures" and partial fixes trigger stronger regulatory action?

4. Monitoring and Measurable Standards

Your statement that "monitoring is not a solution" starkly contrasts with public expectations of modern, evidence-led environmental protection. Without objective, real-time monitoring of hydrogen sulphide and other compounds at sensitive receptors, NRW will continue to rely on subjective observations and arbitrary thresholds. This is neither defensible nor acceptable in 2025.

The urgent need is for measurable, enforceable limits that trigger immediate action — not more sniff tests and reports that gather dust while residents' quality of life deteriorates.

In conclusion, NRW's current approach is inadequate, inconsistent, and fails to uphold its duty to protect communities from environmental harm. I call again for the following:

Immediate suspension of operations at Hafod Landfill until non-compliances are fully resolved and proven odour controls are in place.

Replacement of subjective odour assessments with independent, real-time monitoring.

Publicly accountable enforcement based on objective data and clear consequences for breaches.

I appreciate your time, but residents need more than assurances, we need decisive, enforceable action now.

Sincerely,

Steve Gittins

Sent via BT Email App

From: Central Correspondence Team [REDACTED]

Sent: 3 April 2025 10:26:36 BST

To: Steve Gittins [REDACTED]

Subject: ATI-28202a - Response

Dear Mr Gittins,

Thank you for your email and accompanying letter dated 24 March regarding the odour from Hafod Landfill.

We acknowledge the odour issues with Hafod Landfill and its impact on local people. I would like to assure you that we are focussing our efforts on tackling the issues raised and are dedicating significant resources to ensure that the site operator, Enover, complies with the Environmental Permit requirements of which odour emissions are part. I will seek to address each of the five issues you summarised at the end of your letter below.

1. *Hafod Landfill is immediately shut down until adequate odour controls are implemented and proven effective in eliminating nuisance odours from the site.*

A regulator-initiated Closure Notice is normally used as a last resort once other enforcement options have been exhausted. At present the operator is still working through a number of actions which we believe are addressing the issues at the site. In the meantime, we will continue to regulate them closely.

1. *NRW and Wrexham Council urgently review the inadequacy of the 5 µg/m³ threshold in addressing odour nuisance and implement a lower, more appropriate intervention level.*

There are no specific hydrogen sulphide threshold limits within the Environmental Permit. Our officers carry out odour investigations (including off-site odour assessments) in accordance with our guidance and by reference to published odour management guidance.

Odour intensity describes the strength of the odour as perceived by an individual officer. We record odour intensity using a scale of 0 to 6, where 0 = no odour, 3 = distinct odour and 6 = extremely strong odour. A permit breach will only be recorded where:

1. Odour due to activities on the site at a level likely to cause pollution outside the site boundary is substantiated by an officer, and
2. The operator is not taking all appropriate measures to control that odour.

If the operator is taking appropriate measures, then no breach of the permit has occurred, even if there is some odour. We would expect the operator to identify appropriate measures in its Odour Management Plan (OMP), but we may require additional measures if serious odour pollution occurs.

You may find it useful to review the Frequently Asked Questions on the '[How we are regulating Hafod Landfill](#)' website which includes information about odour management.

1. *Enovert puts forward a detailed and measurable plan on how they will permanently eliminate the odour nuisance before operations can resume.* The Operator is completing works in response to an action plan we agreed with them. The Operator has provided an update on the works completed in 2025, as detailed below:

- Seven new vertical gas wells drilled on Cell 5b, with 14 pin wells installed onto the northern flank of Cell 4.
- Horizontal gas wells installed in Cell 5b to provide gas collection within the operational area.
- A new gas manifold and associated pipework to connect this new infrastructure up to the extraction system and increase volume of gas collected.
- Preparation of an additional area of temporary capping on Cell 4, lined with LLDPE plastic.
- Minor repairs undertaken to temporary plastic liner as the waste settles.

Further works scheduled over the next few weeks will include the installation of a new 180mm gas main between Cell 4 and Cell 5c.

1. *Regulatory bodies enforce strict compliance and real-time monitoring to ensure odour levels never reach detectable levels in residential areas.* We have been working collaboratively with Wrexham County Borough Council (WCBC) Public Protection regarding air quality monitoring. Following a recent meeting with partners and the operator to discuss air quality monitoring options, we welcome the Council's decision to install and trial air quality monitors to measure hydrogen sulphide concentrations at the site boundary and at Johnstown Community Centre.

Monitoring is not a solution in itself to reducing the odours but is an important tool to assist us with addressing concerns effectively. Therefore, we would also encourage you to continue to report any odours believed to be coming from the landfill by contacting us on 0300 065 3000 or via the ['Report It'](#) form on our website.

A solution to the odour will take time to address and we realise that this is not what you would be hoping for. However, work is progressing at the site and while some of the actions to be completed by Enovert may cause a temporary increase in offsite odour, they are essential for reducing longer-term fugitive emissions from the site.

1. *An independent impact assessment is carried out on the effect of odour pollution on house prices, disability rights, and the economic viability of living in the affected areas.*

Assessment of the issues you have outlined would be a matter for WCBC. In line with the motion passed at WCBC's Full Council meeting on 26 March 2025 they will be conducting a Community Concerns Assessment. The aim of this assessment is to 'capture health, ecological and environment' concerns from members of the community which will include resident participation in a stakeholder workshop. More details of the motion can be found [here](#).

We met with Senior representatives of Enovert, Rhos Community Council, Ruabon Community Council and Wrexham Council to discuss the site on Friday, March 21st. Actions included Enovert's continued commitment to mitigate any off-site odours and to improve communication with the public – with a focus on developing its relationship with the community. All partners agreed to help maintain information on our website, and the community councils underlined their commitment to help keep local residents who can't access the internet informed. Progress will be monitored and updates shared with each organisation and the public in the coming months.

I understand how stressful the situation has been and continues to be for residents in the surrounding communities who are eager for a resolution as quickly as possible, and I recognise the strength of feeling surrounding the issue. Please be assured we are fully committed to addressing the issues raised and we hope that odour incident reports continue to show a decreasing trend as improvement works are completed.

Best wishes

Enw / Name [REDACTED]
Teitl swydd / Job title Operations Manager North East
Adran / Department Operation
Rhif ffôn / Phone number [REDACTED]

Subject: Further Submission – Hafod Landfill Petition

Thank you for your message and for outlining how best to structure further submissions to the Committee.

I appreciate the Committee's guidance to focus on key points, and I'm grateful for the opportunity to provide an additional document which I believe is highly relevant to the concerns raised in the Petition.

Please find attached a recent Compliance Assessment Report (CAR) relating to Hafod Landfill, which I referenced in my previous submission. Like earlier CAR reports, it highlights a persistent pattern of poor site management, documenting 43 non-compliance issues that are central to the ongoing odour nuisance affecting local residents.

I would be very grateful if you could ensure that the attached report is shared with Committee Members, as it provides important context for understanding the daily impact on the local community. I've included this CAR report alongside my previously submitted 'Additional Information' document as a matter of prudence.

Each one of these 43 non-compliances contributes to the stench rising daily from the landfill, a snapshot in time of the conditions inflicted upon residents of two large housing estates (one being the largest in North Wales), as well as other surrounding villages within a three-mile radius.

I would also be grateful to receive the link to view the Committee meeting scheduled for 28th April 2025, along with any information on the timing.

Kind regards,
Steve Gittins

Natural Resources Wales
Ty Cambria
29 Newport Road
Cardiff
CF24 0TP

Dear Sir/Madam,

**Compliance Assessment Report CAR NRW0045947 – Compliance Failures - 43 INSTANCES
IN TOTAL !!!!!**

Subject: Urgent Action Required – Hafod Landfill Non-Compliance and Continued Environmental Harm

Dear Sir / Madam,

I am prompted to write to you following the latest Compliance Assessment Report (CAR_NRW0045947), arising from an audit in October 2024. raised on November 12-13, 2024, and submitted on 12th February 2025, to formally raise serious concerns regarding the ongoing mismanagement and environmental failings at Hafod Landfill, as This report, highlights extensive and severe breaches of the site's environmental permit (PP3139GB) held by Enovert North Limited.

For two decades, our local communities have suffered persistent odour nuisances and air pollution due to inadequate landfill gas control at this site. Residents have reported distressing 'lived experiences' of overpowering stench, health concerns, and a continual decline in quality of life. The findings in your report provide undeniable proof that these long-standing concerns are justified and that the site's poor management continues to expose the community to environmental harm.

The CAR confirms multiple critical breaches, including:

- **Failure to collect landfill gas from uncapped areas** (Condition 2.9.1(a)) – 35% of the site lacks adequate capping, leading to fugitive emissions that impact air quality and cause intolerable odours.
- **Failure to manage and maintain landfill gas infrastructure** (Condition 1.1.1) – Numerous defects in gas wells, poor sealing, and inadequate weld joints result in significant gas leaks, exacerbating pollution and increasing health risks.
- **Fugitive emissions of landfill gas to air** (Condition 3.2.1) High levels of methane were detected at the perimeter of the site, confirming that landfill gas is migrating beyond the site boundaries, posing risks to both the environment and residents.
- **Leachate Breakouts** – Observed at multiple locations (Cells 4 and 5b), indicating uncontrolled liquid pollution that threatens local watercourses and soil integrity.

At the last audit, NRW has outlined eight urgent corrective actions that Enovert must take, including capping areas that have been inactive for more than six months, repairing extensive damage to gas infrastructure, and reducing emissions at leachate wells and towers. However, this is not the first time such actions have been mandated. Given the historical pattern of non-

compliance at Hafod Landfill, there is significant concern that Enovert will not fulfil these requirements.

This latest report reinforces what residents have known for years, Hafod Landfill is not being operated in a manner that protects the environment or public health. The repeated failures to manage landfill gas, ongoing odour nuisances, and breaches of permit conditions should no longer be tolerated. NRW's own admission that **enforcement action is being considered** strongly indicates the severity of these failures.

We call on NRW to take decisive action by:

1. **Immediately suspending operations** at Hafod Landfill until all compliance actions have been satisfactorily completed.
2. **Issuing the strongest possible enforcement action** against Enovert North Limited for their breaches of environmental regulations.
3. **Considering the full closure of the site** given the ongoing harm it has caused and the operator's history of non-compliance.

Our community deserves better than continued empty promises and regulatory leniency following compliancy failures. We urge NRW to act decisively to protect public health, uphold environmental law, and finally put an end to the unacceptable pollution emanating from Hafod Landfill.

The recent claim from elected officials suggesting complaints have decreased this month, is no defence. Firstly, **oe swallow does not make a summer**, and secondly, the residents are sick and tired, and frankly exhausted, about having to complain to an NRW, when your apathetic recommendation is that if the experience the stench 3 times a day...report it three times a day. NRW's own 'report logging and management' has already been questioned with another campaign, as to it's accuracy and reliability.

What you ignore today, will confront you tomorrow!!!!

I look forward to your response and an update on what enforcement action NRW intends to take.

Yours sincerely,

Steve Gittins

Copy to :

Natural Resources Wales
Maes Y Ffynnon
Penrhosgarnedd
Bangor
Gwynedd
LL57 2DW



Compliance Assessment Report CAR_NRW0046256

Permit being assessed: PP3139GB.

For: Hafod Quarry Landfill Site, **held by:** Enover North Limited

At: Hafod Quarry Landfill Bangor Road, Johnstown, Wrexham, LL14 6ET.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Q4 (October-December) Monitoring returns 2024.

Report sent to: [REDACTED] on 28/02/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	Action only (X)	
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	Action only (X)	
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	C3 Minor	3.1.7
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.5
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
3	12

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR2I	Action 1: continue to complete actions in Leachate Management Action Plan (LMAP) dated November 2024 and actions proposed following the Landfill Emissions Reduction Project (LERP) landfill gas audit (CAR_NRW0045947)	31/03/2025
IR2I	Action 2: Provide NRW with monthly leachate level data for each permitted monitoring point. Provide this on the last day of each month.	31/03/2025
IR2K	Action3: Continue to complete actions specified in updated Landfill Gas Action Plan (LFGAP) dated 24/01/25 and those proposed following LERP audit (CAR_NRW0045947)	31/03/2025
IR3A(1)	Action4: Submit a proposal in writing ,with supporting evidence, to NRW to raise ELV of chloride for monitoring point BHHA12C(B)	30/04/2025
IR3A(1)	Action5: Operator to continue to monitor surface water monitoring results. If elevated Ammoniacal Nitrogen levels persist then the operator will need to carry out further investigations to determine the root cause and resolution of this issue.	30/04/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Assessment Report (CAR) follows the review of Q4 2024 (October-December) monitoring returns and schedule 5 notifications. Monitoring data was submitted to Natural Resources Wales (NRW) on 28/01/25 in accordance with permit condition 4.2.3.

Leachate

Leachate levels were monitored monthly in accordance with permit condition 3.5.1(a) and Table S3.1 (Leachate level limits and monitoring requirements). Monitoring data was provided for each permitted monitoring point for the quarter.

A total of 7,424 m³ of leachate was removed from site for treatment during Q4.

With reference to schedule 5 notifications Haf 378 (October) and Haf381 (November and December) there were 17 instances where the recorded leachate level was greater than

the compliance limit of 2m. NRW considers this a breach of permit condition 2.7.1. A non-compliance score for this permit breach (IR21-Leachate levels) has already been applied for this quarter following the landfill gas audit at the site in November 2024 (see CAR_NRW0045947) and will therefore not be applied in this CAR.

It should be noted that the breaches of permitted leachate levels were in the older cells (Cells 1,2,3 and 4). Leachate levels within the newer cells (Cells 5a and 5b) were within the permitted limits.

Action 1: continue to complete actions in Leachate Management Action Plan (LMAP) dated November 2024 and actions proposed following the Landfill Emissions Reduction Project (LERP) landfill gas audit (CAR_NRW0045947)

Action 2: Provide NRW with monthly leachate level data for each permitted monitoring point. Provide this on the last day of each month.

The operator completed leachate sampling as specified in Table S3.9. Two sets of sampling were completed as the operator did not complete this sampling during Q3.

Landfill gas

Perimeter gas monitoring was undertaken in accordance with Condition 3.5.1(d) and Table 3.6 (Landfill gas in external boreholes). With reference to Schedule 5 notifications Haf375 (October), Haf379 (November) and Haf383 (December) there were 26 instances during Q4 where methane (CH₄) levels in perimeter gas wells exceeded the 1% permitted Emission Limit Value (ELV). Values between 0-30.3% CH₄ were recorded during Q4. NRW considers this a breach of permit condition 3.1.7 and a non-compliance score has been applied (IR3A-Emissions to water, air or land-C3).

Action3: Continue to complete actions specified in updated Landfill Gas Action Plan (LFGAP) dated 24/01/25 and those proposed following LERP audit (CAR_NRW0045947)

Groundwater

Groundwater monitoring was undertaken in accordance with Condition 3.5.1(c) and Tables S3.5 (Groundwater-emission limits and monitoring requirements) and S3.11 (Groundwater-other monitoring requirements)

Samples were not taken at the following monitoring points as the operator states there was insufficient liquid to sample:

BH HA 1A(T), BH HA 5(T), BH HA 9A(T),BH HA 11B(T),BH HA 12A(T).

With reference to schedule 5 notification Hf380, on 22/11/24, monitoring point BH HA 12C(B) recorded a chloride value of 250mg/l vs a compliance limit of 200mg/l. NRW considers this as a breach of permit condition 3.1.5 and a non-compliance score has been

applied (IR3A-Emissions to water, air or land-C3).

The operator was scored for breaching the compliance limit of chloride in monitoring point BH HA 12C(B) during the review of Q2 2024 (CAR_NRW0045313) monitoring returns and given the following action

'Action5: Operator to carry out further investigations to determine the root cause of elevated chloride levels in monitoring point BH HA12 (B) and propose suitable measures to resolve the issue. Provide NRW with a written update outlining your proposals'

In response to Action 5, the operator provided the following within schedule 5 notification Hf380:

'BH HA 12C(B) is a replacement for previous borehole BH HA 12B(B), which was decommissioned and removed from the monitoring programme, due to the elevated background chloride results. BH HA 12B(B) was situated next to the slip road onto the A483 and it was thought that the application of de-icing salts could be a contributing factor.

Adjacent borehole BH HA 12A(M), also on the slip road, often has elevated chloride too, up to around 600mg/l. The elevated background chloride here is recognised by a higher limit set in the permit.

Partly for this reason, and also due to safety concerns regarding parking a vehicle on the slip road, the replacement borehole BH HA 12C(B) was installed much closer to the site boundary, adjacent to New Hall Road. It is likely that this is being affected by the same background conditions that affect other groundwater monitoring points in the area, for example from de-icing salts being applied to New Hall Road in the winter months. There does appear to be a spike in the chloride results in the winter time. (Which is not accompanied by increases in other leachate-pollution-indicators).

Permit limits were set for replacement well BH HA 12C(B) with the caveat that alternative limits can be agreed in writing with Natural Resources Wales.

Enovert are required to manage and monitor our operations so as not to have any detrimental effect on the environment. All the evidence points to the chloride not being from our operations. As to the root cause of the elevated chloride, we can only speculate that this may be from de-icing salts. We propose to resolve the issue by amending the permit limits by written agreement. We will discuss this with the consultants writing our 2024 annual report.'

It is noted that elevated levels of chloride were recorded in monitoring point BH HA 6A(B)-22/11/24-490mg/l and elevated Ammoniacal Nitrogen was recorded in monitoring points BH HA 2A(M)-22/11/24-2mg/l and BH HA 6A(B)-22/11/24-3mg/l. However, there are no compliance levels associated with these monitoring points.

Action4: Submit a proposal in writing ,with supporting evidence, to NRW to raise ELV of chloride for monitoring point BHHA12C(B)

Surface water

Surface water monitoring was completed in accordance with Condition 3.5.1(b) and (e),

Tables S3.3 (point source emissions to water-emission limits and monitoring requirements) and S3.10 (surface water-other monitoring requirements).

With reference to schedule 5 notification Haf377 (October) monitoring point SW2 recorded an Ammoniacal Nitrogen value of 5.5mg/l vs a compliance limit of 1.8mg/l on 14/10/24. With reference to schedule 5 notification Haf382 (November) monitoring point HafSW1A recorded an Ammoniacal Nitrogen value of 4.8mg/l vs a compliance limit of 1.8mg/l on 18/11/24. NRW considers this a breach of permit condition 3.1.1 and a non-compliance score has been applied (IR3A-Emissions to water, air or land-C3).

It should be noted that monitoring point SW1 (no compliance limit associated with this monitoring point), also recorded elevated ammonia at 3.1mg/l on 21/11/24. With reference to schedule 5 notification Haf382, the operator states:

'The result at SW1, upstream of the site, is also showing elevated ammoniacal-nitrogen, which cannot possibly be related to the landfill site and must be from another source. The likelihood is that both sample locations are affected by the same background processes.'

Ammoniacal-N (in SW1A) was the only elevated result and there were no associated increases in other substances. Therefore, it is very unlikely to be due to any leachate contamination and is more likely to be representative of background conditions, such as rotting autumn leaf fall affecting the surface water, for instance.

If leachate contamination was the cause, then we would be seeing a wide range of parameters being elevated, which is not the case.

Future monitoring results will be reviewed to see if the elevated concentrations continue.'

Action5: Operator to continue to monitor surface water monitoring results. If elevated Ammoniacal Nitrogen levels persist then the operator will need to carry out further investigations to determine the root cause and resolution of this issue.

Annual report

An extension has been granted for the submission of the Annual Report until 31/03/25.

However, the following information has been supplied by the operator:

Volume tipped = 89,419 m³

Void Space remaining = 1,841,499 m³

LFG to engines m³/year = 7,439,635

LFG to Flare m³/year = 1,136,405

Total LFG = 8,576,040

If you have any queries about this report, or to discuss completion of any actions, please contact the [REDACTED]

Dear Members of the Senedd Petitions Committee,

Please accept my apologies for submitting this **further addition** to my petition evidence so close to the committee meeting. However, I only received this information on **11 April 2025**, and I believe it is absolutely **pivotal** to be included in your considerations. It reveals yet **another serious injustice** faced by our community, and further strengthens the case for the **revocation of the environmental permit for Hafod Landfill**.

A response to my Freedom of Information request to Merseyside Waste Disposal Authority (MWDA) has confirmed that over the past five years, a **staggering 81,000 tonnes of Merseyside's waste** has been dumped at the Hafod Landfill in Wrexham. This includes over **30,600 tonnes in 2022–23 alone**, making it a **systemic practice**.

The arrangement is hidden behind contractual layers involving Merseyside Energy Recovery Ltd (MERL), SUEZ, and Veolia. When their energy-from-waste facility in Teesside is offline, whether due to breakdowns or routine maintenance, waste is redirected to “alternative third-party facilities.” One of those is Hafod Landfill. Despite being located in Wales, our community has **no say and no protection** against the volume of **non-Welsh waste** being routinely trucked or railed in from across the border.

This is not our waste, and yet we live with the stench.

The residents of Johnstown and the surrounding area endure **relentless, noxious odours** from the landfill, odours that frequently contain hydrogen sulphide and other volatile gases. The environmental and health impacts are real, and they are being logged time and time again with NRW through formal complaints and incident reports. We are quite literally breathing in the consequences of **England's infrastructure failures, with Merseyside only recycling 17% of its waste in 2023 (2024 not available yet)**.

To make matters worse, this entire system is **opaque and unaccountable**. NRW have permitted this landfill to continue operating under a licence that does not protect Welsh residents from **cross-border harm**. MWDA claims no direct role in the disposal, leaving the decisions to private contractors, and yet our landscape and lungs are paying the price.

In just **72 hours**, our petition gathered over **1,000 signatures, and subsequently submitted**, a huge show of strength from our small community. That response alone is an indication of how desperate and exhausted we have become. But this new evidence transforms our case from one of public anger to one of **regulatory failure**.

We therefore respectfully request that the Committee:

1. **Support the immediate revocation of the environmental permit** for Hafod Landfill, on grounds of public nuisance, disproportionate environmental harm, and breach of the Welsh public interest;

2. **Initiate a review into NRW's role** in allowing non-Welsh waste to be routinely disposed of in Hafod with no local oversight;
3. **Challenge the Welsh Government and NRW to adopt a clear policy** prohibiting the import of out-of-country residual waste to any Welsh landfill.

This new evidence is not just a technical detail, it is a **critical and outrageous truth, and a national disgrace** that must be part of your deliberations. It shows, beyond doubt, that our community is being used as a **dumping ground, by Merseyside Council, a council that only recycles 17% of its own waste. This must end now, enough is enough.**

Thank you once again for considering this updated submission.

Sincerely,
Steve Gittins

Two Decades of Silence: Why Has No Health Risk Assessment Been Carried Out for Hafod

Dear Sir/Madam,

I am writing to formally raise concerns regarding the potential health impacts of the Hafod Landfill Site in Johnstown, Wrexham, operated by Enovert, on residents of the surrounding communities. This matter is deeply personal to me, as my late mother, who led a healthy lifestyle, never smoked, and abstained from alcohol, sadly passed away in 2022 after being diagnosed with dementia.

While it is well-established that dementia has multi-factorial causes, there is an increasing body of scientific evidence indicating that long-term exposure to environmental pollutants, including those emitted by landfill sites, may significantly elevate the risk of neurodegenerative conditions such as Alzheimer's and other forms of dementia.

As of 2024, an estimated 11,900 people are living with dementia in North Wales, including those with young-onset dementia (under 65). This represents a concerning upward trend. However, what remains unknown, and requires urgent investigation, is whether the prevalence of dementia in communities within a 3-mile radius of Hafod Landfill is disproportionately high compared to national or regional averages.

Emerging Scientific Evidence

Recent peer-reviewed studies have increasingly drawn links between air pollution and cognitive decline. Landfill sites such as Hafod Landfill emit a range of hazardous pollutants, including:

- **Particulate Matter (PM2.5 and PM10):** These fine particles are known to penetrate deep into the lungs and bloodstream, triggering systemic inflammation and oxidative stress, both of which are implicated in cognitive deterioration and dementia.
- **Bioaerosols:** Airborne bacteria, fungal spores, and endotoxins can exacerbate respiratory and immune system stress, further increasing neurological vulnerability.
- **Heavy Metals (e.g., Lead, Mercury, Cadmium):** These neurotoxic substances can accumulate in the brain, disrupting neurotransmission and accelerating neurodegeneration.
- **Volatile Organic Compounds (VOCs):** Benzene, toluene, and other VOCs—common in landfill gas emissions—are directly linked to cognitive impairment and neural damage.

These pollutants can arise from waste decomposition, leachate evaporation, vehicle traffic, and landfill gas venting or flaring. Chronic exposure to such substances, particularly in residential areas with vulnerable populations, is deeply troubling.

Lack of Health Impact Assessment

After reviewing available information, there is no publicly documented evidence of a comprehensive Health Impact Assessment (HIA) or Health Risk Assessment (HRA) specifically conducted for the Hafod Landfill Site in Johnstown, Wrexham, over the past two decades. While Natural Resources Wales (NRW) has undertaken regulatory actions and environmental monitoring in response to odour complaints and permit breaches, these efforts have not included a formal health-focused assessment to evaluate potential long-term health effects on nearby residents.

This lack of a dedicated health assessment is particularly concerning given the site's history of environmental issues. For instance, a significant fire in May 2020 resulted in PM10

pollution levels reaching 702 micrograms per cubic metre, 14 times the legal limit, posing acute health risks to the local population. Additionally, persistent odour complaints have led to enforcement notices, with over 300 complaints recorded between October 2023 and August 2024.

In contrast, other UK landfill sites, such as Withyhedge in Pembrokeshire, have been subject to formal health risk assessments by Public Health Wales, despite similar issues with hydrogen sulphide emissions. The absence of a comparable assessment for Hafod Landfill raises serious questions about the consistency of public health protections across different regions.

Given these circumstances, it is imperative to question why a comprehensive health risk assessment has not been conducted for the Hafod Landfill Site. The ongoing environmental concerns and potential health implications for residents living within a 3-mile radius necessitate immediate attention. A formal Health Impact Assessment would provide critical insights into the long-term health effects of exposure to pollutants emitted by the landfill and inform necessary mitigation strategies.

I urge the Welsh Government to prioritise the commissioning of a Health Impact Assessment for the Hafod Landfill Site to ensure the health and well-being of the affected communities are adequately protected.

Request for Comparative Health Data

In light of these risks, I request that the Welsh Government investigate whether there is a statistically significant correlation between the incidence of dementia and proximity to the Hafod Landfill Site. Specifically:

Are dementia diagnosis rates within a 3-mile radius of the site higher than the national or North Wales average?

If such data is not currently being collected or analysed, will the Welsh Government commit to initiating a comprehensive health impact assessment for communities near the landfill?

Should the necessary data not be readily available, I strongly recommend that a Freedom of Information (FOI) request be submitted to Public Health Wales, Betsi Cadwaladr University Health Board, or other relevant authorities to obtain anonymised data on dementia diagnoses by postcode area.

Request for Action

Given the potential health hazards and the persistent statutory nuisance caused by the landfill's odour emissions, I respectfully urge the Welsh Government to:

Commission an independent investigation into the environmental and health impacts of emissions from the Hafod Landfill Site on surrounding communities.

Ensure continuous, real-time air quality monitoring at multiple locations around the site, focusing on key pollutants including PM2.5, VOCs, heavy metals, H₂S, and bioaerosols.

Publish regular updates for residents detailing air quality readings and any potential health risks.

Consider revoking or suspending the landfill's operating permit if emissions are found to pose a risk to public health or quality of life and cannot be adequately mitigated.

Conclusion

I trust the Welsh Government will take these concerns seriously and act with the urgency this matter deserves. Our communities should not be left to wonder whether the air they breathe is contributing to serious and irreversible health conditions. I am willing to work with local authorities, researchers, or community groups to further this investigation, and I urge the government to engage with residents directly to gather further testimonies.

Thank you for your attention to this critical issue. I look forward to your response and to seeing meaningful action taken to protect the health of residents in Johnstown and the wider Wrexham area.

Yours faithfully,

Steve Gittins

Sent to :

Jeremy Miles MS Minister for Health and Social Services - ministerforhealth@gov.wales / jeremy.miles@gov.wales

Huw Irranca-Davies MS Minister for Climate Change - climatechange@gov.wales / 

Dr. Tracey Cooper, Chief Executive, Public Health Wales - phw.enquiries@wales.nhs.uk

Dr. Frank Atherton, Chief Medical Officer for Wales - healthandcmo@gov.wales

Director of Public Health, Betsi Cadwaladr University Health Board - BCU.PublicHealth@wales.nhs.uk

Cllr Mark Pritchard, Leader, Wrexham County Borough Council - cllr.mark.pritchard@wrexham.gov.uk

Lesley Griffiths MS, Member of the Senedd for Wrexham - lesley.griffiths@senedd.wales

Steve Withenden MP, Member of Parliament for Wrexham - steve.withenden@parliament.uk

Llyr Gruffydd MS - Llyrgruffydd@senedd.wales

Dawn Bowden MS – Cabinet Secretary for Health and Social Care –

CabinetHealthSocialCare@gov.wales

Jack Sargeant MS – Chair, Petitions Committee – Petitions@senedd.wales

Ken Skates MS – Clwyd South – Ken.Skates@senedd.wales

Wrexham County Borough Council – EnvironmentalHealth@wrexham.gov.uk

Natural Resources Wales – customerhub@naturalresourceswales.gov.uk

Public Health Wales – publichealthwales.communications@wales.nhs.uk

Betsi Cadwaladr University Health Board – bcuhb.communications@wales.nhs.

Agenda Item 3.1

P-06-1184 Immediately ban the use of toxic lead in all ammunition in Wales... lead is killing our wildlife!

This petition was submitted by Robert Curtis, having collected a total of 4,052 signatures.

Text of Petition:

Lead is a toxic metal and a very strong poison yet more than 6,000 tonnes are fired at game birds each year in the UK. If any citizen deliberately dumped thousands of tonnes of poison into the Welsh countryside they would rightly find themselves facing prosecution in a Court of Law!

Birds often mistake tiny shot pellets for grit or seeds, and ingest them, and so suffer painful deaths. Dying birds are usually taken quickly by predators – making their deaths unseen and invisible to the public.

Additional Information:

Most ammunition –bullets, shotgun pellets and airgun pellets have traditionally been made with lead.

Lead affects most body systems in animals, including the nervous and circulatory systems, and low levels of exposure can affect a birds immune system and behaviour. In some circumstances , swallowing even a single lead pellet can kill a bird.

A consortium of shooting organisations now support a switch to ammunition that is free of lead by everyone taking live quarry with shotguns in the next five years.

We welcome this recognition of the damage lead is doing to our environment but believe the ecological emergency demands that we impose an immediate ban on lead ammunition of all kinds. We also believe that the ban must include clay shoots and not just "live quarry" as the wasted lead shot still ends up in the environment.

Barry Action is a small volunteer conservation group based in the South Wales coastal town of Barry.

Senedd Constituency and Region

- Vale Glamorgan
- South Wales Central

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1184
Ein cyf/Our ref HIDCC/00242/25

Carolyn Thomas MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN
petitions@senedd.wales

28 March 2025

Dear Carolyn,

Thank you for your letter of 5 February regarding the Senedd Petition Committee's Petition Number P-06-1184, concerning the lead in ammunition restriction proposals.

In Spring 2021, Defra asked the Health & Safety Executive (HSE) and the Environment Agency (EA) to prepare a restriction dossier for lead ammunition in all habitats. The HSE and the EA have considered the evidence related to the risk posed by lead in ammunition on human health and the environment, as well as the socioeconomic impact of introducing further restrictions on lead in ammunition. They also considered the effectiveness, practicality, monitorability and enforceability of the suggested restriction.

HSE published a dossier and launched a six-month public consultation in May 2022. In January 2023, HSE announced a six-month extension to the analysis period to allow for due consideration of the large volume of responses received, it included many detailed and technical submissions.

HSE has now formed a final [Opinion](#) on the restriction proposal for lead in ammunition, informed by information from public consultations, as well as independent scientific advice.

This Opinion is currently under review by Defra, in collaboration with the Welsh and Scottish Governments. A decision on the proposal will be made in due course, with the final decision still pending.

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
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.

Thank you for writing to me on the proposed lead in ammunition restriction. I hope you will find the information above helpful in updating the Committee and the petitioner.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name 'Huw Irranca-Davies'.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Agenda Item 3.2

P-06-1242 Improve Endometriosis Healthcare in Wales

This petition was submitted by Beth Hales, having collected a total of 5,895 signatures.

Text of Petition:

Endometriosis devastates the lives of women and their families living in Wales with 1 in 10 suffering with the condition.

The cause of endometriosis is unknown, there is no cure, the average diagnosis time is currently 8.5 years and there's a 6 year waiting list for treatment on the NHS.

The demonstrable lack of understanding of the condition is detrimentally impacting society at all levels. Funding therefore needs to be prioritised to ensure equality of healthcare in Wales.

Additional Information:

A report commissioned by the Welsh Government in 2018 highlighted how big a problem we're facing with resources being wasted and harm currently being caused to individuals suffering with Endometriosis. Despite the findings showing impacts on healthcare, education, economic, financial and social levels within society, most recommendations haven't been adopted, and in many areas things have instead worsened for sufferers of Endometriosis.

(Below is the link to this Government report – Endometriosis care in Wales: Provision, care pathway, workforce planning and quality and outcome measures.

<https://gov.wales/sites/default/files/publications/2019-03/endometriosis-care-in-wales-provision-care-pathway-workforce-planning-and-quality-and-outcome-measures.pdf>).

Please sign this petition to help raise awareness of Endometriosis and encourage the Welsh Government to allocate the appropriate level of funding for this condition so we can take steps towards achieving equality of healthcare in Wales.

Senedd Constituency and Region

- Cardiff South and Penarth
- South Wales Central

Sarah Murphy AS/MS
Y Gweinidog Iechyd Meddwl a Llesiant
Minister for Mental Health and Wellbeing



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref Petition P-06-1220 and P-06-1242
Ein cyf/Our ref SM/00192/25

Carolyn Thomas MS
Chair
Petitions Committee

petitions@senedd.wales

25 March 2025

Dear Carolyn,

Thank you for your letter of 5 February about **Petition P-06-1220 Increase funding available for Women's Health Services, Education and Awareness** and **Petition P-06-1242 Improve Endometriosis Healthcare in Wales**. I am replying as I have Ministerial responsibility for women's health.

Improving women's health is a priority for the Welsh Government. The [Quality Statement for Women's and Girl's Health](#), which sets out what women can expect from health services was published in July 2022. Wales' first *Women's Health Plan*, which was informed by the experiences of almost 4,000 women across Wales, was subsequently published on 10 December 2024 and is available at: [The Women's Health Plan for Wales - NHS Wales Executive](#)

The Quality Statement for Women's and Girls' health makes it clear health board services must reflect women's needs across a wide range of conditions, not just gynaecological conditions.

The Women's Health Plan has been developed by the National Strategic Clinical Network for Women's Health, led by Wales' first clinical lead for women's health. It is an ambitious 10-year plan which will drive real improvements in women's health and outcomes, through a series of short, medium and long-term actions. The short-term actions focus on awareness raising and education of both women and practitioners delivering care.

Women's symptoms and clinical presentations of cardiac disorders, asthma, incontinence, and mental health conditions are often different to men's, and their care must respond accordingly by recognising these patterns, and offer women diagnosis and treatment

Bae Caerdydd • Cardiff Bay
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CF99 1SN

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

Gohebiaeth.Jeremy.Miles@llyw.cymru
Correspondence.Jeremy.Miles@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.

according to their specific needs, through a model of service delivery that is gender and culturally competent.

The Women's Health Network has an important role to play in this by advocating for women. This will include working with the other clinical networks to ensure women's needs are considered; their voices heard, and their experiences are recognised.

An additional £3m has been allocated to support the delivery of the actions in the Women's Health Plan, with a particular focus on the establishment of pathfinder women's health hubs in each health board by March 2026.

Women make up half of the population, yet historically they have been disadvantaged by a lack of research and data about conditions specific to them. The previous Cabinet Secretary for Health and Social Care set out our approach to increasing funding for research for women's health. This included a women's health research prioritisation exercise that has sought the views of those with lived experience and health and social care professionals on the issues that matter most to them. The findings from this exercise will inform a focused call for research on communication around women's health to be launched in April, committing £750,000 to women's health projects.

In addition, just over £3m has been secured for a new women's health research centre in Wales, as part of a wider £49m funding package announced by Health and Care Research Wales. It will provide vital evidence to improve healthcare for women in Wales and will be led by Cardiff University working with Swansea University, Bangor University and the University of South Wales.

This funding represents a significant commitment to address health inequalities and shape future services for women, as set out in the Women's Health Plan for Wales.

With regards to improving endometriosis healthcare in Wales, we understand the difficulties faced by women living with this chronic condition. Endometriosis and adenomyosis is one of the eight priority areas in the Women's Health Plan. For this priority area, there are seven clearly defined actions. These will lead to improvements in the experience of women accessing information, treatment and support for endometriosis across Wales.

The actions will make improvements in a range of key areas, including raising awareness of the condition and improving information available for patients. Providing training and education for healthcare practitioners to ensure it is understood as a chronic condition. Establishing robust monitoring frameworks and data collection to help understand the need and capacity in each health board.

With regards to your specific query relating to tertiary endometriosis care, where more complex endometriosis treatment is required, referrals are made from health boards to an accredited endometriosis centre. There are currently two in South Wales – in Cardiff and Vale University Health Board and Swansea Bay University Health Board. Although these are accredited centres, they are not commissioned as a specialist service. We recognise the difficulties women face in accessing specialist services for women's health conditions, particularly tertiary care for endometriosis. Welsh Government officials will be working with the Women's Health Network and the Joint Commissioning Committee to explore establishing commissioned specialist services in this area.

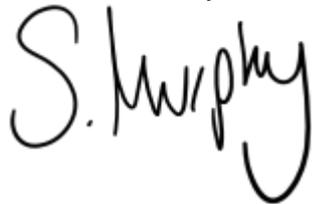
Reducing long waiting times is a national priority and £50m has been committed to cut the longest waits by March 2025. This is additional funding, over and above the recovery money available every year to support the NHS.

While waits of more than two years have reduced by 79% for gynaecology pathways since April 2022, we are committed to reduce this further and expect additional reduction as a result of this additional funding.

Timely diagnosis and management of menstrual health conditions including endometriosis will also be supported through the establishment of the pathfinder women's health hubs.

It is already the responsibility of health boards to deliver high quality gynaecology services, and it is vital they meet the expectations set out in the quality statement, which includes early diagnosis and the management of endometriosis in accordance with the National Institute for Health and Care Excellence guidance.

Yours sincerely,

A handwritten signature in black ink that reads "S. Murphy". The signature is written in a cursive style with a large, looped 'S' and a long, sweeping tail on the 'y'.

Sarah Murphy AS/MS

Y Gweinidog Iechyd Meddwl a Llesiant
Minister for Mental Health and Wellbeing

P-06-1242 Improve Endometriosis Healthcare in Wales - Correspondence from the Petitioner to the Committee, 22 April 2025

Thank you for your e-mail and the letter from the Minister for Mental Health and Wellbeing.

Please could the following extract from the Minister's letter be highlighted with the Petitions Committee during the meeting:

"With regards to your specific query relating to tertiary endometriosis care, where more complex endometriosis treatment is required, referrals are made from health boards to an accredited endometriosis centre. There are currently two in South Wales – in Cardiff and Vale University Health Board and Swansea Bay University Health Board. Although these are accredited centres, they are not commissioned as a specialist service. We recognise the difficulties women face in accessing specialist services for women's health conditions, particularly tertiary care for endometriosis. Welsh Government officials will be working with the Women's Health Network and the Joint Commissioning Committee to explore establishing commissioned specialist services in this area."

I'm really pleased to hear that the Welsh Government will now be starting to explore establishing commissioned specialist services for endometriosis, however I wanted to note what this will continue to mean for endometriosis patients whilst we await progress in this area.

As endometriosis tertiary care is currently not commissioned as a specialist service, for a patient who lives (for example) in the Hywel Dda University Health Board area, they'll be unable to access treatment for endometriosis due to the funding not following the patient to Cardiff and Vale University Health Board or Swansea Bay University Health Board (the two accredited endometriosis centres). Therefore, until this changes, women will be left living in pain or having to pay for treatment privately.

It's also worth noting that tertiary care is not just required for a small percentage of complex cases, it is vital for the majority of us, as laparoscopic surgery is the only way to diagnose and treat endometriosis. I've had three operations (so far) to diagnose and treat my endometriosis, and I had to access this tertiary care treatment privately for two of the operations due to the length of time I would've had to wait for treatment on the NHS (and I live in the Cardiff and Vale University Health Board area).

The lack of tertiary care is why girls are missing out on education whilst they await diagnosis; it's why women are unable to progress their careers whilst they await treatment; and the financial implications are vast with the [NHS Confederation women's health economics report](#) estimating the economic cost of absenteeism due to conditions like endometriosis, to be nearly £11 billion per annum.

As I've previously mentioned, the lack of tertiary care is one of the main points I've been trying to raise via my petition, and we're now hoping to see the start of change with this issue. I therefore again hope that my petition can be kept open until tangible progress is made with tertiary care for endometriosis patients, but if not, I ask that the Committee will agree for a future petition on endometriosis to be accepted and re-considered if no progress has been made within the next year.

Finally, I would also like to add my thanks to the Senedd for recently signing up to the [Endometriosis Friendly Employer Scheme](#) which is run by the charity Endometriosis UK. Through the scheme, Endometriosis UK provides guidance for employers on how to support employees with endometriosis, and work towards improving the work environment.

Diolch,

Beth

Agenda Item 3.3

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

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



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1335
Ein cyf/Our ref KSNWT/00427/25

Carolyn Thomas MS
Chair - Petitions committee

4 April 2025

Dear Carolyn,

Thank you for your further letter of 07 March regarding Transport for Wales (TfW) staff discretion to serve complimentary refreshments on trains.

My officials have raised this matter with TfW and they have confirmed that their catering staff do not carry cash and are therefore unable to accept cash payments. However, they have also advised that it is their policy for catering staff to apply their discretion to serve complimentary refreshments such as water, tea and coffee in circumstances where passengers are unable to make card payments. TfW Customer Hosts are trained and experienced to identify the needs of passengers and are empowered by policies such as this to assist accordingly.

This is not proactively advertised by TfW in order to prevent this policy from being abused by passengers who do not require this assistance. However, I have asked my officials to discuss this matter further with TfW to explore opportunities to develop this solution and further improve the passenger experience for vulnerable adults.

Yours sincerely,

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

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

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Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Ken.Skates@llyw.cymru
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.

A Cashless Society? P-6-1335 Welsh Government should take steps to ensure vulnerable adults without bank cards can pay with cash: Correspondence from the Petitioner to the Committee

We would like to thank the Senedd's Petitions Committee for inviting us to respond to the Cabinet Secretary for Transport and North Wales's letter to the Committee regarding the use of cash on Transport for Wales (TfW) trains and the discretion given to staff to serve complimentary refreshments.

The response provides some clarity for our members and confirms the experiences that have been shared with us from people with a learning disability who have been unable to pay with cash for refreshments whilst travelling on a TfW train. Our view remains that refusing to accept cash payments creates a huge barrier for people who do not have access to digital banking. We are not only talking about the importance of cash as a vital budgeting tool for people with a learning disability and their families, but the substantial risk that many people with a learning disability who are cash users will become unacceptably disadvantaged by a lack of ability to use cash payments. Whilst a policy which provides staff with discretion to serve complimentary refreshments, this doesn't address the wider issues around choice and control which people experience when they are unable to spend their cash.

Whilst we understand that this policy isn't widely advertised by TfW in order to prevent the abuse of this policy by passengers, we would like to understand how people with a learning disability would understand that this is something that they could ask for. We believe that it is important that people with a learning disability who may not have access to a debit or credit card are not only made aware of this policy, but are actively involved in its evaluation to determine whether discretion has been provided to them when trying to purchase food or drink on the train.

We are grateful that the Cabinet Secretary has asked TfW to explore this issue further and further improve the passenger experience on their services. We urge Welsh Government and TfW officials to meet with passengers with a learning disability and their families as part of this process.

Agenda Item 3.4

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

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

Text of Petition:

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

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

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

Additional Information:

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

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

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

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

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

Senedd Constituency and Region

- Dwyfor Meirionnydd
- Mid and West Wales



Eich cyf/Your ref P-06-1350
Ein cyf/Our ref JMHSC/00726/25

Carolyn Thomas MS
Chair
Petitions Committee

petitions@senedd.wales

08 April 2025

Dear Carolyn,

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

Thank you for your letter of 7 March.

You will be aware the committee previously wrote to the then Minister for Health and Social Services in May 2023, who advised that this is an operational matter for the health board, and one in which Welsh Ministers cannot directly intervene. This remains the case.

I understand how strongly people feel about their local health services. However, health boards in Wales remain responsible for the planning and delivery of healthcare services to meet the needs of their local population. In doing so, they will need to consider a range of options and may need to make difficult decisions on how this can be delivered within the financial and staffing resources available. My role and that of the Welsh Government is to set the strategic direction for the NHS in Wales.

Betsi Cadwaladr University Health Board has always stated its intention is to try to reinstate the Dyfi inpatient ward at Tywyn Hospital. However, challenges in recruitment and retention of staff within the local area over the past two years have led to continued concerns about the health board's ability to secure and maintain the required minimum safe staffing levels for a 24/7 inpatient ward at the hospital on a sustainable basis.

My predecessors have raised this matter with the chair of the health board on a number of occasions, as have I in the time since I was appointed as Cabinet Secretary for Health and Social Care. We have been clear that the Board must continue to engage with the local community and key stakeholders to understand their views, to help inform development of a coherent long-term plan for the future of service provision in the area in line with national guidance.

Bae Caerdydd • Cardiff Bay
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CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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

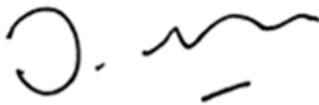
In the time since the Dyfi ward has been closed, the health board has enhanced the range of services available in the community. Feedback and learning from this approach will also help to inform its consideration of the best model of service delivery for this locality moving forward.

I understand that further engagement is planned with the local community and key stakeholders including Llais in early 2025 to discuss a more sustainable way forward . This will include a range of events and activities to support wider engagement with the local community.

My officials continue to monitor this situation in line with oversight and assurance arrangements in place with the health board.

I hope this information is helpful in your consideration of the petition.

Yours sincerely,

A handwritten signature in black ink, consisting of a large 'J' followed by a series of wavy lines and a short horizontal stroke at the end.

Jeremy Miles AS/MS

Ysgrifennydd y Cabinet dros Iechyd a Gofal Cymdeithasol
Cabinet Secretary for Health and Social Care



Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

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

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

Carolyn Thomas MS,
Chair,
Petitions Committee,
Welsh Parliament,
Cardiff Bay,
Cardiff,
CF99 1SN

Ein cyf / Our ref: CS/CT(CE25/0188)

☎: 01745 448788 ext 6382

Gofynnwch am / Ask for: [REDACTED]

E-bost / Email: [REDACTED]

Dyddiad / Date: 17th April 2025

By email – seneddCovid@Senedd.wales

Dear Chair,

RE: Petition P-06-1350 Re-open Dyfi Ward at Tywyn Hospital

I committed to write to you as Chair of the Senedd Petitions Committee with the latest information about health provision in Tywyn.

The health board remains committed to providing sustainable healthcare services for rural communities such as Tywyn. Whilst there have been real challenges in maintaining appropriate and safe staffing levels for the Dyfi Ward, this has provided an opportunity to develop wider community services such as providing health and care services directly in patient's homes, working closer with care homes in the area to provide services for their residents to retain their place for a longer period, and enabling and providing the health support for patients to spend their last few weeks and days with dignity in their own home. The Tuag Adref (Homeward Bound) service supports patients to remain at home, avoiding preventable hospital admissions as well as supporting earlier discharge from hospital, providing low level support and rehabilitation at home following discharge. We have also been able to re-open the minor injuries unit and establish a treatment room and wellbeing hub. We know these have been valued by people in the community.

As the discussion at the Petitions Committee reflected, it has becoming apparent over the last two years that there is a need to engage further with the local community, its representatives and Llais, to further consider what is the best sustainable model of service delivery to meet the health needs of this locality moving forward.

From previous engagement with the community we know people value care closer to home, support for people to return home, end of life care, respite care, minor injury and treatment provision and improved mental health support. The sustainable model of services need to consider all of these.

As a Board, in May, we will be considering the way forward in engaging people in further developing health services in the wider Tywyn area. We look forward to the continued involvement of local people in shaping the future provision in the area.

Cyfeiriad Gohebiaeth ar gyfer y Cadeirydd a'r Prif Weithredwr / Correspondence address for Chairman and Chief Executive:
Swyddfa'r Gweithredwyr / Executives' Office
Ysbyty Gwynedd, Penrhosgarnedd
Bangor, Gwynedd LL57 2PW

Pack Page 120 www.pbc.cymru.nhs.uk / **Web:** www.bcu.wales.nhs.uk

Mae Swyddfa'r Prif Weithredwr yn croesawu gohebiaeth yn Gymraeg a bydd yn sicrhau y darperir ymateb yn Gymraeg heb oedi.
The Chief Executive's Office welcomes correspondence through the medium of Welsh and will ensure that a response is provided in Welsh without incurring a delay



Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

I hope this information shows the Health Board's commitment to the community of Tywyn.
I am happy to keep the committee updated on developments as we move forward.

Kind regards,

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

Carol Shillabeer
Prif Weithredwr/Chief Executive

21st April 2025

Ms Carolyn Thomas MS
Chair –Petitions Committee
Senedd Cymru.
Cardiff
CF99 1SN

Glan Eifion
Seaview
Borth-Y-Gest
Porthmadog
Gwynedd LL49 9TP

Tel : 01766 513 337
Mob: 07968 437 060
e-mail: tom@communityhospitals.net

P-06-1350 Re-open Dyfi Ward at Tywyn Hospital

Dear Ms Thomas,

Once again the petitioners have asked me to forward further observations to your Committee from the Community Hospitals Association. This follows the petitioners' receipt of a copy of the letter of 08th April 2025, from the Cabinet Secretary for Health and Social Care to you as the Petitions Committee Chair.

THE NEED FOR THE TYWYN FACILITY

During the past couple of weeks, I have visited 3 North Wales hospitals with 5 different patients, one acute hospital and two community hospitals. The situation has been consistent. I met kind hard working staff struggling with overcrowded facilities. This was especially so in Ysbyty Gwynedd, where the A&E wait had extended to 7 hours and in the Gogarth Ward (GP urgent referral ward) where finding somewhere to put a patient for an assessment took some time, because of the hospital's bed occupancy level.

Yet we have in Tywyn, modern equipped accommodation that has been underutilised for two years.

The Cabinet Secretary in his letter accepts that the Tywyn facility should be contributing to meeting our healthcare needs in North Wales and that for two years Betsi Cadwaladr UHB has failed to match their own promise to staff and reopen the Tywyn facility. The situation can be rectified.

IMPACT ON THE COMMUNITY

The impact of the Dyfi Ward closure has been felt outside the immediate area. Local South Meirionnydd residents have suffered the most. This is clear from the multiple social media posts that residents have made on the topic and from the recent visit to Tywyn of S4C.

I am encouraged that some of the Cabinet Secretary's staff "monitor the situation". It would be encouraging if they made contact with the Petitioners when they visit the Tywyn area. I am not aware of HIW, PHW or any other national Wales NHS body giving visible assistance to easing the problem.

CHANGE OF CIRCUMSTANCES AND RECOMMENDATION

I understand that there have been senior staff changes in the Betsi Cadwaladr UHB West area, and the Cabinet Secretary confirms that the revised management are charged with developing and consulting upon a "long-term plan for the future of service provision". However, the Cabinet Secretary does not offer any date for the production or implementation of the proposed "long term plan".



Promises and reality have not been comfortable “bedfellows” in Betsi Cadwaladr UHB care provision, as the very extensive periods that Betsi Cadwaladr UHB has been in ‘special measures’ testifies. The chances that a “long-term plan for the future of service provision” will be viewed as meeting the healthcare needs of South Meirionnydd and will then be delivered, is low, based on the recent history of the service delivery in the area.

I know that there has been discussion on whether or not this petition should be closed. I urge you to keep the petition open and seek updates from Betsi Cadwaladr UHB and the petitioners on the progress of the action that the Cabinet Secretary has proposed.

As someone who in my working days made positive contributions to the NHS in Wales, I am embarrassed by the international reputation that we now have. I have no doubt that the level of healthcare service in the Tywyn area can be improved and I ask the Petitions Committee to maintain their contribution to delivering that improvement.

Yours sincerely

Tom Brooks

Committee Member
Community Hospitals Association

P-06-1350 reopen Dyfi Ward at Tywyn Hospital now April 2025

Two years on, the tragic situation at Tywyn Hospital has not been resolved. It is most upsetting and sad to find that the inpatients ward at Tywyn Hospital is still closed and it is now precisely two years since BCUHB shut it down.

The health board has spent most of the last two years offering up many reasons for closing the ward and for keeping it closed; these include being insistent that it did not have the required number of staff, that it was unable to recruit staff, that there was insufficient accommodation for staff, that there were more beds available in Dolgellau than Tywyn, that only 4 beds were needed in Tywyn, and the list goes on. Many of these excuses proved to be unfounded and inaccurate. Through reading the health board's own documents, it was discovered for example, before closing Tywyn, that 16 beds had always been factored equally in calculations for both Tywyn and Dolgellau. The board had never recruited enough nurses to open Tywyn's inpatients ward in full when it was opened in 2017. Now that there are enough staff the inpatients remains closed. To state that only 4 beds were and are needed for Tywyn is completely wrong; BCUHB's own documents show that there was a demand for 87 admissions between April 2022 and March 2023, with an average stay per patient of above 30 days. Almost 90% of these admissions were referrals from Bronglais, Aberystwyth or from local GP's, and because Bronglais is in a different health board, BCUHB have not counted these in some of the figures it then used to calculate '4 beds for Tywyn'. In fact, of course patients could come from the wider population of North and Mid Wales.

Over the course of the last two years the board often changed its mind about how many and which staff were required, at times stating that it needed several nurses at different band levels, when at the same time no live adverts were being publicised. Against the odds, there are now enough staff to reopen the ward. Three months ago, at the Annual General Meeting of the Tywyn Hospital Appeal Fund, the Ward Manager of Tywyn Hospital stated that there were sufficient staff to open the inpatients facility. More recently this fact has been repeated by other staff working at Tywyn Hospital. The action group have also been informed that if the ward is not opened soon then more nurses will leave to work elsewhere. Retention of staff by BCUHB is a problem, for example, six months ago, two nurses who should have been working in Tywyn, (but were placed in Dolgellau because Tywyn wasn't open), left to go and work in Scotland. An additional concern is that Dolgellau Hospital has recently had it's MIU reopened, which requires nursing staff, yet at the same time nurses who should be working in Tywyn are still travelling to Dolgellau; meaning yet again that BCUHB is prioritising Dolgellau over Tywyn.

Now that there are enough staff, the health board have changed their rhetoric, Carol Shilabeer's latest reply to the petitions committee states that it will now have to 'further consider what is the best sustainable model of service delivery to meet the needs of this locality moving forward'. BCUHB are moving backwards not forwards, depriving individuals of the right to stay in hospital when required.

For almost two years the board has been making excuses for not opening the hospital to inpatients, about not having 'safe' levels or enough staff, but has instead promoted and congratulated itself about the number of alternative and peripheral services it provides, and how these services somehow mitigate against opening a brand-new state of the art facility for real inpatients. Many of these services were provided before closing the inpatients. Now that there are enough staff, the inpatients department will still not be opening because the health board now choose to deflect the matter, and say it needs to 'engage further with the local community'. The health board do not need to interact with the local community to find out their opinion about what services should be provided; it already knows! The various public meetings, 'workshops', events held during the last two years (listed in the last reply of the action group to the petitions committee) have all been enough to inform the health board that it is

expected to provide adequate health services for South Gwynedd which include those for inpatients. The petition itself, containing over 5,500 signatures, demonstrates the strength of public opinion – ‘reopen Dyfi Ward at Tywyn Hospital now’! The health board have spent almost two years saying that they are still trying to recruit and retain enough staff; but now they have enough, they are still determined to keep the facility closed. The health board are meant to be the experts at delivering health services to their populations, they do not need to ask people what these should be.

Having an inpatients provision here in Tywyn, housed in a state-of-the-art brand-new facility, paid for with public money and donations, should not need justifying and has been stated time and again. Providing a service for inpatients is completely different from other services, some of which are provided at home, some in Tywyn Hospital or Tywyn Surgery - minor injuries, treatment rooms, clinics, appointments and so on. The health board’s own statistics show how much the inpatients facility should be used. The news is full of waiting lists, bed blocking and ambulance queues. There are many first-hand accounts from locals, where people have died at home, where there have been insufficient palliative care staff to cover, where patients have been sent home on their own without a care package in place, or been transferred to facilities far away, where relatives who cannot drive have to pay for taxis to visit relatives, where public transport is not feasible, and so on. These individuals did not receive the care they deserved and have not been treated with the dignity expected from a public health service. Although Carol Shilabeer spends an awful lot of energy on telling us how popular and successful and valued the other services have been, her statements lack factual evidence and recognition of the many accounts we hear from real people suffering because it is closed.

It is hardly credible that BCUHB and the Welsh Government do not wish to provide a public health service that meets the needs of its populations. The letter to the petitions committee from Jeremy Miles, the Cabinet Secretary for Health and Social Care for Wales, lacks the critique, depth of professional knowledge or objectivity expected. His letter reiterates what a health board in special measures have told him, without any reference to the evidence, the facts or the truth. His letter is an abdication of the responsibility of the Welsh Government, which is to ensure that an inclusive, high quality health service is provided for the people across the whole of Wales. What is the Welsh Government going to do to open this facility to meet the health needs of the local and wider population and why has it done nothing to date?

The group continues to endeavour to demonstrate in our replies to the Petitions Committee how BCUHB have been negligent in their mismanagement of our facilities and health service. There is no reinforcement of the standards and attitudes required, and the continued obfuscation is a serious matter of concern. Two years on, the Health Board do not want to reopen the inpatients ward and the 5,528 people who signed this petition have been let down.

Yours sincerely

Jane Barraclough

Tywyn Hospital Action Group

Agenda Item 3.5

P-06-1389 Introduce a 30mph limit on the trunk road through the villages of Eglwys Fach and Ffwrnais

This petition was submitted by Catherine Ruth Stevenson, having collected a total of 419 signatures.

Text of Petition:

Many residential areas in Wales now benefit from a 20mph speed limit, with a strong evidence based rationale from Welsh Government. We do not feel it is safe that our villages of Eglwys Fach & Ffwrnais still suffer a 40mph limit. For over 30 years we have been campaigning for safer pedestrian access in these villages, with 2 fatalities during that time. We want Welsh Government to review the 40mph limits through the villages to enable residents to walk safely and improve well being.

Additional Information:

The villages sit along the main A487. The majority of the road has no pavement so our residents, including children and young people catching school buses, residents visiting neighbours or attending events, older villagers catching the bus, all have to walk ON the main A487. In some places there is insufficient room for 2 cars to pass on the road so motorists have to slow down to a halt to avoid these walkers.

The rationale of the Welsh Government for the 20mph limits through residential areas is: "The evidence from around the world is very clear – decreasing speeds will reduce collisions, save lives and reduce injuries – helping to improve quality of life and make our streets and local communities safer for all."

Given the evidence we feel strongly that the speed limit through the villages of Eglwys Fach & Ffwrnais should be reviewed and reduced from 40mph.

Senedd Constituency and Region

- Ceredigion
- Mid and West Wales

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



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1389
Ein cyf/Our ref KSNWT/00338/25

Carolyn Thomas MS
Chair - Petitions committee

25 March 2025

Dear Carolyn,

Thank you for letter of 18 February regarding Petition P-06-1389 Introduction of a 30mph speed limit on the trunk road through the villages of Eglwys Fach and Ffwrnais.

I appreciate the concerns that continue to be raised by the local communities and I would like to assure them and the Petitions Committee that a study is currently underway, looking at options to improve safety for pedestrians, including a reduction in the speed limit.

A draft report is being prepared, setting out the potential options and my officials will then consult with the communities.

I hope this helps to provide some reassurance.

Yours sincerely,

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

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

Bae Caerdydd • Cardiff Bay
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Gohebiaeth.Ken.Skates@llyw.cymru
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.

Back Page 128
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-06-1389 Introduce a 30mph limit on the trunk road through the villages of Eglwys Fach and Ffwrnais – Correspondence from the Petitioner to the Committee, 16 April 2025

Dear Kayleigh

Thanks for the email below.

We thank the Petitions Committee for keeping this Petition open. We are also very glad that the safety issue in our villages is being pursued by Ken Skates' team now. We would like to know a timeline for finalising the draft report so that we can advise our residents.

All the best

Ruth

Agenda Item 3.6

P-06-1391 Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners

This petition was submitted by Brian Howell, having collected a total of 284 signatures.

Text of Petition:

We believe that the establishment of clear guidelines, licensing requirements, and industry standards will aid the welfare and safety of dogs during grooming procedures. There's no regulatory framework at all of the sector, whether at local authority or national level. It doesn't fall within the oversight of any charity or the RSPCA.

The last 3 years has seen an exponential growth in dog ownership and the businesses that service their needs. Establishing standards is long overdue.

Additional Information:

1. Animal Welfare: It is imperative to prioritize the well-being and humane treatment of dogs. Regulation will promote responsible ownership, minimise stress levels, and reduce potential harm/injury caused by unqualified/negligent groomers.
2. Training/Certification: Unregulated dog grooming has lead to untrained individuals operating without the necessary knowledge of breed-specific needs, hygiene practices, handling, or grooming procedures. A minimum standard of Animal First Aid should be a pre-requisite component.
3. Health and Safety: Minimum health and safety guidelines to maintain a safe environment. Correct sanitation, grooming equipment maintenance and compliance with hygiene protocols, crucial in preventing the spread of infections/parasites/diseases.
4. Licensing/Inspection: Training/insurance verification and compliance with health and safety regulations.
5. Setting standards: Regulation offers owners an assurance of standards by identifying qualified practitioners.

Senedd Constituency and Region

- Vale of Glamorgan
- South Wales Central

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1391
Ein cyf/Our ref HIDCC/00617/25

Carolyn Thomas MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

02 April 2025

Dear Carolyn,

Thank you for your letter of 25 March regarding the petition to introduce regulation of the dog grooming sector.

The regulation of pet groomers was included as part of our public consultation on [the Licensing of Animal Welfare Establishments, Activities and Exhibits](#). The consultation [summary of responses](#) was published on 18 December, alongside a [written statement](#). I intend to issue a further statement detailing next steps in the Spring.

As set out in the consultation, this forms the first stage in the commitment to develop a National Model and I cannot pre-empt the outcome at this time.

Yours sincerely,

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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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.

Agenda Item 3.7

P-06-1405 We want and need a Mental Health unit for men in North Wales with beds

This petition was submitted by Lynda Leigh, having collected a total of 261 signatures.

Text of Petition:

There are so many men suffering with mental health issues. It was bad enough before lockdown but now it's devastating. As a landlady, I can see for myself the many men struggling with many issues. They are crying out for help and told to speak up and ask for help, yet when they do it is non-existent.

Senedd Constituency and Region

- Delyn
- North Wales

Sarah Murphy AS/MS
Y Gweinidog Iechyd Meddwl a Llesiant
Minister for Mental Health and Wellbeing



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1405
Ein cyf/Our ref SM/00161/25

Carolyn Thomas MS
Chair
Petitions Committee

petitions@senedd.wales

02 April 2025

Dear Carolyn,

Petition P-06-1405 We want and need a Mental Health unit for men in North Wales with beds

Thank you for your letter of 7 March.

I have noted the petitioner's further comments and thank you for highlighting this additional information which we will review.

In respect to the publication dates of the two strategies, I can confirm the Suicide Prevention and Self-harm Strategy will be published on 1 April and the *Mental Health and Wellbeing Strategy* will follow after the Easter recess.

Yours sincerely,

Sarah Murphy AS/MS
Y Gweinidog Iechyd Meddwl a Llesiant
Minister for Mental Health and Wellbeing

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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.

Agenda Item 3.8

P-06-1430 Support deaf children by making a financial commitment to restoring Teacher of the Deaf numbers

This petition was submitted by Rosamund Hannam, having collected 1,431 signatures.

Text of Petition:

Teachers of the Deaf play a vital role in supporting the language and communication development of deaf children. They provide advice to families of deaf children, visiting them at school or college – supporting their education and provide guidance to mainstream teachers on deaf awareness.

But Wales has lost one-in-five Teachers of the Deaf since 2011. There are around 2,300 deaf children in Wales.

I am mum to 5-year-old Lola, who is profoundly deaf and 2-year-old Rudi, who is severely deaf.

Additional Information:

Deaf children living in a hearing world need ongoing support. But Lola and Rudi currently receive just one hour of support a week from a Teacher of the Deaf. Calculated over a year, during school time, that's 37 hours, which does not even equate to my working week. I believe all deaf children should see a Teacher of the Deaf at least once a week regardless of level of deafness.

Lola is in a mainstream primary school, which is right for her, but had she gone to a special provision, she would be seeing specialists and other deaf children every day. Her progress is aspirational but if the technology fails, we have very little to fall back on.

I believe there is also a vital need for more targeted support for the parents of deaf children. More than nine-in-ten deaf children are born to hearing parents, with no experience of deafness. When we discovered Lola was deaf, I was shellshocked. I was also oblivious to my complete lack of deaf knowledge.

Senedd Constituency and Region:

- Newport East
- South Wales East

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



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1430
Ein cyf/Our ref LN/10515/24

Carolyn Thomas MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

1 April 2025

Dear Carolyn,

In my letter to you of 20 December regarding numbers of Teachers of the Deaf, I promised to provide further information regarding a way forward on this important issue.

Skilled education practitioners like Teachers of the Deaf are an essential part of the education workforce and essential to the success of our Curriculum and Additional Learning Needs (ALN) reforms.

On 13 January I [announced](#) the development of a strategic education workforce plan which will set out a strategic way forward for addressing the critical challenges facing our education sector, including recruitment and retention issues, workload pressures, and the evolving role of teachers in supporting learners' diverse needs. It will embed our vision and values for leaders, teachers and support staff for the future, recognising that there are a range of important roles across the school workforce.

I have committed to update the Senedd on progress as the plan is developed in partnership with our local authorities, governing bodies, unions and other key stakeholders.

Yours sincerely,

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

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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.

P-06-1430 Support deaf children by making a financial commitment to restoring Teacher of the Deaf numbers - Correspondence from the Petitioner to Committee, 22 April 2025



The National Deaf Children's Society welcomes the opportunity to contribute further to the Petitions Committee's work on Petition P-06-1430 - Support deaf children by making a financial commitment to restoring Teacher of the Deaf numbers. Following our review of the letter from the Cabinet Secretary for Education, we wish to recommend that the Committee keeps the petition open in order to allow the Welsh Government's Strategic Education Workforce Plan to be published and scrutinised.

We welcome the sentiments expressed by the Cabinet Secretary on the importance of skilled Teachers of the Deaf (ToDs). Given the drop in trained and qualified ToDs across Wales, as indicated by successive CRIDE reports and previously brought to the Committee's attention, this is we believe a step in the right direction and we hope this will result in a tangible positive difference to the lives and education outcomes of deaf children.

We are optimistic over the Cabinet Secretary highlighting that the Review will focus on recruitment and retention, and workload pressures. We know that there is a Wales-wide issue in this regard for ToDs; for example peripatetic ToDs, whose focus will be across large areas, are facing real challenges in terms of workload. Given their wide-ranging responsibilities, as they assist not just the deaf child but also their family and their school in deaf awareness, inclusion and accessibility, it is crucial that these professionals are valued, respected and given the appropriate levels of support. In order for deaf children to be fully supported in their educational development, local authorities need to be empowered to fully meet the needs of all deaf learners.

We also know that issues in relation to recruitment and retention and workload pressures are currently faced by many specialist roles across the education sector. Given her point in relation to the range of important roles across the sector, we are interested to see how the Welsh Government plans to integrate ToDs into their wider thinking in supporting the diverse needs of children. This is particularly important when we consider upcoming policy and legislation, for instance the Welsh Language and Education Bill which aims to expand Welsh medium provision; or upcoming changes in NewBorn hearing screening which will likely result in more diagnoses of childhood deafness.

However, we are disappointed to see that the Cabinet Secretary has not explicitly committed to including the voluntary and community sector in the development of the Strategic Education Workforce Plan, neither in the letter nor the attached statement. The sector has a wealth of knowledge and expertise that the Welsh Government could, and we would argue should, take into consideration. We are concerned that the lack of this expertise in the Plan's development could result in easily preventable shortcomings that would not only negatively impact deaf children, but all learners. As such, we would strongly urge the Cabinet Secretary to also include the VCS sector in a meaningful way during the development of the Plan, and stress again that should we be approached we would proactively seek to achieve synergy with planned changes in other parts of the system, seeking to ensure no deaf child is left behind.

Agenda Item 3.9

P-06-1483 Give neighbours their say when holiday let owners start applying for licences

This petition was submitted by Jacqueline Cullimore, having collected 1,027 signatures online and 1,033 paper signatures.

Text of petition:

There are thousands of holiday lets in Wales. This means that many of us have suddenly found ourselves living near businesses instead of homes, and we've had no say in the matter.

The holiday let licensing scheme in Scotland allows neighbours to respond to licence applications: the neighbours' responses may then be considered as potential grounds for refusing an application.

We want Welsh Government to include neighbour consultation in Wales' holiday let licensing scheme too.

Additional information:

As well as holiday let providers being able to demonstrate compliance with safety and quality requirements, we believe the licensing scheme in Wales should also address the issues faced by neighbours.

Legislation for a holiday let licensing scheme in Wales is expected to be introduced to the Senedd before the end of 2024, and we want Welsh Government to adopt The Scottish Government's licensing scheme where:

1. neighbours are notified of new licence applications/renewals;
2. neighbours are allowed to raise objections/concerns in response to a licence application;
3. neighbour objections are considered as potential grounds for refusing a licence application.

Senedd Constituency and Region

- Vale of Glamorgan
- South Wales Central

Carolyn Thomas MS
Chair, Petitions Committee

18 February 2025

Dear Carolyn,

Petition P-06-1483 Give neighbours their say when holiday let owners start applying for licences

Thank you for your letter regarding the above petition, which we considered at our meeting on 12 February. We note that you have also written to the Cabinet Secretary for Housing and Local Government for her views on the issue raised in the petition. Members agreed that it would be helpful if you could please share the Cabinet Secretary's response with us when available.

Yours sincerely,



John Griffiths MS
Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.



Eich cyf/Your ref P-06-1483
Ein cyf/Our ref MDFWL/00145/25

Carolyn Thomas MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

26 March 2025

Dear Carolyn,

Thank you for your letter and for bringing Ms Cullimore's concerns to my attention. As the Cabinet Secretary with responsibility for the legislation relating to the regulation of visitor accommodation and the visitor levy, it felt appropriate that I respond.

As the Cabinet Secretary for Economy, Energy and Planning set out in her letter of 19 November 2024, the Welsh Government recognises concerns about the impact that some visitor accommodation can have on communities and reports of inconsistent compliance with, or understanding of, statutory requirements. It is partly for this reason we have already put in place a range of measures which seek to begin to address those concerns, some of which are referenced in Ms Cullimore's letter.

In particular, the primary aims of our changes to local taxes are to ensure property owners are making a fair contribution and to maximise the use of property, to the benefit of local communities. This could include benefits arising from increased occupancy for short-term letting or the release of some properties for sale or rent as permanent homes for local people. As a consequence of the changes, self-catering holiday lets are liable for non-domestic rates (rather than council tax) only if they are being used for business purposes for at least half of the year (182 days).

It is expected that genuine holiday let businesses are able to meet the letting criteria where the local supply of self-catering accommodation does not exceed demand. Properties with high levels of occupancy make a substantial contribution to the local economy and benefit from the same non-domestic rates support as other small businesses. Second homes let out on a more occasional basis are instead liable for council tax, which may include a premium.

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The classification and valuation method applied to self-catering holiday lets is the responsibility of the Valuation Office Agency (VOA), which is independent of the Welsh Government. The figure quoted by Ms Cullimore for the number listed for non-domestic rates reflects the position as it was prior to full implementation of the current letting criteria. The VOA will soon have completed all compliance checks since the changes took effect on 1 April 2023. I look forward to receiving further evidence from the VOA after April, which will provide updated numbers of holiday lets listed for non-domestic rates. I can also clarify that properties which do not meet the criteria will have their council tax listing backdated to the first day, on or after 1 April 2023, from which the properties did not comply.

I note Ms Cullimore's suggestions for alternative approaches to local taxes for second homes and holiday lets. We are in a period of adjustment, following the policy changes already made by the Welsh Government and the decisions taken locally about premiums, as some property owners consider their options and determine how to respond. It will be important to allow time for these changes to embed before drawing any firm conclusions. We consider our local tax regime will help local authorities to incentivise the right balance between capacity within the self-catering tourism sector, and the economic benefits that brings, and supporting viable communities of local residents to live and work in these areas.

In relation to council tax premiums, if a liable person has more than one home, the local authority must decide which is their main residence based on any evidence available. The starting point for deciding the sole or main residence is section 6(5) of the Local Government Finance Act 1992, where a 'sole or main residence' refers to premises in which the taxpayer actually resides. Usually, a person's main residence would be the dwelling that a reasonable onlooker with knowledge of facts would regard as that person's home at the time. Using the property for example as a postal address or store property does not constitute residence for council tax purposes. The local authority can consider a range of evidence from a taxpayer that the property is their main residence e.g. bank statements, utility bills, registration at a GP surgery, forms of identification and statements from neighbours and professionals. A local authority is expected to act reasonably when assessing such evidence.

The Council Tax (Exceptions to Higher Amounts) (Wales) Regulations 2015 provide an exception for dwellings being marketed for sale which is time-limited for one year only. If a self-catering property does not meet the letting thresholds, it will be classified as a domestic property and will be liable for council tax and the premium. If the owner subsequently decides to market the property for sale, the exception is designed to allow time to do so and they will not be liable to pay a premium, but will continue to pay council tax at the standard rate. After an exception has ended, a dwelling being marketed for sale will not be eligible for a further exception period unless it has been sold to a new owner.

More broadly, the Welsh Government is committed to reducing opportunities for tax avoidance, which undermines the efforts of the vast majority to pay what is due. We are delivering a package of measures to tackle non-domestic rates avoidance, which will be fully implemented by April 2026. This package includes changes to help prevent a minority of ratepayers from accessing non-domestic rates reliefs they are not intended to be eligible for.

These measures are, however, just part of the picture. On 25 November 2024, I introduced to the Senedd the Visitor Accommodation (Register and Levy) Etc. (Wales) ('VARL') Bill. As the title shows, it includes provision for the registration of visitor accommodation in Wales, a decision I took in order to expedite the implementation of the register. That Bill, subject to Senedd approval, will require all visitor accommodation providers to register any and all visitor accommodation they provide in Wales and share information about that accommodation.

Once implemented, the register (much of which will be made publicly available), will provide valuable data for local authorities which has been, up to now, either unreliable or simply not available. As Ms Cullimore pointed out, only the local authority in Gwynedd and Eryri National Park Authority have considered implementing the Article 4 direction thus far. However, the register will help to fill the data gap, providing a more rounded picture of the sector and a better evidence base for local authorities to consider the needs of communities and the visitor economy in their area.

The VARL Bill is the first Bill in a package of legislation to regulate visitor accommodation. As well as providing for registration, this first Bill affords local authorities discretionary powers to implement a levy on overnight stays in their area, to raise additional funds that can be invested back into local services and infrastructure. Following this, and as the petition itself highlights, the Welsh Government intends to introduce further legislation before the end of this Senedd term to provide for the licensing of visitor accommodation in Wales.

This second Bill will require visitor accommodation providers to apply for a licence. Work is continuing quickly on the detail of that Bill, with the matters to be included still being finalised. As part of that work, we are considering what scope the legislation should give for a future Senedd to add additional requirements into the licensing scheme without needing further primary legislation. The focus, at least in the first instance, will be on safety; emphasising compliance with relevant statutory safety obligations, and complementing existing legislative requirements.

In considering this legislation and government policies more broadly, we are seeking to balance not only the needs of communities with those of a successful and sustainable visitor economy, but also with the rights of owners to peaceful enjoyment of their property. As such, any additional conditions that may be developed in the future will need to consider that balance carefully, alongside whether existing regulatory or enforcement measures are sufficient to mitigate any harm to visitors, staff, and the communities in which the visitor accommodation is being used, whilst also maintaining value for money for the taxpayer. We will also need to consider which part of the system is best placed to act, balancing a clear and consistent national framework with support for local authorities to meet the distinctive needs of their areas.

It is for these reasons that there are no plans to include provision for neighbours or communities to be involved in the consideration of applications for a licence under this scheme. It may appear this prioritises visitors over residents or communities, but ensuring properties being used for visitor accommodation are safe will be of benefit to all, particularly where the accommodation is in close proximity to other residential properties, such as in Ms Cullimore's case.

Whilst individually, these measures and legislation may not achieve the exact outcome Ms Cullimore and the other petitioners desire; taken together, and once implemented, they will go a significant way to achieving the right balance.

Yours sincerely,

A handwritten signature in black ink that reads "Mark Drakeford". The signature is written in a cursive style with a large initial 'M'.

Mark Drakeford AS/MS

Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language

P-06-1483 Give neighbours their say when holiday let owners start applying for licences - Correspondence from the Petitioner to the Committee, 21 April 2025

I felt that Rebecca Evans MS' letter dated 19 November 2024 did not adequately address the issues that I raised in my petition. I responded to that letter because I wanted to share my views on the "measures in place" for short-term holiday lets: measures which, I believe, support holiday let owners rather than local residents. Mark Drakeford MS has now responded to my letter: again, this letter defends the current "measures in place", and again I believe that the issues raised in my petition i.e. the effect that holiday lets are having on local residents are not being considered/addressed.

Obviously, my views differ greatly to those of the Cabinet Secretaries. I can only speak from the experience of living next door to busy holiday lets and how it has affected the enjoyment of my home. I did not buy a house next door to holiday lets, and I never would: I bought my mid-terraced home in a residential area. The measures that the Cabinet Secretaries refer to allowed the situation to arise whereby I now find myself living next door to businesses, and I have had no say whatsoever in the material change of use of the property next door to me. The holiday lets next door were operating prior to the implementation of Article 4, so unfortunately this measure has no effect on my personal situation.

I find it very difficult to understand why Welsh Government defends a system whereby holiday let owners pay no taxes whatsoever on their properties simply because of the number of days their properties are rented out to guests. Consider this example: A detached house in Gwynedd is a holiday let business: it fails to meet the letting criteria, so the owner pays the council tax premium. The holiday let has no effect on neighbours. A mid-terraced house in Gwynedd is a holiday let business: it meets the letting criteria, so the owner pays no taxes on the property. The house shares rights of access with neighbouring properties, and the holiday let guests disrupt the lives of the local residents on a regular basis.

Which of these properties is the "genuine holiday let business"? Mark Drakeford MS' letter suggests that the genuine business is the mid-terraced house in the example above because it's able to meet the letting criteria. However, the "genuine business" is the one which is causing problems for neighbouring properties. Why is this considered acceptable?

I'm also not convinced that holiday let guests make a substantial contribution to the local economy: the guests I see always arrive with boxes/bags of food and alcohol. I believe the guests' main contribution is to the holiday let owners. The downside of the tourist economy is paid by local residents in spiralling property prices and gig economy jobs: this is money being taken out of the local economy, not contributing towards it.

I would also like to point out that Mark Drakeford MS' letter states that the figure I quoted for the number listed for non-domestic rates reflects the position as it was prior to full implementation of the current letting criteria: this is incorrect. The figure I quoted in my letter (more than 10,000 short-term holiday lets in Wales not paying any taxes) was obtained from freedom of information requests sent to local authorities last year, in the period May to September 2024. My figure is, therefore, correct and up-to-date...unless there's been a

dramatic decline in the number of self-catering holiday lets failing to meet to letting criteria since last summer.

How will making the holiday lets next door safe for visitors affect me? For example, will it stop guests throwing lit cigarettes on my patio which has a rubber roof? Will it stop large numbers of people ruining the enjoyment of my home? Will it stop noise disturbance from guests?

Why is visitor safety the primary concern for short-term holiday let licences? Has there been a spate of incidents where visitors staying at self-catering holiday lets have been injured due to the absence of health and safety regulations? I'm sure that any work required to ensure compliance with safety regulations will be undertaken by the majority of holiday let owners because the short-term letting business is very lucrative: it will be in the holiday let owners' interest to spend some money to meet safety requirements because the financial returns are so rewarding. Where does that leave me as a neighbour, and others like me?

Shouldn't a licence be site specific e.g. limits on numbers of people using them if they happen to be located in a residential area? Why isn't a licence for short-term holiday lets addressing the wellbeing and needs of residents and communities in the first instance rather than the safety of visitors?

And yes, it does appear that the licensing scheme for holiday lets prioritises visitors over residents and communities: it appears to be doing this because it actually is doing this.

Before the flats next door to me became holiday lets I had a close friend who lived next door to a property that had been converted to a holiday let: they had been complaining for some years about the effect the holiday let was having on the enjoyment of their home and to their mental health. Although I was trying to be sympathetic, I thought that they might have been overstating the negative effect of living next to a holiday let: I had absolutely no idea how they felt or how living next door was affecting them until the same thing happened to me.

I find myself now pleading my cause to Members of the Senedd who have not experienced my situation because they do not know what it is like to live next door to a holiday let. It also appears that a vocal minority of wealthy people will continue having more of a say in Wales than the communities they are exploiting.

J Cullimore

P-06-1483 Give neighbours their say when holiday let owners start applying for licences - Correspondence from the Petitioner to the Committee, 23 April 2025

Good afternoon.

I appreciate that the deadline was yesterday, but this is relevant to my petition: please see the attached reason given for refusing a recent planning application to change a domestic property to a short-term holiday let in Gwynedd. The application was refused because it "would likely cause general disruption and noise to a primary residential street adversely affecting the amenities and living conditions of the local occupants": this is the point I am trying to get across in my petition.

Thank you, Jacqueline Cullimore

rhif Cais / Application Number: C25/0127/35/LL

rheswm (rhesymau) am ddyfarniad y Cyngor i wrthod y datblygiad a nodwyd eisoes yw (ydyw):

the reason(s) for the Council's decision to refuse permission for the development specified is (are):

1 - Byddai caniatáu newid defnydd o eiddo preswyl sefydledig presennol (C3) i lety gwyliau tymor byr (C6) yn arwain at golled o stoc dai parhaol yn groes i ofynion maen prawf iii polisi TWR 2: Llety Gwyliau, Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn a Chanllaw Cynllunio Atodol: Cyfleusterau a Llety i Dwristiaid (2021). Allowing a change of use of an existing established residential property (C3) into a short-term holiday let (C6) would result in a loss of permanent housing stock contrary to the requirements of criterion iii of policy TWR 2: Holiday accommodation of the Anglesey and Gwynedd Joint Local Development Plan.

2 - Byddai'r newid defnydd prif gartref (C3) i lety gwyliau tymor byr, sydd a natur gweithgarwch a symudiadau gwahanol i ddefnydd preswyl, yn debygol o achosi aflonyddwch cyffredinol a swm i stryd bennaf breswyl gan gael effaith andwyol ar fwynderau ac amodau byw y meddianwyr lleol, felly'n groes i ofynion maen prawf iv polisi TWR 2: Llety gwyliau a maen prawf 7 polisi PCYFF 2: Meini Prawf Datblygu o'r Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn. Changing the use of a main home (C3) to a short-term Holiday let (C6), which has a different nature of activity and movement to residential use, would likely cause general disruption and noise to a primary residential street adversely affecting the amenities and living conditions of the local occupants therefore, contrary to the requirements of criterion iv of policy TWR 2: Holiday Accommodation and criterion 7 of policy PCYFF 2: Development Criteria of the Anglesey and Gwynedd Joint Local Development Plan.

Agenda Item 3.10

P-06-1494 Welsh Government to protect funding in education from WG and Local Authority cuts

This petition was submitted by Catherine Drews, having collected 11,040 signatures online.

Text of petition:

ALN Reform Wales call on Welsh Government to protect funding in education from WG and LA cuts. There are numerous reports of LA's putting out consultations or actual published budgets with massive cuts to education budget. Jeremy Miles pledged to invest in education. This cannot be allowed to happen to the most vulnerable members of society. Recent reports show Wales education standards have fallen. Our children's education is the best investment in social justice and a healthy economy.

Senedd Constituency and Region:

- Llanelli
- Mid and West Wales



Eich cyf/Your ref P-06-1494
Ein cyf/Our ref LN/00134/25

Carolyn Thomas MS
Chair - Petitions committee

Government.Committee.Business@gov.wales

14 April 2025

Dear Carolyn,

Thank you for your letter of 3 February regarding Petition P-06-1494 Welsh Government to protect funding in education from WG and Local Authority cuts, following your consideration of the petition on 20 January and further correspondence from the petitioner, Catherine Drews, to the Committee on 13 January.

Regarding ring-fencing of funding to protect education within local authority budgets, decisions on the level of funding available to schools and to other services are made by each authority as part of their overall budget and council tax setting. This is in line with the Welsh Government's policy that local authorities are best placed to judge local needs and circumstances and to fund schools accordingly.

Local authorities and schools are responsible for providing a suitable education for all learners, including those with additional learning needs (ALN). It is for local authorities to determine how to spend the total resources available to them in order to best meet their local needs. Local authorities are however, expected to work with schools to ensure school funding arrangements are effective in supporting and raising the achievement of all learners, regardless of their needs. Schools have the opportunity to influence their local authority's decisions on school budgets by engaging in dialogue with authorities including through their budget forum, which is required in law. Once local authorities set budgets for their schools, management of those budgets is the responsibility of the school's governing body.

In determining the overall levels of funding for local government, Welsh Government took into account the pressures local authorities were reporting in budget discussions. In particular, we were conscious of the powerful points local authority partners and schools have made around pressures in ALN and wider education provision. Local government stressed the pressures on front line services, including demand and inflationary pressures, notably pay, across the breadth of local authority responsibilities.

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

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

Despite significant budget pressures we have continuously prioritised public services. The 4.5% increase to the Local Government Settlement for 2025-26, builds on previous increases of 9.4% in 2022-23, 7.9% in 2023-24, and 3.3% in 2024-25.

On 7 February I published the [Review of School Funding Formula in Wales](#), which provides a summary of an in-depth analysis of local authority funding formulae across Wales. The aim of this analysis was to understand the complexities and decision-making processes in relation to school funding formulae. The published report includes recommendations that we will take forward to address the findings of the review, this includes a recommendation around ALN funding. This review and its recommendations will enable us to consider how the system can be improved to make a fairer funding system across Wales, to enable more transparent, comparable and consistent funding across Welsh schools.

In addition to the un-hypothecated funding through the local government settlement, hypothecated funding is provided for education through grants. Grant funding is useful in allowing Welsh Government to target specific areas, projects, or initiatives that align with its priorities. Grants often come with specific conditions and reporting requirements, and are a way of providing additional ringfenced support to the education sector.

I have prioritised funding for schools within the Education Budget. On 5 March I [announced](#) a further £20m for schools across Wales. This is in addition to previous announcements which will see funding provided through the Local Authority Education Grant increasing to £435.5m in 2024-25. For 2025-26, over £402m will also be provided through the Local Authority Education Grant. This grant funding does not include the extra money we give to local authorities for our demand-led schemes including UPFSM and School Essentials Grant.

Through additional in-year funding and the 2025-26 Final Budget, the education sector is set to benefit from an additional £262.5m in funding, with schools, colleges and other settings receiving funding to help meet the needs of learners across Wales. The funding will be made up of £151m additional funding for 2024-25 and £111.5m additional funding allocated in the 2025-26 Final Budget.

Additional hypothecated funding has been granted for a number of purposes, to underpin the infrastructure, enable implementation, and increase provision to support ALN learners. This funding is allocated through the Education Reform element of the Local Authority Education Grant (LAEG), which supports reforms across schools and settings, supporting four policy areas: Curriculum for Wales, ALN, Professional Learning and Leadership and the Whole School Approach.

As mentioned in my previous letter to the committee, I announced additional in year funding, which included an additional £10m to support local authorities and schools in delivering provision for learners with ALN across Wales, and £5m to be directed to schools to increase the capacity of the Additional Learning Needs Co-ordinators (ALNCo's) and to prepare to move them to the senior management / leadership team. This funding has been allocated through the LAEG, increasing the 2024-25 ALN grant from £22m to £37m.

To continue this investment in ALN reform, the 2025-26 Final Budget maintains the £10m uplift to support local authorities and schools in delivery of provision for learners with ALN, taking the 2025-26 ALN funding, through the LAEG, up to £32m. This funding is allocated to support:

- [Funding for ALN Provision](#) - In response to growing demand and complexity of need, funding is provided to increase additional learning provision for children and young

people to improve planning, appropriate workforce and access to high quality provision for learners with ALN.

- Funding for ALN Quality and Delivery – Local Authorities - To continue funding support costs associated with implementing and embedding the ALN system, maintain ALN processes including quality assurance and Person-Centred Practice (PCP) and support local authorities and schools to deliver their statutory duties under ALNET.
- Funding for ALN Quality and Delivery – Schools - To continue funding support costs associated with implementing and embedding the ALN system, improve the planning and provision to support high quality teaching and learning and support schools to deliver their statutory duties under ALNET.

We understand that having a medical diagnosis for neurodiverse conditions, like autism, can help people of all ages gain a greater understanding of their condition and to help find strategies that work for them. Demand for neurodivergence services has grown significantly in recent years and the Welsh Government is committed to tackling long waiting times for diagnosis. A National Neurodivergence Improvement Programme is in place to transform neurodivergence services and on 3 February 2025 the Mental Health and Wellbeing Minister announced an investment of £13.7m to extend the work of this Programme and to support the [National Neurodivergence Team](#) until March 2027. This funding builds on the £12m invested in the Programme over the past three years and the £3m already announced to reduce the longest waiting times for children's assessments.

Our ALN reforms aim for long-term systemic change so children and young people with ALN receive the support they need. For lots of learners and families this is working well and as evidenced by Estyn in their recent [thematic review](#), the requirements of ALN reform are starting to ensure improvements in provision for pupils with ALN across the country and there is much excellent practice. I remain concerned, however, that it is not working for all learners which is why we are working with key partners on improvements aimed at addressing the challenges that remain.

Regarding attendance, all parents and carers have a legal responsibility to ensure their child regularly attends school. There are often complex and multiple factors lying behind non-attendance. These could include mental health and wellbeing, availability of specific learning support services, and the ever-rising cost of living and attitudes of parents and learners towards school attendance generally.

Fixed penalty notices (FPN) should be used as part of a package of intervention and support strategies to improve attendance. It should also be considered whether a fine will be effective in getting a child back to school.

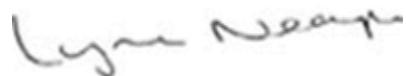
We remain clear that fines are to be used in only the most extreme cases, as part of a range of options and when all efforts to engage with the family have been tried and failed and where it is evident that there are no underlying reasons that are impacting upon attendance at school which could otherwise be addressed through a suitable support plan.

The local authority must have made all reasonable efforts to accommodate and support the family and pupil through engagement with their Education Welfare Officers and via a Family Engagement Officer, to ensure that all other possible measures have been attempted before an FPN is issued as a last resort.

I know that across Wales, leaders, elected members and officers will be striving to find ways to make the best use of their resources. Whilst there is an increased settlement, we

recognise that demand for services, alongside cost pressures mean that local authorities will still need to make difficult decisions on services, efficiencies, and council tax in setting budgets.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Lynne Neagle'.

Lynne Neagle AS/MS

Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

P-06-1494 Welsh Government to protect funding in education from WG and Local Authority cuts - Correspondence from the Petitioner to the Committee, 21 April 2025

Thank you to the Cabinet Secretary for Education for the detailed response to Petition P-06-1494 and for outlining the Welsh Government's continuing commitment to educational funding and support for learners with Additional Learning Needs (ALN).

While the steps being taken are welcomed, I remain seriously concerned that these measures are not delivering the intended impact on the ground, particularly within the ALN system.

I am increasingly hearing reports that significant amounts of money are being spent by local authorities on education tribunals—many of which they go on to lose. This is a troubling use of public funds. Rather than focusing on early, appropriate support, families are being pushed into stressful, lengthy legal processes just to secure basic educational rights for their children. These tribunal costs reflect not only financial inefficiency, but also a system where the law and guidance are being misunderstood—or worse, ignored.

One of the key issues is the ongoing misinterpretation of the ALN Act and the ALN Code, especially regarding "universal provision." As tribunal rulings have made clear, there is no basis in law for refusing a child an Individual Development Plan (IDP) simply because their needs could be met through so-called universal provision. The term does not appear in the Act, the regulations, or the Code.

The legal test is straightforward: it's whether the child's learning difficulty or disability requires Additional Learning Provision that is different from or additional to what is generally made for others of the same age in mainstream schools across Wales—not just within a particular school or local authority.

It's extremely worrying that, several years into this new system, such a fundamental point is still being widely misunderstood. I am hearing about children—particularly those who were previously on School Action/School Action Plus, those who mask their difficulties, and many academically able learners—being denied IDPs based on flawed internal policies and inconsistent interpretations of the law.

Even more concerning is the apparent lack of a formal process for the tribunal to flag local authorities that repeatedly misapply the law. Without a mechanism for accountability, it's difficult to see how consistent improvement can be achieved.

I therefore urge the Welsh Government to consider the following actions:

Ring-fence education funding within local authority budgets, with a particular focus on ALN, to prevent it from being diverted or deprioritised.

Review the use of funding for education tribunals, and introduce incentives for early, lawful provision of ALP to reduce the need for families to resort to legal action.

Issue clear and immediate guidance confirming that “universal provision” is not a lawful basis to refuse an IDP, and that decisions must be made using the criteria set out in the ALN Act—not local policy.

Establish a formal feedback loop between the Education Tribunal and the Welsh Government to highlight repeated failings by local authorities and support consistent application of the law.

Mandate further training for local authority staff, schools, and governing bodies, to ensure a shared and accurate understanding of the ALN system across Wales.

Without clear leadership, accountability, and consistent practice, we fear the ALN reforms will fall short of their purpose—and risk deepening the inequalities they were meant to address.

Thank you for taking the time to consider these concerns. I urge swift and meaningful action to ensure every child in Wales receives the support they are legally entitled to.

Yours sincerely,

Cath Drews.

Sir David Henshaw, Chair
Natural Resources Wales

25 March 2025

Dear Sir David,

Thank you for your attendance at the annual scrutiny session of Natural Resources Wales. Further to the meeting, I have been contacted by someone who has raised some questions that I hope you can address.

These issues are:

Firstly, at the committee meeting, you set out that the cost of running the visitor centres at Ynyslas, Coed y Brenin and Nant yr Arian is around £1 million a year. The representations I have received claim that it can be evidenced that Ynyslas is not loss-making.

Secondly, as you have acknowledged, the Visitor Centre Wardens do not have retail and catering responsibilities alone. I am told that there is "a job description issued by NRW which proves that the Visitor Centre staff's remit was much wider than retail and catering. Duties officially included ensuring safe public access to the site amongst many other things." NRW has provided reassurances that the site and paths will remain open to the public. I appreciate that you are engaged in a process to ensure that all statutory and essential functions are delivered by other staff. However, my correspondent suggests that, under the proposals, there would be no one to maintain that access, since the Land Management function is "just one individual with 2,000 hectares of land to look after". I am also told that it is the wardens who ensure that the ringed plover nesting sites are fenced off.

Finally, concerns have been raised with me about public safety due to the site being a red flag beach due to tidal currents, quick sands and unexploded WW2 ordnance which is regularly uncovered and safely detonated.

I would be grateful if you could address these issues that have been raised with me. It would be helpful if you could respond by **Tuesday 22 April 2025**.

I am copying this letter to the Chair of the Petitions Committee and to fellow Members of the Climate Change, Environment, and Infrastructure Committee.

Your sincerely,



Llyr Gruffydd MS,
Chair, Climate Change, Environment, and Infrastructure Committee
Croesewir gohebiaeth yn Gymraeg neu Saesneg. / We welcome correspondence in Welsh or English.



Llyr Gryffydd MS
Chair, Climate Change, Environment and Infrastructure Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

By email only: seneddclimate@senedd.wales

15 April 2025

Dear Llyr

Ynyslas Visitor Centre

Thank you for your letter of 25 March regarding Ynyslas Visitor Centre. I will deal with your queries in turn.

We have made our Visitor Centre accounts for the financial year 2023/24 publicly available on our [Consultation Hub webpage](#). They show that Ynyslas Visitor Centre made a loss for that year of £72,976.

Our Land Management and Commercial teams are working together to ensure we continue delivering our statutory services at the National Nature Reserve (NNR) in the long term, in line with our Case for Change focus on our strategic objectives. Although the NNR Officer at Ynyslas is only one individual, they are and will continue to be ably supported by a wider team of conservation and land management experts.

Now that our visitor centre services have ceased, the NNR will continue to be managed in line with the other NNRs we manage across Wales, which do not have any visitor centre provision.

Visitors to all our sites, including Ynyslas, are responsible for their own safety as well as the safety of any children and animals with them during their visit. Ynyslas is a red flag beach and is clearly labelled as such; signs are posted prominently along the beach and estuary advising the public of the dangers. Safety advice is also available to visitors on our website, for those planning a visit to Ynyslas.

In respect of ordnance, there are warning signs in place around the Ynyslas site along with pictures of the ordnance types that have been found, advising people to contact the

emergency services if they come across one. If an ordnance is reported, our Incident team will arrange for the area to be cordoned off and it will be treated as a priority incident. There is a 24/7 incident rota to ensure swift response, should attendance or other action be necessary.

Thank you again for your letter. I hope I have been able to address your concerns.

If you have any further questions, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sir David Henshaw', with a horizontal line underneath the name.

Sir David Henshaw
Cadeirydd, Cyfoeth Naturiol Cymru
Chair, 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.

Agenda Item 6

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