

Agenda – Petitions Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date: 16 June 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

(Pages 1 – 34)

2 New Petitions

2.1 P-06-1499 Stop the use of term 'Universal Provision' as a reason to deny ALN
(Pages 35 – 43)

2.2 P-06-1500 Neath Port Talbot UNISON needs additional Funding for NPT
Council
(Pages 44 – 52)

2.3 P-06-1522 Convene a summit to accelerate sustainable and ethical
investment by public sector pensions
(Pages 53 – 64)

2.4 P-06-1523 Reverse the Closure of Post Grad Counselling and Psychotherapy
Courses at University of South Wales
(Pages 65 – 71)

2.5 P-06-1524 Erect a statue of Rachel Williams to commemorate her impact on
Welsh language education in the Vale of Glamorgan
(Pages 72 – 77)

2.6 P-06-1527 Review dog walking restrictions on Welsh beaches and issue
guidance to relevant bodies
(Pages 78 – 88)

3 Updates to previous petitions



- 3.1 P-06-1443 Re-instate core funding for TRAC Cymru (Music Traditions Wales / Traddodiadau Cerdd Cymru)
(Pages 89 – 97)
- 3.2 P-06-1464 Allow Welsh families who have experienced Baby loss before 24 weeks to obtain baby loss certificate
(Pages 98 – 99)
- 3.3 P-06-1475 Urgently improve the safety of the A458, Middletown, Powys in light of continuous dangerous driving
(Pages 100 – 103)
- 3.4 P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales
(Pages 104 – 110)
- 3.5 P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham
(Pages 111 – 149)

4 Paper to note

- 4.1 P-06-1463 Continue to fund school police officers who educate children and support schools
(Page 150)
- 4.2 P-06-1525 Preserve the unique character of the Monmouthshire and Brecon Canal for the future generations of Wales
(Pages 151 – 152)
- 4.3 Higher Education Funding
(Pages 153 – 154)

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

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Stop the use of the term Universal Provision

Y Pwyllgor Deisebau | 16 Mehefin 2025
Petitions Committee | 16 June 2025

Reference: SR25/11030

Petition Number: P-06-1499

Petition title: Stop the use of term 'Universal Provision' as a reason to deny ALN

Text of petition: Over recent months there has been much discussion around the term Universal Provision. ALNET and Welsh Government have given clear guidance as to what this term means. Yet, despite this clarification, Local Authorities and members of Welsh Government continue to allow this term to be used to refuse a learner ALN status and provide ALP. There can only be one solution and that is that this term is banned from use.

While members of Welsh Government still use this term when discussing ALN, including during media interviews, it gives LA's opportunity to follow suit, and continue to deny ALN to learners.

There is ongoing work through the Education reform inquiry and CYPE committee however, there are still ongoing issues with families that arise that show inconsistencies amongst authorities and Welsh Government in Wales.



1. Background

The Welsh Government and the education sector are currently implementing the Additional Learning Needs and Education Tribunal (Wales) Act 2018. This replaces the existing/previous Special Educational Needs (SEN) system with a new Additional Learning Needs (ALN) system.

The new ALN system is being introduced on a phased basis over four years (September 2021 to August 2025). All learners newly identified with ALN come under the new system, while those already supported with SEN are transferring over in different years, depending on their year group and level of intervention (whether or not they have a statement of SEN). As such, both the existing/previous SEN system and new ALN system are operating side by side, until August 2025.

Senedd Research published an article in April 2023 regarding the timetable for implementation.

1.1. Defining ALN

Learners judged to have ALN are eligible for a statutory Individual Development Plan (IDP). An IDP describes a person's ALN and the Additional Learning Provision (ALP) which the person's learning difficulty or disability calls for. The 2018 Act's definition of ALN is materially the same as that for SEN, whereby learners:

- have a significantly greater difficulty in learning than the majority of others of the same age; or
- a disability (for the purposes of the Equality Act 2010) which prevents or hinders them accessing education or training that is generally provided for others of the same age; **and**
- the learning difficulty or disability calls for ALP.

[Bold is our emphasis]

The final point of the definition is significant as, if a learning difficulty can be addressed through universal, or ordinarily available, provision and does not require ALP then the learner will not be considered to have ALN.

1.2. A shift towards universal provision

There appears to have been a shift towards 'universal provision' to meet children's needs, where previously those needs may have been recognised as SEN and

special education provision put in place for them. This is despite the definition of ALN being essentially the same as SEN. The number of learners identified with SEN or ALN has reduced by almost a half (44%) since the new system began being implemented – from 92,688 in 2020/21 (20% of all pupils) to 52,152 (11% of all pupils) in 2023/24. The decrease is accounted for by a reduction in those with relatively low level SEN/ALN, indicating that it is not the case that learners with severe or complex needs are no longer being recognised as having ALN/SEN.

However, the shift away from ALP towards universal provision for many learners who would previously have been regarded as having SEN/ALN was not something publicly anticipated by the Welsh Government. The Welsh Government said during passage of the ALN Bill in 2017 that those covered under the new system would be broadly the same as before and, when making subsequent regulations in 2021, it anticipated there would be “around 110,000 school-age IDPs”, which was equivalent to the number of pupils with SEN at that time.

In its school census statistical release and in a letter from the then Minister for Education and Welsh Language to the CYPE Committee, the Welsh Government has offered several explanations for the decrease.

- SEN has been historically over-reported, partly due to the inclusion of a learning difficulty category which on reflection does not actually amount to SEN/ALN;
- The new statutory ALN co-ordinators have reviewed their schools' SEN registers and seen fit to remove some learners with the lowest levels of needs.
- The ALN legislation was conceived of a decade ago and the more inclusive approach of the new Curriculum for Wales means some learners who previously required ALP can have their needs met through universal provision, with differentiated teaching and inclusive education practice. The removal of some pupils from the SEN/ALN register brings the proportion of all pupils identified as having SEN/ALN down from 20% in 2020/21 to 13% in 2022/23 and 11% in 2023/24.

Senedd Research published an article in September 2022, Identifying Additional Learning Needs: Has the bar been raised or was it previously too low?

1.3. The ALN Code

As required by the 2018 Act, the Welsh Government issued an Additional Learning Needs Code, that was approved by the Senedd in March 2021. The ALN Code outlines requirements and guidance for schools, further education institutions,

local authorities, NHS bodies and others on delivering the ALN system. The Welsh Government consulted on a draft version of the ALN Code in winter 2018/19. Issues raised included defining and identifying ALN, timescales for meeting duties, the roles of various professionals and arrangements for resolving disagreement, advocacy services and appeals. The Senedd's Children, Young People and Education Committee submitted a response following work it undertook with stakeholders.

1.4. Estyn's reports on ALN reform implementation

In September 2024, the education inspectorate, Estyn, published the first report the Welsh Government has remitted it to produce. Among Estyn's findings was a lack of consistency in people's understanding and application of terms such as 'universal', 'targeted' and 'specialist', and how these relate to ALP. Estyn also noted that these terms do not necessarily appear in the ALN Code.

Estyn recommended that the Welsh Government ensures that all settings have a clear understanding of the legal definitions contained in the 2018 Act and the ALN Code, and provides practical examples to aid understanding.

In the second report published in December 2024, Estyn stated that they recognised in their visits to settings, schools and local authorities that the shared understanding and common application of terms such as universal provision and practices remained inconsistent. They recommended that the Welsh Government should work with all local authorities to ensure that they have a common and secure understanding of the definition of additional learning provision and that local authorities and their schools apply this consistently.

2. Welsh Government action

On 8 May 2024, Lynne Neagle, Cabinet Secretary for Education told the Children, Young People and Education Committee that the Welsh Government would be holding a review of how consistently the legislation is being implemented:

and will look at the issues that have been raised with me about the inconsistencies and the fact that the legislation is intellectually challenging.

In a Written Cabinet Statement on 7 October 2025, the Cabinet Secretary for Education said:

in response to evidence and concerns that some parts are complex and unclear we are now examining the legislative framework in detail and in discussion with delivery partners. The review is considering the clarity and accessibility of the legislative framework and gathering evidence of the practical challenges in implementing the ALN system.

In a [letter to the Children, Young People and Education Committee on 4 February 2025](#), the Cabinet Secretary provided more detail on the scope and timetable of the review. She said that she expects to update the Senedd on the progress and findings of the review by early July 2025.

3. Welsh Parliament action

3.1. Children Young People and Education Committee

The Senedd's Children, Young People and Education Committee is [scrutinising the implementation of the ALN reforms](#) (along with other major reforms to the curriculum) throughout this Senedd. It is doing this through a series of 'check-ins' and has carried out three of these to date.

The Committee published an [interim report in July 2024](#). The Committee heard from some schools that, although they recognise that certain pupils have a learning difficulty or disability, they do not believe that they need ALP because the school's standard provision (called 'universal provision' or otherwise) meets their educational needs. Consequently, these schools do not consider such pupils to have ALN for the purposes of the ALN Act.

Schools also explained that the Curriculum for Wales allows for greater levels of differentiation from teachers. The curriculum encourages a focus on "stage, not age", which means that children who formerly could not access the curriculum - and therefore required additional provision - could now be taught more inclusively at a level suitable to their needs.

The President of the Education Tribunal for Wales told the Committee in [March 2024](#):

... there's no such thing as universal provision in the law. It's not in the ALN Act, it's not in the regulations, it's not mentioned in the code. But there's a lot of conversation about children not having ALN because there's provision that's provided for them under universal provision.

Welsh Government hasn't set out what a universal provision is. It's not there in the law. The legal tests are a child compared with the ordinary developing child, or provision that's provided in mainstream schools across Wales, so it's not specific to a particular local authority area, or a particular school even, and that's causing confusion.

One of the Committee's recommendations in the interim report was:

As part of its review into the ALN Act and Code, the Welsh Government should review the clarity and accessibility of the legislation and statutory guidance. A focus of that work should be what constitutes, or at least is commonly understood as, so-called 'universal provision'.

The Welsh Government accepted the recommendation. It said:

An update to the Senedd on the progress and findings of the review is expected by Summer 2025. In addition, work is underway to acquire further knowledge on what provision is 'generally available' to learners of the same age in Wales. Whilst 'universal provision' is not a term referenced in the ALN Act or Code, the term is widely used in the sector to describe the day-to-day practice which happens in every classroom to respond to educational needs, secure individual progress and ensure that all children and young people can thrive in their setting.

3.2. Petitions Committee

The Petitions Committee has recently considered five petitions about ALN:

- P-06-1392 Reform of the additional learning needs Code of Wales 2021
- P-06-1341 Accessible guidance for parents and schools to help develop plans to support children with additional learning needs
- P-06-1342 Fund more specialist school places and staff for children with additional learning needs in Wales
- P-06-1347 Review Additional Learning Needs policies & make compulsory to FULLY train all teachers and TAs in regulation techniques
- P-06-1406 Financial penalties for Local Education Authorities who do not comply with timeframes for ALN

The Committee considered the petitions together and Members noted that the Cabinet Secretary was already working with campaigners to address concerns. They also noted ongoing work in this area by the Children, Young People and Education Committee, which is due to report again by the end of the Senedd. The Petitions were closed and there was a [Plenary debate on 8 May 2024](#) on the petition in relation to the reform of the additional learning needs Code of Wales 2021. Senedd Research published an [article](#) ahead of that debate.

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-06-1499
Ein cyf/Our ref LN/00283/25

Carolyn Thomas MS
Chair - Petitions committee

29 May 2025

Dear Carolyn,

Thank you for your letter of 4 March in relation to Petition P-06-1499 Stop the use of term 'Universal Provision' as a reason to deny ALN. I'm sorry for the delay in responding to you.

I want to be clear that 'universal provision' should not be a reason to deny ALN. However, I am aware that the term 'universal provision' is widely used by schools and local authorities when describing the provision which is generally available to all pupils of the same age. Estyn's recent thematic review of the ALN reforms report there is confusion in schools and local authorities around what constitutes 'universal' provision, and what is additional learning provision. This confusion is causing difficulties when determining whether a learner has ALN.

In response to evidence and concerns that some parts of the ALN legislative framework is complex and unclear, I have announced a review of the framework. The review will consider the clarity and accessibility of the legislative framework, and this includes the clarity and consistent interpretation of the definitions of ALN and ALP (Additional learning provision). The evidence gathering period of the review has now complete and after a period of consideration of the evidence, I will report next steps in July.

In parallel to the review of the ALN legislative framework, we are also considering ways to improve the shared understanding of what provision is 'generally available' to learners of the same age in Wales to support the sector when making decisions on ALN.

Our recent work with researchers at Policy Bristol has explored the use of the term and finds that it includes strategies, resources and adaptations to the curriculum and environment adopted by practitioners to remove barriers to learning for all children and young people. This approach is fundamental to providing an inclusive education system. I include a link to the published report here. [What should constitute 'Generally Available' Provision in schools in Wales? - Policy Bristol](#).

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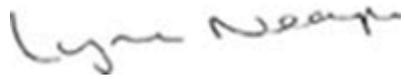
Gohebiaeth.Lynne.Neagle@llyw.cymru
Correspondence.Lynne.Neagle@gov.wales

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

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

The authors, Dr Cathryn Knight, Dr Carmel Conn and Dr Rhiannon Packer found a high-level of agreement amongst stakeholders about important 'generally available' practices which centred around high-quality teaching. They made important points for government to consider developing national guidelines on what's generally available, and we are identifying next steps to add clarity to the term universal provision and improve consistency in applying the ALN legislation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lynne Neagle'.

Lynne Neagle AS/MS

Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

Neath Port Talbot UNISON needs additional Funding for NPT Council

Y Pwyllgor Deisebau | 16 Mehefin 2025
Petitions Committee | 16 June 2025

Reference: SR2511287-1

Introduction

Petition Number: P-06-1500

Petition title: Neath Port Talbot UNISON needs additional Funding for NPT Council

Text of petition: Neath Port Talbot UNISON is requesting a much needed injection of funding to Neath Port Talbot Council to protect services, protect jobs, keep communities safe. Without this extra funding Neath Port Talbot Council will have to make decisions on both statutory and non-statutory services for example, close Libraries, Youth Services, Public Amenities' also make staff compulsory redundant.

All additional funding allocated to Neath Port Talbot Council will support the disadvantaged people living in the area affected by the job losses in TATA Steel. The Trade Unions and Local Council are working in Social Partnership to protect the workforce and any extra revenue will assist partnership further in these terrible times.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.



1. Background

1.1. The Local Government Settlement

The Welsh Government allocates funding to local authorities through its **Housing and Local Government Main Expenditure Group** (MEG). The main element within the MEG is the Revenue Support Grant (RSG). In the **Final Budget 2025-26**, the Welsh Government allocated just over £5 billion into the RSG, which included top-up funding of £8.2 million to ensure no authority received an uplift below 3.8%.

In addition to the RSG, local authorities will receive around £1.1bn in redistributed NDR (Non-Domestic Rates/business rates). This means that local authorities will receive a total of £6.14bn in revenue and NDR for 2025-26, an increase of 4.5% compared to 2024-25.

The Welsh Government has also allocated around £1.3 billion in specific grant funding to support some of its policy priorities, which local authorities can access, as well as in excess of £1bn in Capital Funding.

1.2. Funding formula

The local government settlement is distributed to councils on the basis of a needs based formula. The formula consists of a variety of indicators which consider characteristics of a local authority such as; population, sparsity and deprivation among other things.

The formula is under continuous review and updated regularly. It is maintained by the **Distribution Sub-Group (DSG)**. The DSG is comprised of representatives from the Welsh Government, Welsh Local Government Association (WLGA) and independent members. It advises the **Partnership Council for Wales** and Welsh Ministers on the amount of revenue funding each local authority receives.

A **written statement** on the Distribution Sub-Group's Work Programme on the funding formula was published in March 2024.

The **Cabinet Secretary for Housing and Local Government**, answering question in Plenary (22 January 2025) stated in relation to the local government funding formula that:

We're committed to continuing to use and maintain a fair and transparent funding formula for the local government

settlement, which is agreed with local government. The funding formula is kept under review annually by the distribution sub-group. Work that is under way includes updating the sparsity and that deprivation data and how it's used in the formula. We've got relevant statistical techniques, such as regression and multilevel modelling, which were used to determine the indicators with the biggest relationship to cost when the formula was established. This is now being reviewed, using the same techniques to see if they're still the strongest relationships.

1.3. Local Authority Distribution 2025-26

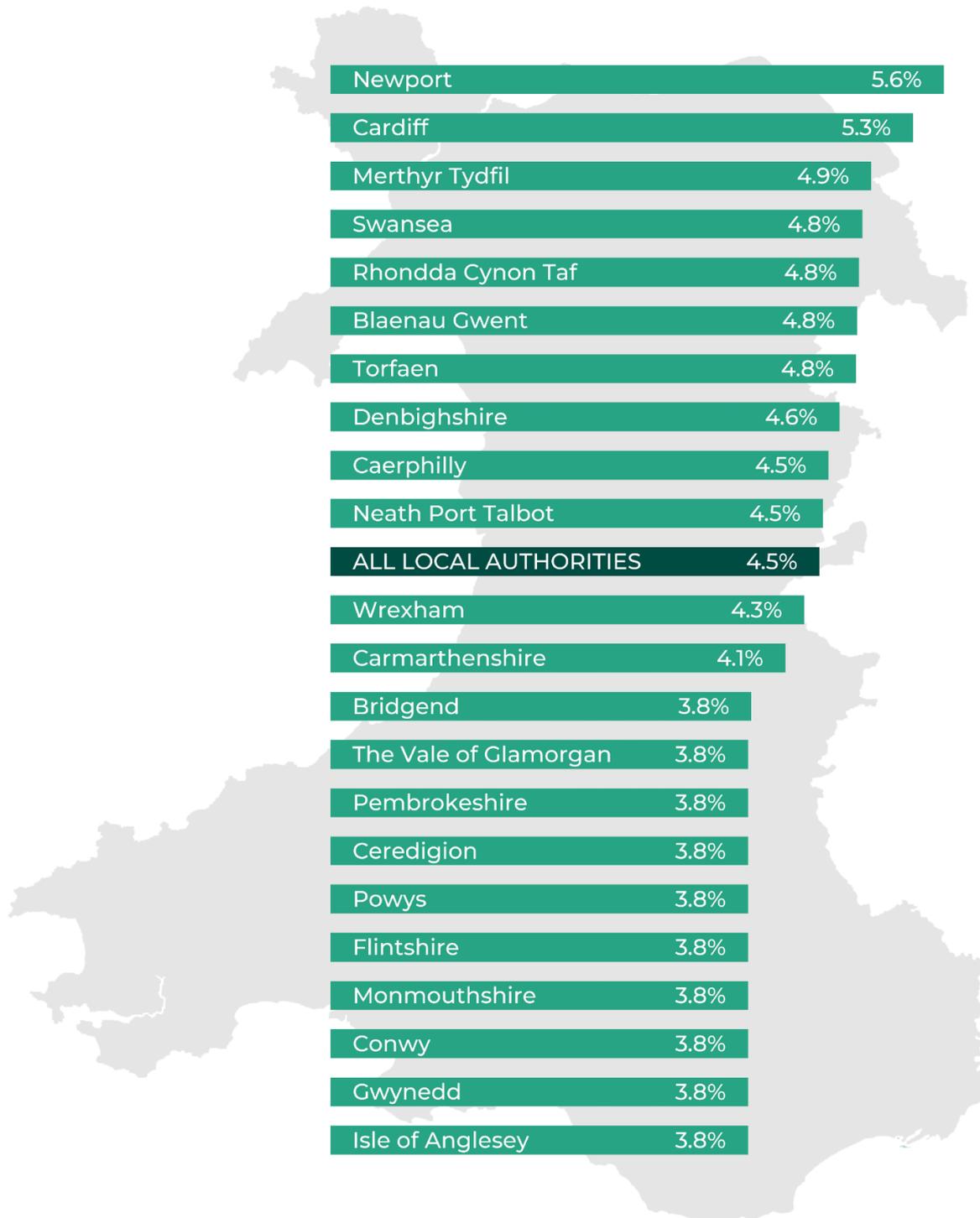
Core revenue funding for local authorities increases by 4.5% overall for 2025-26. As part of its budget agreement with Jane Dodds MS, leader of the Welsh Liberal Democrats, the Welsh Government **implemented a funding floor in the Final Settlement**. This means that no authority will receive less than a 3.8% uplift in its funding for 2025-26. Nine local authorities benefitted from the floor.

Neath Port Talbot County Borough Council was not a recipient of the additional top-up funding as it was expecting to receive a 4.5% uplift in its settlement. This equates to an increase of a little over £13.1 million for the authority on a like-for-like basis compared to 2024-25.

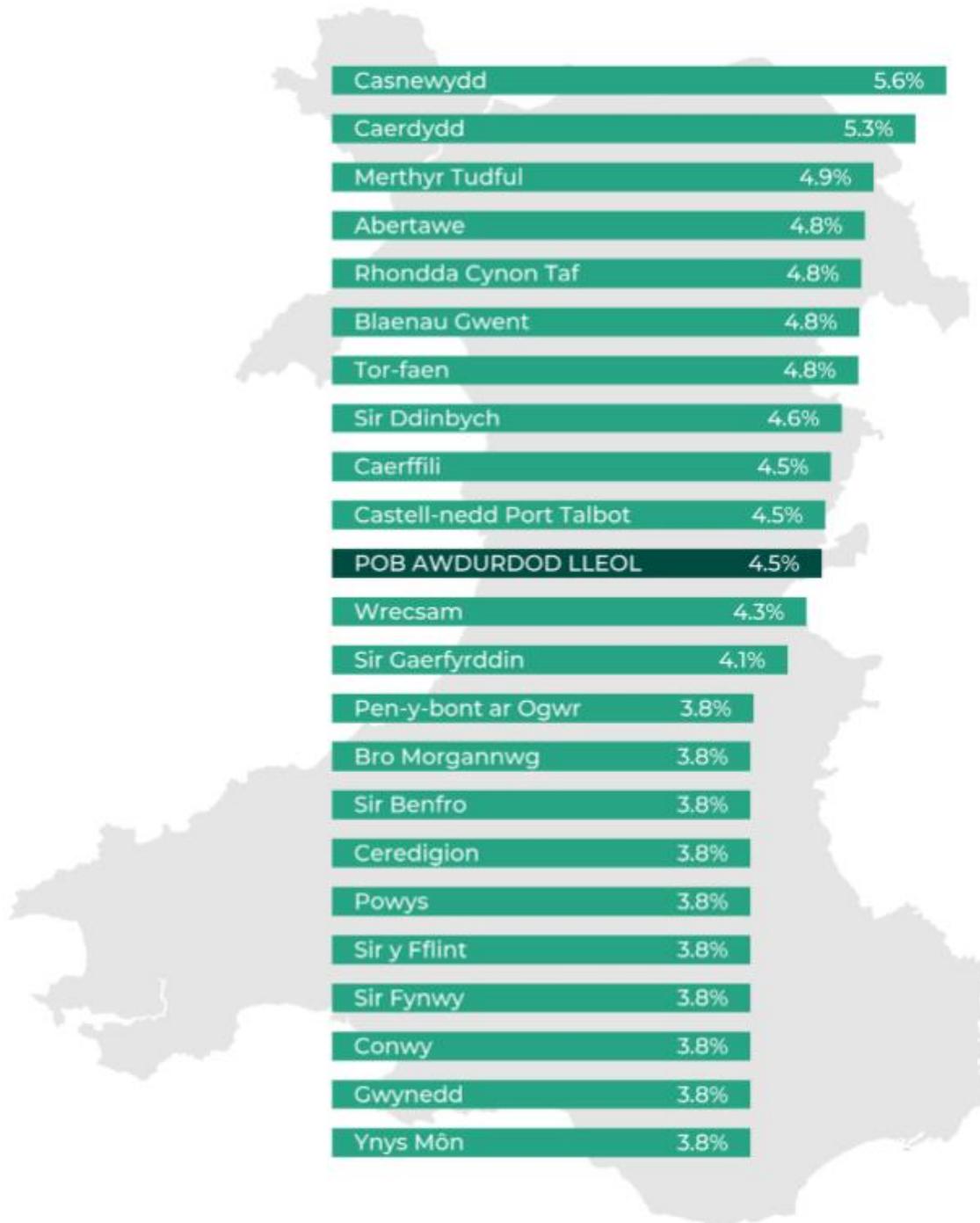
Neath Port Talbot CBC was also able to retain a very small amount (£12,000) of NDR (business rates) derived from the Swansea Bay City Deal. Retained rates are the share of any net NDR revenue generated as a direct result of the actions of the City and Growth Deal. As this revenue cannot be distributed directly from the NDR pool, an equivalent figure has been calculated and shared amongst relevant Councils through the Revenue Support Grant.

Newport received the biggest uplift overall in 2025-26 (5.6%) with Cardiff close by (5.3%) as illustrated in the [Senedd Research analysis](#) of Welsh Government data below:

Change in AEF (RSG+NDR) (adjusted) by local authority (2024-25 to 2025-26) %



Data source: Welsh Government – [Final Local Government Settlement 2025-26 tables](#)



Ffynhonnell data: Llywodraeth Cymru - [Setliad referniw a chyfalaf llywodraeth leol: terfynol 2025 i 2026 mewn tablau](#)

The Welsh Government also publishes details on *per capita* spend, that is, the amount of core funding available to spend on public services divided by the number of people living in the authority area. The figures below are based on the Mid Year 2023 Population Estimates and show Neath Port Talbot ranked 5th overall:

Table 1c: Aggregate External Finance (AEF) per capita, by Unitary Authority, 2025-26

Unitary Authority	2025-26 Final Aggregate External Finance	Aggregate External Finance per capita (£) [Note 2]	Rank
Blaenau Gwent	154,534	2,294	1
Merthyr Tydfil	133,144	2,272	2
Denbighshire	215,251	2,216	3
Rhondda Cynon Taf	521,329	2,162	4
Neath Port Talbot	306,177	2,143	5
Caerphilly	373,900	2,119	6
Gwynedd	248,390	2,084	7
Torfaen	192,216	2,058	8
Newport	329,322	2,013	9
Carmarthenshire	375,692	1,976	10
Ceredigion	144,225	1,974	11
Isle of Anglesey	135,881	1,961	12
Conwy	219,010	1,914	13
Swansea	468,409	1,898	14
Bridgend	276,528	1,884	15
Powys	251,461	1,870	16
Pembrokeshire	233,534	1,868	17
Wrexham	249,508	1,833	18
Flintshire	275,984	1,771	19
Cardiff	674,886	1,760	20
The Vale of Glamorgan	224,448	1,666	21
Monmouthshire	135,248	1,430	22
Total unitary authorities	6,139,078	1,940	

Tabl 1c: Cyllid Allanol Cyfun (AEF), yn ôl Awdurdod Unedol, 2025-26

Awdurdod Unedol	Cynllun Allanol Cyfun cyllid terfynol 2025-26 (£000)	Cynllun Allanol Cyfun Terfynol y pen (£) [Nodyn 2]	Rheng
Blaenau Gwent	154,534	2,294	1
Merthyr Tudful	133,144	2,272	2
Sir Ddinbych	215,251	2,216	3
Rhondda Cynon Taf	521,329	2,162	4
Castell-nedd Port Talbot	306,177	2,143	5
Caerffili	373,900	2,119	6
Gwynedd	248,390	2,084	7
Torfaen	192,216	2,058	8
Casnewydd	329,322	2,013	9
Sir Gaerfyrddin	375,692	1,976	10
Ceredigion	144,225	1,974	11
Ynys Môn	135,881	1,961	12
Conwy	219,010	1,914	13
Abertawe	468,409	1,898	14
Pen-y-bont ar Ogwr	276,528	1,884	15
Powys	251,461	1,870	16
Sir Benfro	233,534	1,868	17
Wrecsam	249,508	1,833	18
Sir y Fflint	275,984	1,771	19
Caerdydd	674,886	1,760	20
Bro Morgannwg	224,448	1,666	21
Sir Fynwy	135,248	1,430	22
Cyfanswm Awdurdodau Unedo	6,139,078	1,940	

These figures do not take into account other local authority funding or income streams, such as council tax revenue, specific grant funding or other funding streams via UK Government.

Neath Port Talbot CBC considered its **final budget proposal on Wednesday 5th March 2025**, and the **budget proposals for a net revenue budget of £405.3m for 2025-26 was approved** by the council.

2. Welsh Government action

In her response to the Petition, the Cabinet Secretary for Housing and Local Government, Jayne Bryant MS acknowledges the concerns of UNISON, and that councils have had to make “difficult decisions on services, and council tax in setting budgets”. The Cabinet Secretary also confirms that Neath Port Talbot received a 4.5% (£13m) uplift for 2025-26, which is “equivalent to the Welsh average uplift”.

While un-hypothecated funding does not take account of “specific support for specific local incidents such as Tata steel”, the Cabinet Secretary notes the data

used to calculate the settlement “includes indicators on benefit rates where appropriate”.

The paper continues by highlighting various UK Government funding to support businesses in the supply chain to “build resilience and grow”. Neath Port Talbot Council is also leading on the [Employment and Skills Fund](#) aimed at supporting individuals gain new skills and access employment opportunities.

3. Welsh Parliament action

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](#).

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

The [Finance Committee also took evidence from the WLGA on the Draft Budget 2024-25 on the 15 January 2025](#).

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-06-1500
Ein cyf/Our ref JB/00359/25

Carolyn Thomas MS
Chair - Petitions committee

28 May 2025

Dear Carolyn,

Thank you for your letter of 28 March, enclosing a petition you have received from the Neath Port Talbot branch of UNISON, requesting additional funding for Neath Port Talbot County Borough Council.

I have noted the concerns of UNISON regarding local government funding and I know that demand for services, alongside cost pressures mean that authorities have had to make difficult decisions on services, and council tax in setting budgets. The Welsh Government again prioritised local government and front line public services in its budget decisions. The local government settlement for 2025-2026 provides over £6.1bn in core revenue funding which is an increase of 4.5% compared to 2024-25 on a like for like basis. Neath Port Talbot CBC received an additional £13m in the 2025-26 settlement, an increase of 4.5%, equivalent to the Welsh average uplift.

The core settlement provides un-hypothecated funding for a local authority's ongoing responsibilities, not specific support for specific local incidents such as Tata steel. The data used to inform the settlement distribution includes indicators on benefit rates where appropriate. These will continue to feed through into the annual distribution whilst alternative employment is found.

The UK Government's TSUK Transition fund will provide support and funding for businesses in the supply chain and local businesses to build resilience and grow in the region. In addition, the Business Start Up Fund will enable Tata steelworkers, their immediate family members, and people in the supply chain to receive support, guidance and to access a grant. People who wish to set up new firms will be able to access non-repayable grants of up to £50,000. The 'Resilience Fund' will focus on supporting local businesses who have been impacted by the Tata transition but were not eligible to apply for support via the Supply Chain Fund.

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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.

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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.

I welcome the close working between Welsh Government, UK government and the Council. Neath Port Talbot Council will be leading on the administration of the Start-up funding, with Business Wales providing business advice and guidance to individuals and businesses. Neath Port Talbot council will also lead on the Employment and Skills Funding for individuals that been made redundant from Tata Steel UK or a company within its supply chain, to access grant funding to help support training and secure future employment.

Please be assured I am engaging closely with local authorities on the pressures facing them. I have a regular series of meetings with Council Leaders collectively as well as meeting individual Leaders. While the outlook is challenging, I welcome the pragmatic way we are working together with local government to ensure we do all we can within the funding available.

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

P-06-1500 Neath Port Talbot UNISON needs additional Funding for NPT Council - Petitioner to the Committee, 05 June 2025

To Whom It my Concern

Please see NPT P-06-1500 Feedback

We believe that the consensus now from all political parties and their respective representatives is that the SPF funding irrespective of what it's going to look like after this transition year, needs and we emphasis needs to come directly to all local governments across Wales.

I'm sure that's the view shared by all chief executives , corporate directors, heads of services, and the local government politicians.

Obviously, we need fairer funding on lots of other funding opportunities, but I was specifically highlighting the SPF as a way forward in this process going forward and require SPF funding resolved ASAP for Neath Port Talbot Council , to protect jobs also services .

Kind regards

Mark Fisher

Convene a summit to accelerate sustainable and ethical investment by public sector pensions.

Y Pwyllgor Deisebau | 16 Mehefin 2025
Petitions Committee | 16 June 2025

Reference: SR25/11287-4

Introduction

Petition Number: P-06-1522

Petition title: Convene a summit to accelerate sustainable and ethical investment by public sector pensions.

Text of petition:

The eight Welsh Local Government pensions, managed through the Welsh Pension Partnership total assets worth £25 billion (31 March 2024) . Although there is a Responsible Investment policy, there are millions of pounds of assets in people and planet harming investments such as fossil fuels, deforestation, arms and companies complicit in human rights abuses.

The Well-being of Future Generations Act requires public bodies to consider the long-term impact of their decisions and work towards improving the economic, social, environmental and cultural well-being of Wales.

One of the well-being goals calls for Wales to be a 'Globally Responsible Nation'. Derek Walker, the future generations commissioner has called on Welsh public



bodies to conduct an urgent review of public sector pension investments to ensure they are ethical and sustainable.

Presently Rachel Reeves the UK chancellor is proposing the amalgamation of all Welsh and English Local Government Pension pots into a small number of pooled funds and changing their governance. It is crucial that Welsh funds are directed towards ethical and sustainable investments that can practically benefit the people and environment of Wales rather than creating harm here and abroad. eg. sustainable social housing, regenerative forestry, local green energy, green transport, nature restoration.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

1. Background

The Local Government Pension Scheme (LGPS) is a public service pension scheme for local government workers and other employers that participate. Scheme rules and regulations can only be changed with the approval of the UK Parliament. The scheme is administered locally by pension funds.

Administering authorities are required by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 to set out their approach to investment in an investment strategy statement, such as this one by Gwynedd Pension Fund. UK Government Guidance was issued in 2017. The statement has to include certain information, including:

- The authority's policy on how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments

In Wales, there are eight LGPS funds, each run by a constituent authority:

- Gwynedd Council (Gwynedd Pension Fund)
- City of Cardiff Council (Cardiff and Vale Pension Fund)
- Flintshire County Council (Clwyd Pension Fund)
- Carmarthenshire County Council (Dyfed Pension Fund)
- Torfaen County Borough Council (Greater Gwent Pension Fund)
- Powys County Council (Powys Pension Fund)
- City and County of Swansea (City and County of Swansea Pension Fund)
- Rhondda Cynon Taf County Borough Council (Rhondda Cynon Taf Pension Fund)

In 2017, the Wales Pension Partnership (WPP) was established. This is a collaboration of the eight LGPS funds that cover the whole of Wales. It was established in response to UK Government requirements for local government pension funds to 'pool' their assets. Its role is to advise the constituent authorities on their investment strategies, maintaining investment performance and reduce investment costs.

Responsible investments

In its Governance Manual, the WPP sets out its 'Beliefs', noting that:

Responsible Investment and effective Climate Risk mitigation strategies, alongside consideration and evidential management of broader Environmental, Social and Governance issues, should result in better outcomes for the WPP's stakeholders.

In its Responsible Investments Policy, the WPP it states that the document “sets out WPP’s policy on responsible investment for all assets invested within the WPP.”

It continues by **stating**:

In developing and implementing this policy, WPP will have regard to the Well-being of Future Generations (Wales) Act 2015, the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 and any relevant guidance provided by the Scheme Advisory Board (“SAB”), the Ministry of Housing Communities and Local Government (“MHCLG”) and the Welsh Government.

The policy continues by **stating that**:

The Constituent Authorities are individually responsible for setting investment strategy (and the underlying structure of those strategies, e.g. geographical exposure) for their own funds which reflect their membership profile and funding position. The investment strategy is the high-level split between asset classes including but not limited to equities, debt, property and infrastructure. The role of WPP is to provide a means for each Constituent Authority to implement its agreed strategy.

The Responsible Investment policy also sets out the WPPs Climate Risk Policy and how it’s assessing portfolio risks:

8. This policy will have regard to the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 and any relevant guidance provided by the Scheme Advisory Board (“SAB”), the Ministry of Housing Communities and Local Government (“MHCLG”), Intergovernmental Panel on Climate Change (“IPCC”).The policy will note Welsh Government guidance and the Well-being of Future Generations (Wales) Act 2015.

WPP’s Annual Update

In its [Annual Update for 2023-24](#), the WPP noted that in June 2023, it “launched a **£1.2bn Sustainable Global Active Equity sub fund**”, which sees its partner, Russell Investments “manage a diversified multi-manager sustainable active equity solution built to the WPP’s bespoke requirements”.

According to the [WPP’s Annual Report 2023-24](#), the Constituent Authorities have total assets in the region of £25bn (as of 31 March 2024), £18.5bn of which are invested in WPP’s existing sub-funds.

2. Welsh Government action

The Cabinet Secretary for Housing and Local Government responded to the petition on 2 May 2025. The Cabinet Secretary makes clear from the outset that local government pension funds are and remain a “**reserved matter**” to the UK Parliament, and that the Welsh Government has “no powers in relation to the scheme or its operation”.

Nevertheless, the Cabinet Secretary does set out how the Welsh Government has and continues to have dialogue with LGPS constituent authority leaders and the WPP. This includes discussions about the:

*[...] steps the Pool was taking to increase opportunities to invest in **climate positive investments** and to take account of the risks posed by investing in fossil fuel related funds.*

The Cabinet Secretary also notes the Welsh Government’s support for the UK Government’s review of pensions, which is intended to “boost investment, including investment in local economies”. The paper also notes that the Welsh Government has been given:

[...] reassurances that the UK Government recognises the benefits of a single Welsh LGPS pool, in which partner funds will have a mutual interest in investing in the Welsh economy, including in sustainable investments.

3. Welsh Parliament action

In [March 2022](#), [Peter Fox MS](#) asked the then Minister for Finance and Local Government, [Rebecca Evans MS](#) about local government pension schemes in relation to investments in Russian companies and funds. Responding to the question, the [Minister noted](#):

I've had some very good discussions with the local government pension scheme representatives in respect of a range of issues—for example, divestment from fossil fuels, which again is a shared area of concern between Welsh Government and local government.

In May 2022, a Member Debate on Decarbonising public sector pensions in the name of Jack Sargeant MS was moved. The Member stated that he'd been:

[...] working with Friends of the Earth Cymru for some time now on the campaign that is the subject of today's motion: for the Welsh Government to bring in targets for public sector pension fund disinvestment. The motion calls on the Welsh Government to mirror its 2030 target for the public sector to go carbon neutral with a target for public sector pension funds to achieve the same.

Members during the debate referenced that over £500 million of local government pension funds has been invested in fossil fuels, which Cefin Campbell MS notes was “around 3.2 per cent of these schemes' value”.

Responding to the debate, the then Minister for Finance and Local Government stated the Welsh Government “supports the ambitions set out in the motion to decarbonise those public sector pension scheme” and that:

[...] public sector pensions, like others, must develop a coherent understanding of the current and historic emissions inherent in their investments. They need to identify positive opportunities to invest in developments that support the shift to the decarbonised world. They need to understand and respond to the financial risks that the climate emergency brings.

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.

Jayne Bryant AS/MS
Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government



Llywodraeth Cymru
Welsh Government

2 May 2025

Dear Carolyn,

Thank you for your letter of 28 March to the Cabinet Secretary for Finance and Welsh Language about Petition P-06-1522 – “Convene a summit to accelerate sustainable and ethical investment by public sector pensions”. I am replying given my responsibilities for local government. It is important to note at the outset that Pensions remain a reserved matter and decisions on the local government pension scheme are reserved to UK Government. I have no powers in relation to the scheme or its operation.

However, I thought it would be helpful to provide some information on matters relevant to the Welsh Government.

Our Programme for Government emphasises creating a "stronger, greener, fairer Wales" with a focus on tackling climate change and achieving Net Zero by 2050. There is clearly an important role here for pension and other investors to invest in climate positive actions and to support the Welsh economy.

I and my predecessors have discussed this with Leaders and Pension Authority Members. This has included discussion at the Local Government Partnership Council with elected Leaders when the Chair of the Wales Pension Partnership presented on the steps the Pool was taking to increase opportunities to invest in climate positive investments and to take account of the risks posed by investing in fossil fuel related funds.

Subsequently, WLGA, together with Friends of the Earth, facilitated an event to further build on conversations across Wales on the decarbonising of pension funds. Elected Members and officers attended. The event was chaired by the then Chair of the Wales Pension Partnership Governance Committee and included guest speakers from the Good Economy, Leeds University Business School and the Swansea Pension Fund. These expert speakers shared their experience of moving towards a sustainable pension before plenary discussions on the challenges to decarbonising pensions and how to overcome these.

While discussions in this event acknowledged that the funds had to ensure they could meet the pension requirements of their members, there was general agreement on the potential for funds to also support expansion of sectors that generated a return while contributing positively towards net zero goals. Affordable housing, targeted SME finance, clean energy and natural capital were all identified as examples that have such potential.

As the petition notes, the UK Government last year launched a review of pensions intended to boost investment, including investment in local economies and in the UK, increasing the size of investment funds and tackling waste and duplication in the pensions system. These are, of course, objectives which the Welsh Government fully supports.

As part of its pensions reform programme, the UK Government ran a consultation on a package of proposed reforms to the structure, investments and governance of the Local Government Pension Scheme (LGPS) from 14 November to 16 January.

It is important that the arrangements for the LGPS are not set too narrowly so as to allow pensions authorities the ability to retain, develop and deliver on their responsible investment policies. The Welsh Government has been a strong supporter of the creation of the Wales Pension Partnership (or "Welsh Pool") which predated the wider pooling arrangements in the LGPS.

I understand that the UK Government is currently considering responses to the consultations it has run. As part of the consultation process, the Welsh Government was provided with advanced sight of the proposals, as well as reassurance that the UK Government recognises the benefits of a single Welsh LGPS pool, in which partner funds will have a mutual interest in investing in the Welsh economy, including in sustainable investments. It is my understanding that this is also part of the feedback to the consultation provided by relevant Welsh stakeholders.

I hope this information is helpful. We await the outcome of the UK Government's consultations and will of course consider carefully how any changes will affect Wales.

Yours sincerely,

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

Jayne Bryant AS/MS

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

P-06-1522 Convene a summit to accelerate sustainable and ethical investment by public sector pensions - Petitioner to Committee, 04 June 2025

Dear Members of the Petitions Committee,

Thank you for forwarding the letter from Jayne Bryant, Cabinet Secretary for Housing and Local Government to us. In response, we wish to articulate several key points pertinent to her communication.

1. While we are of course fully aware that Local Government Pensions are a reserved matter, this legal demarcation does not preclude the Welsh Government from establishing the proposed summit. The very acceptance of this petition for consideration affirms that it falls within the appropriate scope of the Welsh Government's authority.
2. Wales must urgently hold a summit to commit to ethical and sustainable public pension investments, leveraging place-based benefits like green housing and local renewables, and respond to overwhelming public support for climate action and divestment, recognizing the critical implications for future generations.
3. The event referenced by the Cabinet Secretary, organised jointly by the Welsh Local Government Association (WLGA) and Friends of the Earth, took place in late 2023. It is important to note that this engagement was narrowly focused on climate change issues, and consequently, it did not comprehensively address other critical concerns relevant to the petition's broader ethical and sustainable remit, such as human rights abuses, deforestation, and the degradation of vital ecological systems.
4. Since that time (late 2023), numerous critical developments have fundamentally altered the context. These include the tragic devastation of lives and livelihoods across Palestine, the escalating urgency of record-breaking local and global temperatures impacting the health and safety of both Welsh and international communities, and the continued rapid decline of species and biodiversity worldwide, including within Wales. Furthermore, the UK Chancellor's recent pension review has presented new opportunities for targeted investments within Wales, which can directly enhance the health and wealth of Welsh communities while simultaneously protecting and improving the precious natural environment.
5. While the event organised by the Welsh Local Government Association (WLGA) and Friends of the Earth was an informative, regrettably no subsequent concrete actions followed this initiative. Only unsubstantial progress has been observed in divestment initiatives among most Welsh Local Government Pension Funds and the amalgamated Welsh Pensions Partnership (WPP) fund.
6. The Cabinet Secretary highlights the Welsh Government's ambition for a "*stronger, greener, fairer Wales*" and achieving Net Zero by 2050. However, these crucial

objectives cannot be realised without aligning the billions of pounds invested through Local Government Pension Schemes with these very goals.

7. The Senedd has already laid the groundwork to support initiatives in this area. In 2022, it passed NDM7964 which, among other things, *"calls on the Welsh Government to work with the public sector to agree a strategy to decarbonise pensions by 2030."* Jayne Bryant MS was a key supporter of this motion. It also notes the precedent that (acting alongside WG concerns) *"the Welsh pension partnership moved quickly to withdraw funds from Russian holdings and has previously divested from coal, thus demonstrating it is possible for pension funds to make these decisions"*.
8. The Cabinet Secretary's deferral to the outcome of the UK Government's pensions consultation is concerning, given the pressing urgency of the matter. Now is a critical moment for the Welsh Government to act decisively on public pensions, thereby benefiting the Welsh people, our precious environment, and the wider global community. Such proactive leadership directly aligns with Wales' aspirations, as enshrined in the Future Generations Act, to be a frontrunner in climate action, nature protection, fairness, and global responsibility.

Actions for the Welsh Government that we wish the Petitions Committee to support

- **Convene an urgent Pensions Summit:**

Immediately organise a dedicated summit with relevant stakeholders (including Welsh Local Government Association, Welsh Pensions Partnership, pension funds, and civil society) to foster ongoing planning, and secure concrete commitments for ethical and sustainable public pension investments. This summit must expand beyond a sole focus on fossil fuels, to encompass broader ethical and environmental concerns.

- **Prioritise ethical divestment:**

Drive forward a clear strategy for divestment from investments linked to human rights abuses and environmentally destructive practices, acknowledging and responding to the widespread public support for such action (e.g., in relation to Palestine, as indicated by recent UK polls).

- **Align investments with Welsh priorities and public will:**

Actively work with the Welsh Pensions Partnership (WPP) to identify and facilitate "Place-Based Income" investments within Wales. This includes directing pension capital towards:

- Social and sustainable housing projects.
- Green transport infrastructure.
- Local renewable energy schemes.

- Regenerative farming initiatives.

This alignment should explicitly aim to maximise benefits for Welsh communities, strengthen local economies, and enhance the natural environment.

- **Reinforce the Future Generations Act and Net Zero alignment:**

Clearly articulate and actively pursue the direct implications of public pension investment strategies for achieving Wales' Net Zero targets and fulfilling the long-term well-being goals enshrined in the Well-being of Future Generations Act.

- **Demonstrate global leadership:**

Actively position Wales as a proactive global leader in ethical and sustainable investment practices, leveraging the strong public support for climate action across the political spectrum (as demonstrated by recent polls among various voter groups) to drive ambitious change.

Actions for the Petitions Committee

Here are suggested actions for the Petitions Committee, leveraging its remit to advance the call for a summit on ethical and sustainable public pensions:

- **Undertake scoping work for a Summit:**

Initiate a short, focused piece of work to envision the optimal structure and content of a summit on ethical and sustainable public pension investments to aid and assist the work that the Welsh Government will carry out.

Kick-start the process of designing the Summit's content:

Propose a summit agenda that includes:

- **Knowledge and skill-sharing workshops:**

Facilitate sessions for pension fund representatives and stakeholders to exchange best practices.

- **Showcasing success stories:**

Feature presentations from councils that have successfully divested and illustrate the tangible financial and ethical benefits realised.

- **Financial viability analysis:**

Present robust financial analysis demonstrating the viability and advantages of ethical and sustainable investment strategies.

- **Engage key organisations:**

Formally invite and collaborate with relevant organisations, such as Divest Gwynedd, Divest Cymru, Climate Cymru, and the Palestine Solidarity Campaign (PSC), to support the initiative and contribute their expertise to the summit's development and delivery.

We appreciate you taking the time to review our response. We would welcome the opportunity to engage with you further on this critical matter.

We respectfully urge the committee to consider our suggestions in detail before proceeding to close our petition, especially given the pressing urgency of the issues at hand.

Kind Regards,

Heather Bolton

For Divest Gwynedd

University of South Wales Course Closure

Y Pwyllgor Deisebau | 16 Mehefin 2025
Petitions Committee | 16 June 2025

Reference: SR25/11287

Petition Number: [P-06-1523](#)

Petition title: Reverse the Closure of Post Grad Counselling and Psychotherapy Courses at University of South Wales

Text of petition: We urge the University of South Wales to reverse its decision to close key counselling and psychotherapy courses. These programmes provide vital training and support local mental health services. Their loss will reduce access to qualified therapists and force students to train in England. USW must consult with students and stakeholders, including the Welsh Government, to find a solution that protects these essential courses.

Students on these courses provide essential support in charities, schools, and NHS services. Their absence will worsen the strain on already overstretched provisions.

With no alternative BACP Post Grad psychotherapy training in Wales, students must travel to England, increasing financial and logistical challenges. This disproportionately affects mature students and those from lower-income backgrounds, reducing diversity in the profession.

USW has not followed its own policies on consultation, failing to engage students and stakeholders prior to decisions being made.

These courses are vital for training skilled professionals and ensuring accessible mental health support. Given the rising demand for services, this decision is short-sighted and harmful.



We urge Welsh Ministers and USW to explore alternative solutions, such as restructuring programmes or securing additional funding. Protecting these courses is essential for the future of counselling and psychotherapy in Wales.

1. Background

On 19 February 2025, the University of South Wales (USW) announced its 'Consultation on the workforce implications of a review of our academic provision' ('the consultation'). The consultation highlighted closing a 'small number of courses' though did not provide detail about affected areas as it said "staff and students were being spoken with directly in the first instance".

Additional articles regarding the consultation were published by USW on their students news pages and the university's 'Advice Zone'. These articles further stipulated "the specific courses identified for closure is a decision which is not subject to consultation and has been approved by the Executive team at the University".

The rationale for the consultation was outlined in relation to challenges facing universities across the country and an aim to ensure the future financial sustainability of the University.

While limited detail regarding the affected areas was made public, as reported to the petitions committee in a previous brief regarding the closure of Lampeter Campus, Wales Online reported that staff and students advised that the affected courses included integrative counselling and psychotherapy.

While information in the public domain is limited, the response to the petition from the Minister for Further and Higher Education outlined:

My officials have spoken with the USW for clarification on these particular courses. The USW has confirmed that the Masters level courses in Integrative Counselling and Play Therapy were being considered for closure under the proposals but **an early decision has been made by the University to retain them**. During the consultation period, alternative delivery models were proposed that will reduce operating costs and make the courses financially viable and therefore both have been removed from the consultation process. [Bold is our emphasis]

2. Other Higher Education Institutions in Wales

The previous research brief regarding Lampeter Campus outlined that other higher education (HE) institutions throughout Wales are facing challenges associated with financial pressures leading to a number of institutions consulting on reductions in staff and courses.

On 28 January 2025, [Cardiff University](#) began a consultation on proposed staff and course reductions. Though [Wales Online](#), along with other media sources, have since reported that Cardiff University have proposed alternative plans. Such alternative plans regarding course reductions require further discussions with the Welsh Government and NHS bodies according to [the BBC](#). [The University and College Union \(UCU\)](#) criticised the significance of concessions made in such alternative plans. A [joint statement between Cardiff University and UCU](#) has since been published on Cardiff Universities' website indicating that Cardiff University are ruling out compulsory redundancies for all staff connected to the consultation and the wider transformation programmed for the remainder of the calendar year. In return, UCU has agreed to suspend all industrial action under their current mandate for 2025.

The BBC reported that [Bangor University](#) aims to cut about 200 jobs to make savings of £15m, it's Vice-Chancellor told staff in an email. Though on 14 May 2025, the BBC reported this had been [reduced to around 78 full-time equivalent posts](#).

On 3 April 2025, [Cardiff Metropolitan University](#) announced they will be consulting with unions and colleagues regarding their restructuring proposals which include an expectation of making between 30 and 50 further staff redundant as it attempts to cut costs.

3. Welsh Government Action

As stipulated above, Welsh Government action has included contacting the USW regarding the course closures which have since been removed from the consultation of which this petition is based.

A previous statement by the Minister for Further and Higher Education at [Plenary on 4 December 2024](#) noted universities as autonomous institutions, saying it would be inappropriate for Welsh Ministers to intervene on such academic matters such as course delivery and campus location.

In a further [Written Statement on 18 February 2025](#), the Minister announced additional funding to the university sector in order to support estate maintenance and digital projects. Further, the Minister asked Medr to report back on “how this funding has been maximised to make future savings to ease the current financial challenges”. In addition the Minister has asked Medr to undertake an overview of subject demand, provision, and distribution in HE in Wales.

The Minister announced at [Plenary on 19 February 2025](#) that she has invited all Vice-Chancellors in Wales to a round-table meeting for more discussions about the current challenges facing the sector. Regarding USW specifically, the Minister suggested she did not want to pre-empt and speculate on the situation when there has been no formal announcement from USW regarding the affected areas of the consultation.

On 3 April 2025, [Welsh Government](#) announced it has made the Tertiary Education and Research (Wales) Act 2022 (Commencement No. 5 and Transitory and Transitional Provisions) Order 2025 (‘the Order’), along with the Tertiary Education and Research (Wales) Act 2025 (Consequential Amendments) Regulations 2025, following the agreement of the latter in [Plenary on 1 April 2025](#). The Order brings into force a range of duties on Medr (from 5 April 2025) which it says will help deliver a number of key reforms including the development of a learner engagement code as well as development of guidance to support providers of tertiary education in the preparation of learner protection plans.

Regarding Medr’s powers, the BBC article cited above quotes a statement by its Chief Executive Simon Pirotte outlining that Medr did not have powers to instruct a university to deliver or keep specific courses, but it could advise the government on where a subject may be ‘vulnerable’.

4. Welsh Parliament Action

Currently there are two further petitions relating to cuts to universities in Wales which have passed the number of signatures required to be considered by the petitions committee:

- [Enable Cardiff University to keep the Nursing degree course](#) [7,574 signatures as of 03/06/25 @ 15:00]
- [Help Cardiff University to keep their Modern Languages degree courses](#) [2,522 signatures as of 03/06/25 @ 15:00]

The Chair of the Children, Young People and Education Committee wrote to all HE providers, including the Vice-chancellor of USW with a request for information regarding the challenges facing the HE sector. USW's response highlighted the university's projected end of year position for this financial year will be a deficit and that USW has previously made "difficult decisions" to withdraw from Chemistry, Geography, Mathematics and Geology since 2019/20. USW suggested the conclusion of the consultation period (11 April 2025) will be followed by a "careful review" of all feedback before final decisions are made.

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.



Ein cyf/Our ref VH/00182/25

Carolyn Thomas MS
Chair - Petitions committee

29 April 2025

Dear Carolyn,

Thank you for your letter of 28 March regarding Petition P-06-1523 - Reverse the Closure of Post Grad Counselling and Psychotherapy Courses at University of South Wales (USW).

This is a difficult time for the higher education sector in Wales and indeed across the UK, with higher education institutions facing financial pressures and needing to find ways to respond to these challenges. I have met with the Vice Chancellor 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. These discussions build upon the ongoing dialogue I have had with the sector since being appointed in September.

In February, the USW announced that it would be reviewing its range of courses offered and its areas of research and launched a statutory consultation with staff and trade unions. The university subsequently extended the consultation until 11 April. The university stated it would not be publicly releasing information on which courses are affected until after the consultation closure, to enable constructive discussions with staff. There has, however, been press coverage of this issue where staff and students have reportedly advised that among courses at risk are integrative counselling and psychotherapy. The USW has confirmed that any courses affected will remain open for existing students to finish their studies but there will be no new intakes.

I recognise the impact the university's plans may have on staff and students and acknowledge that the university has support services in place for affected staff and students to raise their concerns directly. At challenging times such as this I expect institutions to adhere to the principles of social partnership and that the trade unions and the affected workforce are involved and engaged on the proposed restructuring process and fully supported. I also expect to see support in place for those students on affected courses to finish their studies with minimum disruption.

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

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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.

As an autonomous institution, the USW is responsible for its own academic affairs, including course delivery and provision. It would not be appropriate for Welsh Ministers to intervene in such matters. However, my officials have spoken with the USW for clarification on these particular courses. The USW has confirmed that the Masters level courses in Integrative Counselling and Play Therapy were being considered for closure under the proposals but an early decision has been made by the University to retain them. During the consultation period, alternative delivery models were proposed that will reduce operating costs and make the courses financially viable and therefore both have been removed from the consultation process. Staff and learners have been informed of this.

I want to emphasise my commitment to supporting our universities. Our universities are crucial to our ambitions for improving public services, growing the economy, and enabling the wellbeing of future generations. Welsh Government will continue to work with the sector and other partners, alongside Medr, to negotiate this challenging time and safeguard the future of higher education in Wales. The [Written Statement](#) of 3 March sets out the Welsh Government commitment and the next steps we are taking in supporting a sustainable higher education sector in Wales.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'V. Howells', with a long, sweeping underline stroke extending to the right.

Vikki Howells AS/MS

Y Gweinidog Addysg Bellach ac Uwch
Minister for Further and Higher Education

P-06-1524 Erect a statue of Rachel Williams to commemorate her impact on Welsh language education in the Vale of Glamorgan

Y Pwyllgor Deisebau | 16 Mehefin 2025
Petitions Committee | 16 June 2025

Reference: RS25/11287/6

Introduction

Petition Number: P-06-1524

Petition title: Erect a statue of Rachel Williams to commemorate her impact on Welsh language education in the Vale of Glamorgan

Text of petition: Rachel Williams started her career as a teacher in an English-medium school. She received a phone call, asking her to start work the following day as a teacher at a Welsh-medium nursery.

Upon starting the role, she learned that an education officer called Mr Angel would be visiting the school in order to test the children's Welsh. Some of the children came from English-speaking homes, and so they could not speak Welsh. Rachel taught these children a little Welsh, so that they could pass the test and would not have to leave the school.



Years later, she was awarded an MBE to thank her for her work in supporting the Welsh language in Barry and the Vale of Glamorgan.

Without the work of Rachel Williams, the Welsh language would not have grown so much in Barry and the Vale of Glamorgan.

By now, there are seven Welsh primary schools in the Vale of Glamorgan, as well as one Welsh secondary school, and this would not have been possible without Rachel Williams, because only the children of Welsh-speaking families would have been allowed to attend Welsh schools.

In addition, for many children at Ysgol Gymraeg Sant Baruc, our identities would be different because we would not have been able to learn Welsh.

A statue of Rachel Williams should be erected in Barry to celebrate, commemorate and share her history and the tremendous impact that she had on the Welsh language. Did you know that there are only four statues of women in the whole of Wales? A statue of Rachel Williams would inspire children and young people to stand up for what is right and for the Welsh language.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

A number of sources of funding could be pursued for a statue such as this. Senedd Research has produced a number of guides for constituents, signposting sources of funding and advice. The following may be relevant to this petition:

- [Assistance for the arts](#)
- [Community buildings, places of worship and faith groups](#)

The petitioners may find it useful to consider the work of [Monumental Welsh Women](#), a group that are campaigning to erect five statues of Welsh women in five years. The group was motivated by the fact that, when their campaign started, there were not any statues to named Welsh women in Wales.

Information about the four statues they have erected, and funding sources involved, is available on [the group's website](#).

2. Welsh Government action

The Welsh Government response to this petition notes:

The Welsh Government does not normally commission statues and does not have a specific budget to do so. Usually, erecting commemorative statues is initiated by local authorities, sometimes in partnership with non-profit organisations or community groups.

Although the Welsh Government does not normally commission statues, it has contributed to the erection of statues, including the following:

- [Bett Campbell statue, Cardiff](#)
- [Elaine Morgan statue, Mountain Ash](#)
- [Elizabeth Andrews, Penderyn](#)
- [Lady Rhondda, Newport](#)
- [Fred Keenor, Cardiff](#)

3. Commemoration audit

The Welsh Government commissioned an audit of statues, street and building names to address Wales' connections with the slave trade, led by Gaynor Legall. In November 2020 the [Legall audit](#) identified 209 monuments, buildings or street names, located in all parts of Wales, which commemorate people who were directly involved with slavery and the slave trade or opposed its abolition.

The report noted a number of groups are under-represented in public commemoration in Wales:

The general absence noted of the commemoration of people of colour is remarkable, as is the lack of commemoration of women, disabled people and significant world figures.

In an [accompanying statement](#), the First Minister said that “the audit has shown the slave trade and colonial exploitation were embedded in our nation’s economy and society” and that:

This is the first stage of a much bigger piece of work, which must now, collectively, consider how we move forward with this information as we seek to honour and celebrate our diverse communities.

The Welsh Government published [guidance on public commemoration](#) in 2024.

4. Welsh Parliament action

In 2020, the previous Senedd’s Culture, Welsh Language and Culture Committee carried out an [inquiry](#) into public acts of commemoration, in the wake of the toppling of Colston’s statue in Bristol and widespread discussion about the appropriateness of historic monuments.

The [report’s](#) recommendations included:

The Welsh Government should work in partnership with local authorities, charities, and the heritage sector to identify ways in which the current under-representation of particular groups can be addressed with a view to commissioning new statues or commemorative art works in Wales.

The Welsh Government accepted this recommendation.

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.

5. Contact

For more information contact:

Robin.Wilkinson



0300 200 6298



Robin.Wilkinson@senedd.wales

Mark Drakeford AS/MS
Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1524
Ein cyf/Our ref MDFWL/00236/25

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

7 May 2025

Dear Carolyn,

Thank you for your letter of 28 March, asking for my opinion on the matters raised in the petition calling on us to “*Erect a statue of Rachel Williams to commemorate her impact on Welsh language education in the Vale of Glamorgan*”.

Recognising individuals for work they have undertaken in their local communities is important. As the Cabinet Secretary responsible for the Welsh language, I support everyone who promotes the Welsh language in their community and the positive impact their work has on the language locally.

However, the Welsh Government does not normally commission statues and does not have a specific budget to do so. Usually, erecting commemorative statues is initiated by local authorities, sometimes in partnership with non-profit organisations or community groups.

I suggest that you advise the petitioner to contact the local authority to start exploring the idea. The petitioner may also find it useful to consult the Welsh Government’s guidance: [Public Commemoration in Wales: Guidance for Public Bodies.](#)

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Correspondence.Mark.Drakeford@gov.wales
Gohebiaeth.Mark.Drakeford@llyw.cymru

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

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.

Additionally, the committee may want to draw the petitioner's attention to the work of two independent voluntary organisations dedicated to recognising the contribution of women to the history and life of Wales: [Monumental Welsh Women](#) and [Purple Plaques](#). Both organisations aim to highlight and honour notable women across Wales and may be able to advise accordingly.

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-06-1527 Review dog walking restrictions on Welsh beaches and issue guidance to relevant bodies

Y Pwyllgor Deisebau | 16 Mehefin 2025
Petitions Committee | 16 June 2025

Reference: SR25/11480-2

Introduction

Petition Number: P-06-1527

Petition title: Review dog walking restrictions on Welsh beaches and issue guidance to relevant bodies

Text of petition: In Scotland and Northern Ireland dogs are banned from beaches from 1 June – 15 Sept (incl). In England, such as Cornwall, dog bans cover the shorter period 15 May – 30th September for Blue Flag beaches and the school holiday period of 1 July – 31st August for other beaches, but additionally allow out of hours dog access between 6pm and 10am. In not so sunny, rain and windswept Wales the banned period is 1 May – 30th September or even longer (with NO out of hours' time exceptions) and this applies for some general beaches, for green coast awards and for Blue Flag beaches. This is even 2 weeks before the commencement of the official bathing season on 15 May under England and Wales Bathing Water Regulations 2013.



There is NO presumption that Blue Flags should cover the entirety of a beach or that their season should be fixed 15 May – 30 September (or even from 1 May!) or to exclude out of hours access. Keep Wales Tidy (who classify Blue Flag beaches in Wales) say that it is up to the applicant body to decide how long the Blue Flag season will be within the timeframe of the Bathing Water season and other considerations.

Responsible dog owners pick up and help educate and police others. They recognise the value of excluding dogs on busy beaches in the summer. But they are fed up of being excluded from deserted beaches for 5 months of the year for no good reason whatsoever. Local Authorities have scarce resources and cannot afford to police dog exclusions from beaches unnecessarily. A better supported, shorter closed period to dog walking would reduce burdens upon them. A review of the timing of dogs on beaches is in keeping with the recent (November 2024) Bathing Water Regulations 2013 consultation. To aid flexibility Governments in England and Wales have supported a removal of regulation 4 (fixed bathing season) from the regulations to guidance.

We, responsible dog owners of Wales, call on the Senedd to recognise the value of dogs – socially, to the economy of Wales, to our tourism and to the health and welfare of dog owners. Also, the merits of walking dogs on expansive beaches as opposed to muddy fields, paths or parks. We ask the Senedd to debate the matter and to support the Welsh Government in issuing guidance (as appropriate) to Welsh Local Authorities (LA), NRW and Keep Wales Tidy that the default dog ban period on Welsh beaches should follow that generally of Cornwall, being 1 July – 31 August and with additional 6pm – 10am out of hours access, except where Local Authorities make the case for longer exclusion. Where a LA calls for a longer exclusion, it should take into account the availability of nearby beach walking opportunity and social and economic impacts.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dily. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

Currently, there are restrictions to dogs accessing some beaches in Wales between 1 May and 30 September. The petition calls for guidance to be issued to local authorities to reduce the length of the summer restrictions in line with other local authorities outside of Wales, and for out of hours access to restricted beaches - similar to the approach used by [Cornwall Council](#) - between the hours of 6pm-10am.

The petition received [361 signatures](#), and 60% of those signatures came from within the Swansea area. Using Swansea as an example, it is worth noting that restrictions do not apply to guide dogs, and as [this map](#) shows, a number of beaches are listed as “dog friendly” at all times of the year.

[Natural Resources Wales](#) lists dog, bird, and other animal faeces as one on the top five contributors to bathing water pollution due to their high levels of bacteria.

1.1. Powers to implement restrictions

Local authorities have powers under the [Anti-social Behaviour, Crime and Policing Act 2014](#) (the Act) to apply restrictions through the use of Public Space Protection Orders (PSPOs). They are required to review these every three years, either to renew or abolish the order. [Guidance on PSPOs](#) (published by the Local Government Association) sets out that PSPOs are a tool used by local authorities to help tackle anti-social behaviour (ASB), and ensure that public places remain safe.

To be able to use a PSPO, [certain criteria must be met](#). For example, in order to impose a restriction, the ASB must have a detrimental effect on the quality of local life, it must be persistent in nature, it must be unreasonable, and it must justify the restriction being imposed.

With reference to controlling the presence of dogs, the PSPO guidance above highlights that owners have a duty of care to exercise them, and that local authorities should consider how to accommodate this need elsewhere. Local authorities are encouraged to publish lists of alternative sites for dog walkers to use without restrictions, and also to consult dog law and welfare experts prior to seeking a PSPO. The impact of displacing dog owners into nearby regions or neighbouring authorities should also be considered to avoid unintended consequences. It's worth noting that under the Act there are [statutory consultation requirements](#) that must be followed prior to making a PSPO.

2. Welsh Government action

In a letter to the Chair dated 12 May 2025, the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs Huw Irranca-Davies MS, sets out that local authorities are responsible for controlling dog access to beaches throughout the year, and that these restrictions are often in place to prevent a health risk.

He states:

Whilst I sympathise with the sentiments expressed in the petition in relation to responsible dog owners, there are no plans to introduce further guidance. Local Authorities already have the necessary powers to amend local restrictions and, as noted above, they are best placed to decide on any potential changes, should they consider it necessary.

The petitioner has provided a response to the letter and a copy is included in your papers for today's meeting.

3. Welsh Parliament action

This issue does not appear to have been raised in the Senedd previously.

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

Eich cyf/Your ref P-06-1527
Ein cyf/Our ref HIDCC/00783/25

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

Government.Committee.Business@gov.wales

12 May 2025

Dear Carolyn,

Thank you for your letter of 17 April regarding the Senedd Petition Committee's Petition P-06-1527 which calls upon the Welsh Government to *Review dog walking restrictions on Welsh beaches and issue guidance to relevant bodies*. I am responding as policies relating to Local Environmental Quality reside within my portfolio.

The requirement for byelaws, set by Local Authorities, prohibiting dogs from certain beaches exist primarily to protect the interests of beach goers during the spring and summer seasons, for example, to prevent potential risk to health from dog waste which is not removed and disposed of correctly by dog owners. Local Authorities can also use Public Space Protection Orders (PSPO), which require local consultation every two years. The aim of such orders is to stop the unreasonable behaviour in public spaces, such as the risk outlined above, by introducing restrictions on the use of a physical area. Breach of a PSPO restriction is an offence liable, on conviction in court, to a fine of up to £1000.

Whilst I acknowledge there may be reduced beach users outside of the peak tourist seasons, I firmly believe it is individual Local Authorities who are best placed to make decisions on what approaches are needed for their beaches in their areas.

I understand Local Authorities advertise their restrictions and requirements on their websites to enable dog owners to check these before visiting any beaches. In addition, they often include detailed maps which clearly identify the areas where dog restrictions apply and post notices at relevant beaches.

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

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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.

Whilst I sympathise with the sentiments expressed in the petition in relation to responsible dog owners, there are no plans to introduce further guidance. Local Authorities already have the necessary powers to amend local restrictions and, as noted above, they are best placed to decide on any potential changes, should they consider it necessary.

Thank you for writing to me about the petition and this important subject. I hope you will find the information above helpful in updating the Senedd Petition 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

P-06-1527 Review dog walking restrictions on Welsh beaches and issue guidance to relevant bodies - Petitioner to the Committee, 03 June 2025

Petitions Committee – further evidence

I would like to thank the Committee and the Minister for their interest in this matter.

Introduction and context

It is an important subject considering around 31% of UK households own at least one dog and that there are around 12 million dogs kept as pets in the UK. The proportions are higher in rural areas such as Wales.

Dogs need exercising and beaches are an ideal place to do so, however their presence needs to be balanced against the public use of beaches for other purposes.

Pet dog ownership brings with it a range of other wider social benefits beyond just direct and indirect economic benefits which are themselves very substantial:

- In mental health and wellbeing, thus reducing burden on the NHS
- In getting people out and exercising
- It Increases social connection
- In developing environmental awareness
- In the development of children
- As working dogs e.g. in public safety

Dog ownership in the UK is more than a lifestyle choice—it is a public good with widespread benefits for individuals, communities, and the economy. By recognising the value that dogs bring to society, the Welsh government can strengthen communities, reduce healthcare costs, and enhance overall wellbeing.

A quick look at the number of Airbnbs that make a point of offering dog friendly accommodation shows how many people visit Wales for instance, and might not do so if dogs were not tolerated, creating economic loss especially out of season. And dog owners make a contribution to the economy even down to the last pound they put into the car parking ticket machine.

Therefore, dog ownership touches upon a number of areas of central and local government administration, including: economic, mental health, physical health, public health and water quality, social wellbeing, tourism, environment, safety and litter.

The Climate Change and Rural Affairs Ministerial portfolio is a broad one. Notwithstanding, matters associated with dog ownership relate to a number of Ministerial portfolios in Welsh Government. So, therefore, should dog related policies.

Governance

1. Management of dogs on beaches is one of many functions delegated to local Government local authorities (LA). Historically it used to do so through the provision of byelaws which were signed off by Ministers. The legislative byelaw powers were often antiquated and therefore used as interpreted powers rather than absolute ones.

In more recent times powers have been delegated further to LAs and a new set of powers used – that of the expedited Public Space Protection Order (PSPO) process which relates to anti-social behaviour generally. But even this piece of legislation is not designed specifically to cover dogs or dogs on beaches; it is one that may be usefully adapted and used for that purpose. Importantly, such orders are implemented directly by LAs thereby by-passing the previous Ministerial overview associated with the old byelaw method. What this does in practice, is remove a level of standardisation that implicitly was a part of the old mechanism in favour of individual decisions by LAs in Wales.

Notable point: A coherent policy of dogs on beaches now relies upon those individual LAs who do have a coast in producing one. This does not happen and I suggest there is a potential role in Welsh Government to aid this process.

2. All legislation must follow the principle of PROPORTIONALITY as a matter of sound law. What this means in practice is that because legislation is restrictive and constrains otherwise legitimate public activity, it must be “no more than is strictly necessary to deliver the intended objectives”. This is an extremely important principle and one that LAs must themselves adhere to when implementing their PSPO orders.

Notable point: If LAs are acting individually and self-implementing their own PSPO related dog control Orders (unlike historically under byelaws) where is the guidance to aid that they are acting in a proportionate manner AND in relation to the laid down objectives?

3. In practice, options to control dogs on beaches include the following limitations either individually or in combination:
 - Area eg north – south boundary usually shown on a map.
 - Times eg restrictions not applying overnight say 6pm to 10am
 - Season eg May to September prohibition
 - Specific reasonable control measures such as dogs being on a lead or in picking up littering.

4. The Minister’s response says that “*there are no plans to issue further guidance*”. That is the subject and intention of my petition.

I am not aware that any such guidance exists. There is guidance on the general principles of issuing old byelaws and more recent guidance in relation to the newer PSPO powers. Any mention of dogs on beaches is tangential.

If the Minister can provide this guidance, then, depending on its content, the whole basis of this petition falls away. It would then be a matter of seeing if the guidance was being followed or if it needs amending in the light of observation.

Notable point: What Welsh guidance does in fact exist as to what controls of dogs on Welsh beaches would be reasonable, proportionate and consistent?

Admittedly I am assuming that some level of consistency would be useful in Wales and that there is no random hotch-potch of controls as this would make

understanding and implementing dog control measures very difficult, nor might such controls be consistent with addressing presumably common issues?

An active practical example

5. City and County of Swansea (CCS) are currently reviewing their dog control measures on Swansea Bay which is an urban beach under no blue flag or Green coast designation.
6. The review is a positive action as the controls in place are old (referring to 1907 Public Health Act legislation and the resultant byelaws as old as and as last revised in 1991). Beach activities have changed since then and a change to the areas of dog activity are very much supported by both dog and non-dog people.
7. The Council's original plans can be found at [\(Item 16 papers pack\)](#). However, the item has been temporarily withdrawn for decision for redrafting following representations on legal and procedural issues.
8. Whilst solid support exists to modify the dog ban areas for Swansea Bay, the CCS is not minded to look any further than this such as to make a change to the core season or to introduce times for access. This despite a large majority of their informal questionnaire's 4188 respondents supporting this (72% on season and 66% on times respectively- [see pg 200 CCS report](#)). Perhaps CCS would benefit from some guidance?
9. This is their prerogative. But they are seemingly doing the review individually in the absence of guidance which risks producing an inconsistent approach throughout Wales with different measures taking place in different places at different times and for different reasons (assuming justification reasons are stated at all). In the defence of CCS and as far as season is concerned, no doubt they would say that they *are* being consistent in following a 1 May Wales default. Below I question the basis of that date in defining the closed season period.
10. So far, so good if the reasons for their decisions are given for each option (assuming they are called to account at all as part of the PSPO Order introduction process) and their actions are reasonable and proportionate.
11. However, there must be some doubt since the current petition received a high percentage and very rapid response from the Swansea Bay and Gower region which indicates a high degree of discontent. Swansea Bay is a plain urban beach. It generally has no facilities and often has poor water quality so it has neither a Blue Flag nor Green coast award. Clearly a lot of dog owners are unhappy. Would some guidance be useful with respect to non-Blue Flag and non-Green coast award beaches?

Notable point. When a LA implements a PSPO order what level of independent scrutiny takes place such that an order meets the reasonableness and proportionality tests required of good legislation? Or that the actions are

appropriate for non-designated urban beaches compared to others with a Green coast or Blue flag classification? Or should the highest level of dog controls apply equally to all beaches, thus depriving dog walkers of access to beaches not being heavily used recreationally by the public? Is there is a risk of PSPO powers being misused?

12. In the remainder of this submission, I wish to largely refer to the matter of **Seasonal controls**.

Whether the bespoke seasonal ban of dogs on Welsh beaches should be as long as from 1 May – 30 September

13. The question asked is: Why are dogs banned from Wales on 1 May each year which is a longer prohibition than other UK countries and counties which work to 15 May or later?
14. Taken from the petition – *“In Scotland and Northern Ireland dogs are banned from beaches from **1 June – 15 Sept** (incl). In England, such as Cornwall, dog bans cover the shorter period **15 May – 30th September** for Blue Flag beaches and the school holiday period of **1 July – 31st August** for other beaches, but **additionally allow out of hours dog access between 6pm and 10am**. In not so sunny, rain and windswept Wales the banned period is **1 May – 30th September** or even longer (with NO out of hours’ time exceptions) and this applies for some general beaches, for Green coast awards and for Blue Flag beaches. This is even 2 weeks before the commencement of the official bathing season on 15 May under England and Wales Bathing Water Regulations 2013.*

There is NO presumption that Blue Flags should cover the entirety of a beach or that their season should be fixed 15 May – 30 September (or even from 1 May!) or to exclude out of hours access. Keep Wales Tidy (who classify Blue Flag beaches in Wales) say that it is up to the applicant body to decide how long the Blue Flag season will be within the timeframe of the Bathing Water season and other considerations.”

15. In its [item 16 pg 201 CCS report](#) erroneously said *“It is important to note that a seasonal dog ban between 1st May and 30th September is a fundamental requirement for Blue Flag status. Therefore, all the other Gower beaches should retain the existing byelaw controls.”* As this conflicts with Keep Wales Tidy view, perhaps the council would benefit from some guidance?
16. **If** the May commencement date is tied to historical EU bathing waters legislation, then should the start date be the 15th May and not the Welsh 1 May? In considering the proportionality test required as part of good legal practices does the 1 May period meet that test i.e. does the end justify the means, that the extent of control of dogs on beaches is no more than is reasonably required to meet legislative needs and the objectives being met?
- Again, perhaps the matter would be furthered by the issuing of guidance to Local Authorities in Wales?

17. Dog walkers are fed up of being restricted from walking on Welsh beaches during large parts of the 1 May – 30th September period seemingly “as rote”. When for a large part the dog walkers might be the only persons on the beach had they been allowed! Temptation is high, risking enforcement action. Action that LAs are ill placed to enforce. Feelings risk running high. If dog owners are discontented, to whom do they turn – especially if the LA has no guidance and does not listen and the owner has no idea why they are banned on that date?
18. If controls of dogs on beaches are no more restrictive than is reasonably required to deliver the objectives –then would a revised closure period of **1 July to the end of August** main school holiday period be a more suitable baseline than 1 May (or even 15 May) to 30th September- possibly with an additional **6pm to 10 am inclusion** as in many areas in Cornwall? Concise Welsh Government guidance might then be used to guide LAs to making more restrictive practice when appropriate eg for Blue Flag and Green coast award areas. One size does not fit all. A May 1 exclusion start date seems to be an unexplained anachronism.

Conclusion

19. Much of the above submission provides context.

My ask via the petition is: Whether the Senedd consider that Welsh Government should issue guidance to Local Authorities in the management of dogs on Welsh beaches, given the importance of the subject and the benefit of a consistent approach?

More specifically, whether the current total blanket exclusion of dogs on many Welsh beaches in the period 1 May to 30 September (and without further daily relaxation times) and which is more restrictive than any other part of UK (save some Blue Flag beaches) is proportionate to the objectives? And is it a subject on which LAs would benefit from Welsh Government guidance?

P J Coates

03 / 06 / 2025

Agenda Item 3.1

P-06-1443 Re-instate core funding for TRAC Cymru (Music Traditions Wales / Traddodiadau Cerdd Cymru)

This petition was submitted by Owen Shiers, having collected a total of 822 signatures.

Text of Petition:

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

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

Additional Information:

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

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

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

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

Senedd Constituency and Region

- Ceredigion
- Mid and West Wales

P-06-1443 Re-instate core funding for TRAC Cymru (Music Traditions Wales Traddodiadau Cerdd Cymru) – Correspondence from the Petitioner to the Committee, 09 June 2025

About Trac Cymru

Trac Cymru is Wales' national development agency for its traditional music. A registered Charity and Company Limited by Guarantee, it was formed over 20 years ago by Welsh traditional musicians to work strategically to protect our traditional music from extinction and increase the amount of participation and professional excellence in the sector, working across Wales and internationally. Since we began, our activities have generated more than 188,000 in-person attendances. Our online video resources have been accessed 280,000 times. We have run 1,800 workshops and training events, 80 separate youth and community courses creating 500 freelance jobs in over 70 locations throughout the whole of Wales. Our professional development programmes have seen us deliver 580 performances, 35 professional training courses and continued to represent the music of Wales at over 40 showcases and conferences internationally. Arts Council of Wales' (ACW) own figures show that we are the sole organisation to have repeatedly reached more than 60% of ACW's own Welsh language music audience engagement. We work bilingually and have seen a tremendous growth in the usage of Cymraeg, the Welsh language within both the amateur & professional sectors and we consult & collaborate internationally with other cultural organisations who work with threatened, minoritised & indigenous languages to share best practise.

We are the founding organisation of the European Folk Network, a constituted organisation that now has membership from the Arctic to the Azores that speaks on behalf of at least 2,000,000 Europeans active in the promotion, participation and delivery of folk & traditional music.

We co-ordinate the World Pan Indigenous Music Network, a global forum for indigenous, first nation and minority language music industries.

We are the major representative voice for Wales' unique cultural assets in the development of the UK's adoption of the UN's Intangible Cultural Heritage convention.

More recently we have established #WelshMusicAbroad in partnership with Focus Wales and Tŷ Cerdd to establish the basis for a Welsh Music Export function that creates evidence based strategies to help our emerging and under-developed music industry reach the global markets it needs in order to trade successfully.

We work with organisations such as Eisteddfod Genedlaethol, Tafwyl and others to make sure that our traditional music has centre stage in our national festivals.

We mentor individuals and organisations from the Mentrau Iaith and other societies, festivals and cultural enterprises to help them achieve their ambitions to use our traditional music in their own projects.

We advocate for recognition of our traditional music within the education system, arts in health and other areas of public life.

Alongside this we run education and youth engagement programmes such as Gwerin Gwallgo so that our young people have inspirational engagement with our traditional music, song & dance to ensure that we are not the final generation in the Land of Song to steward the lived experience of Wales for rising generations to come.

I have attached our 2023 21+1 campaign document 'This is Trac Cymru' which, along with our website www.trac.cymru, offers a more in-depth description of who we are.

All of this has been made possible by core funding of less than £100,000 a year for twenty years from ACW - and the removal of that core funding places all of the above under immediate threat.

Why Core funding matters

For us, and for any cultural organisation, core funding is the key element of any organisation. It allows us to retain a small team that develops strategy, projects, long-term plans, professional relationships which can be used to bring in the necessary funds that deliver the visible, public facing activities. Project funding will never support the development work necessary to be able to apply for Lottery and other funds, nor does it allow for the development of regional, national and international professional relationships that can then be turned into:

- international tours for Welsh musicians
- artform engagement and development
- the development of a pack to deliver GCSE music through Welsh traditional arts
- or the engagement with other indigenous and minority cultures that then gives, for example, Wales Arts International the ability to deliver WOMEX in Cardiff, or work with Welsh Government to commit to the UN International Decade of Indigenous Languages.

Only core funding allows an organisation to have the stability to retain expertise, invest in capacity building and develop long-term strategies.

Well Being of Future Generations

We are all aware that the seven pillars of the Well-Being of Future Generations Act are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

As can be shown, our work aligns with developing prosperity, resilience, health, equality and cohesion, global responsibility through relationship building and most importantly for us and the people of Wales, the safeguarding of our cultural assets and language.

It is this capacity that is under threat from the withdrawal of core funding.

The Letter from Cabinet Secretary for Culture and Social Justice to the Chair- Petitions Committee

As I indicated earlier I had not seen the correspondence between Lesley Griffiths and Jack Sergeant : Eich cyf/Your ref P-06-1443, Ein cyf/Our ref LG/05304/24, Jack Sargeant MS, Chair - Petitions committee, Government.Committee.Business@gov.wales, 18 June 2024) until you forwarded it to me on April 29th this year. We have been delivering a number of projects including international exchanges that required the attention of our whole team and have not been able to respond until now.

In the letter you attached, Ms Griffiths gives a general overview of the Investment Review process, the appeals process and post decision activity. While this is accurate it does not

address the petition's call to re-instate Trac Cymru's funding to protect Wales' unique cultural activities from the threat of extinction. Nor does it address the balancing factors that could apply, for example deciding not to fund National Theatre Wales did not mean that there would be no provision for theatre production in Wales. She states that "Under the arm's-length funding principle, the Investment Review is an issue for the Arts Council of Wales (ACW) and the Welsh Government does not interfere in its funding decisions." However it does lay out the broad operating priorities which it wishes the Council to follow, specific areas of focus to develop and requires the Council to comply with the Well-Being of Future Generations act and a number of other policies & initiatives. ACW are on the record as saying that whilst Lottery funding is governed by the legal principle of 'additionality' (i.e. not using Lottery money to deliver work that would normally be funded directly from taxation), its Lottery distribution should take due regard of the priorities of the Welsh Government.

Ms Griffiths points out that "...organisations who were unsuccessful in their application to the Investment Review 2023 continue to be eligible to apply to ACW through its published National Lottery programmes for funding for specific project activity." However all properly constituted organisations in Wales, whether or not they are in receipt of ACW multi-year funding agreements, are eligible to apply for National Lottery funding. However in turning down an application to continue a project, previously funded through 50% funding from ACW Lottery, Colwinston Trust and other grant-making bodies, and 50% earned income from performances, an un-named ACW officer wrote on 22 May 2024 that "We [the panel] felt that you would benefit from focussing on developing a more sustainable business model through your Transitions funding at this point." Which perhaps indicates that that application was viewed not solely on its merits or the capacity of Trac Cymru to successfully deliver.

A Brief Update since 2023

We are very proud to have been commissioned by ACW, along with Tŷ Cerdd and consultant Angharad Wynne, to deliver ACW's Traditional Music Review. That document now lies with ACW and is due for publication this week (11th June). while the content is embargoed it should not surprise anyone connected with our traditional music sector. We on its behalf have been advocating for a comprehensive overhaul of how ACW and the Welsh Government recognise, support and develop those traditional arts at grass roots, professional and educational levels with dedicated funding along the lines of Arts Council Ireland, Arts Council Northern Ireland and Creative Scotland and we have repeatedly pointed towards other support organisations across these islands and in continental Europe with stable and adequate funding arrangements in place to be able to deliver long-term strategies. For comparison Arts Council Ireland invest approximately 2% of their distributable

funds solely to traditional music and Creative Scotland between 4.5 and 5% of their funding. ACW's investment has not been more than 0.7%. We have had informal conversations with ACW about their proposed actions following Council's receipt of the Review and Conclusions and we are convinced that they have taken them seriously and have a measured and appropriate suite of measures which I am sure they will share with the Minister, Civil Service and other Welsh Government Stakeholders.

Since September 2023 we have undergone a long review of our own work and what we aim to achieve for the people of Wales as the national development organisation for Welsh Traditional Music. We continue to have a working relationship with ACW, with both of us acknowledging that any future investment in the traditional arts of Wales will have to include both of us working together for the benefit of the people of Wales. Their decision to invest in traditional music-making with the aim of making it easier for more people in Wales, from all of our communities and traditions to access funds is to be welcomed, especially as we have been advocating exactly for this for over 20 years. But it is one step of many to ensure that the traditional arts of Wales contribute to the 'vibrant culture and thriving Welsh language' enshrined in the Well-Being of Future Generations Act.

We have continued to deliver *Cân y Cymoedd* - a three-year project funded by Heritage Fund in Rhondda Cynon Taf as well as renew our youth projects post COVID and access some ACW funds to work in schools. The loss of our core funding has meant that we have lost two members of staff and now have a full time Director supported by four part-time staff funded from project delivery. Our international work is funded by international partners and occasional small sums from British Council and project work. We are grateful to Welsh Government for the receipt of Jobs Protection funding while we develop a more sustainable business model. But this is a temporary fix not a long-term solution

Re-instate, Renew and Re-frame

We and the sector - according to the responses to the Traditional Music Review - remain convinced that there can be no strategic development within the world of traditional music without a strategic body that represents, advocates and delivers traditional music. There remain larger questions about how Wales chooses to support and protect its unique, indigenous cultural assets. In 2005 we were repeatedly told that there was no possible ability for folk singers singing in Cymraeg to perform in Europe or the US. Now we have our musicians appearing across the globe.

Who else in Wales can do this? Who else has nurtured professional and personal relationships within Wales, the UK and globally to be able to offer impartial advice on how to tour the US, which festivals in northern Italy are looking for bands from Wales and how to bring University research to the value and size of the European folk sector? Without Trac Cymru's gentle presence at Eisteddfod Genedlaethol since 2003 there would be no Tŷ Gwerin as the most popular stage at that festival. Without Trac Cymru's projects Gwerin Gwallgo and 10 Mewn Bws, the three artists showcasing at 2023's Showcase Scotland, Cerys Hafan, Gwilym Bowen Rhys and VRî would not have their careers. Without Trac Cymru working with Tŷ Cerdd and Focus Wales a whole generation of emerging professional musicians would not have the careers they enjoy today. Who other than Trac Cymru built the European Folk Network to be a voice for Wales leading that continent-wide forum. To whom can young musicians, or development officer in the Mentrau Iaith turn to for advice, mentoring and practical help other than Trac Cymru. Who else in Wales has a resource section online that shows over 280,000 people how to play our tunes and sing our songs? Who else kick started 11 music careers in the pandemic and got a folk band of young Welsh musicians a gig for £10,000? Which other organisation has changed the way we as a nation and the rest of the world values our music and can articulate that value to grassroots and government?

While we disagree with the decision and we argued our case against it at the time, we see little point in revisiting the detail of it or to rehearse those arguments. That decision was made 2 years ago. What concerns the traditional music sector that we represent is what Wales does now and next.

We welcome ACW's review and the overwhelming support for Trac Cymru and our activity within the responses. ACW have decided to shift the direction of their support to directly engage with traditional music and to make accessing funds easier. However, all strategies have to be the responsibility of a small team to deliver them and there is no such organisation in Wales to take on this work other than Trac Cymru.

At some point Wales will have to invest in a traditional music development organisation, as does every other nation we know of to work with our traditional arts. We know how long it takes to build that body of expertise and living relationships, both of which we have now and which is under threat due to the loss of our core investment. What we can say with certainty is that Trac Cymru is the only organisation on this planet whose constitution places the traditional music, dance and song of Wales at its core. We are the only organisation in the world that works strategically with our traditions for economic, social and cultural benefit and who has sustained a small team of dedicated staff and Trustees to that end.

We would welcome the opportunity to continue to work with the Senedd and ACW's strategic investment to develop added value activities both within and outwith Welsh public life, with independently funded projects that continue to reach and engage with all the people of Wales of all traditions and cultures. We look forward to being able to discuss this further.

Yn gywir

Agenda Item 3.2

P-06-1464 Allow Welsh families who have experienced Baby loss before 24 weeks to obtain baby loss certificate

This petition was submitted by Angharad Cousins, having collected a total of 749 signatures.

Text of Petition:

The UK government have introduced baby loss certificates for families in England who have lost babies prior to 24 weeks. This doesn't apply to Welsh families. Let's get this changed!!

Senedd Constituency and Region

- Caerphilly
- South Wales East

Jeremy Miles AS/MS
Ysgrifennydd y Cabinet dros Iechyd a Gofal Cymdeithasol
Cabinet Secretary for Health and Social Care



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1464
Ein cyf/Our ref SM/00259/25

Carolyn Thomas MS
Chair - Petitions committee

Petitions@senedd.wales

01 May 2025

Dear Carolyn,

Thank you for your letter of 3 April on behalf of the Petitions Committee requesting an update on baby loss certificates scheme being extended into Wales.

My officials have recently been given direct contact by DHSC officials to NHS Business Services Authority (BSA), the supplier of the baby loss certificate for England to extend the scheme into Wales. A proforma document is currently being reviewed by BSA and their internal partners, to progress this work. We anticipate that we will receive an update in the coming weeks.

Yours sincerely,

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

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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.

Agenda Item 3.3

P-06-1475 Urgently improve the safety of the A458, Middletown, Powys in light of continuous dangerous driving

This petition was submitted by Amanda Jenner, having collected a total of 311 signatures and 107 signatures on paper, making for a total of 418 signatures.

Text of Petition:

Following many crashes & the tragic death of a local resident on the A458, Middletown (outside Bank Farm), the Community Council & Local Councillor has called for urgent safety improvements on this stretch of road to help prevent dangerous overtaking where there are two hidden dips. A recent response from the Minister for Transport states "we don't have any current plans for road safety improvements at this location". We cannot wait for another death. We urge the Welsh Government to act.

Additional Information:

Local residents, as well as many other members of the public who regularly travel this road, are upset and frustrated that nothing more is currently being considered by the Welsh Government to improve the safety of the road in this area. The Cabinet Secretary should attend a site meeting to further discuss the concerns.

In order to improve this stretch of road, urgent consideration needs to be given to providing the following:

- A permanent speed camera
- The double white 'no overtaking' lines extended in both directions
- The road resurfaced, specifically the red tarmacked areas.
- A flashing light that indicates a driver's speed and saying there should be 'no overtaking'.
- A flashing light to highlight that there is a car in the hidden dip ahead.

As part of the road safety review, we would like the speed of the road to be taken into consideration and whether reducing the speed would help cease any future accidents.

Senedd Constituency and Region

- Montgomeryshire
- 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-06-1475
Ein cyf/Our ref KSNWT/00579/25

Carolyn Thomas MS
Chair - Petitions committee

19 May 2025

Dear Carolyn,

Thank you for your letter of 3 April regarding Petition P-06-1475 Urgently improve the safety of the A458, Middletown, Powys in light of continuous dangerous driving.

The study is anticipated to be completed this financial year, and further design work will depend on the outcomes of the study and funding available. Once the study is completed, we will consult with the petitioner, community council and affected landowners.

It is not possible to commit to a timeframe for implementing measures before we know the outcome of the study. However, any measures identified will be implemented as soon as practically possible, subject to the availability of funding.

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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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 102
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-06-1475 Urgently improve the safety of the A458, Middletown, Powys in light of continuous dangerous driving - Petitioner to Committee, 09 June 2025

Good evening,

Sorry for the slight delay in responding.

Whilst we are grateful that the study will progress, it does not seem that there are any clear or urgent timeframes in place for preventing dangerous driving at this location. Given the recent findings on the causes of the latest tragic death caused by dangerous driving, and the comments by the police that people continue to drive in this way, please would the minister consider expediting the study.

Below are links to recent press reports where the police have commented:

<https://www.countytimes.co.uk/news/25225343.middletown-crash-victims-family-plea-road-safety/>

"[Dyfed-Powys Police](#) said drivers continue to overtake on the same dangerous stretch of road and fear there could be another fatal collision.

"There is no doubt that Matthew Parrott's manner of driving was dangerous, conducting an overtake where there is not a full view of the road ahead," Sergeant [Rob Hamer](#) said.

"However, since this incident we have evidence to show that other drivers are conducting the same dangerous manoeuvre, overtaking while driving towards Shrewsbury, and we fear we will be called to another fatal or serious injury collision in the same location in the near future."

I should be grateful if the petition could remain open until we have a further response that this will be expedited.

Kind regards

Amanda Jenner

Agenda Item 3.4

P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales

This petition was submitted by Elizabeth Trombley, having collected 260 signatures.

Text of petition:

Swifts are the fastest birds in level flight and can sleep, eat, drink and mate on the wing. Their cries define Welsh summers. Sadly, they are rapidly declining – down 72% in the last 30 yrs. Swifts nest in holes in buildings. Renovation makes them homeless, and new-builds currently offer no cavities. Without more nesting options, swifts will disappear. Incorporating swift bricks into all new developments would help swifts (and other struggling birds like house martins and sparrows) to recover.

Additional information:

British Trust for Ornithology data show Welsh swifts declined by 72% from 1995 – 2018. They are Red Listed as Birds of Conservation Concern. Swifts face many challenges, but nest site loss is a major factor. Due to the scale of Welsh decline and ongoing destruction of their unprotected nest sites, only a mandatory approach will provide enough new nest spaces to allow swifts to recover to anything like former levels. Regulatory or legislative change is needed for this.

Swift bricks are nest-boxes that can be built into a wall. They are BSI standardised, affordable, sustainable, easy to install, don't need maintaining / replacing, and help other declining hole-nesting birds.

Swifts' lives have been linked to ours for centuries. Their connection with buildings is captured in an old Welsh name – gwrach yr eglwys ('church sprite'). Swifts are a charismatic species and enliven built up areas, inspiring people and communities. They depend on us – their disappearance would be a real loss.

Senedd Constituency and Region

- Cardiff West

- 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-06-1489
Ein cyf/Our ref HIDCC/00599/25

Carolyn Thomas MS
Chair – Petitions Committee

01 May 2025

Dear Carolyn,

Thank you for your further letter of 24 March regarding Petition P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales.

The Welsh Government is aware that nesting sites for swifts have been depleted. The reasons include building renovation as well as the limited opportunities provided in the design and construction of new buildings. While providing additional nesting sites in tall buildings and new developments would help, this is only part of the problem. Habitat loss, land management practices and climate change also contribute. We are committed to helping address many of these wider issues through initiatives like the Nature Networks programme, tackling climate change and the Sustainable Farming Scheme.

With my lead responsibility for biodiversity, I thank Jenny Rathbone for her lead as the Senedd Species Champion for the Swift. I responded to the Petitions Committee in January concerning the petition calling on the Welsh Government to legislate.

The use of levers to promote or mandate swift bricks in new buildings, which largely lie outside of my portfolio like planning and building regulations, is not without problems. Focusing on using planning conditions to mandate a single issue outcome will cut across existing policy relating to securing a net benefit for biodiversity. It would most likely have adverse and unintended consequences. We are already aware of discussion across development sectors suggesting that this proposal will be a way of circumventing the implementation of a net benefit for biodiversity which reflects ecological context and delivers the right measures in the right place. The potential for inclusion of swift bricks as part of the building work we fund or procure in other parts of government may attract similar concerns. Action across Wales needs to be set in the context of securing wider biodiversity benefits. It requires a cross-Cabinet approach which we support and are keen to explore. Like many issues relating to the nature and climate change emergencies, the solutions require an integrated and cross Government approach.

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.

Existing legislation, the Wildlife and Countryside Act 1981, already protects all wild birds and swifts. It is illegal to kill or harm them, to damage their nests or take their eggs. Under the Environment (Wales) Act public authorities have their section 6 duty. Planning Authorities for example must seek to maintain and enhance biodiversity and the resilience of ecosystems across their functions, including decisions for planning and development control. This is articulated in Planning Policy Wales where developers are required to achieve a Net Benefit for Biodiversity (NBB).

Swifts are not currently included on the Interim Section 7 list of species and habitats of principle importance for Wales. We are currently working with Natural Resources Wales (NRW) to finalise an updated Section 7 list. It is proposed that the swift will be included in the revised list. This requires Welsh Ministers to take all reasonable steps to maintain and enhance this species alongside the other species and habitats on the list. They must also encourage others to take such steps.

While it is likely that the loss of nesting opportunities will have contributed to the decline in swift numbers, the whole picture is more complicated. A combination of factors from the 'insect apocalypse' (driven by habitat loss, agricultural pesticides and climatic factors) to the wider consequences of climate change in Wales and in their wintering grounds in Africa have impacted on health and breeding success. Evidence suggests that increasingly colder and wetter summers are playing a key role. Breeding success is positively associated with warmer temperatures in June and July.

Mandating the use of swift bricks in all new buildings will require legislation. There is little space within the current legislative programme to introduce new legislation this Senedd term. The forthcoming Environmental Governance, Principles and Biodiversity Targets Bill will include a power and duty for Welsh Ministers to set statutory domestic biodiversity targets. While the details of the targets are to be developed, the proposed priority areas of safeguarding and recovering species and ecosystem resilience offer the potential for further action to support swift populations.

Equally the actions we are currently taking to meet the United Nations Global Biodiversity Framework (GBF) will over time also deliver benefits for bird populations such as swifts. For example, action to deliver GBF targets to restore 30% of our degraded ecosystems and 30 by 30 will improve the condition and resilience of habitats and ecosystems across Wales. This will improve the availability of the flying insect food vital to swifts in their summer breeding grounds.

The Nature Networks Programme is Welsh Government's key biodiversity delivery programme. It aims to address the nature emergency in Wales. Increasing biodiversity, improving the condition of protected sites and enhancing the resilience and connectivity of our terrestrial, freshwater and marine habitats and species. The Programme is delivered through the Nature Networks Fund by Heritage Lottery, with direct delivery by NRW. Officials can explore scope for targeted action to benefit swifts. The Sustainable Farming Scheme will support a sustainable, productive agricultural industry. It recognises the key role farmers play in protecting and restoring nature and tackling the climate emergency.

Working within the Cabinet Secretary for Economy, Energy and Planning's portfolio, the Property Infrastructure Division has a set of Biodiversity Guidelines. These guide the integration of biodiversity management and enhancement into the development process. They are currently being updated. These will include guidance on best practice approaches for applying the wider policy of NBB and Planning Policy Wales. This will encompass delivery of S6 duties under Environment (Wales) Act. For site development and land management activities work would deliver bigger benefits for biodiversity and underpin the ecosystems resilience approach.

The Cabinet Secretary for Housing and Local Government has stated her recognition of the seriousness of this issue. She supports new social housing developments incorporating biodiversity innovations into their design and build. In 2021 swift bricks were included in the Innovative Housing Programme and swift bricks were included until that programme came to an end. Our social housing new build standard, the Welsh Development Quality Requirement, requires developments to consider biodiversity. This has meant swift bricks are being used by many social landlords in their new developments. The Welsh Development Quality Requirement is due for review this year. We will consider the mandated use of swift bricks as part of this review.

I am grateful to the Committee for raising this important issue with the Welsh Government. I hope my response is useful.

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

P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales - Correspondence from the Petitioner to the Committee, 09 June 2025

Dear Petitions Committee members

SWIFT BRICK PETITION

Thank you for giving me the opportunity again to respond to the Deputy First Minister's latest letter. The following are my comments -

Swifts are Wales' fastest declining birds - the latest Breeding Bird Survey figures for Wales (just published), show the decline is now at more than 76% since 1995, and 56% in just the last 10 years. It is clear that the existing (limited and inadequate) protections for swift nests are not fit for purpose.

Any potential recovery of swift populations due to e.g. improved environmental factors and recovery of insect numbers, would still be severely limited by the declining stock of available nest sites: more swifts would have to nest somewhere. Increasing the availability of nest sites is therefore **essential** for the recovery of swifts. It will also help other birds of conservation concern, such as house sparrows and house martins.

The Deputy First Minister mentions some concerns about mandating swift bricks, but it isn't clear exactly what these concerns are, nor what the 'adverse and unintended consequences' might be. There is no mandatory percentage requirement for Net Biodiversity Benefit, so Local Planning Authorities could take a pragmatic approach as to whether swift bricks would alone demonstrate NBB in a given case (it could be sufficient for a simple house extension for example, but not for a large, complex scheme). There seems no reason why mandating swift bricks via planning condition and delivery of NBB could not be complementary. It would be helpful to know whether the Deputy First Minister has consulted with swift experts and organisations on these points. It would also be helpful if he could provide some examples of the perceived problems. Having been involved with swift conservation for the past 14 years (during which the loss of swift nest sites in Cardiff and the decline in swift numbers has been all too apparent), I am not clear what these problems are. Mandating swift bricks as part of the Welsh Development Quality Requirement would be a positive step, but if swift brick provision in social housing is desirable why not in other developments?

To reiterate, swift bricks are cheap, long-lasting (at least 30 years) easily and quickly installed and need no maintenance. There is already British Standards Institution guidance on the selection and siting of swift bricks in new builds – '*BS42021: 2022 Integral nest boxes. Selection and installation for new developments – Specification*', so additional ecological expertise re. their installation is not required.

I welcome the review of the s.7 species list and the likely inclusion of swifts. I note that Welsh Ministers will need to take all reasonable steps to maintain and enhance swift numbers, if they are included. Mandating swift boxes would be an entirely reasonable step to take in the case of Wales' fastest declining bird.

In my view, it would be helpful if Welsh Government were to produce a Regulatory Impact Assessment on the mandating of swift bricks. By doing this, concerns would be identified and any

misconceptions could be clarified. I'd be grateful if the Petitions Committee would ask for this to be done.

Yours faithfully

Julia Barrell (Petitioner)

Agenda Item 3.5

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

This petition was submitted by Steven Gittins, having collected 1,125 signatures.

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.

Additional information:

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 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.

Senedd Constituency and Region:

- Clwyd South
- North Wales

Formal Complaint Letter to Natural Resources Wales / Local Authority

Subject: Complaint Regarding Hydrogen Sulphide (H₂S) Exposure in Johnstown – March 2025 Monitoring Results

Dear Sir/Madam,

I am writing to formally raise a serious complaint regarding ongoing hydrogen sulphide (H₂S) exposure in the Johnstown area, following the publication of monitoring data collected in March 2025 near the Community Centre.

The data clearly shows that the **odour threshold of 4.7 ppb**, the level at which 50% of people can detect the unpleasant smell, was exceeded in **547 out of 2,401 15-minute intervals**, amounting to **approximately 23% of the entire monitoring period**.

This finding alone demonstrates a **persistent and repeated odour nuisance**, which is not only disruptive to quality of life but can also contribute to stress, sleep disturbance, and mental health impacts. **The peak level recorded was 17.97 ppb, almost four times the recognised odour detection limit.**

Despite this, the monitoring report (attached) attempts to downplay the results by referencing **workplace exposure limits** set by the Health and Safety Executive (HSE). These thresholds, **5,000 ppb (8-hour average) and 10,000 ppb (15-minute STEL)**, are designed for **industrial settings**, not **public residential areas**, and are **entirely inappropriate benchmarks for assessing public health impacts in this context.**

Location-Specific Public Health Concerns:

The monitor in question is situated:

- **At a community centre**
- **Adjacent to a children's play area and park**
- **Next to two football pitches**
- **In the middle of a housing estate**

This makes the use of workplace limits all the more inappropriate, and raises serious concerns for the **health, wellbeing, and environmental justice of local residents**, particularly vulnerable groups such as children, the elderly, and people with respiratory conditions.

We urge you to:

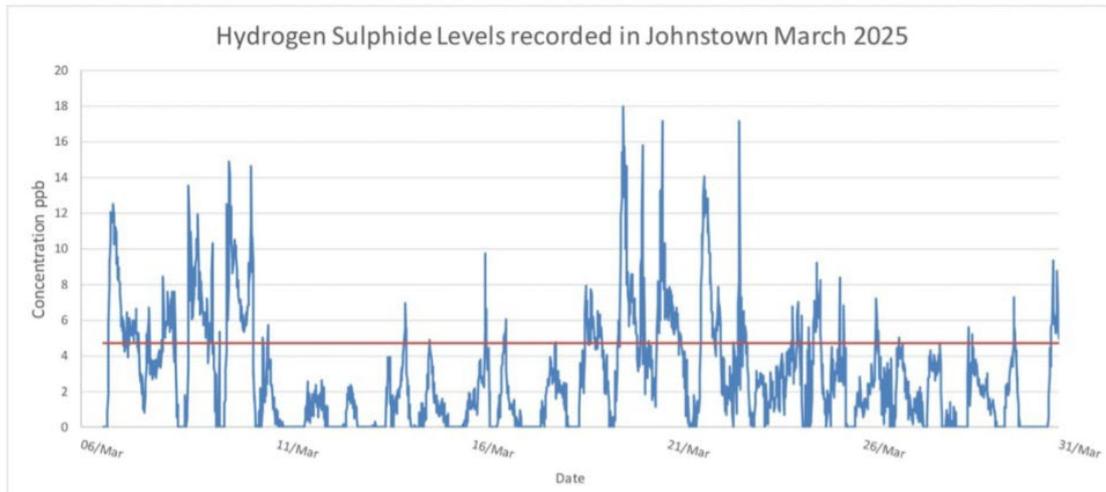
1. **Cease the use of occupational exposure limits** in reporting or justifying ambient public exposure.
2. **Acknowledge the public health implications** of frequent odour events and the cumulative impact on community wellbeing.
3. **Implement enforcement actions** or call for the revocation of the environmental permit if the source cannot be properly controlled.
4. **Undertake further monitoring** across the wider community, particularly at sensitive receptors such as schools and homes.

This situation is unacceptable and cannot be allowed to continue.

Yours sincerely,

Steve Gittins

(On behalf of concerned residents)



Senedd Petition Update Submission

Title: Additional Information in Support of Petition to Revoke the Environmental Permit for Hafod Landfill

To the Petitions Committee,

As a follow-up to our petition regarding the Hafod Landfill Site, I submit the following critical data arising from the March 2025 hydrogen sulphide (H₂S) monitoring exercise in Johnstown.

Key Findings:

- The **odour detection threshold (4.7 ppb)** was exceeded in **23% of recorded 15-minute intervals** throughout the month.
- The **peak concentration (17.97 ppb)**, while below industrial workplace safety limits, is almost **4 times the level at which odour is detectable to the public**.
- These figures confirm what residents have consistently reported: **frequent, foul odours that interfere with daily life**.

Misuse of Exposure Standards:

The accompanying official report attempts to dismiss these findings by comparing them to Health and Safety Executive (HSE) workplace exposure limits, which are designed for occupational settings—not for ambient exposure in residential areas. This is a serious error and undermines trust in the monitoring process.

Location of Monitoring:

The monitor was installed at a **community centre**, which is:

- **Adjacent to a children's playground and public park**
- Close to **two football pitches used by young people**
- Surrounded by housing, making this a **community hub** and not a workplace

To cite industrial workplace thresholds in such a setting is **utterly inappropriate and misleading**. This community includes **young children, families, and vulnerable individuals** who should be protected by the highest standards of environmental oversight—not subjected to industrial-scale pollution with no recourse.

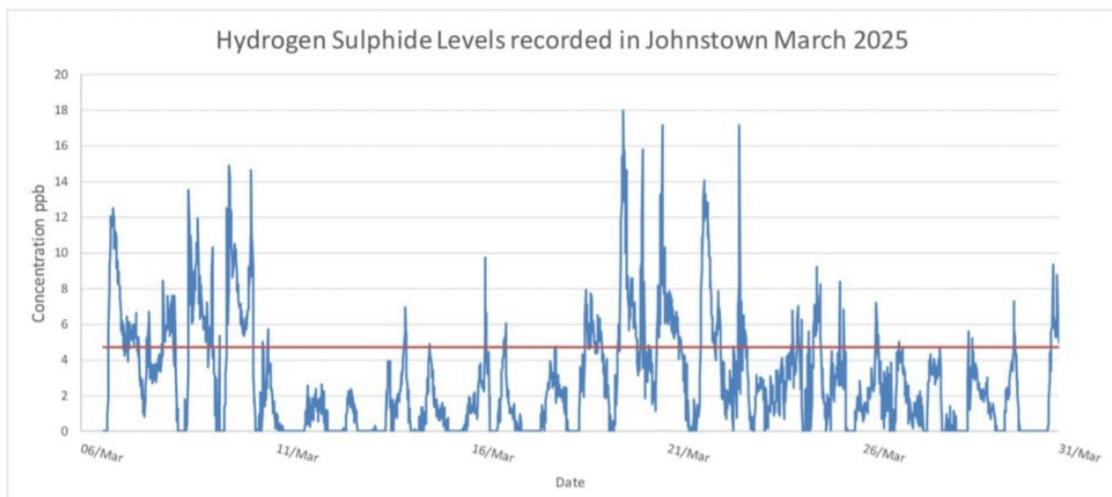
Conclusion:

The data confirms ongoing exposure to **odour nuisance levels of H₂S** at a **public, residential location**. We reiterate our call for:

- **Revocation of the environmental permit** for the Hafod Landfill
- Independent, health-focused monitoring frameworks that reflect the realities of residential exposure
- Urgent action to protect this community from further environmental degradation

Respectfully submitted,
Steve Gittins

Petitioner



FAO : Carolyn Thomas
Chair of the Senedd Petitions Committee
Welsh Parliament / Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN
United Kingdom

29TH May 2025

Subject: Petition P-06-1510 – Hafod Landfill: A National Disgrace Demanding Immediate Action

Dear Carolyn Thomas MS,

Given that our first committee hearing was held on 28 March and we are now approaching a third committee meeting, I would like to take this opportunity to respectfully reiterate the seriousness of our long-standing plight. I sincerely apologise for the length of this submission, but I cannot overstate the importance of each of the 19 points raised, one for every year our community has endured this unacceptable burden. This may well be our best and final chance to achieve the outcome we have worked toward for so long on behalf of exhausted and deeply frustrated residents. I therefore respectfully ask that all 19 points be read in full, not as a list of complaints, but as a compelling case for public health, environmental justice, and community dignity.

At the last meeting of the Senedd Petitions Committee, Petition P-06-1510 was again brought forward for discussion, reflecting the urgency and sustained public concern surrounding the continued operation of Hafod Landfill. The Committee acknowledged the rapid return of this petition to the agenda as unprecedented in its frequency, and expressed a strong preference to defer further decisions until the full committee, including its Chair and local Member, Carolyn Thomas MS, could be present. The committee members recognised both your keen interest in the matter and the importance of your voice being heard at this critical juncture. The petition has thus been held open, pending a more comprehensive discussion at the next scheduled hearing, in which your leadership and local insight are expected to play a pivotal role.

First and foremost, thank you sincerely for your ongoing commitment to Petition P-06-1510. I am extremely grateful that the Committee has kept this petition open and scheduled a third hearing on 16 June 2025. Your engagement has brought renewed visibility to an issue that has blighted our lives for 19 years. The Committee's willingness to listen and engage has restored a measure of hope to a community that for too long felt ignored and abandoned. Your involvement has already made a difference, and I hope this submission conveys both our deep appreciation and the urgent need for final, corrective action.

1. Clean Air and Accountability Are Not Luxuries.

Our community is not asking for special treatment or favours. We are asking for what every person in Wales should be entitled to: clean air, health protection, and environmental accountability. These are not luxuries; they are fundamental rights. For nearly two decades, residents of Johnstown and nearby villages have been forced to endure conditions that would not be tolerated elsewhere. We have documented evidence of regulatory breaches, and persistent pollution. This is not a matter of perception or exaggeration; it is supported by the many protests, long standing campaigns, and lived

experience of all the local residents. What is lacking is not information, but the political will to act upon it.

2. 47 Permit Breaches: NRW's Compliance Assessment Report

In November 2024, NRW published a Compliance Assessment Report (CAR) that revealed 47 separate non-conformities with the site's environmental permit. The report, released publicly in January 2025, paints a damning picture of ongoing operational failings, insufficient controls, and an overall lack of compliance. These breaches are not isolated or technical in nature; they have a direct and ongoing impact on air quality, odour emissions, and public health. The fact that such a volume of violations could accumulate without triggering decisive regulatory intervention is, in itself, a profound indictment of the oversight regime. NRW have failed continually to take reasonable enforcement. In December 2023, Enovert were issued a rare, unique and serious enforcement notice by Natural Resources Wales due to ongoing failures at the Hafod Landfill site. Yet, despite this formal intervention, in 2024, we suffered the worst and most persistent period of foul odour that local residents have ever experienced. This demonstrates beyond any doubt that, even under regulatory pressure, Enovert remains incapable of effectively controlling the stench impacting our community. The enforcement action, rather than leading to meaningful improvements, has only highlighted the company's inability or unwillingness to manage the site to acceptable standards.

3. Real-Time Monitoring: WHO Thresholds Breached

In March 2025, a real-time air quality monitor installed at our community centre recorded hydrogen sulphide (H₂S) levels that exceeded the conditions of the permit and World Health Organization's public health thresholds. These findings were deeply troubling, not only because of the health implications, but because they confirmed what residents have been reporting for years, that the air in our neighbourhoods is unsafe. The monitor is strategically located in the heart of our community, adjacent to children's play areas, a sports field, and residential homes. The horrific stench is smelt across 6 km² area, but there is no other comparable monitoring equipment installed anywhere else in that 6 km² area, subsequently trivialising the lived experience of all concerned who live beyond the area of our monitored Community Centre. Families here live with chronic exposure, and now, for the first time, we have irrefutable evidence of what we have long suspected, and destroys the subjective claims of NRW's ridiculous 'Sniff Tests'.

4. Leachate Mismanagement and Climate Change: A Worsening Crisis

The persistent stench affecting Johnstown is increasingly linked to failures in managing landfill leachate, polluted liquid that forms when rainwater filters through waste material. These leachate levels are clearly not being controlled adequately at Hafod Landfill. This problem is being compounded by more frequent and intense rainfall events in North Wales, driven by the accelerating impacts of climate change, a situation the Climate Change Minister must surely be aware of and must acknowledge. As weather patterns shift, the volume and intensity of rain is overwhelming the site's ability to manage runoff and drainage effectively. When this leachate builds up, it releases the powerful odours and airborne toxins we suffer with, further degrading air quality and public health. This raises serious questions about the long-term viability of landfill sites like Hafod in a changing climate. If the site cannot cope with existing meteorological conditions, how can it be allowed to operate for another 37 years, with the projected detrimental effects of climate change. Continued failure to address this will be catastrophic for our community, a grim and unacceptable future of worsening odour, pollution, and health risks for generations to come.

The continued reliance on so-called "temporary capping" across large areas of the Hafod Landfill site is unacceptable and indicative of a broader failure in site management. What was intended as a short-term control measure has, in practice, become a long-term solution—one that is wholly inadequate for the scale and severity of the odour issues experienced by the community. The use of lightweight plastic liners, loosely secured with sandbags, fails to provide a robust barrier against landfill gas emissions. In severe weather, these covers are prone to flapping, tearing, and being displaced entirely, allowing odours to escape unchecked. This approach does not meet any reasonable definition of best practice and falls short of public expectations and environmental standards. It is increasingly clear that

without proper, engineered capping and durable gas control infrastructure, the site will continue to emit foul and intrusive odours regardless of weather conditions or temporary **fixes**.

5. Misuse of Occupational Exposure Limits

In its analysis of this data, NRW inexplicably applied the EPA permitted 'work place / occupational' exposure limits criteria, thresholds designed for adult workers in controlled industrial environments using personal protective equipment. These limits are entirely inappropriate for evaluating ambient air quality in residential areas. Wrexham Council repeated this error during its Scrutiny Committee meeting on 28 March 2025, citing "compliance" with these irrelevant benchmarks. This is not a matter of technical interpretation it is a dangerous misapplication of scientific standards that puts vulnerable populations at risk. The WHO's 24-hour guideline of $7 \mu\text{g}/\text{m}^3$ shown in the graph presented at the Homes & Environmental Scrutiny Meeting, and in previous communications, is designed to protect the public, especially children, the elderly, and those with existing health conditions. Ignoring it is not just flawed methodology it is a betrayal of public duty, and incompetence.

6. 18 Years of Regulatory Inertia

This failure to apply appropriate standards is part of a broader pattern that has persisted for 18 years. Time and again, regulators have deferred meaningful enforcement, allowing the operator to continue with business and with a 'benefit of the doubt' approach as usual, despite clear evidence of harm. Residents have submitted complaint after complaint to NRW (who's accurate complaint logging and recording has previously been questioned), supported by social media testimonies, site protests, local petitions and ultimately the Senedd Petition. Yet we see the same cycle: delay, denial, prevarication and dismissal. Regulatory inertia has become the norm. The authorities have shown more interest in preserving the status quo than protecting public health.

7. No Health Risk Assessment in 18 Years

Despite almost two decades of continuous operation and community exposure, there has never been a comprehensive health risk assessment for residents living near Hafod Landfill. This omission is not a mere oversight, it is a systemic failure. Scientific literature has clearly linked prolonged exposure to H_2S and airborne particulate matter (PM_{10} and $\text{PM}_{2.5}$) with a range of health effects: respiratory conditions, neurological symptoms, developmental impacts in children, cardiovascular issues, and increased mortality. Our community has lived through odour, illness, anxiety, and the stigma of proximity to this site for 18 years. We deserve answers, accountability, and protection.

8. Council and Regulators Lack Basic Competence

Wrexham Council's Public Protection Office has admitted it cannot interpret the monitoring data, stating they are "having difficulty understanding the monitoring numbers" in the Homes and Environmental Scrutiny Committee Meeting, on 28th March 2025. This level of confusion from those charged with safeguarding public health is not just disappointing it is deeply alarming and offensive. It points to a skills gap and a lack of preparedness that undermines public confidence. Residents should not have to educate themselves in air quality science to hold their local authority to account. Yet that is precisely what we have been forced to do.

9. Cabinet Minister's Comments Are Deeply Misleading

We were deeply shocked by Deputy Minister Huw Irranca-Davies' assertion in his letter to the Petitions Committee that closing the Hafod Landfill site would not eliminate odour problems. From the outset, the permitting process requires a comprehensive landfill restoration plan precisely to address the eventuality of closure. To suggest otherwise is not only misleading, but also dismissive of the years of suffering and environmental degradation endured by this community. The implication, made by a Deputy Minister and the Cabinet Secretary for Climate Change and Rural Affairs, that noxious and nuisance odours from landfill sites are somehow inevitable and must simply be tolerated, is staggering and reflects a troublingly defeatist stance. It betrays the principles of environmental justice and sets a dangerous precedent for communities across Wales living near landfill sites. This is not just an administrative failure; it is a national disgrace.

10. Failure to Issue an Abatement Notice

Despite widespread and persistent complaints, Wrexham Council has refused to issue an abatement notice, citing NRW's lead role and primacy in these matters. Yet NRW has consistently failed to take enforcement action, creating a stalemate in which no one acts. Compare this to Walleys Quarry in Staffordshire, where the local authority's issuance of an abatement notice prompted swift regulatory intervention. In Wrexham, all we receive are apologies, rhetoric, deflections, contradictory statements, and abdication. The result is predictable, continued exposure and continued suffering.

11. No Scrutiny at the Scrutiny Committee

The Homes & Environment Scrutiny Committee meeting held by Wrexham Council on 28 March 2025 was, in many ways, emblematic of the broader failure to meaningfully interrogate and challenge the status quo. Public Protection Officers appeared before the Committee ill-prepared to scrutinise, and showed a disturbing level of deference to both NRW and Enovert. Rhetoric and platitudes were accepted without question, and unsubstantiated claims of "best practice" and "effective management" went unchallenged. Particularly egregious was the acceptance of Enovert's suggestion that one of their 'best practices' and reliable measures for controlling emissions during extreme weather conditions, is the use of 'sandbags' dropped on top of temporary capping. The very idea of such an example put forward as 'best practice' would be laughable if the consequences weren't so serious. This was not scrutiny. It was passive endorsement masquerading as oversight.

12. "Sniff Tests" and Data Misrepresentation

The so-called "sniff tests" used by regulators have been totally undermined and discredited by the very first monthly results of real-time data monitoring, showing significant exceedance of the public health thresholds. Yet NRW, Enovert, some Wrexham Officers and Councillors, continue to lean on outdated and subjective methodologies while misapplying inappropriate workplace-occupational exposure limits. This is not science, it is a bureaucratic charade. It echoes the story of the Emperor's New Clothes, where everyone maintains a fiction while the truth is plain to see.

13. Schoolchildren Speak the Truth

In recent weeks, children from local schools have begun to speak up about their experiences. Many have made presentations in classrooms, and describe their world where the air smells of rotting eggs, where headaches, nausea eye irritation are prevalent, and where the stench permeates their classrooms and bedrooms. These children may lack the vocabulary of science or policy, but they know when something is wrong. Their courage shames those in power who remain silent.

14. This Is Not Wrexham's Waste

It is worth reiterating that this landfill does not exist to serve Wrexham's waste needs. It imports waste from outside the area. Yet it is our residents who bear the burden, in the form of degraded air quality, health risks, and a diminished sense of place. This is not just unjust; it is indefensible. No community should be forced to suffer in perpetuity so that others can dispose of their refuse more cheaply.

15. The Future Cannot Be Sacrificed — 37 More Years of Harm?

The current environmental permit allows for operations until 2062. That is 37 more years of emissions, odour, monitoring failures, and broken promises. For a community that has already endured 18 years, this is not just a timeline; it is a sentence. It means our children will grow up in its shadow, and their children may too. Every year that passes without action compounds the harm. The psychological toll, the reputational damage (Stinky Johnstown), the devaluation of property, and the disintegration of community cohesion will not repair themselves. The permit must be revoked before more irreversible damage is done.

16. A Callous Dismissal of Residents' Reality

Perhaps the most revealing, and insulting, comment to date came from the Principal Environmental Public Health Specialist at Public Health Wales who outrageously suggested during the Homes and Environment Scrutiny Committee Meeting on 28th March 2025, that residents should "just close their windows and take respite from the area." Such a remark is not only flippant and offensive, but it encapsulates the institutional indifference and lack of empathy that have characterised this entire ordeal. Being advised to abandon your home to escape toxic air is not a public health strategy, it is a dereliction of duty. It is an affront to every resident forced to live under these

conditions. Such comments demonstrate how far removed some officials have become from the lived reality of our community, and how urgently we need decision-makers who are willing to stand up for what is right, not retreat behind dismissive platitudes.

17. The 2020 Fire :A Stark Warning Ignored

On 27 May 2020, a major fire at the Hafod Landfill site released thick black smoke that enveloped nearby villages and parts of Wrexham town. The fire, which covered 1,000 square metres, required multiple fire crews and burned for several days. Residents were told to stay indoors with windows and doors closed. NRW could not begin monitoring air quality immediately, by which point the worst of the pollution had already been released. PM10 concentrations recorded after the fire reached 702 µg/m³, **more than 14 times the legal daily limit**. Despite widespread concern, no public inquiry was launched. The incident became yet another example of institutional failure and missed opportunities.

18. The Time for Action Is Now

We remain grateful for the Committee's attention and your recognition of the seriousness of this issue. This is not just a local nuisance; it is a public health emergency with long-term environmental implications. We urge you not to be swayed by procedural inertia, vague assurances, or bureaucratic shrugs and language. If Enovert has not resolved the problem after 18 years, then it will not resolve it in 37. If NRW has failed to regulate, then stronger mechanisms must be applied. The evidence is overwhelming. The suffering is real. Enough is enough. We implore you: do not allow this to continue. Revoke the permit. Restore justice.

19. The Truth Must Be Spoken — Like the Child in the Emperor's Tale

The situation at Hafod Landfill has become a tragic parody of the allegorical story of *The Emperor's New Clothes*. Officials nod, reports are filed, and phrases like "best practice" and "ongoing improvement" are repeated, while children struggle to sleep, sick with nausea and headaches. The harm is real, yet scrutiny is absent. The truth remains unspoken. We now plead with the Senedd Committee to be that lone child in the tale, the one who dares to say what everyone knows:

- **The Emperor has no clothes.**
- **The site is not safe.**
- **Oversight is not effective.**
- **The public is not protected.**
- **Prevarication has become the norm.**

The time for patience has passed. Our community needs clarity, honesty, and decisive action. We have endured this reality for 19 years. We cannot survive another 37. Please, help us bring this nightmare to an end, once and for all.

May I respectfully offer a personal appeal to you, Carolyn, in light of your longstanding connection to North Wales, and with Wrexham in particular. Your unique insight into the realities we face lends real weight to this cause. As Chair of the Petitions Committee, your leadership in progressing this petition has already made a meaningful difference, restoring a much-needed sense of hope and visibility within our community. Your understanding of the regional context, combined with your strong commitment to public accountability, gives us not only confidence that our voices are being heard, but also genuine hope for a positive and just outcome. We trust that, under your guidance, this committee will stand with us in acknowledging the scale of this injustice and detrimental effect on our residents, and taking the decisive action needed to bring it to an end.

Sincerely,



Steve Gittins
Lead Petitioner

Date:01/06/2025

Carolyn Thomas
Chair of the Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

Re: Petition P-06-1510 – Supplementary Submission Regarding Further Evidence Misapplication of Exposure Thresholds in Wrexham Council Report (Item 5, Homes and Environment Scrutiny Committee, 29 April 2025)

Dear Petitions Committee,

I write to formally submit further evidence and raise a serious concern regarding the treatment of public health risk in relation to Hafod Landfill Site, as presented in **Item 5** of the **Wrexham Council Homes and Environment Scrutiny Committee**, held on **Tuesday, 29 April 2025**.

This report includes **Appendix 4**, page 13, where the following passage appears:

“The highest recorded 15 minute concentration of H₂S was 17.97 ppb... This value is significantly under the maximum values outlined in the Health and Safety Executive’s (HSE) stated workplace exposure limits and the human irritant level. However, as can be seen the odour threshold limit was exceeded on a number of occasions...

The monitoring shows that... the levels of H₂S are not expected to result in any direct physical health effects, based on the available **workplace exposure limits**. However, the results show that odour is being experienced.”

This is a **deeply misleading and scientifically inappropriate application of exposure standards**.

The **HSE’s Workplace Exposure Limits (WELs)**, referenced here (EH40/2005), are designed for **healthy adult workers in industrial settings**, exposed **up to 8 hours per day, five days a week**. They are not – and must not be – applied to the **general public**, who may be exposed **24/7**, and whose population includes vulnerable individuals: **children, the elderly, pregnant women, and people with respiratory or chronic conditions**.

In stark contrast, the **World Health Organization (WHO)** sets the **ambient air guideline for hydrogen sulphide (H₂S)** at just **5 ppb (parts per billion)** to prevent **odour nuisance and associated health complaints**. The HSE’s 8-hour WEL, by comparison, is **5,000 ppb – 1,000 times higher** – and has no validity in assessing chronic community exposure in a residential setting.

Comparison of Public vs Occupational Exposure Limits to Hydrogen Sulphide (H₂S)

To compare public and occupational exposure limits for hydrogen sulphide (H₂S), we must convert both into the same units—**either ppm or µg/m³**. This is essential because occupational limits are typically given in **ppm** (for air in workplace environments), while public health and environmental guidelines use **µg/m³**, which reflect broader, continuous exposure risks.

Long-Term Exposure (Chronic)

- **Occupational limit (8-hour TWA): 5 ppm ≈ 6,968 µg/m³**
- **Public limit (24-hour average): 150 µg/m³ ≈ 0.108 ppm**

Result: Public exposure limits are about **2.15%** of the occupational limit—**more than 46 times stricter**.

Short-Term Exposure (Acute / Odour)

- **Occupational STEL (15-minute): 10 ppm ≈ 13,937 µg/m³**
- **Public odour annoyance threshold (30-minute): 7 µg/m³ ≈ 0.005 ppm**

Result: Public threshold is about **0.05%** of the occupational short-term limit—**roughly 2,000 times stricter**.

Why This Difference Matters

- **Occupational limits** apply to **healthy adults** working limited hours (e.g. 8-hour shifts) with protective equipment and oversight.
 - **Public limits** protect **everyone**—including children, the elderly, and those with health conditions—who may be exposed **continuously** in residential areas near sites like landfills.
-

Importance of Compliance Monitoring

It's critical to **differentiate** between occupational and public exposure thresholds when monitoring emissions from facilities like landfills:

- **Occupational monitoring** ensures worker safety during site operations.
- **Public monitoring** ensures the broader community is not exposed to harmful or nuisance levels of H₂S.

Failing to distinguish between the two can result in underestimating community health risks, overlooking odour nuisance issues, or applying incorrect standards for enforcement and environmental permitting.

Summary of Misapplication

Concept	Inappropriate Use in Report	Correct Approach
Thresholds Applied	EH40/2005 WELs (5,000–10,000 ppb)	WHO Ambient Air Guidance (5 ppb)
Population Considered	Adult industrial workers	General population (including vulnerable groups)
Exposure Duration	Occupational (e.g., 8 hrs/day, 5 days/week)	Potentially continuous (24/7)
Consequence	Public nuisance and risk significantly understated	Community health impacts properly contextualised

Formal Objection

I therefore raise a **formal objection** to the methodology employed in this report. By using **occupational exposure thresholds** to assess **residential public health risk**, the report significantly under-represents the **ongoing impact of hydrogen sulphide emissions** from Hafod Landfill.

This substitution is **methodologically incorrect** and **regulatorily unsound**, and it risks **dismissing the very real health burdens** that residents continue to report: headaches, nausea, disrupted sleep, and severe odour annoyance.

The appropriate frame of reference for interpreting such data is the **WHO's 5 ppb limit**, not the HSE's occupational standard of 5,000–10,000 ppb.

Request for Action

In light of the above, I respectfully request that the Petitions Committee:

1. Note this **misapplication of risk thresholds** as a serious issue in the oversight of environmental reporting and seek an immediate abatement notice.
2. Seek clarification from Wrexham Council, Natural Resources Wales (NRW) and Enovet, as to why WELs were cited in a public health context, and do they know what they are doing !
3. Give immediate consideration to the revocation of the Hafod Landfill environmental permit, in light of this and other compounding evidence of regulatory inadequacy.

I trust that the Committee will take this matter seriously. Please confirm receipt of this submission.

Yours sincerely,
Steve Gittins
Lead Petitioner

Addendum – P0-06-1510

Who sets occupational H₂S exposure limits?

1. Health and Safety Executive (HSE) – UK

- The HSE sets **Workplace Exposure Limits (WELs)** for hydrogen sulphide (H₂S) under the **EH40/2005** regulations.
- These limits apply **only to occupational settings**, e.g., factories, waste facilities, etc.
- Current HSE WELs for H₂S:
 - **5 ppm (parts per million)** over 8 hours (long-term)
 - **10 ppm** over 15 minutes (short-term)

These are meant for **healthy adult workers**, not the general public.

◆ Who sets public health exposure limits for H₂S?

2. World Health Organization (WHO)

- The WHO provides **ambient air quality guidelines** intended for **the general population**, including sensitive individuals like children, the elderly, and those with pre-existing health conditions.
- WHO guideline for hydrogen sulphide:
 - **0.005 ppm (5 ppb)** — based on **odour nuisance prevention and low-level health effects** from chronic exposure.

3. Environment Agency (EA) – England

4. Natural Resources Wales (NRW) – Wales

- These regulators **issue and enforce environmental permits** for landfill and industrial sites.
- However, they often **do not explicitly set a numerical public exposure threshold for H₂S** in permits.
- Instead, they rely on a combination of:
 - **Site-specific odour management plans**
 - **Complaint-based enforcement**
 - **Generic guidance from DEFRA or Public Health England (now UKHSA)**

There exists a regulatory gap in which odour nuisance is typically addressed reactively rather than proactively. The failure to adopt or acknowledge the WHO's ambient air quality guideline for hydrogen sulphide (H₂S), set at 5 ppb, allows some operators or local authorities to inappropriately substitute occupational Workplace Exposure Limits (WELs) as benchmarks for public exposure. This practice is fundamentally flawed, as **WELs are designed for healthy adult workers in controlled industrial settings, not for continuous exposure by the general population**, which includes vulnerable individuals. Such misapplication not only distorts risk assessments but actively **endangers public health by downplaying the harmful impacts of prolonged low-level H₂S exposure**.

Steve Gittins

Lead Petitioner

To: [REDACTED]

Subject: Systemic Misapplication of Hydrogen Sulphide Exposure Limits and Failings in NRW's May 2025 Update on Hafod Landfill

Dear [REDACTED]

Whilst I have your attention, and I have subsequently viewed on-line, ‘**How we are regulating Hafod Landfill**’, I am compelled to address many inaccuracies.

While NRW’s May 2025 update on Hafod Landfill is presented as a detailed and responsive document, it falls short in several key areas. The tone of cautious optimism belies the reality of persistent, unresolved community harm, unsubstantiated regulatory claims, and a lack of measurable success. Below, we set out the key concerns that undermine the credibility and effectiveness of this update, and introduce a fundamental issue that demands immediate correction: **the misapplication of hydrogen sulphide exposure thresholds.**

1. Fundamental Error: Misuse of Occupational Exposure Limits for Public Health Assessment

I formally raise serious concern regarding the treatment of public health risk associated with hydrogen sulphide (H₂S) emissions, most recently evidenced in Appendix 4 (p.13) of the report submitted to the Homes and Environment Scrutiny Committee (29 April 2025). It states:

“The highest recorded 15 minute concentration of H₂S was 17.97 ppb... This value is significantly under the maximum values outlined in the Health and Safety Executive’s (HSE) stated workplace exposure limits and the human irritant level... the levels of H₂S are not expected to result in any direct physical health effects...”

This reflects a fundamental and deeply concerning **misapplication of regulatory standards**. The use of **HSE Workplace Exposure Limits (WELs)**, intended solely for controlled, short-term occupational settings, to assess **chronic residential exposure** in communities near Hafod Landfill is both **scientifically invalid and regulatorily inappropriate**.

Key Distinctions Between Occupational and Public Limits

Exposure Type	Limit	Equivalent (ppb)	Intended For
HSE 8-hour WEL (TWA)	5 ppm	5,000 ppb	Healthy workers, industrial setting
HSE 15-min STEL	10 ppm	10,000 ppb	Acute work exposure
WHO ambient guideline	150 µg/m ³	~108 ppb	General public (24h exposure)
WHO odour threshold	7 µg/m ³	~5 ppb	Public nuisance/health symptoms

WELs are **not designed** to protect vulnerable groups (children, elderly, chronically ill) from 24/7 exposure in residential environments. WHO’s ambient air guidelines, especially the 5 ppb odour threshold, are the appropriate benchmarks. Yet NRW, Enover and Wrexham Council continue to **evaluate community impact using irrelevant occupational standards**, leading to a **systematic understatement of public health risk**.

2. Lack of Tangible, Measurable Outcomes

NRW claims “improvements” and “a decreasing trend in complaints” without providing:

- Month-by-month complaint data
- H₂S concentration trends over time
- Before-and-after comparisons for interventions like gas well installations or capping

Instead, we are offered subjective phrases like “tentative decreasing trend,” which **lack verifiability**. Where is the empirical evidence of a sustained reduction in odour and H₂S levels, validated by independent review?

3. Vague Assurances and Ambiguous Language

The update uses generalised statements that deflect accountability:

- “Officers conduct regular visits” – No detail on outcomes or enforcement.
- “Actions to be completed” – No timeline or metrics.
- “Appropriate measures” – Used to defend inaction, even amid continued impact.

Notably, NRW’s view that no breach occurs if “appropriate measures” are taken, **regardless of outcome, undermines the intent** of the environmental permit.

Regulatory compliance cannot be detached from real-world consequences.

4. Claims of 'Best Practice' Without Evidence

Technical actions such as gas well installations and liner repairs are mentioned without **audit, validation, or performance data**.

- The use of **sandbags** to weigh down liner sheets in high winds is cited without scrutiny.
- There is no post-installation evaluation of **temporary capping** measures.

Can you provide engineering assessments or external audits confirming these as best practice? Otherwise, these are at best unproven and at worst inadequate

5. Lack of Public Involvement and Transparency

There is no indication that affected residents:

- Receive Hafod Liason Group minutes. I was informed by a member of the committee to submit a FOI to the NRW. That is not engagement or transparency.
- Have timely access to monitoring data or decision-making criteria
- Can influence the environmental oversight process

The group appears closed, institutional, and opaque.

6. Overreliance on Pending Data and Deferred Accountability

The update repeatedly defers action or disclosure:

- “Preliminary data under review...”
- “Joint statements pending...”
- “Reports to be released...”

This tactic allows NRW to **avoid scrutiny indefinitely**.

Publish current data, enforcement logs, and compliance status **effectively**, not “in due course.”

7. Continued Dismissal of Community Harm

Despite recognising that “odours are still being experienced,” **no relief or remedial support** is offered to residents, such as:

- Health monitoring
- Health Risk Assessments

Residents are **asked to endure and report**, but **offered no direct protection or relief**.

What concrete steps are being taken to support those exposed in Johnstown and surrounding areas?

Summary Demands and Formal Objection

To restore public trust and regulatory credibility, we formally request:

1. **Immediate correction** of the public record: WELs are **not valid** for assessing residential exposure risk.
2. A **review and explanation** from Council and consultants (e.g., Enovet, NRW) on why **inappropriate** exposure limits were cited, in the H & E Scrutiny Committee Meeting.
3. **Adoption of WHO 5 ppb guidelines** as the appropriate reference point for public health assessment.
4. Full publication of:
 - Odour complaint data (2024–2025)
 - Permit enforcement logs and inspection records
 - Independent assessments of gas control and capping efficacy
 - Membership and minutes of the Hafod Stakeholder Group
5. A transparent, time-bound roadmap for:
 - Site remediation, or
 - Permit revocation if public impact continues

Conclusion

By continuing to rely on occupational thresholds and vague reassurances, NRW, Enover, and Wrexham Council are failing to uphold their public health responsibilities. This letter is both a formal **objection to flawed methodology** and a renewed request **scientifically sound data and publicly accountable action**.

Please confirm receipt of this letter, and I await your promised response.

Sincerely,

Steve Gittins

On behalf of the affected residents of Johnstown and surrounding communities

Dear [REDACTED]

Thank you for your attention and your promise of a response below.

While I have this opportunity, I would like to formally set out my priority questions, as detailed in the attached document.

Given the time and effort taken to provide a detailed response, I would appreciate it if you could reply within **7 days**. I look forward to hearing from you.

Regards, Steve Jones

Dear Mr Gittins

Thank you for your e mail, I have spoken with [REDACTED] and he has advised me that he will respond in full to the points raised in your e mail by the end of this week.

In terms of communications, - at our recent Stakeholder Group meeting we agreed that all parties are to ensure proactive communication between parties and with the community, this includes accurately representing what is said in meetings and working together for the benefit of the community.

- All parties to work together to support and strengthen the good work of the Hafod Liaison Group, ensuring continued representation and to improve communication from the meeting to the community via NRW Citizen web page - [How we are regulating Hafod Landfill, Wrexham - Natural Resources Wales Citizen Space - Citizen Space](#).

Your local members are fully involved in this process and they have a roll in ensuring effective communications and I have copied them into this response.

Kind regards

[REDACTED]

Dear [REDACTED] Thank you for your reply. Can I ask through what channels you are effectively communicating to the local community, please, so I can look out for them.

Regards,
Steve Gittins.

Good morning Mr Gittins

[REDACTED] has shared your e mail with me and I have asked for the questions which you raise to be answered within 7 days.

As Chair of the newly formed stakeholder group I am committed to ensuring effective communication between all the stakeholders involved which, importantly, includes the local community.

Kind regards

[REDACTED]



Health and Safety Executive (Wales)

Ty William Morgan
6 Central Square
Cardiff
CF10 1EP
United Kingdom

Cc:

HSE Wrexham Office
Unit 7 & 8 Edison Court
Ellice Way
Wrexham Tecology Park
Wrexham
LL137YT

4th June 2025

Subject: Urgent Call for Regulatory Review – Misapplication of H₂S Exposure Limits & Public Health Risk from Landfill Gas (Ref: EA LFTGN03)

Dear Sir/Madam,

I am writing to raise urgent and serious concerns regarding the systemic misapplication of occupational exposure limits in the context of Landfill sites and the **public health assessments** related to hydrogen sulphide (H₂S) emissions from landfill sites, specifically Hafod Landfill in Wrexham. This concern forms part of the supporting evidence for **Petition P-06-1510** currently before Senedd Cymru.

Misuse of Workplace Exposure Limits in Public Health Contexts

The continued use of the **Health and Safety Executive's (HSE) Workplace Exposure Limits (WELs)**, as detailed in EH40/2005, to assess public health risk from landfill emissions is wholly inappropriate. These limits were designed exclusively for healthy adult workers in occupational settings wearing PPE, and do not account for continuous or long-term residential exposure, especially among vulnerable groups such as children, the elderly, and those with pre-existing conditions.

Despite this, local authorities and site operators regularly cite WELs in public communications, reports, and regulatory assessments, claiming compliance based on thresholds that have no relevance to public safety.

Calculated Comparison – A Staggering Demonstration of Regulatory Failure

To clarify the magnitude of this misapplication, I have converted both occupational and public health thresholds into the same unit, **parts per billion (ppb)**, as used in actual environmental monitoring near Hafod Landfill:

- **HSE Short-Term Occupational Limit (STEL): 10 ppm = 10,000 ppb**
- **WHO Ambient Air Guideline for Public Health: 0.005 ppm = 5 ppb**

This represents a 200,000% difference, a staggering and indefensible gap that illustrates the real danger in using the wrong exposure criteria.

This is not simply a matter of miscommunication, it is a fundamental regulatory failure. Applying occupational thresholds to general public exposure not only understates health risks but actively facilitates **regulatory complacency**, where the suffering of residents is dismissed despite measurable exceedances of safe public exposure levels.

It answers the recurring question from those living near landfill sites: *“Why does nothing change, even when the smell is overwhelming and symptoms are widespread?”* The answer lies in the **misuse of irrelevant industrial standards in a public health context**.

Lack of Enforceable Public Protection – A Regulatory Blind Spot

At present, the UK lacks a clearly defined and enforced **ambient air exposure limit for hydrogen sulphide** applicable to the general population. While the **World Health Organization (WHO)** guideline of **5 ppb** is internationally recognised as protective of public health, UK regulators—including **Natural Resources Wales (NRW)** and **Environment Agency (EA)**, have not formally adopted this limit in enforceable permit conditions.

Instead, landfill operators are typically bound only by odour management plans, complaint-driven enforcement, and vague references to tolerability. This results in **landfill sites operating without effective constraints**, despite significant and ongoing impacts on community health and well-being.

Relevant Regulations and Guidance

The failure to manage landfill gas emissions in accordance with appropriate health thresholds contravenes the spirit, and arguably the letter, of several key regulatory provisions:

1. **The Landfill (England and Wales) Regulations 2002:**
 - *Schedule 2, Paragraph 4(1):* “Appropriate measures must be taken in order to control the accumulation and migration of landfill gas and to prevent air pollution.”
 - *Schedule 2, Paragraph 5(1):* “Measures must be taken to minimise the nuisances arising from the landfill, including those due to emissions of odours.”
2. **Environment Agency Landfill Technical Guidance Note EA LFTGN03:**
 - *Section 5.2:* Requires appropriate and ongoing monitoring of landfill gas emissions, particularly H₂S.
 - *Section 8.3:* Details the necessity of monitoring trace components of landfill gas for impact and compliance assessment.
3. **EA/NRW Permit Guidance for Landfill Operators:**
 - Landfill operators must develop environmental management plans to prevent harm and nuisance; however, these are often outdated and fail to integrate ambient air quality standards for H₂S.

The cumulative effect of ignoring or failing to adopt WHO standards and using WELs instead is to leave local populations **entirely unregulated**, subject to continuous exposure to pollutants that would never be tolerated in other environments.

Climate Change – A New Urgency

This issue is further compounded by the increasing frequency and intensity of rainfall due to climate change, which elevates leachate production and exacerbates gas migration from landfill cells. Regulatory frameworks largely designed decades ago, are now **outdated and unfit for purpose**, yet still relied upon by operators and authorities to justify inaction.

Requests for Immediate Action

In light of the above, I respectfully request that the **Health and Safety Executive (Wales)**:

1. **Confirm publicly** that EH40/2005 WELs are not suitable for use in assessing public health risks from landfill gas emissions.
2. **Engage with Natural Resources Wales, UKHSA, and DEFRA** to establish or adopt an enforceable public exposure limit for hydrogen sulphide, such as the WHO's 5 ppb guideline.
3. **Support an urgent review** of landfill site permits, such as that of Hafod Landfill, where WELs have been used as inappropriate benchmarks for community exposure.

Conclusion – A National Disgrace Demanding Correction

Residents living near Hafod Landfill and likely all other affected sites up and down the country who have experienced years of avoidable suffering, while authorities continue to claim that emissions are “within safe limits.” Yet these limits are misappropriated, and are categorically unsuitable for public protection and the current regulations effectiveness are adversely affected by increased periods and intensity of rainfall due to climate change. The operators are unable to manage increased levels of leachate, and the policy and permit is outdated, and non-protective.

The situation of fugitive noxious odours (Hydrogen Sulphide) from landfill across the UK sites is now rightly regarded as a **national disgrace**, as often reported on national TV and media platforms, is one that erodes public trust and undermines confidence in environmental and health protection frameworks.

I urge the HSE to provide clarity, leadership, and accountability on this issue, in adopting the WHO limits as a regulatory mandate. Communities need and deserve regulation that is based on **appropriate science**, not misplaced assumptions.

I am compelled to make this approach following disappointing claims by Enovert Landfill Site in Johnstown, with regulatory over-site by NRW, that they are working within the permit framework. However, in doing so, they have cited incorrect and inappropriate threshold criteria in their report to the Wrexham Council Homes & Environment Scrutiny Committee meeting in March 2025. This misrepresentation only reinforces the wider concern that regulatory standards are being misappropriated or selectively interpreted to the detriment of public health, further justifying the urgent need for review and reform.

Thank you for your attention to this matter. I am available to discuss this further at your convenience.

A prompt response would be highly appreciated, given the urgency of the situation.

Yours faithfully,

Steve Gittins

From : Steve Gittins
Lifelong Resident of Johnstow.
Lead Petitioner, Petition P-06-1510

To : [REDACTED]
[REDACTED]
Natural Resources Wales

Dear [REDACTED]

Re: Misleading Public Assurances Regarding Hafod Landfill Environmental Data and Oversight

I am writing in direct response to your recent public media statement concerning the environmental performance of the Hafod Landfill site. I must challenge both the tone and substance of your comments, which regrettably recycle a litany of tired platitudes and sidestep the fundamental failures that have allowed this public health nuisance to persist for 18 years.

Your assurance that "*Enovert continues to provide accurate and verifiable data*" may sound comforting to an uninformed audience, but the reality is far more troubling. The data being cited by both NRW and Enovert is **incorrectly based on occupational exposure thresholds (i.e., Workplace Exposure Limits, WELs)** which are wholly inappropriate for evaluating the chronic environmental exposure endured by the local community.

Let me be clear: **the HSE's WELs are designed for healthy adults in controlled industrial environments**, employing the use of PPE, typically for 8 hours per day, 5 days a week. These thresholds **do not, and must not, serve as benchmarks for ambient air quality** in residential areas, where **vulnerable individuals**, including children, the elderly, and those with pre-existing health conditions, are exposed 24/7.

The correct comparator is the World Health Organization's ambient air guideline for hydrogen sulphide (H₂S), which is set at 5 parts per billion (ppb) to prevent odour nuisance and protect public health. By contrast, the HSE's 8-hour limit is 5,000 ppb—a figure **1,000 times higher**—and dangerously misapplied in this context. To continue relying on these flawed criteria while proclaiming compliance is disingenuous and undermines public health and trust.

Furthermore, your reference to "unannounced inspections" and "improvement work by the operator" rings hollow when viewed alongside the lived reality of residents who continue to suffer from foul odours with no meaningful accountability. The claim of a "steady drop in odour complaints" should not be interpreted as success; it simply reflects **despair, resignation, or the futility of repeated reporting**.

Equally hollow is your commendation of the Deputy Minister's visit to Hafod. The visit was pre-announced and, by your own admission, showcased a **fully prepared and sanitised site**, an exercise in optics rather than meaningful oversight. That NRW would frame such a visit as evidence of transparency or accountability borders on deluded self-congratulation.

Perhaps most staggering is your statement that "*more work is needed to understand the causes*" of odour exceedances. Let me repeat that for clarity,.....you claim that,..... *more work is needed to understand the causes*. After nearly two decades of persistent nuisance, to still plead ignorance is not just inadequate, it is bewildering to the extreme, after two decades of suffering this damn stench. It's insulting to the intelligence of residents and campaigners who have tirelessly documented the failures of Enovert'. The cause is not elusive. **It is systemic mismanagement, enabled by weak regulation,**

inadequate enforcement, and a regulatory culture more inclined to shield the operator than to protect the community.

I urge you, and NRW more broadly to abandon this defensive rhetoric and instead stand up and do your job, and acknowledge the real, long-term harm inflicted on local people. This starts by:

- **Adopting WHO's 5 ppb ambient guideline for H₂S** as a benchmark in your assessments;
- **Rejecting the misapplication of HSE workplace limits** in residential exposure settings;
- **Publishing independent, disaggregated, real-time air quality data** that reflects actual community exposure;
- And finally, **being transparent about the historic and ongoing regulatory failures** that have allowed Hafod to remain a blight on our environment and wellbeing for far too long.

This is no time for comfortable narratives or platitudes. The people of Johnstown, Rhostyllen, and surrounding communities deserve facts, accountability, and urgent corrective action, not more spin. This is a National disgrace.

I am currently in the process of writing formally to the Health and Safety Executive (HSE) in Wales to highlight this fundamentally flawed rationale. I will be urging them to re-evaluate the application of these outdated occupational exposure limits in non-industrial, residential settings. It is unacceptable that a permit issued decades ago—under regulatory assumptions and technological standards long surpassed—remains unchallenged, especially in the face of mounting public health concerns and a drastically altered climate context. **I will also be registering that incorrect threshold limits are being employed to promote a narrative of compliance**, when in reality they mask the true scale of community exposure and its consequences.

I eagerly await your reply, by e-mail.

Sincerely,

Steve Gittins

Lead Petitioner – Petition P-06-1510





Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref TO/HIDCC/00746/25

Steve Gittins
[REDACTED]

30 April 2025

Dear Mr Gittins,

Thank you for your emails of 7 April and 14 April to Huw Irranca-Davies, Deputy First Minister regarding your concerns about the Hafod landfill site in Johnstown near Wrexham. I understand you have also written to the Deputy First Minister referencing the Hafod Landfill Petition (P-06-1510).

As you know, activities at the Hafod landfill are controlled by an Environmental Permit that contains conditions the operator must comply with to prevent harm to the environment or human health. Natural Resources Wales (NRW) as the waste regulator in Wales is responsible for regulating the site and ensuring compliance with the conditions of the permit. NRW will ensure the site will continue to be managed by the operator within the conditions of the permit and will not be allowed to deteriorate as you infer.

The Environmental Permit states that the operator shall maintain a closure and aftercare management plan. This plan shows how the operator intends to close and manage the site in the aftercare phase, which would be enacted upon formal site closure. There are two ways that a landfill can be formally closed under the Environmental Permitting (England and Wales) Regulations 2016 and the Landfill Directive:

- Operator-initiated closure - When the operator of an operational landfill permanently stops accepting waste, it can start the closure procedure. It must be compliant with the permit and have appropriate infrastructure, operating techniques, and management plans in place to manage the site through the aftercare phase.
- Regulator-initiated closure - When NRW decides that a site must close and issues a Closure Notice. A Closure Notice is used as a last resort once other enforcement

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.

Cangen Rheoliadau Polisi Gwastraff / Waste Regulation Policy Branch
Is-adran Effeithlonrwydd Adnoddau ac Economi Gylchol / Resource Efficiency and Circular Economy Division
Adran Newid Hinsawdd / Climate Change Department

Canolfan
Cyswllt Cyntaf / First Point of Contact Centre 0300
0604400

options have been exhausted. Under a Closure Notice, the operator must still comply with its permit conditions and remains responsible for maintaining active pollution control measures.

In relation to the Hafod site, the operator is undertaking several actions that NRW have requested to address the issues at the site. Further information regarding landfill aftercare and permit surrender can be found [here](#).

Regarding your request for Welsh Government to commission an independent investigation into the environmental and health impacts of emissions from the Hafod Landfill Site on surrounding communities, I understand Wrexham County Borough Council (WCBC) passed a motion at their Full Council meeting on 26 March 2025 where 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](#).

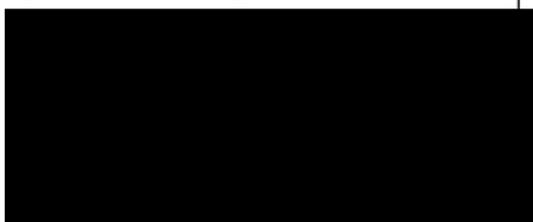
Further to your request for real-time air quality monitoring at multiple locations around the site, focusing on key pollutants including PM_{2.5}, VOCs, heavy metals, H₂S, and bioaerosols, WCBC and the site operator have installed air quality monitors around the site boundary and at Johnstown Community Centre. It is understood that WCBC will be publishing regular air quality data reports.

With regards to your request for the Permit to be revoked, NRW report that the site operator is working through the actions which are addressing the issues at the site. Revoking the permit and closing the site would not immediately resolve the current odour issues. As outlined above, this course of action is taken as a last resort by NRW where other options have been exhausted and revoking the permit and closing the site would not immediately resolve the issues.

The outcome of the Petitions Committee discussion on Hafod Landfill is a matter for the Senedd Committee to take forward and the Deputy First Minister will consider their recommendations.

I understand a Hafod Landfill Stakeholder Group meeting was held on Friday 21 March 2025 and that going forward it is planned that the stakeholder group will meet at least quarterly. A residents group meeting has also been set up and this will provide residents with the opportunity to engage with stakeholders. I believe this group is the ideal forum for you to obtain the answers to any concerns and I would encourage you to engage with these meetings.

I hope you find this information useful. In the meantime, NRW will continue to regulate the operators closely.

A large black rectangular redaction box covering the signature area of the letter.

Waste Regulation Policy Manager

Steve Gittins

01/06/25

To:

The Senedd Petitions Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

**Re: Rebuttal to Welsh Government's 30 April 2025 Response on Hafod Landfill —
Petition P-06-1510**

Dear Petitions Committee Members,

I write further to the Welsh Government's letter dated 30 April 2025 from [REDACTED] (Ref: TO/HIDCC/00746/25) in response to correspondence regarding the Hafod Landfill site. As lead petitioner, I feel compelled to address several factual inaccuracies and policy misrepresentations made within that response, particularly the suggestion that **closure of the site would not solve the odour issue** and could even **worsen environmental degradation**—an argument that is not only misleading, but contrary to environmental law and regulatory practice.

1. Site Closure Does Not Equal Abandonment

The claim that closure would not solve odour issues appears to rely on the flawed premise that formal closure leads to site neglect. In fact, **closure under the Environmental Permitting (England and Wales) Regulations 2016 and the Landfill Directive** is a **highly regulated process**. Whether closure is initiated by the operator or enforced through a Closure Notice by Natural Resources Wales (NRW), the operator remains legally obligated to:

- Maintain and operate landfill gas and leachate control systems.
- Prevent pollution through site capping and restoration.
- Conduct long-term environmental monitoring and site management.

Closure would legally compel the operator to implement the **Aftercare and Closure Plan**, which the current permit already requires. It is therefore incorrect—and irresponsible—to suggest that closure invites environmental harm.

2. Ongoing Operation Is the Source of Continuing Harm

The site's **continuing acceptance and processing of waste** remains the active source of persistent odour and pollution, causing documented **statutory nuisance** and adversely impacting local air quality. Closure would **eliminate the root cause** of emissions: ongoing waste input, active cell exposure, and operational failures.

The idea that "closure would not immediately solve the issue" is a **distraction from accountability**. No intervention offers an "immediate" fix, but closure offers a **definitive and enforceable path to control and recovery**, unlike the current strategy which tolerates repeated breaches of permit conditions with little consequence.

3. The Site Has Already Breached Permit Conditions

Extensive public complaints, environmental incidents (notably the **major landfill fire in 2020**), and persistent odour events are evidence that the operator is not meeting permit standards. Under Regulation 22 and 23 of the Environmental Permitting Regulations 2016, **NRW has full legal grounds to revoke the permit** where permit conditions are breached and environmental harm continues. The Welsh Government's framing of permit revocation as a "last resort" overlooks this lawful pathway.

4. Land Restoration Is a Legal Obligation, Not an Option

UK and EU law mandates that closed landfill sites must be **restored, capped, monitored, and managed** for decades after closure. The **Landfill Directive, Environmental Protection Act 1990**, and the **Land Restoration Regulations** guarantee that post-closure management is not optional. NRW remains responsible for ensuring compliance through inspections and enforcement.

Far from leading to neglect, closure would **activate enforceable obligations** for containment, monitoring, and pollution mitigation—measures that should have been fully in place already.

5. Air Monitoring Is Not a Substitute for Intervention

While we welcome the installation of monitors, this is a **reactive and incomplete** measure. Monitoring does not prevent harm, nor does it constitute a regulatory solution. Public health protection requires **prevention of pollution at source**, not data collection after exposure.

6. Failure to Acknowledge Health Impacts and Community Harm

The Welsh Government's response omits any meaningful acknowledgment of the **cumulative and long-term public health implications** of exposure to PM2.5, H₂S, VOCs, and bioaerosols. The absence of reference to the **2020 Hafod landfill fire**, which caused mass evacuations and widespread pollution, is particularly egregious and appears to downplay the severity of the situation.

7. Welsh Government Has a Statutory Duty to Act

Under the **Well-being of Future Generations (Wales) Act 2015**, the Welsh Government is legally bound to protect the environment and promote good health and well-being. Allowing a known polluting site to continue operations in the face of strong community opposition and substantial evidence of harm is incompatible with this obligation.

Request for Committee Consideration

We respectfully ask that the Senedd Petitions Committee consider these rebuttals in their deliberations and **recommend the revocation of the environmental permit for Hafod Landfill** as a proportionate and lawful remedy to long-standing, unresolved environmental and public health harms.

We remain committed to constructive engagement but firmly believe that only **formal closure** will bring about the level of control and accountability necessary to protect our community.

Yours sincerely,

Steve Gittins

Lead Petitioner – Petition P-06-1510



Campaign to revoke Hafod Landfill Site permit

To : Natural Resources Wales

From : Steve Gittins – Resident of Johnstown.

As part of our above campaign and ongoing petition with the Welsh Government (P-06-1510), I written to Wrexham Council Public Protection Office, and I copy NRW and the regulator in these matters and seek answers to the following question, which have also addressed to Wrexham Council. I also await a reply from [REDACTED], regarding previous correspondence, that to date appears to have been ignored.

Questions Regarding Hafod Lanfill Regulation.

Public Health Assessment Standards

- 1. Why were HSE Workplace Exposure Limits (WELs), which apply to occupational settings, used to assess public health impacts in a residential area near Hafod Landfill?**
- 2. Will the Council now acknowledge this misuse of occupational standards, and correct the public record by adopting WHO guidelines (e.g. the 5 ppb odour threshold) instead?**
- 3. Who advised or authorised the use of WELs in the Homes and Environment Scrutiny Committee’s April 2025 report? Was this based on NRW guidance, internal consultants, or Enovert’s submissions?**

Data Transparency and Verification

- 4. The Council has stated that a single “all-encompassing” report—containing data from all installed monitors, alongside weather data—will be presented to the Stakeholder Group and then passed to NRW for publication via the Public Register. However, from the experience of many residents, the Public Register is often difficult to navigate, inconsistently updated, and not readily accessible to the general public.**

Given these limitations:

- Will the Council commit to making this report—and any future monitoring data—available through a more direct and user-friendly communication channel, such as a dedicated web page, a community bulletin, or local publication?**
- Will the full dataset, including raw time-stamped H₂S readings, exceedance durations, wind direction overlays, and analysis methodologies, be published in an accessible and timely manner?**

This would ensure that affected residents are not excluded from critical health-related information due to technical or bureaucratic barriers.

Campaign to revoke Hafod Landfill Site permit

5. **Can you provide month-by-month odour complaint data from 2024 to present, broken down by location and incident type?**
6. **Are there H₂S monitoring datasets available for public review, including raw values and trends over time?**
7. **Have there been any independent audits or validations of NRW or Enovert's reported gas management improvements (e.g. well installations, liner repairs)? If so, will these be published?**

Enforcement and Compliance

8. **What specific enforcement actions has WCBC Public Protection taken over the past 18 months in response to permit breaches or persistent odour complaints from residents—particularly actions falling within the Council's own statutory responsibilities, regardless of NRW's primary regulatory role?**
9. **Does the Council agree that "appropriate measures" should be judged by their actual impact on the public, not just whether they were attempted?**
10. **What are the current criteria used by the Council (not NRW) to determine whether a breach of the environmental permit has occurred?**

Technical Measures and Best Practice

11. **Can you confirm whether the temporary capping and use of sandbags to secure liners has been subject to engineering evaluation of effectiveness.**
12. **Have any independent experts reviewed the gas control systems and landfill management practices? If so, who, and what were their findings?**

Would you not agree that climate change is driving an increase in both the frequency and intensity of rainfall events, which significantly challenges the effective management of leachate volumes at landfill sites. The current permit framework and operational processes, often based on historical weather patterns, are increasingly outdated and inadequate to address these intensified hydrological conditions. Without updated regulatory standards and adaptive management practices that reflect these climate realities, landfill operators risk greater leachate overflow, increased odour emissions, and environmental harm.

Community Involvement and Governance

13. **Why are Hafod Liaison Group minutes not made automatically available to residents? Will the Council now commit to publishing these routinely?**
14. **Can affected residents be given observer status in stakeholder groups, and timely access to monitoring and compliance data?**
15. **Is the Council willing to hold a public forum to allow direct engagement with affected residents?**

Timelines, Accountability, and Next Steps

16. **When will the Council publish:**
 - **a) All complaint and monitoring data?**

Campaign to revoke Hafod Landfill Site permit

- **b) Current enforcement status and actions taken?**
 - **c) A formal position on whether to consider revoking the environmental permit?**
17. **Is it possible to implement an independent review, or regulatory reassessment of the permit conditions?**

Public Health Support

18. **Will the Council commit to initiating a formal Health Risk Assessment for residents exposed to odour and gas emissions near Hafod?**
19. **Have any local public health services or environmental health specialists been consulted on the chronic effects of low-level H₂S exposure on vulnerable populations?**

Summary

Will you not agree that despite repeated claims of "taking this seriously," the report (How to regulate Hafod Landfill) lacks demonstrable, lasting outcomes. It relies on generic language, unsubstantiated claims of best practice, and deflects accountability through vague collaboration efforts and pending data reviews. The community continues to suffer from persistent odours, which undermines the credibility of both Natural Resources Wales (NRW) and Wrexham Council's Public Protection efforts.

Key Issues Identified:

1. **Vague Assurances & Regulatory Ambiguity**
 - "We are taking each report seriously" and "operator is taking appropriate measures" lack measurable performance indicators.
 - The phrase "if some odour is still detectable... no breach occurs" appears to license prolonged nuisance without accountability.
2. **Unsubstantiated Claims of Best Practice**
 - Example: "Sandbags on temporary capping" is cited as a best practice—without any scientific justification or performance data.
 - Repetitive updates on gas wells and temporary liners mask the lack of long-term containment solutions.
3. **Lack of Tangible Improvement**
 - Despite years of actions, "odours are still being experienced"—a direct admission that current regulation and operator action are insufficient.
4. **Absence of Transparency & Community Engagement**
 - Stakeholder groups and Scrutiny Committee meetings are cited, but outcomes are missing or delayed.
 - There is no mention of how residents are actively involved in shaping enforcement or validating operator claims.
5. **Inadequate Monitoring Data**
 - Air quality monitoring data is described as "preliminary" and "needs further assessment"—despite 18 years of complaints.
 - Hydrogen sulphide (H₂S) thresholds are reportedly exceeded, but without acceptance of WHO exposure limits or health impact analysis.
6. **Selective Liaison Committee Participation**

Campaign to revoke Hafod Landfill Site permit

- The Hafod Stakeholder Group is referenced, but its composition, decision-making power, or independence is not transparent.

Additional Key Questions for Council Oversight

20. Effectiveness of Regulation

- Over 18 years, why have odour complaints persisted despite NRW and Council oversight? What specific regulatory failures are acknowledged?
- What measurable enforcement outcomes (e.g. fines, permit modifications, temporary suspensions) have been imposed on the operator since 2010?

21. Odour Assessment and Permit Interpretation

- How can "appropriate measures" be considered sufficient when community exposure to odours continues?
- Do you accept that ignoring Public WHO exposure thresholds, has allowed Hafod landfill site and probably other UK sites to carry on regardless and with impunity.
- Why does NRW continue to accept the presence of odours under permit conditions? Does this not contradict the legal duty to protect public wellbeing?

22. Monitoring Transparency and Data Sharing

- Will WCBC commit to publicly releasing real-time, **monthly H₂S monitoring data**, including wind vectors and analysis methodology? Not every 3 or 6 months....but monthly!

23. Technical Validity of Mitigation Measures

- What evidence exists to support the use of sandbags and temporary LLDPE liner as effective odour controls under storm or high rainfall conditions?
- Would you agree that Sandbags and temporary LLDPE liners **cannot be considered effective or resilient odour control methods** in storm or high rainfall conditions, and that Best available techniques (BAT) in landfill odour management call for **engineered capping systems, active gas extraction, and integrated stormwater controls**. Continued reliance on temporary surface coverings during adverse weather raises significant questions about the adequacy of site management and regulatory compliance.
- Has an independent third party ever validated the effectiveness of gas wells, pin wells, or temporary caps installed at Hafod?

24. Stakeholder Group Accountability

- Who selected the members of the Hafod Stakeholder Group? What criteria were used? Were local residents or campaigners allowed to nominate representatives?
- Can WCBC provide minutes, actions, and measurable outcomes from the March 2025 Stakeholder Group meeting?

25. Scrutiny Committee Recommendations

Campaign to revoke Hafod Landfill Site permit

- What was achieved at the Homes and Environment Scrutiny Committee on 29 April 2025?
- Will WCBC publicly commit to timelines and enforcement updates and actions arising from these recommendations?

26. Health and Impact Assessment

- Has WCBC conducted any public health impact assessments in Johnstown or the surrounding area related to chronic exposure to landfill gases?
- Will the Council now commission an independent health risk study given the consistent H₂S exceedances?

27. Cumulative Regulatory Response

- What lessons have been learned from past operator non-compliance, including the 2020 landfill fire, and how have they informed current regulatory strategies?
- Why has NRW or Wrexham Council never considered revoking or suspending the permit despite repeated non-performance, non-conformities, considerable public objection, and more recently, the discovery of inappropriate Occupational / workplace data criteria to assess compliance in Public locations.

Steve Gittins



Lifelong Resident of Johnstown.

Correspondence from Natural Resources Wales to the Petitioner, 11 June 2025

Dear Mr Gittins,

RE: Hafod Landfill, Wrexham

Thank you for your detailed correspondence dated 4 June regarding Hafod Landfill site and your concerns relating to both environmental data interpretation and regulatory oversight. We take all representations from members of the public and stakeholders seriously, and I welcome the opportunity to respond directly.

At the outset, I would like to reaffirm that protecting public health and the environment remains our overriding priority in the regulation of Hafod Landfill site. Oversight of this site has included routine inspections (both announced and unannounced), detailed data reviews, operational improvement programs, and ongoing dialogue with the operator, local authorities, and residents.

You have raised a concern regarding the applicability of Workplace Exposure Limits (WELs) in the assessment of hydrogen sulphide (H₂S) emissions in a residential context.

H₂S monitoring off-site is not a requirement of the Environmental Permit. Wrexham County Borough Council (WCBC) and the site operator have elected to install air quality monitors around the site boundary and at Johnstown Community Centre. We understand that the selection of threshold levels to assess the monitoring data have been determined by WCBC and Enovert in discussion with Public Health Wales.

We share your view that public confidence is underpinned by transparency. We understand that the monitoring data collected by WCBC and Enovert is to be made available in the form of monitoring reports, which will be shared publicly.

We have used a range of regulatory powers to drive operational improvements at Hafod Landfill, including formal enforcement notices, mandatory action plans, and compliance audits. Our work includes continued investigation into odour incidents, ongoing evaluation of site gas management, and ensuring that the operator remains fully accountable for performance against permit conditions. Further information regarding our regulatory work can be found on our '[How we are regulating Hafod Landfill Site](#)' website.

Please be assured that we take our regulatory responsibilities seriously and we continue to inspect and audit Hafod Landfill site against the requirements of the Environmental Permit and associated best practice. All information on the actions we take to regulate the site are public register documents.

It should be noted that we do not provide individual feedback on our response to, or the outcome of, reports of potential incidents, regulatory breaches, or criminal activity.

This is so that we can focus our resources on delivering an effective and cost-efficient incident and regulatory service, to protect the environment and people of Wales. We very much appreciate the reports we receive and would like to thank you for taking the time to report your observations to us. These reports are critical in enabling us to identify and address the impacts of incidents and regulatory breaches and provide valuable intelligence to support our incident prevention and regulatory compliance and enforcement work.

The Senedd Petitions Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

9th May 2025

Dear Petitions Committee,

RE: Petition Number: P-06-1510 - Direct NRW to revoke the environmental permit and ensure the closure of Enovert's, Hafod Landfill Site in Wrexham

Following the committee meeting of 28th April 2025 in which the above petition was discussed I wanted to reach out on behalf of Enovert as operator and permit holder at the Hafod Landfill Site, Wrexham.

Enovert are proactively engaged and working with NRW, as the site's regulator, to address community concerns of odour. Much work has been done and improvement delivered since complaints and interest in the site escalated in September 2024, and this work continues.

Enovert have attended meetings of Wrexham County Borough Council's Homes and Environment Scrutiny Committee held on 16th October 2024, and more recently on 29th April 2025. The meetings have provided the opportunity to present detail of Enovert's operations and actions taken at the site with responses to these works, improvements and overall compliance reported on by NRW at the same meetings. One important action arising from the Scrutiny Committee meeting in October was the Committee's request for provision of air quality monitoring. Enovert have facilitated installation of monitoring devices at the site, to assess the presence of Hydrogen Sulphide gas with data collection on going. We have committed to assessment of the data by a company of independent third-party environmental consultants and reporting of the findings to NRW in order there is proper oversight of the information and that the public can have confidence in the reporting. We also attend Stakeholder group meetings which was established as an action also arising from the Scrutiny Committee meeting held in October.

Enovert hold regular quarterly community liaison meetings, held since 2008, attended by local community representatives, NRW, Minerals and Waste Planning Officers, Wrexham Public Protection Officers and local Councillors from the surrounding wards and these meeting continue to be held. You will be aware Enovert have also met at Hafod on separate occasions with Members of the Senedd (Deputy First Minister, Huw Irranca-Davies), and Members Parliament.

I hope the above demonstrates how Enovert are engaging with all interested parties and our commitment to ensuring concerns raised regarding our operations are addressed and in a transparent manner. It is on this basis that I write to you simply to say, that should you require

information about the Company's operations at Hafod or wish to have direct discussion about the actions we're taking to address the community's concerns, then please do contact me directly.

Yours Sincerely

A handwritten signature in black ink, appearing to be "MS", written over a horizontal line.

Mark Silvester

Chief Executive Officer

Agenda Item 4.1

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-06-1463
Ein cyf/Our ref SM/00221/25

Carolyn Thomas MS
Chair
Petitions committee

petitions@senedd.wales

01 May 2025

Dear Carolyn,

Thank you for the letter of 3 April to the Cabinet Secretary Finance and Welsh Language, about Petition P-06-1463. I am replying as the responsibility for the former Wales Police Schools Programme (WPSP) fell within my portfolio.

I would like to thank the committee for its consideration of the petition. I have noted the decision to close it. Given the non-devolved nature of policing, I welcome the committee's decision to write to the Home Office to stress the importance of funding the provision of the police's work in schools.

I have also noted the letter you received from PCC Dafydd Llywelyn, chair for policing in Wales, and CC Amanda Blakeman, chair for the Welsh Chief Officer Group.

Yours sincerely,

Sarah Murphy AS/MS

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

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

Bae Caerdydd • Cardiff Bay
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CF99 1SN

Gohebiaeth.Sarah.Murphy@llyw.cymru
Correspondence.Sarah.Murphy@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.



Welsh Affairs Committee

Agenda Item 4.2

Wednesday, 4 June 2025

Emma Hardy MP
Minister for Water and Flooding
Department for Environment, Food and Rural Affairs

Dear Minister,

Monmouthshire and Brecon Canal

The Welsh Affairs Committee, which I chair, has read with concern the recent reports of the threat to the Monmouthshire and Brecon Canal.

This 55-mile canal is of great importance to local communities and tourists alike, and runs through a Site of Special Scientific Interest and a World Heritage Site. I am concerned that any threat to the canal's future will have a devastating impact on local businesses, such as those offering canal boat hire and tours.

I acknowledge that there are clearly devolved issues at play here, and I welcome the actions of the Senedd Petitions Committee in securing an opportunity to scrutinise the role of Natural Resources Wales and the Welsh Government.

However, I also note that the Canal & River Trust, which has responsibility for maintaining the navigability and safety of the canal, receives over 20% of its total income from Defra. This is underpinned by a grant agreement, which stipulates that this funding is in consideration for the Trust's responsibilities for waterways in both England and Wales.

I would therefore be grateful for your responses to the following questions:

1. What assessment does Defra make of the Canal & River Trust's ongoing ability to fulfil its responsibilities in relation to the Monmouthshire and Brecon Canal?
2. Has Defra taken account of the recent change in Natural Resources Wales's water abstraction regulations in considering the financial support required by the Canal & River Trust?
3. To what extent does Defra co-ordinate with the Welsh Government and with devolved bodies such as Natural Resources Wales to ensure a joined-up approach to securing the financial future of Welsh canals?

4. Are you satisfied that waterways such as the Monmouthshire and Brecon Canal will not face a damaging cliff-edge at the expiration of Defra's grant agreement with the Trust in 2027?

I would much appreciate a response by Thursday 19 June.

My committee intends to publish this letter and, in time, your response.

I am copying this letter to Rt Hon Alistair Carmichael MP, Chair of the Environment, Food and Rural Affairs Committee, and Carolyn Thomas MS, Chair of the Senedd Petitions Committee.

Yours sincerely,

A handwritten signature in black ink that reads "Ruth Jones". The signature is written in a cursive style with a large initial 'R' and a long, sweeping underline.

Ruth Jones MP
Chair of the Welsh Affairs Committee

Carolyn Thomas MS
Chair
Petitions Committee

22 May 2025

Petitions on Higher Education funding and sustainability of the sector

Dear Carolyn,

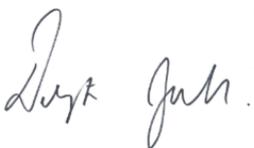
Thank you for your letter drawing our attention to petitions on higher education funding and sustainability which we considered at our meeting on 8 May 2025.

We are currently keeping a watching brief on the situation and are particularly interested in the potential implications of the proposed closures for areas within our remit.

We are currently undertaking an inquiry into the Welsh Government's International Strategy and as part of this inquiry we are looking at the decline of modern foreign language learning in Wales.

You will also be aware that the Children, Young People and Education Committee is looking at the issues facing the higher education sector in Wales. Members of our Committee have been invited to attend their Committee on 12 June for an evidence session with the President and Vice-Chancellor of Cardiff University, Professor Wendy Lerner. We will use this opportunity to raise issues relating to the closure of Schools and subjects within our remit.

Yours sincerely,



Delyth Jewell MS
Committee Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

