

Agenda – Petitions Committee

Meeting Venue:

Committee Room 3 – Senedd

Hybrid

Meeting date: 20 October 2025

Meeting time: 14.00

For further information contact:

Gareth Price – Committee Clerk

0300 200 6565

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- 1 Introductions, apologies, substitutions and declarations of interest**
(14.00) (Pages 1 – 23)
- 2 Evidence session: P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham**
(14.00 – 14.40) (Pages 24 – 82)
Steve Gittins, Lead petitioner
- 3 Updates to previous petitions**
(14.40 – 15.15)
 - 3.1 P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities
(Page 83)
 - 3.2 P-06-1494 Welsh Government to protect funding in education from WG and Local Authority cuts
(Pages 84 – 85)
 - 3.3 P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales
(Pages 86 – 88)
 - 3.4 P-06-1423 Reinstate the 552 Cardi Bach coastal bus service in South Ceredigion!
(Pages 89 – 91)



- 3.5 P-06-1444 Women of North Wales have the right to have a Menopause Services/Clinic in Ysbyty Gwynedd
(Pages 92 – 109)
- 3.6 P-06-1426 Install traffic lights at the McDonald's Pontypool roundabout
(Pages 110 – 112)
- 3.7 P-06-1440 Establish a Welsh under 18 gender service in Wales for Welsh children and young people asap
(Pages 113 – 115)
- 3.8 P-06-1445 Change Land Transaction Tax for First Time Buyers in Wales to be in line with the UK Government
(Pages 116 – 117)
- 3.9 P-06-1487 Provide a pedestrian crossing on A4042 Llanover; make safe for bus users and reduce the speed limit
(Pages 118 – 121)
- 3.10 P-06-1464 Allow Welsh families who have experienced Baby loss before 24 weeks to obtain baby loss certificate
(Pages 122 – 123)

Paper to note

- 4 P-06-1427 Create a sustainable traffic plan for the Rhiangoll Valley
(Page 124)
- 5 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the meeting for the remainder of today's business:
(15.15)
- 6 Discussion of evidence: P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover's, Hafod Landfill Site in Wrexham

7 Review of Standing Order 23 and Petitions Process: Proposals

(Pages 125 – 151)

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P-06-1510 Direct NRW to revoke the environmental permit and ensure the closure of Enover't's, Hafod Landfill Site in Wrexham.

Y Pwyllgor Deisebau | 22 Medi 2025
Petitions Committee | 22 September 2025

Reference: SR25/11931-1

Petition Number: P-06-1510

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

Text of petition:

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

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



cannot hold Enovert 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.

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

This briefing supports the Petitions Committee's short inquiry into the Hafod Landfill site. It updates the earlier briefing published for the Committee's first consideration of this petition on 28 April 2025.

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

Hydrogen Sulphide (H₂S) is a gas that is released during the decomposition of organic matter and is associated with landfill odour. As set out in this April 2025 local authority scrutiny report, there were a significant number of complaints relating to odour from the site during 2024. The petitioner has called for NRW to revoke the site's environmental permit.

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

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

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

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

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

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

NRW summarises the findings of its site inspections, audits, and monitoring activities in Compliance Assessment Reports. A [February 2025 compliance report](#) for the Hafod Landfill details 5 'non-compliances' of environmental permit conditions, relating to:

- leachate management;
- landfill gas;
- chloride monitoring; and
- surface water monitoring.

There were 26 instances of landfill methane emissions exceeding the permitted amount during the final quarter of 2024.

An [NRW webpage](#) outlines its ongoing regulatory actions for the site, including:

- regular site inspections;
- reviewing Enovert's management procedures and action plans; and
- working with Wrexham CBC to ensure air quality and monitoring meets [Welsh Government standards](#).

NRW says it told Enovert to take action to reduce long-term fugitive (unintentional) emissions in late 2024. It also [issued Enovert with an Enforcement Notice](#) on 21 December 2023, which included "several actions that needed to be taken to address the odour complaints reported between October and December 2023". NRW says Enovert complied with the notice, completed related works, and updated its action plan related to its management procedures.

Its March 2025 update says Enovert has installed new infrastructure to increase the volume of gas being collected from the site, and that further air quality monitoring equipment will be installed in the near future. On odour emissions to residential areas, NRW says:

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

The Hafod Landfill Stakeholder Group was established in early 2025, following a rise in odour complaints. The Stakeholder Group includes Enovert, NRW, Wrexham CBC councillors and officials, and community council representatives. It had its first meeting on 21 March 2025. Additionally, the Hafod Liaison Group was established over 20 years ago as a forum for dialogue between the operator and the local community. It is chaired by a local councillor and includes Enovert, NRW, local Wrexham CBC councillors and officials, community councillors, and four local residents.

In its most recent (May 2025) update, NRW says the number of odour incidents has “shown a steadily decreasing trend as improvement works are completed”.

2. Written evidence submitted to inquiry

The Petitions Committee carried out a consultation with key Hafod Landfill stakeholders in July and August 2025. This section summarises the written responses the Committee received.

2.1. Enovert

Enovert's submission details its waste management role and how it is regulated. It says the degradation of waste in landfill produces landfill gas and leachate. The landfill gas is collected for use as fuel, whilst the leachate is stored in tankers for later processing at wastewater treatment facilities. Enovert provides detailed information on the types of waste it accepts and the source of that waste.

In relation to odour, Enovert says it takes complaints seriously and investigates and reacts to each one. It says it took remedial action both before and after it was issued a Statutory Notice by NRW in December 2023, and that it complied with all actions on agreed timescales. Its response includes a list of works it undertook between October 2023 and July 2025. Enovert says it installed four monitoring stations around the site, and it has appointed “leading independent environmental consultants” to assess the data. It says it

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

followed the consultancy's recommendation to install "additional diffusion tube monitoring devices to provide accurate detail in respect of actual exposure risk".

Enovert says that, following a meeting with the Wrexham CBC Homes & Environment Scrutiny Committee, it agreed to part-fund an air quality monitoring scheme. The scheme includes monitoring hydrogen sulphide gas on site and in the community. In relation to publishing that data, Enovert says:

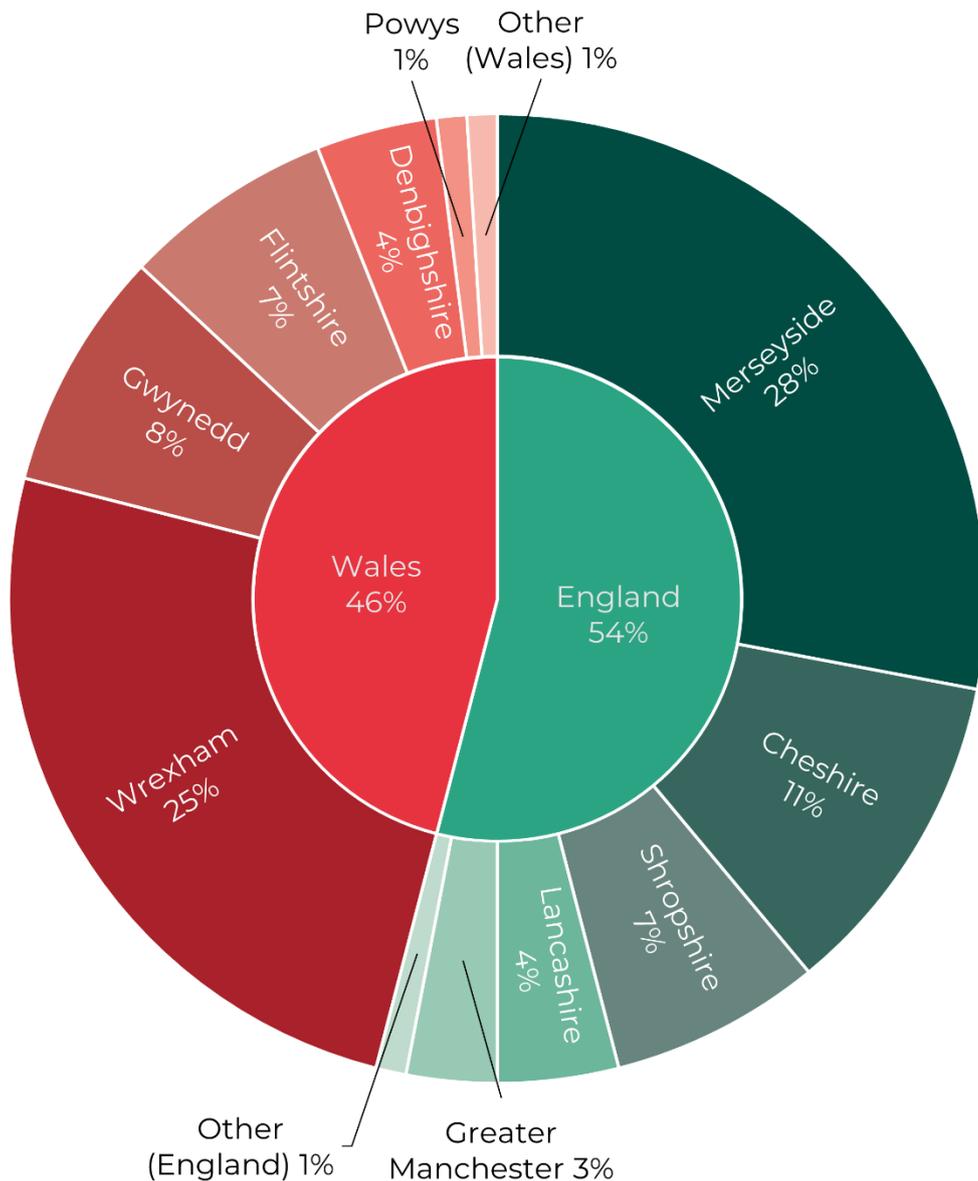
"The monitoring exercise needs to gather a sufficient body of data to allow proper assessment of the air quality environment. We are awaiting the data from the instruments for the third monitoring period at the time of writing. We have agreed to provide the latest monitoring data summary, with the benefit of the third round of monitoring detail, to the Senedd Petitions Committee by 15th September for inclusion in our evidence."

The latest data is not available at the time of preparing this briefing. However data for March 2025 can be found in a [report produced for the scrutiny Committee](#).

The response goes on to rebuke specific claims made in the petition. It also details the volume of landfill gas extracted from the site since November 2023, which has stabilised and (on average) fallen slightly.

Enovert provides information on the source of waste inputs to Hafod during 2024. It says around 10% of all waste is residual 'black bag' waste diverted from Energy from Waste plants. Just over half of the 2024 input (54%) came from England, with most of the remainder coming from north Wales. This is summarised below.

Hafod landfill 2024 inputs by nation and local authority area.



Source: Enovert

2.2. Public Health Wales

Public Health Wales (PHW) submitted evidence detailing its involvement with Wrexham CBC in relation to odour at Hafod.

PHW provides advice on guideline values for assessing public exposure to hydrogen sulphide over different time periods. It says it does not need to be informed of routine findings “unless the data shows significant concerns e.g.

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

concentrations are routinely above the exposure standards". It also advises that occupational exposure standards are inappropriate for assessing public exposure.

PHW also provides information on assessing the concentration of Volatile Organic Compounds (VOC) in air, which does not include hydrogen sulphide. It suggests benzene could be used as a conservative proxy for assessing the health risks of VOC unless Wrexham CBC can establish "an informed estimation of what VOCs are likely to be present".

2.3. Natural Resources Wales

NRW says Enovert's Environmental Permit "requires the operator to prevent odour off site or, where that is not possible, to keep it to a minimum". It says Enovert's Odour Management Plan describes how it will achieve this condition. And that any updates to its Plan must be assessed by NRW officers.

The response details NRW's approach to odour investigation, which includes site investigations and a odour intensity scale. It says a breach will only be recorded when on-site activities are likely to cause off-site pollution, and the operator is not taking all appropriate measures to control odour.

NRW says it can only initiate the closure of a landfill "when the management of an operational site is poor and further operation of the site may result in significant, long-term pollution". It says a closure notice is only used "when other enforcement options have been exhausted".

NRW provides a timeline of significant events in the regulatory history of Hafod, which are summarised in the table below:

Recent history of NRW's regulatory activity at Hafod

Date	Event
October 2023	Large increase in odour incident reports.
21 December 2023	NRW issued a Compliance Notice to Enovert to address odour.
31 January 2024	NRW satisfied that Enovert had complied with Notice.
8 March 2024	More gas emissions identified, Enovert proposes more remediation measure.
13 May 2024	NRW follow-up visit finds overall improvement, but some transient odours still detected.

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

November 2024	NRW's Landfill Emissions Reduction Project (LERP) team audits Hafod, gives recommendations and actions to Enovert in a Compliance Assessment Report.
December – January 2025	Escalation in odour incident reports. NRW officers confirm offsite odour is present.
After January 2025	Odour incidents reports decrease. NRW makes unannounced inspections and site audits. NRW considering additional enforcement on leachate.

NRW also provided a more [detailed history of recent enforcement action](#) to Wrexham CBC's Home and Environment Scrutiny Committee meeting on 29 April 2025.

2.4. Wrexham CBC

Wrexham CBC's submission to the inquiry describes the history of the site and the council's work in addressing community concerns about the landfill.

Its Homes and Environment Scrutiny Committee considered complaints about the site during meetings in June 2024 and April 2025. It also produced a report in October 2024. Key recommendations arising from the most recent meeting include:

- consideration of another update report in 6 months – the report should detail any site-related toxicity and associated health impacts;
- the council should explore expanding air quality monitoring in the community; and
- if monitoring shows odours “above accepted limits”, Wrexham CBC should explore its powers under the *Environment Protection Act 1990* (the 1990 Act) to tackle these.

Wrexham CBC says its officers have enforcement powers to tackle ‘statutory nuisance’ under the 1990 Act, but its policy is for the organisation with primacy (in this case NRW) to implement formal actions. It says any local authority-led prosecution would require the consent of the Welsh Ministers.

The Council says its officials determined the best options for air quality monitoring for hydrogen sulphide and volatile organic compounds. Four AQMesh Pod monitors were installed by Enovert around the Hafod Landfill in February and March 2025, and are operated by the company. An additional monitor was installed and is operated by Wrexham CBC at the Johnstown Community Centre, and a second monitor is due to be installed at the Johnstown and Nant Parc Bowling Pavilion. Data from monitors “can be checked in real-time by [Wrexham CBC] Public Protection, NRW and Enovert personnel”. However, Wrexham CBC qualifies the interpretation of this data:

"It is important to stress that the data from AQMesh Pods is qualitative. Quantitative data can only be provided when a stringent QC plan is in place with access to reference instruments. The options to implement this process is being pursued with Enovert and Geotechnology."

In addition to the AQMesh Pods, Wrexham CBC says hydrogen sulphide diffusion tubes have been co-located with the monitors and also deployed in other nearby locations. It says this is "to determine the accuracy of the real time monitors and check for other sources of H₂S".

Data interpretation is to be done through a company called Geotechnology, which is being employed by Enovert. It says reports are being provided to the Council, NRW, and Enovert, and "will be accessible to the public via NRW's citizen web pages". It is unclear whether the raw data itself will be published. Wrexham CBC says it has altered its interpretation of hydrogen sulphide thresholds following correspondence with Public Health Wales, and it will now compare readings to [World Health Organisation \(WHO\) air quality guidelines](#) and [Acute Exposure Guideline Levels \(AEGs\)](#).

Wrexham CBC officers conducted daily assessments of odour levels around Hafod Landfill from mid-July to mid-August 2025. In 85% of assessments, no odour was detected. When odour was detected, this was most commonly at one of 3 sites immediately adjacent to the landfill on its eastern boundary. Wrexham CBC says its results "indicate that no statutory odour nuisance currently exists, relating to the Hafod landfill site at the current time".

2.5. Wrexham councillors

Three Wrexham CBC councillors representing wards around Hafod Landfill submitted a joint response to the Committee's inquiry, they were:

- Cllr David A Bithell (Deputy Leader of the Independent Group);
- Cllr Steve Joe Jones (Independent Councillor); and
- Cllr Dana Davies (Leader of the Labour Group).

The response says there have been fewer complaints during 2025 compared to previous years and that Enovert has recently been more proactive in working with other stakeholders. However, it caveats this by saying public communication needs to improve "to rebuild trust and demonstrate that action is being taken when problems arise". The Councillors say they support "measures which will reduce odour, provide public health assurance, minimise complaints, and ensure accountability", emphasising the need for ongoing support and oversight.

2.6. Residents

The Petitioner wrote to the Committee asking for clarity from NRW and Wrexham CBC in five areas:

- the assessment of off-site health and nuisance impacts by NRW;
- the exercise of statutory powers by Wrexham CBC;
- the transparency of monitoring datasets;
- enforcement in relation to hydrogen sulphide levels; and
- perceptions of whether regulators are acting to protect the public.

Another resident responding to the Committee says that Enovert and NRW have sometimes attributed odours to agricultural activity, rather than the landfill.

Both the petitioner and other resident suggest that a recent decrease in complaint reporting to NRW may be attributable to “complain fatigue”, where residents no longer report odours “because they now feel that it is a waste of time”.

Residents expressed concern about their lack of representation in the Hafod Stakeholder Group, which was established earlier this year.

3. Welsh Government action

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

“...to encourage Enovert to ensure compliance with the site's Environmental Permit through engagement with NRW, and the importance of engaging with the public regarding any necessary maintenance and infrastructure works at the site”

4. Welsh Parliament action

The Petitions Committee initially discussed this petition on 28 April 2025. On 16 June 2025, it agreed to hold a short inquiry into outstanding issues related to the

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

site. This involved inviting Enovert, NRW, and Wrexham CBC officials to give oral evidence to the Committee.

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

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

The Cabinet Secretary for Social Justice, Trefnydd and Chief Whip, Jane Hutt MS, responded:

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

On 28 January 2025, Mark Isherwood MS asked the Trefnydd for a statement on the Hafod landfill, citing Johnstown constituent complaints about smells and NRW's "apparent lack of action in stopping it". The Trefnydd said the point "will be recorded with the Cabinet Secretary for Climate Change and Rural Affairs".

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

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

By virtue of paragraph(s) vi of Standing Order 17.42

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Submission of Evidence to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Opening Statement

To the Chair and Members of the Senedd Petitions Committee,

Firstly, I wish to express my sincere gratitude for the opportunity to provide a comprehensive response to the evidence presented during the initial inquiry session on **22nd September 2025**.

My submission is constructed as a direct, evidence-based rebuttal and augmentation to the transcripts and documents submitted by Natural Resources Wales (NRW), Public Health Wales (PHW), Enover, and Wrexham County Borough Council (WCBC). This evidence is structured to explicitly address the inconsistencies, technical deficiencies, and management failures that have allowed the persistent public health and odour nuisance from Hafod Landfill to continue.

The following index outlines the critical areas where the operator's and regulators' claims are challenged by the objective monitoring data and established scientific principles.

Steve Gittins

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)



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SG#3	Sniff Testing – Discrepancy in Monitoring
SG#04	Transparency and Engagement Failures
SG#05	Interrogation of Transcripts – 22nd September 20025
SG#06	Health Risks as per Enover & Wrexham Council Graphs
SG#07	Challenging Claims of Regularatory Compliance
SG#08	Challenging PHW ‘low risk’ statement
SG#09	Complaint Fatigue
SG#10	Summary

Steve Gittins

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Analysis of Hydrogen Sulphide Monitoring Data: Exceedances of WHO Exposure Guidelines & Recommendation for Enforcement Action

Submitted by: Steve Gittins Date: 10th October 2025

1. Introduction

This report analyses hydrogen sulphide (H₂S) monitoring data collected from AQMesh pods installed at Hafod Landfill Site and within the adjacent community between March–September 2025.

Public Health Wales has confirmed that the World Health Organization (WHO) exposure guidelines are the applicable criteria for protecting public health in this context. These guidelines include:

- **0.5 ppb** (1 µg/m³) as the threshold at which H₂S becomes perceptible (**odour threshold / annoyance**).
- **4.7 ppb** (7 µg/m³, 24-h mean) as a short-term health / **nuisance guidance threshold**.
- **100 ppb** (150 µg/m³, 30-minute average) as the acute exposure limit.

The ‘single’ community pod data are of primary interest for assessing **ambient public exposure** in residential areas like Johnstown and the surrounding community.

2. Methodology

Source data are from Table 4-2 of the report produced by Enover and Wrexham Council and submitted to the Inquiry on 22nd September 2025. (2551r3v1d0925).

The WHO guideline values (**0.5 ppb** and **4.7 ppb**) were applied across all timepoints to compute exceedance frequencies. Percentages above these thresholds were inferred from the proportions <1 ppb and <5 ppb provided in Table 4-3.

I examined and ‘drilled down’ into the report to confirm the detailed occurrence, magnitude, and **persistence of threshold exceedances**, contained an extremely small representational graph, a detail obscured by “zoomed-out” data representations.

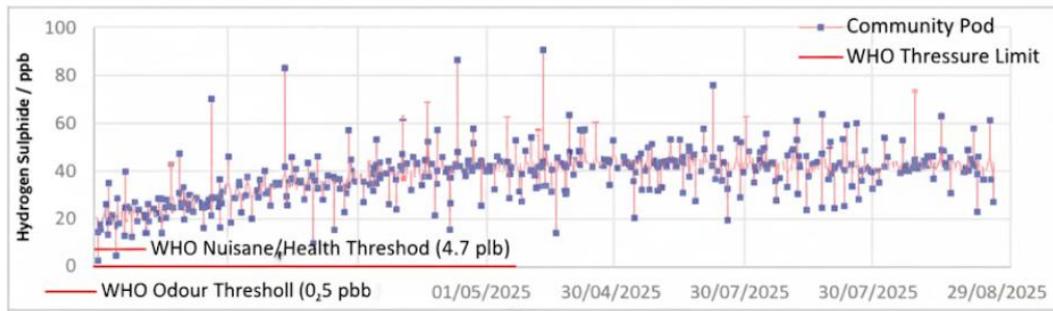
Also a qualitative review of published scientific literature was also conducted to support the assertion that increased rainfall / leachate mobilization may worsen H₂S emissions. See Report of the Correlation of Rainfall and incremental H₂S emissions. (see **SG#02**)

3. Results

3.1 Exceedance Statistics (from Table 4-2)

Monitoring Pod	% ≥ 0.5 ppb (odour threshold)	% ≥ 4.7 ppb (nuisance / health threshold)	Peak observed (ppb)
Community	63%	39%	29.16
Entrance (609)	66%	34%	258.85
Southern Cap (627)	20%	7%	42.05
Western Bund (044)	61%	30%	20.83
Lagoon (630)	36%	7%	37.47

Community Pod H₂S Monitoring Data vs WHO Exposure Guidelines (March — Sept 2025)



3.2 Visual Confirmation from Figure 4-3 Above (Community Pod Time-Series)

- The **Community Pod** time-series clearly shows **frequent and sustained exceedances** above both 0.5 ppb and 4.7 ppb, with multiple peaks in the ~10–30 ppb range.
- The **Entrance Pod (609)** experiences the most extreme peaks (up to ~259 ppb), vastly exceeding the WHO 30-minute acute threshold of 100 ppb.

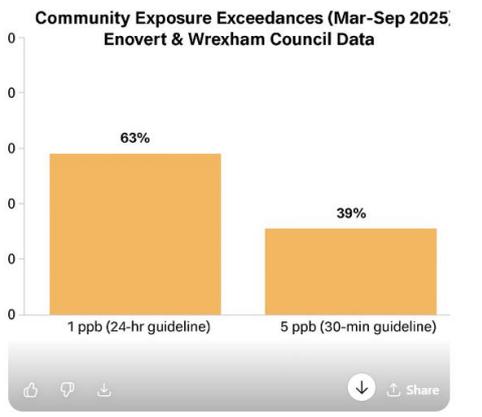
4. Interpretation & Judgement on Exposure

4.1 Odour / Human perceptibility at 0.5 ppb

The Community Pod recorded H₂S concentrations ≥ 0.5 ppb in **63% of the monitored time**. This means perceivable odour was present during nearly **two out of every three measured hours**. In a residential setting, this is **unacceptable exposure and chronic nuisance**.

4.2 Statutory Nuisance / Health Threshold at 4.7 ppb

The Community Pod had **39% of measurements ≥ 4.7 ppb**. Exposure at this level for nearly 40% of the time is far beyond tolerable limits for ambient public spaces, and strongly indicates a failure to protect the health and quality of life of residents.

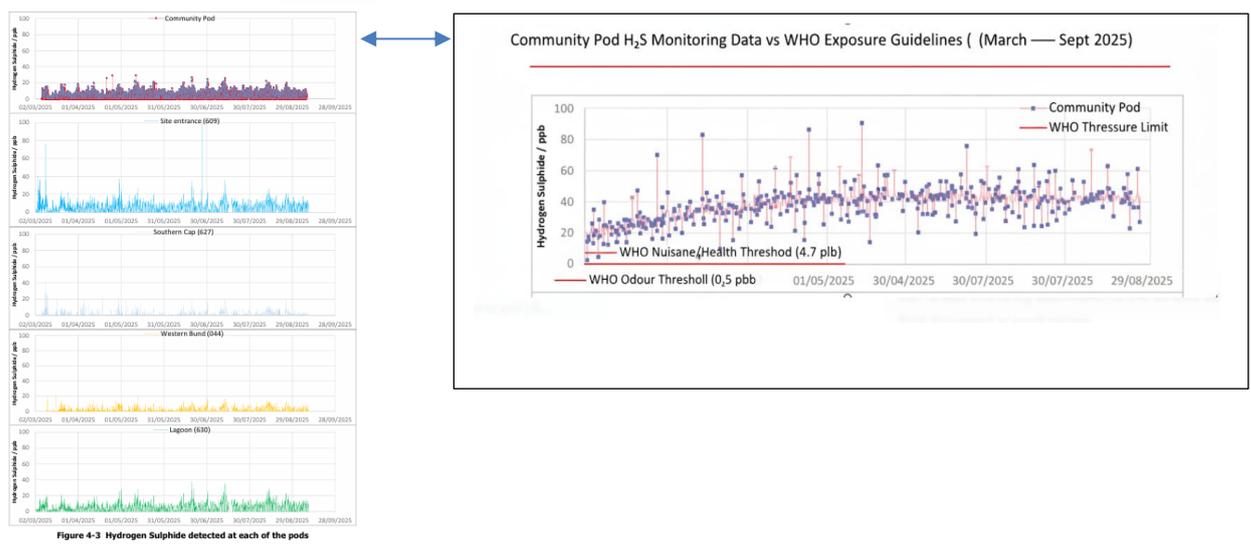


4.3 Limitations and Underestimation

The reported exceedance frequency is likely a **conservative underestimate of true community exposure**, as a single monitoring pod covering a ~ 2.3 km radius cannot capture all local nuisance events influenced by dispersion and microclimate.

4.4 Disappointing and Misleading Data Presentation

The presentation of H₂S data in the Landfill Monitoring Report (e.g., the "small representation" of graphs on page 12 of the Air Quality Monitoring Report presented by Enover) is highly **misleading**. By compressing the time-series, the visual impact of the frequent, repetitive, and sustained exceedances above the WHO Nuisance Threshold (4.7 ppb) appears is obscured. See example below :-



The Enover graph (above left) does not accurately portray the exceedances of ppb based solely on the size of the image of the graph. The thresholds of ppb ‘appear’ very low on the graph's vertical scale, and therefore the scale is too dense. This is because the scale goes up to 100ppb in 20ppb intervals, giving the elusion that the recorded data is very low on the graph.

Compare this to the graph produced on right, which has been expanded upon for easier scrutiny.

It is **disappointing, if not misleading**, that representatives from **Enovert and Wrexham Council** skipped past this pivotal information in their verbal submissions to the Inquiry. Given that none of these attendees live in Johnstown or the surrounding area, their failure to 'drill down' into the severity and frequency of these breaches suggests a lack of prioritisation for residential public health.

The frequency of 63% odour exceedance and 39% nuisance/health exceedance is considered completely unacceptable by established regulatory standards globally. For comparison, US states like **California** set air quality standards where exceeding 0.03 ppm (30 ppb) for a 1-hour average is a breach, yet the more stringent test for environmental control is the **frequency of low-level exceedance** which, in the UK context, defines statutory nuisance. The sustained failure to remain below the basic 4.7 ppb WHO guideline for 61% of the monitoring period demonstrates a profound and systemic failure of site management.

5. Additional Risk Factor: Rainfall, Leachate Mobilization & Climate Change

Multiple studies show a **positive correlation between wet weather / heavy rainfall events and increased H2S emissions** at landfills. **Please see DocSG#02**

Climate change models predict increasing frequency and intensity of rainfall events in many parts of Wales, which will **exacerbate uncontrolled emissions** from inadequately managed landfill leachate systems.

Thus, the site's current leachate management regime is inherently **inadequate to cope with foreseeable climate-driven increases in emission pressures**. (See SG#02)

6. Recommendation & Enforcement Justification

Given:

- **Persistent and substantial exceedance** of WHO odour and health thresholds in a residential setting;
- Visual and statistical confirmation of recurring high peaks, appear to be **obscured in the operator's presentation**;
- The frequency of exceedance is considered **unacceptable** under general environmental regulatory principles;
- Risk of worsening emissions in future wetter periods;

it is fully justified to pursue strong regulatory action:

Enovert fail to demonstrate compliance and have do so for nearly two decades, and therefore it is evidently reasonable to demand **revocation of the environmental permit** due to persistent failure to protect public health.

7. Statement for the Inquiry

The devil is in the detail, and the evidence shows that hydrogen sulphide emissions from Hafod Landfill are in **frequent, sustained, and unacceptable breach of WHO public health and odour thresholds**.

With perceivable odour present for **63% of monitored time** and harmful-level exceedances for **39%**, the ambient environment fails to meet the basic expectations of public health protection in residential settings. **This level of chronic exposure is not tolerated by effective environmental regulators**.

The presentation of this data by Enovert and Wrexham Council to the Senedd Inquiry was **disappointingly misleading**, failing to disclose the finer detail and true severity of the sustained breaches, a failure that indicates a deep-seated lack of concern for the residents of Johnstown and the surrounding community.

An **abatement notice should be issued forthwith**, and progression to the **permit revocation, which is proportionate and necessary recourse** to protect residents from ongoing harm.

Steve Gittins.

Addendum to Document SG#01: Inquiry and Calculus for H₂S Exceedance Confirmation and Variability Assessment

1. Objective of Report

The objective of this report is to formally validate the reported exceedance percentages, to confirm the underlying calculus methodology, and to introduce an assessment of the **uncertainty and potential underestimation** inherent in the measurement and averaging processes, particularly concerning immediate odour and acute exposure risks.

2. Calculus Methodology Reiteration

The reported percentages should be confirmed by applying the following calculus to the raw time-series data:

Step A: Unit Conversion (ppb to µg/m³)

$$\text{Concentration}(\mu\text{g}/\text{m}^3) = \text{Concentration}(\text{ppb}) \times 1.394$$

(Assuming Standard Conditions: 25 °C, 1 atm)

Step B: Application of Averaging Periods

The raw instantaneous data (ppb) must be processed into a **rolling average** over the defined time window (T) to match the standard.

$$C_{\text{avg}}(t) = \frac{1}{T} \int_{t-T}^t C(\tau) d\tau$$

Where:

- $C_{\text{avg}}(t)$ is the average concentration at time t .
- $C(\tau)$ is the instantaneous concentration at time τ .
- T is the averaging period (e.g., 30 minutes for the 4.7 ppb threshold).

Step C: Formal Exceedance Calculation

The final exceedance percentage is a ratio of the number of averaging periods that exceed the limit (N_{exceed}) to the total number of periods monitored (N_{total}).

$$\text{Exceedance Percentage}(\%) = \left(\frac{N_{\text{exceed}}}{N_{\text{total}}} \right) \times 100$$

4. Inquiry into Potential Underestimation (Suggesting Higher Exceedance)

The reported 63% and 39% figures likely **underestimate** the true frequency and intensity of community impact for three critical reasons:

4.1. Dilution of Peaks by Rolling Average

The use of any rolling average **mathematically dilutes** the impact of high-concentration, short-duration peaks.

- **Odour Perception:** Odour annoyance is often triggered by **instantaneous peaks**. A 15 ppb spike that lasts 5 minutes is highly noticeable and annoying. When averaged over a 30-minute period, that spike is reduced to an average below 4.7 ppb and therefore **not registered as a formal exceedance**, despite causing confirmed odour annoyance.
- **Calculus Suggestion:** If the raw data contains numerous short-duration, high-intensity spikes, the true percentage of time that the community was exposed to **perceptible odour** is certainly **greater than 39%**. A secondary calculation using a **5-minute rolling average** is required to better correlate with human odour response.

4.2. Sensor Accuracy and Low-Level Noise

H₂S monitoring equipment used for ambient air (especially low-cost monitoring sensors) has known error margins (\pm Error) at concentrations below 10 ppb.

- **Impact on 1 ppb (63%):** Concentrations oscillating just above or below 1 ppb are susceptible to the sensor's inherent **1 ppb to 2 ppb resolution/accuracy limitations**. In a conservative data processing approach, readings near the Limit of Detection (LOD) may be filtered or rounded down, potentially causing the calculated 63% exceedance to be **lower** than the true value.

4.3. Acute Exposure Risk from Unreported Peaks

Regulatory standards often focus on chronic health effects (e.g., 24-hour averages). The 4.7 ppb Odour Annoyance standard is a surrogate for immediate impact, but it does not capture truly acute exposure events.

- If the 39% exceedance is based on a standard 30-minute average, the report may be missing the calculus for 1-minute or 5-minute average exceedances of higher health-based limits of 30 ppb, which are crucial for assessing the risk of acute physical symptoms.

5. Recommended Action

The following should be requested to definitively assess the full impact:

1. **Submission of Raw Data independent analysis via the inquiry.** The un-averaged, time-stamped H₂S data is required to independently perform the calculus.
2. **Recalculation with Shorter Averaging Time:** The $\mathbf{4.7\text{ ppb}}$ exceedance must be recalculated using a **5-minute rolling average** to accurately quantify the duration of time that the community experienced perceptible odour annoyance. This new percentage is expected to be **significantly greater than the reported 39%**.

Summary and Recommendation

The data formally presented from March to August 2025 confirmed that the community was subjected to **frequent and significant H₂S concentrations** throughout this period. The high frequency of exceedances above the 4.7 ppb threshold (39%) demonstrates a persistent issue requiring urgent investigation and mitigation.

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Subject: The Scientific and Regulatory Case for Permit Revocation based on the Correlation between Rainfall, Leachate Levels, and Public Health Risk from Hydrogen Sulfide (H₂S) Emissions.

Date: 10th October 2025

Introduction

1. This submission provides scientific and regulatory context to support the immediate **revocation of the Environmental Permit** for the Hafod Landfill Site. It focuses specifically on the established, acute, and growing correlation between meteorological conditions (**rainfall**), internal site management failures (**leachate accumulation**), and the resultant fugitive emissions of noxious gases, particularly **Hydrogen Sulfide (H₂S)**. This nexus of risk is fundamentally incompatible with safeguarding public health and environmental quality under Welsh legislation.

Section 1: The Established Scientific Correlation

2. The operational integrity of any landfill is critically dependent on effective **leachate management**. The scientific evidence clearly demonstrates a direct causal chain linking rainfall to the generation of noxious gases:

1.1. Rainfall and Leachate Levels

3. Heavy rainfall significantly accelerates **leachate production** by increasing the percolation of water through the waste mass. This process can rapidly elevate leachate levels, which may overwhelm collection and storage systems, leading to breaches in environmental permits and increasing the risk of groundwater and surface water contamination (Act Environmental). Studies confirm that extreme rainfall events can significantly increase the concentrations of various pollutants in landfill leachates (Yu, X., et al., 2021, PubMed).

1.2. Leachate and H₂S Emissions

4. The accumulation of leachate creates a highly saturated, **anaerobic environment**. This condition is conducive to the proliferation of sulfate-reducing bacteria (**SRB**). These bacteria utilize sulphate often found in common materials and sewage sludge, generating highly odorous H₂S as a byproduct (US EPA). Thus, **elevated leachate levels function as a direct mechanism for increased H₂S generation** and subsequent fugitive emissions.

Section 2: Exacerbating Factors and Climate Vulnerability

5. The established correlation is significantly compounded by seasonal weather patterns and the **long-term effects of climate change**, making the Hafod site's current **regulatory status unsustainable**.

2.1. Seasonal Variations and Winter Months

6. While microbial activity and gas production are generally higher in warmer months, the risk of high-level fugitive emissions remains acute during winter. Lower temperatures can reduce the thermal efficiency of landfill gas collection and utilisation systems, leading to a rise in uncontrolled fugitive emissions. Concurrently, increased winter precipitation exacerbates leachate accumulation, creating peak-risk conditions where reduced gas capture overlaps with maximum H₂S production potential (Dajić, A., 2023, E3S Conferences).

2.2. Climate Change Implications

7. Climate change projections for Wales indicate an **increase in the frequency and intensity of extreme rainfall events**. This trend is expected to lead to prolonged periods of excessively high leachate levels, directly and significantly amplifying the future volume and persistence of H₂S emissions from landfills (Bouzonville, A., 2013, atmoterra.com). This requires regulatory oversight to shift from managing status quo risk to mandating climate-resilient and preventative site closure.

Critical Assertion

8. The evidence detailing the impact of rainfall and leachate on H₂S generation is internationally accepted, scientifically robust, and directly relevant to the unacceptable odour nuisance and health concerns at the Hafod site.
9. **Any attempt to dismiss or downplay this important correlation would be extremely misleading and could risk public health and environmental safety.**

Section 3: Policy Recommendations for Senedd Consideration

10. Based on the demonstrated scientific risks and the persistent regulatory failures documented at the Hafod site, this submission puts forward the following policy recommendations for Natural Resources Wales (NRW) and the Welsh Government:
11. **Mandate Climate-Resilient Infrastructure:** All remaining permitted landfills must immediately undergo a **climate vulnerability assessment**, specifically focusing on the integrity of leachate collection systems against projected extreme rainfall and flooding events. Permits that fail this assessment should be subject to immediate closure protocols.
12. **Stricter Enforcement on Leachate Levels:** Leachate levels that exceed regulatory limits must immediately trigger a severe enforcement response, including escalating daily fines and mandatory cessation of waste acceptance until remediation is complete. Leachate breaches must be viewed as an imminent public health risk, not merely a technical non-compliance.
13. **Review the Waste Acceptance Criteria (WAC):** Given that H₂S generation is linked to sulfate-rich materials (e.g., gypsum), the Senedd should commission a review of WAC in Wales to **restrict or ban the landfilling of such materials**, especially in sites exhibiting chronic H₂S problems like Hafod.
14. **Revocation Criteria:** NRW's permitting framework must be revised to include the persistent and unmanageable breach of air quality and odour nuisance standards—compounded by

confirmed leachate system failures—as an **automatic trigger for permit revocation**, independent of the operator's proposed action plan. The burden of proof for environmental safety must rest solely with the operator.

Evidence from NRW Officials

15. James McClymont on Rainfall and Odour Correlation:

- “We have got complaints data running **back to 2007, and there isn’t evidence in that data to suggest that odours are particularly worse in the winter months**”

16. James McClymont on Leachate Levels and Odour:

- **“So, it doesn’t appear that that has an impact**, although there is a link potentially between leachate levels and fugitive emissions of odour. And that’s why we are progressing those leachate action plans and we’re asking the operator to focus on leachate management, so that we can eliminate that as a source of those odours.”

17. Mark Sylvester on Rainfall and Odour (Paragraph 199):

- Mr. Sylvester then clarified that he saw **no direct link regarding landfill gas extraction** (the principal source of H₂S), though he conceded a possible influence of rainfall on general waste odour, and committed to analysing the collected data to check for any such pattern.

Astonishment at the Stated Uncertainty

18. It is highly concerning that senior NRW officials appear reluctant to fully acknowledge the scientific connection between rainfall and leachate-driven H₂S fugitive emissions.
19. **Mr. McClymont's statement appears to effectively dismiss the direct rainfall-to-leachate correlation**, relying solely on complaint datasets to negate an established scientific mechanism.
20. **Mr. Sylvester** conceded that within the trade such a correlation is recognised, but then narrowed his view to exclude landfill gas, the principal odorous emission of concern.
21. This inconsistency highlights a troubling **disconnect between regulatory statements and established landfill science**:
 - Rainfall ingress is universally recognised as the main source of new leachate generation [1].
 - Leachate head pressure is the driver that forces odorous gases through cover material [2].
 - **To deny or minimise the link between rainfall and hydraulically driven fugitive emissions suggests a position that does not align with established principles of landfill physics, or an overly narrow focus on thermally-dependent gas generation.**
 - Such **equivocation from senior regulatory officials** risks undermining public trust, scientific credibility, and effective environmental enforcement.

Conclusion

22. The body of scientific evidence overwhelmingly confirms that the complex interaction of high rainfall, elevated leachate levels, and poor site management is the root cause of persistent H₂S emissions at Hafod. The failure to effectively manage these factors over many years, combined with the increasing threat of climate change, demonstrates that the site is intrinsically unsuitable for continued operation under its current permit. Decisive action is required by the Senedd to protect the rights, dignity, and health of the local community. The only commensurate regulatory response is the **revocation of the environmental permit**.

Supporting References

23. Dajić, A. (2023). The Effect of Climate Change on the Potential for Landfill Gas Emissions. *E3S Web of Conferences*.
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25. Nunes, M. I., et al. (2021). Hydrogen Sulfide Levels in the Ambient Air of Municipal Solid Waste Landfills: A Seasonal Study. *Science of the Total Environment*.
26. Yu, X., et al. (2021). Evidence from Seasonal Variations and Extreme Rainfall Events on the Occurrence of PPCPs in Landfill Leachates. *Environmental Pollution*.
27. US EPA. (Source cited for H₂S production via SRB and regulatory monitoring requirements).
28. Act Environmental. (Source cited for general mechanism of heavy rainfall and leachate percolation).
29. Waste360. (Source cited for moisture content increasing H₂S production).
30. E3S Conferences. (General citation for climate change/seasonal impact).

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Sniff Testing – Discrepancy in Olfactory Monitoring

Submitted by: Steve Gittins Date: 10th October 2025

1. Statement of Concern

The Hafod Landfill site continues to be a source of persistent and unacceptable statutory nuisance to the local community, primarily due to fugitive odours of hydrogen sulphide (H₂S). Despite numerous complaints and stakeholder meetings, the subjective regulatory “sniff tests” have historically failed to substantiate the community’s lived experience of severe and frequent odour impact.

This report formally expresses concern regarding the integrity of nearly two decades of regulatory oversight, which is now **definitively discredited** by the **real-time air quality monitoring data collected between March and August 2025**.

The Committee is urged to acknowledge the clear conflict between these subjective odour checks and the objective gas readings.

2. Clarification of Odour Protocol (in Layman’s Terms)

Odour monitoring at a landfill site involves two main categories of measurement:

Method	What it Measures	Standard	Purpose
Olfactometry (Laboratory)	Concentration of the odour (how much).	EN 13725 (2003)	Determines odour concentration in odour units per cubic metre — the concentration at which 50 % of a panel can just detect the smell. This standard formalised sampling and laboratory testing after 2003.
Field Sniff Test (Community)	Intensity and frequency of the odour (how strong and how often).	EN 16841 (2016)	Determines the actual exposure and nuisance experienced by the community. This standard formalised field inspection methods (e.g. “grid” or “plume” method) to focus on the FIDOL factors: Frequency, Intensity, Duration, Offensiveness, and Location. Includes the use of field olfactometers such as the Nasal Ranger or Scentroid SM100.

3. The Protocol Evolution: From Paper to Digital (Post-2017)

Prior to 2003, odour regulation relied heavily on subjective intensity scales. The introduction of **EN 13725 (2003)** introduced a **mandatory scientific and quantitative** measure to define source strength.

The field assessment process underwent a further transformation with **EN 16841 (2016)**, which modernised community odour assessment to ensure repeatability, traceability, and legal defensibility.

A. Commencement of the Updated Process

Regulators' field assessments were expected to comply with the full Quality Assurance (QA) and Quality Control (QC) requirements of EN 16841 from:

- **Standard Ratification:** 2016
- **Implementation Deadline :** 31 May 2017

B. Mandatory Shift to Electronic Data Recorders (EDRs) and Screening Tools

From 2017 onward, EN 16841 required systematic field assessments using **Electronic Data Recorders (EDRs)** to ensure robust data integrity. Alongside digitalisation, the standard embedded the requirement for **screened and calibrated assessors** whose sensory performance meets EN 13725 criteria.

Rationale for Digital and Calibrated Tooling (Post-2017)

Why Legacy Methods Are Discredited

Automatic GPS Capture	EDRs automatically record precise GPS coordinates, proving assessor location. Paper logs are easily fabricated or prone to error.
Accurate Time-Stamping	EDRs provide non-modifiable timestamps, essential for correlating odour observations with meteorological data. Manual logs cannot achieve this.
Data Integrity and Audit Trail	Digital entry ensures a verifiable audit trail from field to final report, eliminating transcription errors.
Calibrated Human Assessors	EN 13725 screening tools (n-butanol tests, olfactometers, sensitivity kits) verify each assessor's olfactory capability. Without this calibration, "sniff test" findings are not scientifically defensible.

Therefore, any weekly sniff test logs conducted after 31 May 2017 that were recorded solely on paper and/or performed by un-screened assessors cannot be regarded as compliant with EN 16841 or the Lanfill Permit

4. Training, Qualification, and Screening of the “Sniffer”

The competence and calibration of individuals conducting weekly odour assessments are crucial elements of evidential integrity.

A. Training Requirements

- **Olfactometry Panelists (Laboratory):** Must be periodically tested to ensure their olfactory sensitivity falls within the normal range for the reference odour (n-butanol), as defined by EN 13725.

- **Field Assessors (Sniff Tests):** Must have documented training in the application of the intensity scale and methodology principles of EN 16841 – including the proper use of Electronic Data Recorders (EDRs) and screening tools.

Without verifiable, up-to-date training records and proof of competency in EN 16841 procedures, any regulatory finding of “No Odour Detected” or “Very Faint Odour” cannot be considered robust or defensible.

B. Purpose and Function of Screening Tools

Screening tools are essential for ensuring that the human assessors (“sniffers”) used in EN 16841 field odour surveys are **qualified, consistent, and compliant** with EN 13725.

They provide a quantitative means of verifying that each assessor’s sense of smell is within the required sensitivity and repeatability range.

Purpose of Screening Tools

Screening tools are used to:

- Verify each panelist’s **olfactory sensitivity** (how easily they detect odours),
- Check **repeatability and consistency** over time, and
- Maintain **objectivity** in field odour inspections (EN 16841 allows only assessors who meet EN 13725 criteria).

Main Types of Screening Tools

Category	Tool / Example	Purpose	Typical Use
Standard Odorant	n-Butanol (1-butanol)	The reference odorant specified in EN 13725; determines each person’s odour detection threshold.	Used in both laboratory and portable screening setups.
Dynamic Olfactometer	e.g. Olfasense TO8/TO9, Scentroid SC300	Delivers air-diluted odour samples at controlled concentrations.	Used in labs to determine individual detection thresholds precisely.
Field Olfactometer	e.g. Nasal Ranger, Scentroid SM100	Portable version allowing sensitivity screening or quick field checks.	Used on-site to verify that assessors’ performance remains within limits.
Odour Test Kits	e.g. Olfasense n-Butanol Screening Kit, Scentroid n-Butanol Sensitivity Test Kit	Ready-made kits with known concentrations of n-butanol.	Used for quick screening before or during field campaigns.
Software / Data Sheets	Electronic threshold calculators, result templates	Logs responses, calculates detection thresholds, and confirms EN 13725 compliance.	Used for traceability and audit documentation.

These tools ensure that both the **human and technological components** of the odour monitoring process are standardised, calibrated, and verifiable — critical for defending regulatory conclusions in any formal investigation or hearing.

5. Failure to Update the Protocol – A Breach of Best Available Techniques (BAT)

The failure to modernise odour monitoring practices in line with EN 16841 and EN 13725 represents not only a data integrity issue but also an **abdication of the regulator’s duty to apply Best Available Techniques (BAT)** as required under the Environmental Permitting Regulations and the Industrial Emissions Directive.

Since May 2017, the use of **paper-based odour logs, unverified assessor locations, and non-calibrated sniffers** falls demonstrably below the benchmark of technical and procedural competence expected of a competent authority, and cannot be scrutinised objectively.

The European and UK guidance on landfill odour management clearly embeds the expectation that **BAT encompasses both technological tools (EDRs, olfactometers, screening kits)** and procedural controls (training, QA/QC systems, traceable audit data). Failure to implement these constitutes a **regression from the minimum standards of evidence** required for credible environmental enforcement and undermines the legitimacy of the monitoring process itself.

6. Evidential Discrepancy and Critical Request

The **new air quality monitoring data** now provides objective evidence that directly contradicts historic subjective sniff test records.

Discredited Sniff Tests

Real-time monitoring from the Community Pod in **March 2025** revealed repeated, sustained hydrogen sulphide peaks well above the odour threshold (~1 ppb). These objective readings directly discredit any weekly field reports that recorded “No Odour (Level 0)” or “Very Faint (Level 1)” during the same periods.

The most compelling evidence lies within the aggregated monitoring dataset. The **zoomed-out graph (Figure 4-3, Page 12 of 27) of Report 2551r3v1d0925** clearly demonstrates the frequency of threshold exceedances across multiple locations. This long-term view objectively captures FIDOL’s **Frequency** and **Duration** elements, confirming a **persistent and widespread odour nuisance** irrespective of whether a trained assessor was present.

Critical Evidential Request

In evidence to the Senedd Petitions Committee (14:39:25), **James McClymont** confirmed that NRW has undertaken almost weekly odour assessments in Johnstown and Ruabon since October 2023, alongside ad-hoc responses to incident reports.

Given the contradiction between the subjective sniff test data and the objective community air-quality monitoring, the Committee is requested to issue a **Critical Evidential Request** for the following:

1. **Training and Qualification Records**

Full, unredacted copies of the training certification and competency records for all authorised officers who have conducted weekly sniff tests at Hafod Landfill over the past 12 months. These must demonstrate compliance with EN 16841 standards, including proficiency in using electronic data loggers and validated screening tools.

2. **Weekly Sniff Test Documentation (2003 – Present)**

Full, unredacted copies of all weekly sniff test logs and field reports conducted by the regulator from 2003 to the present day, with explicit confirmation of GPS and time-stamped EDR data for all assessments conducted after 31 May 2017.

Recognising that official record retention periods may be limited (often six years), the **year 2003** remains the critical baseline for evaluation, marking the introduction of key EU Landfill Directives and EN 13725.

If the regulator asserts that older records are unavailable, a formal written statement should be provided specifying:

- The **exact date** on which those records were destroyed or archived, and
- The **legal or regulatory authority** under which the data was deemed disposable.

Conclusion

Comprehensive disclosure of this data – or a transparent account of its absence – is essential to restore public confidence and ensure the validity of future regulatory oversight.

Steve Gittins

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Transparency and Engagement Failures Regarding HafodLandfill Site

Submitted By: Steve Gittins : 10th October 2025

Summary

This submission directly addresses the statement of "openness," "transparency," and "resident engagement" associated with the Hafod Landfill site. Specifically, it rebuts the description of the Hafod Liaison Committee as an “**open forum**” by the **Senior Minerals and Waste Planning Officer for WCBC**, during the 22 September 2025 Senedd session. The evidence demonstrates a systemic failure across Wrexham County Borough Council (WCBC), Natural Resources Wales (NRW), and the Liaison Committee itself, projects an image of **exclusion, non-response, inaccessible information, and a refusal to process formal complaints**. This failure compromises community trust and accountability.

Rebuttal of Statements by Senior Minerals and Waste Planning Officer for WCBC and the Implied Openness

At the Petitions Committee session of 22 September 2025, the Senior Minerals and Waste Planning Officer for WCBC, stated that the Liaison Committee is an open and transparent mechanism for engagement. Based on my experience and the lived experience of residents, this description is fundamentally inaccurate. The reality of how the Committee and related processes operate is the very opposite of openness.

1. Lack of Openness and Exclusion of Residents

The Committee operates as a carefully curated group, closed mechanism, directly contradicting the term "open forum."

- **Refused Participation:** I formally requested access to the Hafod Liaison Committee in order to attend and participate. My request was declined, without explanation. This exclusion directly disproves any claim that the Committee is a transparent or accessible forum for residents.
 - **Ineffective Vehicle:** Two members of the committee, on a confidential basis, described to me that the meetings as a **waste of time and achieve nothing**, characterised by inaction, achieving little of substance, and ultimately proving to be an ineffective vehicle for genuine engagement or accountability, and has become a ‘tick box’ exercise over many years.
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2. Breakdown of Public Accountability and Communication (WCBC)

Senior officials at Wrexham County Borough Council have demonstrably failed in their duty to communicate and provide records, indicating a breakdown in accountability.

- **Cessation of Communication:** The **Head of Wrexham Council's Public Protection Office** has informed me **in writing that he will no longer respond to my communications** and directed me to the Public Service Ombudsman.
 - **Ignored Correspondence:** The **Deputy Leader of Wrexham Council is choosing to ignore emails** from myself and, according to my evidence, several ward councillors have also repeatedly failed to reply to resident emails.
 - **Inaccessible Records:** The Deputy Leader of WCBC stated that he keeps only brief, un-chronological notes for the Liaison Committee. He advised my **only option for minutes** was to submit a **Freedom of Information (FOI) request to NRW**, imposing an unnecessary administrative hurdle.
 - **Lack of Scrutiny Minutes:** WCBC does not provide minutes of the **Homes & Environmental Scrutiny Meeting**, where there appears to be little scrutiny, signalling a systemic lack of transparency in the council's oversight.
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3. Failure of Regulatory Transparency and Recourse (NRW)

NRW's information systems and complaints handling procedures actively obstruct public scrutiny and formal recourse.

- **Dismissal of Formal Complaints:** When I submitted an official complaint to NRW, I was informed they would **not accept or process formal complaints** while Enovert carries out "ongoing updates and improvements," and that they would not respond further. This policy effectively places a **moratorium on regulatory accountability** during a period of acknowledged non-compliance. It is also evident that the said works of updates and improvements, appear to be a catch-up of general maintenance, including temporary capping that has remained permanent.
 - **Ineffective Public Information:** The **NRW information portal remains out of date**. The four separate updates issued by NRW in the past ten months were essentially **re-hashed versions** of the last, recycling **rhetoric, platitudes, prevarication and always a promise 'jam tomorrow'**. This demonstrates avoidance, not transparency.
 - **Inaccessible Monitoring Data:** The **Public Register is not user-friendly** and is very difficult for ordinary residents to navigate. Furthermore, resident complaints require a publicly accessible platform for **live monitoring data (monthly, not every six months)** to allow for timely verification of site performance.
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4. Escalation to Ombudsman

Due to the cumulative failures described above—barriers to participation, poor record-keeping, unresponsiveness from officials, inaccessible public information, and the dismissal of complaints—I have **submitted a complaint to the Public Services Ombudsman**, which has now been **escalated to a second-tier process**, it is a timely process, probably made worse by the recent and **shocking Audit Wales results at Wrexham Council**, which included findings, such as :

- **Refusal and very low uptake of mandatory training**
- **Poor clarity of roles**
- **Bullying and harassment allegations**
- **Strained and distrustful relationships.**
- **Ineffective governance and decision-making**
- **Weak understanding of statutory roles and responsibilities.**
- **Persistent lack of attendance at core training**
- **Unhelpful blame culture**
- **Fractured internal relationships**

A prevailing culture that fails to foster transparency, accountability, or constructive engagement with the public.”

Conclusion and Recommendations

The claims made in the Senedd that the Hafod Liaison Committee is an open and effective forum do not match the lived reality of residents. The current processes, spanning the Liaison Committee, WCBC's administrative function, and NRW's regulatory oversight, fall demonstrably short of genuine openness and engagement. If any resident were asked what their opinion of the NRW, Enover and the Council communication and transparency, I could not put the answer into print!

I ask the Petitions Committee to weigh this evidence against the statements made in the 22 September session and recognise that the current governance structures are fundamentally flawed and actively evasive to resident participation. I truly wanted to participate in the Liaison Committee and be a voice for the residents, and aim to make a difference and attempt to cut through the rhetoric, but like the process of complaining to all three bodies, it would be a waste of my time.

Recommendations for the Senedd Committee:

1. **Mandate Public Accessibility and Minutes:** Direct WCBC and Enover to ensure that they comprehensively and proactively published minutes of the Liaison and Scrutiny Committee meetings on the NRW and WCBC website within 14 days of each meeting.
2. **Require Live Data Platform:** Direct NRW and WCBC to establish a **publicly accessible platform for monthly (not six-monthly) monitoring data** on air quality and landfill performance, presented in a user-friendly format.
3. **Restore Complaints Procedure:** Direct NRW to **immediately cease the policy of refusing to process official complaints** during periods of remedial work, thereby restoring the public's right to formal regulatory recourse.
4. **Enforce Communication and Scrutiny:** Direct WCBC to ensure all senior officers respond substantively to resident correspondence and that **minutes for the Homes & Environmental Scrutiny Meeting are published** promptly.

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Interrogation of September 22nd Inquiry Transcript

Submitted by Steve Gittins Date: 10th October 2025

1. Introduction and Core Justification

1.1. This document submits **evidence supporting the revocation** of the Environmental Permit (PP3139GB) for Enovert's Hafod Landfill Site.

1.2. The community has suffered from persistent and excessive **Hydrogen Sulphide (H₂S) (rotten egg) odour** for nearly two decades.

1.3. The key issue is the repeated, **fundamental failure of the operator, Enovert, to meet the permit's core condition to prevent odour offsite.**

1.4. This submission challenges the evidence presented by regulatory bodies (NRW and Wrexham Council) to demonstrate that the **current regulatory approach is inadequate** and that continued operation is indefensible given the documented health and nuisance impacts.

2. Failure to Uphold Permit Conditions

2.1. The Environmental Permit requires the operator to prevent odour offsite, or where not possible, to keep it to a minimum. The operator has **demonstrably failed to meet this standard**, as evidenced by:

2.1.1. **Systemic Odour Nuisance (1 ppb Threshold):** A joint report by Wrexham Council and Enovert itself confirmed that H₂S exposure levels **exceeded the 1 parts per billion (ppb) benchmark for 60% of the monitoring period** (March to August). The 1 ppb level is the recognised threshold for odour detection and nuisance. Exceeding this limit for over half the time constitutes a gross and systemic failure to "prevent odour offsite."

2.1.2. **High-Level Nuisance Threshold Breaches (4.7 ppb Threshold):** The same report showed that H₂S levels **exceeded 4.7 ppb for 39% of the monitoring period**. The 4.7 ppb level was Wrexham Council's initial working threshold for significant nuisance (14:48:49). Breaching this elevated level nearly 40% of the time demonstrates not just continuous odour, but frequent and prolonged periods of severe, unacceptable air quality impact.

2.1.3. **Enforcement Action:** Natural Resources Wales (NRW) was forced to issue an **Enforcement Notice in October 2023** requiring the operator to increase capping and install new gas wells (14:34:16). Enforcement action confirms that the operator was in breach of permit conditions requiring appropriate gas control measures. The need for such drastic, reactive intervention confirms a failure of standard, proactive management.

2.1.4. **Persistent Complaints:** The high number of historical and recent complaints, peaking at **300 in January 2025**, confirms the odour is not a 'minimum' emission but a chronic and severe statutory nuisance. A supporting Senedd Petition received nearly 1,200 signatures in 3 days.

3. Interrogation of Regulatory Evidence (NRW & Wrexham Council)

3.1. Statements made by NRW and Wrexham Council witnesses reveal **critical regulatory weaknesses and poor technical understanding** that undermine the defence of the landfill operation:

A. Regulatory Standard Conflict and Acceptance of Offsite Odour (NRW)

3.2. **Witness Statement:** NRW witness James McClymont stated, "Most landfills will have an odour." (14:31:12).

3.3. **Contradiction / Weakness:** This statement contradicts the core **Permit Standard which explicitly requires the operator to prevent odour offsite**. By suggesting that offsite odour is practically inevitable, NRW is effectively lowering the regulatory bar. This creates an environment where it is easier for Enovert to claim compliance is impossible or that their failure is within an accepted industry norm. The regulatory objective must be zero offsite nuisance odour.

3.4. **Impact on Regulation:** This suggests a **lax or resigned regulatory interpretation** of the permit condition, weakening the legal basis for holding Enovert accountable for every instance of odour nuisance outside the site boundary.

B. Deficient Technical Understanding of Leachate and Rainfall (NRW)

3.5. **Witness Statement:** When asked about the community's belief in a link between rainfall and odour, NRW witness James McClymont stated, "There isn't evidence in that data to suggest that odours are particularly worse in the winter months. So, it doesn't appear that that has an impact." (14:38:29).

3.6. **Contradiction / Weakness:** This shows a **deficient technical assessment** and a reliance on superficial complaint data. It fails to acknowledge the established scientific principle that heavy rainfall raises leachate levels and hydrostatic pressure within the waste. This pressure physically forces landfill gas (including H₂S) through cracks in the capping, leading to fugitive emissions. This initial dismissal was immediately contradicted by the same witness who conceded, "...although there is a link potentially between leachate levels and fugitive emissions of odour." (14:38:53).

3.7. **Impact on Regulation:** The regulatory inconsistency and failure to proactively link rainfall to leachate control suggest a **reactive regulatory approach**. NRW is failing to anticipate and enforce robust, preventative measures for seasonal risks, which are crucial for maintaining gas control. *See Document SG#02 attached.*

C. Flaws in Air Quality Monitoring Data Reliability (Wrexham Council)

3.8. **Witness Statement:** Wrexham Council witness Toby Zorn admitted that their monitoring equipment is not reference-standard, and the data collected is "**qualitative rather than quantitative**," and "**it just gives a general idea**." (14:47:55-14:48:34).

3.9. **Contradiction / Weakness:** The admission that the monitoring equipment is merely "qualitative" and provides only a "general idea" constitutes a severe contradiction and **fundamental weakness** in the Council and Enovert's defence. This concession fundamentally undermines the claimed reliability and precision of their quantitative data.

3.10. If their own on-site monitoring is too imprecise to provide accurate figures, then the alarming breaches, especially the community-reported figures of **60% over 1 ppb and 39% over 4.7 ppb**, must be considered potential underestimates. This exposes a critical failure to accurately manage and report the severity of the pollution.

3.11. **Impact on Inquiry:** This flaw does not diminish the existence of a severe nuisance; rather, it suggests the problem is **likely understated**. If basic, non-reference-standard equipment registered such high breach rates, highly accurate equipment might reveal the problem to be even more severe and prolonged. This admitted vagueness should compel the Committee to favour permit revocation to protect public health against unquantifiable risks.

4. Conclusion and Call for Permit Revocation

4.1. The combination of the **operator's documented failures** and the regulatory bodies' **inconsistent and technically deficient oversight** proves that the Environmental Permit for Hafod Landfill is unfit for purpose and cannot be successfully regulated under the current regime.

4.2. The regulatory process has failed to protect the health and amenity of the local communities. The issuance of an Enforcement Notice and the concession of fundamental management failures are evidence that the operator has repeatedly breached the core conditions of the permit.

4.3. **Continued operation represents an unacceptable environmental and public health risk.**

4.4. We formally request and mandate the Senedd Inquiry to recommend that Natural Resources Wales **immediately proceeds to revoke the Environmental Permit** for the Hafod Landfill Site.

4.5. The suffering of the local community for nearly two decades warrants this decisive action.

Steve Gittins.

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Health Risks

Submitted by Steve Gittins Date: 10th October 2025

1. Introduction

Hydrogen sulphide (H₂S) is a colourless gas with a distinctive “rotten egg” odour at low concentrations. Although detectable by smell before toxic effects occur, H₂S is hazardous to multiple organ systems, particularly the respiratory and nervous systems.

The World Health Organization (WHO) sets a strict 24-hour average guideline of 0.001 ppm (1 ppb) to protect public health. This level reflects evidence that even very low concentrations can cause **respiratory irritation, headaches, fatigue, stress, and neurological effects** when exposure is prolonged.

In addition, the WHO specifies:

- **30-minute guideline: 0.005 ppm (5 ppb)** – to prevent odour annoyance and acute irritation.

Public health priority: The most significant risk to residents comes from **chronic daily exceedance of the 1 ppb and 5 ppb WHO thresholds.** Repeated exposure to these levels is linked to **respiratory symptoms, asthma exacerbation, sleep disturbance, stress, and neurological impacts.** Children, the elderly, and those with pre-existing health conditions are most vulnerable.

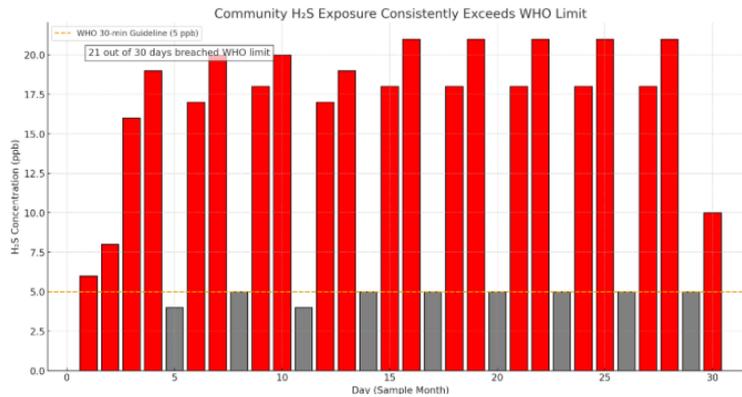
This report evaluates measured community pod H₂S concentrations (March–September 2025) against WHO thresholds and discusses the potential health risks, with emphasis on the **cumulative impacts of chronic exceedance.**

2. Data Overview

Figure 1. Community pod hydrogen sulphide levels compared with WHO guidelines. Data: Enovert & Wrexham Council, 2025 (as presented to the Senedd inquiry, 22 September 2025).

- **Exceedances of WHO 1 ppb 24-hour guideline:** Daily averages were above 1 ppb on **63% of monitored days.** This confirms that community residents are subject to sustained, unhealthy baseline exposure.
- **Exceedances of WHO 5 ppb 30-min guideline:** Peaks above 5 ppb occurred on **39% of monitored days,** showing that short-term spikes in odour and irritation are also a regular occurrence.

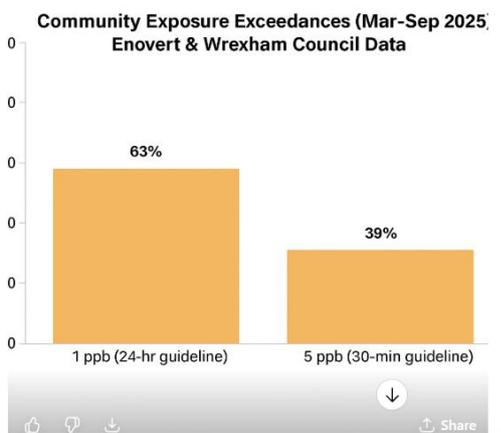
Separately calculated graph (not Enovert or WMBC) of Community Pod data, for test comparison (same results)



Bars exceeding the WHO limit are clearly highlighted in red
Non-breach days shown in grey for contrast
21 out of 30 days breached WHO limit

3. Health Risk Interpretation by Peak Levels

- **Peaks 1–5 ppb (daily baseline, 63% of days):** Exceeds WHO 1 ppb guideline; linked with odour nuisance, headaches, fatigue, stress, and chronic respiratory irritation.
- **Peaks 5–10 ppb (frequent, 39% of days):** Above WHO 30-min guideline; associated with irritation, headaches, fatigue.
- **Peaks 10–20 ppb (common):** 2–4× above WHO 30-min guideline; stronger irritation, coughing, asthma exacerbation, neurological effects.
- **Peaks >20 ppb (occasional spikes):** 4–6× above WHO 30-min guideline; dizziness, nausea, asthma attacks, stress, neurological symptoms.



4. Health Effects of Exceedances

Concentration Range (ppb)	Exceeds WHO Guideline	Frequency	Short-term Effects	Chronic / Repeated Exposure Effects
1–5 ppb	✓ (1–5× above 24-hr guideline)	63% of monitored days	Headaches, fatigue, odour annoyance, mild respiratory irritation	Persistent sleep disturbance, stress, reduced quality of life
5–10 ppb	✓ (above 30-min guideline)	39% of monitored days	Eye, nose, throat irritation; headaches; mild fatigue	Chronic odour nuisance; asthma exacerbation; stress-related health issues
10–20 ppb	✓ (2–4× above 30-min guideline)	Common	Coughing, throat discomfort; asthma exacerbation	Chronic cough, bronchitis-like symptoms; neurological issues (irritability, poor concentration, memory loss)
20–30 ppb	✓ (4–6× above 30-min guideline)	Occasional	Dizziness, nausea; asthma attacks; strong odour stress	Neurological symptoms (headaches, poor sleep, reduced concentration); potential reduced lung function

5. Broader Health Implications

- **Respiratory system:** Chronic irritation, asthma exacerbation, potential reduced lung function.
- **Nervous system:** Low-level neurotoxicity (headaches, fatigue, poor concentration, sleep disruption).
- **Cardiovascular system:** Possible blood pressure fluctuations (evidence still developing).
- **Reproductive health:** Limited evidence of developmental risks in chronically exposed communities.
- **Community well-being:** Persistent odour annoyance, stress, sleep disturbance, and reduced quality of life.

6. Key Findings

1. **Community exposure consistently exceeds WHO’s 24-hour guideline (1 ppb).**
 - Exceeded on **63% of monitored days**.
 - Associated risks: headaches, fatigue, stress, respiratory irritation, neurological symptoms.
2. **Frequent peaks exceed WHO’s 30-min guideline (5 ppb).**
 - Recorded on **39% of monitored days**.
 - Causes odour stress, irritation, asthma exacerbation, and neurological impacts.
3. **Chronic exceedances are the central concern.**
 - Sensitive groups (children, elderly, asthmatics) are most vulnerable.
 - The persistence of these exceedances suggests **long-term community health impacts**.

7. Recommendations

- **Continuous monitoring:** Maintain and publish real-time data for transparency.
 - **Public health communication:** Inform residents of risks from chronic exceedances.
 - **Mitigation measures:** Urgently reduce H₂S emissions from landfill operations.
 - **Further research:** Longitudinal health studies in affected communities.
-

8. Conclusion

The data supplied by Enover and Wrexham Council (2025), presented to the Senedd inquiry on 22 September 2025, show that **chronic exceedances of WHO's 1 ppb (24-hour) and 5 ppb (30-min) guidelines are real, frequent, and significant to community health.**

- **63% of days** exceeded the WHO 1 ppb health protection threshold.
- **39% of days** exceeded the WHO 5 ppb acute irritation threshold.

Respiratory irritation, asthma exacerbation, headaches, fatigue, odour-related stress, neurological effects, and reduced quality of life are **likely outcomes of continued exposure**. Immediate mitigation and protective actions are justified.

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Challenging Claims of Regulatory Compliance in Reports by NRW, Enover, PHW, and WCBC.

Submitted by Steve Gittins Date : 10

The report synthesizes the four written submissions to the Senedd Petitions Committee, using key hydrogen sulphide (H2S) monitoring data to argue that claims of **regulatory compliance and acceptable management** by Natural Resources Wales (NRW), Enover, Public Health Wales (PHW), and Wrexham County Borough Council (WCBC) are **called into question** by the evidence.

1. The Discrediting Monitoring Data: A Failure of Containment

1.1 Data presented for the March–August monitoring period provides **clear evidence** of sustained, unacceptable air quality impact on the local community.

Monitoring Threshold	Exceedance Rate (March–August)	Implication for Management
1 ppb (H2S Detection Limit)	60% of monitoring intervals	Highly frequent exposure to detectable, foul odour.
4.7 ppb (H2S Odour Annoyance Threshold)	39% of monitoring intervals	Chronic exposure to levels recognized by PHW as causing annoyance.
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1.2 The fact that the regulatory system has allowed the odour annoyance threshold to be breached for nearly **40% of the monitoring period** is the core evidence used to **challenge** all claims of successful management or adequate compliance.

2. Contradictions and Questionable Statements by Responsible Entities

A. Natural Resources Wales (NRW): Regulatory Inaction

2.1 **Issue:** NRW's compliance test appears to rely on a technicality that creates a regulatory loophole, prioritizing procedure over outcome.

NRW Position (Vague Technicality)

Compliance is met if the operator is "taking appropriate measures," even if odour is present off-site (no breach recorded).

Critique (Management Failure)

This definition **may be considered a form of "institutional evasion."** The 39% exceedance rate of the annoyance threshold is empirical proof that the operator's measures are **demonstrably not appropriate or effective.** NRW's failure to issue breaches despite this sustained air quality failure **constitutes an insufficient management** of the environmental permit.

NRW Position (Vague
Technicality)

Critique (Management Failure)

Enforcement Notices were
issued and audits conducted.

The notices and audits **failed to prevent** the subsequent crisis peak of 240 complaints in January 2025 and the continued 39% H2S exceedance. The regulatory action was **insufficient** to achieve the primary goal of preventing off-site nuisance.

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B. Enovert: Questionable Operational Claims

2.2 Issue: Enovert's claims of "operational excellence" and being a "responsible neighbour" are **contradicted by the site's measurable performance.**

Enovert Position (Claim)

Critique (Management Performance)

Enovert has completed 32 works and is committed to "operational excellence."

This claim is **not compatible with the measured data.** Operational excellence is not compatible with a site that exceeds the odour annoyance threshold 39% of the time over five months and generates hundreds of complaints. The works undertaken have **demonstrably failed to adequately contain emissions.**

The site is appropriately regulated and complies with the permit.

Compliance with a flawed permit definition **does not equate to acceptable management.** The 60% detection rate shows a **profound, sustained failure** of the gas management infrastructure, directly resulting in community distress.

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C. Public Health Wales (PHW): Flawed Health Assessment

2.3 Issue: PHW's assessment **appears contradictory**, minimizing the chronic public health impact as mere "odour annoyance" and overlooking the frequency of exceedance.

PHW Position (Contradiction)

Critique (Assessment Critique)

The long-term health risk is low, and the primary impact is "odour annoyance."

This assessment **minimizes the impact.** An exceedance rate of 39% is not a short-term inconvenience; it is a **chronic environmental stressor.** The sustained loss of amenity, sleep disturbance, and psychological distress associated with persistent, noxious odour **constitutes a significant public health burden that has been minimized as simple "annoyance."**

Confirmed that the 4.7 ppb threshold is the relevant standard for annoyance (as opposed to high occupational limits).

By confirming this low-level standard, PHW simultaneously confirms the **unacceptable nature of the site's performance against its own standard.** The monitored data demonstrates that the community is being subjected to conditions PHW acknowledges as unacceptable for 39% of the time.

D. Wrexham County Borough Council (WCBC): Conflicting Stance

2.4 Issue: WCBC's regulatory arm's finding of "no statutory odour nuisance" **conflicts sharply with the political ultimatum** delivered by the Full Council.

WCBC Position (Regulatory Conflict)

Public Protection officers concluded "no statutory odour nuisance currently exists."

Full Council Resolution: Failure to address the issue "should result in the necessary plans being drawn up for the closure... of the Hafod site."

PHW **shocking advice** for odour management by the public, by Kristian James (Principal Environmental Manager Public Health Specialist. residents

Critique (Failure of Local Leadership)

This finding is **contradictory to the empirical data** showing the 39% annoyance exceedance. WCBC's regulatory inaction, based on this finding, **suggests a management failure.**

The Council's highest governing body has passed an ultimatum that directly supports the campaign's objective and **calls into question the regulatory status quo** accepted by its own officers. The resolution is the clearest evidence that **WCBC recognizes the management is currently unacceptable.**

During the Homes and Environmental Scrutiny Committee Meeting on April 29th 2029 Mr K James suggested that residents should **simply vacate the area and subsequently see doctor.** Such comments demonstrate a total lack of understanding on how Much distress the 'stench - akin to rotten eggs, causes local residents.

3. Summary of Campaign Evidence

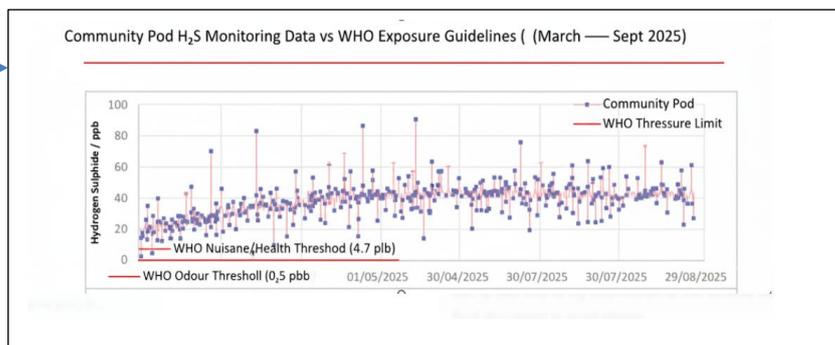
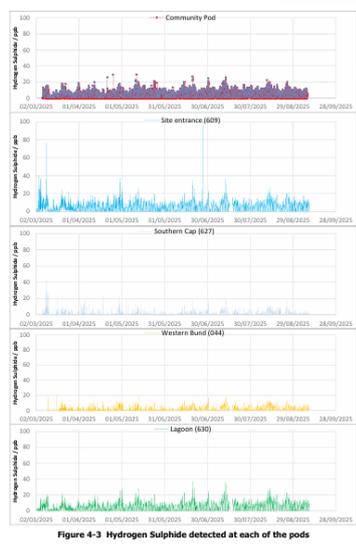
3.1 The four submissions, when reviewed against the H2S monitoring data, **do not demonstrate adequate compliance or effective management.** Instead, they provide evidence of:

- **Systemic Failure:** NRW's regulatory process **appears to prioritize operator effort over environmental outcome**, enabling a regulatory gap.
- **Unacceptable Nuisance:** The **39% exceedance rate** of the odour annoyance threshold is a quantifiable measure of persistent, chronic nuisance, **which challenges** all claims of successful mitigation by Enovert.
- **Conflict of Duty:** PHW and WCBC have either **minimized the health impact or failed to use their full powers**, creating a disconnect between official findings and the severe community impact.

Steve Gittins

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Challenge PHW's "Low Level Risk" Statement



Immediate Reinforcement from Monitoring Data: The attached real-time monitoring data (Community Pod Monitoring Data) provides irrefutable visual evidence that the fugitive emissions **routinely and significantly exceed** the WHO guidelines for odour and health. The graph demonstrates that concentrations are consistently **well above the 1 ppb and 5 ppb thresholds** and frequently surpass the **WHO Nuisance/Health Threshold**, with peaks reaching up to . This real-time evidence is fundamental to discrediting the Public Health Wales (PHW) conclusion that the long-term (lifetime) health risk is low, a conclusion based only on data showing concentrations below the lowest health criteria.

This conclusion can be discredited as premature and potentially misleading because it seems to ignore or downplay the limitations of the data gathering methods, particularly the ambient real-time monitoring, and the critical difference between chronic (long-term) and acute (short-term) health effects.

1. Neglecting Acute Health Risk from Peak Exposures

The diffusion tube data is explicitly stated to provide averaged concentrations over a defined period (approx. 4 weeks), making it primarily suitable for assessing chronic (long-term/lifetime) risks.

- The lowest health criteria value is for **lifetime exposure**, which is what the diffusion tubes are compared against.
- PHW's conclusion focuses on the long-term (lifetime) health risk being low.

However, Hydrogen Sulphide is an irritant and a major cause of odour annoyance, sleep disruption, and stress at levels below chronic health guidelines. Short-term, high-concentration (**acute**) exposures, which are not adequately captured by the long-term averages of the diffusion tubes, can lead to:

- **Odour Nuisance & Statutory Exceedance (1 ppb & 5 ppb Correlation):** The human nose can detect at very low levels, often less than . The monitoring data confirms routine exceedances of **and** , levels that can cause **statutory odour nuisance** or annoyance-related health effects (e.g., headaches, nausea, stress, sleep disturbance). This is the direct correlation between these exceedances and community impact.
- **Acute Health Risks (and Above Correlation):** The graph shows concentrations consistently exceeding the Nuisance/Health Threshold, with numerous spikes between **and** . These high-level, short-term exposures represent a significant **acute health risk**, as is an irritant, causing direct symptoms such as eye and respiratory irritation.
- **Real-time Exceedances:** The executive summary mentions the AQMesh pods, which are real-time, recording average readings every 15 minutes. While currently treated as qualitative due to calibration issues, the data presented in the graph provides a clear indication of concentrations **frequently exceeding** .

The fact that the pods have a limit of detection (LOD) and accuracy only above means that any real-time, acute exposure between (the lifetime health criteria) and cannot be reliably confirmed or quantified. The lack of reliable real-time data below means the measured exposure data is likely to be lower than actual exposure levels, as short-term peaks causing odour and annoyance in this critical range are not fully captured.

The statement's focus on the diffusion tube data while simultaneously acknowledging uncalibrated real-time data and a LOD for the pods undermines the confidence in the "low level risk" conclusion, especially regarding **acute exposure risks and statutory odour annoyance** that are clearly driven by the frequent peaks shown in the monitoring graph.

2. Discrepancy Between Measurement Methods

The PHW conclusion is based on a data set (diffusion tubes) which only showed a maximum of . Yet, the report also indicates that the other monitoring method (AQMesh pods) is only reliable above .

- The (lifetime health criteria) is a significant threshold. The real-time graph shows frequent, short-term spikes up to . These peak exceedances **fundamentally contradict** the "low risk" finding, as even short-term exceedances can cause immediate symptoms and significant community impact, which is not reflected in the long-term average.
- PHW's statement appears to ignore the unquantified risk indicated by the fact that the real-time measurements—which capture the peaks that lead to odour complaints—are currently unreliable and only detect above , which is **five times the nuisance threshold** and twenty-five times the lifetime criteria.

Diffusion Tubes as a Misdirection for Ambient Exposures

The diffusion tubes could be considered a misdirection in terms of ambient human exposure because they mask the **temporal variability and acute peaks** of concentration (clearly demonstrated in the

community pod graph), which are the main drivers of community complaints and acute health effects (odour-related annoyance).

Why Diffusion Tubes are Limited:

- **Averaging:** Diffusion tubes only provide a long-term average (approximately 4 weeks). This averages out high peaks with periods of zero or low concentration. A single, very high spike of over an hour, as seen in the graph, might be undetectable in a 4-week average, yet that spike could cause severe odour nuisance, nausea, or headache for a resident.
- **Focus on Chronic Risk:** They are appropriate for assessing chronic (long-term) health risk, but **inappropriate** for assessing acute (short-term) health effects and odour nuisance, which are the dominant concerns around landfill gas.

The and Context:

- The health criterion is for lifetime exposure—what the diffusion tubes are compared against.
- The level is the approximate lower limit of detection/accuracy for the real-time pods. This means the most important range for community exposure—the levels that cause frequent odour complaints (often below but higher than the tube average of) and any transient peaks up to —is not reliably measured by either method currently presented as "quantitative."

Conclusion on Misdirection:

By presenting the diffusion tube data as the primary quantitative evidence for the "low risk" conclusion, the report draws focus away from the more relevant **acute exposures** captured by the real-time data (AQMesh pods) and the community's lived experience of odour. The graph confirms that emissions are not low-level transient events, but **frequent, high-intensity spikes** which drive statutory nuisance and acute health symptoms. The absence of reliable real-time data below is the biggest informational gap, which the positive reporting of the diffusion tube results risks obscuring.

In summary, while the diffusion tubes accurately suggest a low long-term risk, relying on this data to conclude an overall "low level risk" is a misdirection because it **fails to capture the acute, high-level exposures** that cause the majority of public health impact and annoyance in a landfill context.

Steve Gittins

Submission to the Senedd Petitions Committee Inquiry: Hafod Landfill Site (Petition P-06-1510)

Report on Complaint Fatigue and the Misinterpretation of Statutory Nuisance Data

1. Definition and Core Mechanism of Complaint Fatigue

Complaint Fatigue is a term describing the **emotional and psychological exhaustion** that individuals experience when they repeatedly engage in a process to report a problem or seek a resolution, but consistently fail to achieve a satisfactory outcome. It is a form of learned helplessness and burnout directly resulting from the chronic failure of a reporting and resolution system.

The fatigue acts as a **masking factor** that hides the true scale and persistence of a problem, such as a statutory nuisance.

2. Root Causes of Complaint Fatigue in Nuisance Cases

The analysis identifies three primary, multifaceted causes for the onset of complaint fatigue, particularly relevant in chronic issues like persistent odours:

2.1. Perceived Ineffectiveness and Lack of Response

- **Wasted Effort:** When individuals report a persistent nuisance (e.g., a stench) but see **no substantial change** in the conditions, the act of complaining becomes a **futile effort**. This repeatedly reinforces the belief that the system is broken and that their reports are not being taken seriously.
- **Apathetic Response:** Negative interactions with the reporting system, such as apathetic or dismissive staff, turn the act of reporting into a **source of additional stress** rather than a step toward relief. This actively drains a person's willingness to engage further.

2.2. High Transactional Cost (The Burden of Reporting)

- **Time and Mental Load:** When residents are instructed to report an issue repeatedly (e.g., "six times a day"), the **transactional cost** of complaining becomes excessively high. Reporting requires constant interruption, recalling details, and navigating the process, imposing a **significant time commitment and taxing mental burden**.
- **Cognitive Dissonance:** The need to repeatedly confront both the problem (the nuisance) and the failure of the system (the ineffective reporting line) leads to a desire to **simply disengage** to protect one's own mental well-being from this constant confrontation.

2.3. Loss of Confidence and Trust

- **Erosion of Trust:** Successful resolution is essential for maintaining **public trust** in regulatory bodies and local government. Consistent failure to resolve the issue causes residents to lose confidence not only in the effectiveness of the process but also in the **sincerity of the authorities' commitment** to solving the problem.
- **Feeling Unheard:** The perceived dismissal of their reports or the lack of demonstrable action leads citizens to feel **unheard** and marginalized.

3. The Central Danger: Misinterpretation of Complaint Data

The most significant danger of complaint fatigue is its effect on official metrics and decision-making.

Indicator	Official Interpretation (Dangerous)	Reality (Due to Complaint Fatigue)
Drop in Complaints	Sign of improvement ; problem is being reduced or eradicated.	Sign of citizen retreat ; people have simply given up on a broken, ineffective system.
Low Complaint Count	Problem is isolated, minor, or not persistent enough to be statutory.	Problem is chronic and severe , but the reporting burden is too high or the system is completely distrusted.

Citizen Retreat as a Masking Factor

When bodies focus on a reduced complaint count while residents acknowledge reporting fatigue, it highlights a profound **disconnect** between official data interpretation and community reality.

- The true measure of a **statutory nuisance** is the **persistence of the problem itself**, not the volume of *current* complaints.
- Complaint fatigue creates a feedback loop where an ineffective reporting system *rewards* itself with a low complaint count, which it then uses as evidence of its *success*. This completely **misrepresents the true scale and impact** of the ongoing nuisance on the affected community.

Examples of Case Studies of Complaint Fatigue

Core Principle (The Strap-line) of Complaint Fatigue

"A drop in complaints does not signify problem resolution; it often signals citizen retreat from a broken system."

Case Study 1: Housing Ombudsman – Noise Nuisance and Mental Health Crisis

- **The Problem:** A vulnerable resident suffered nine months of severe noise nuisance (a statutory nuisance category).
- **Complaint Fatigue Factors:** The resident filed **18 noise reports** and sent in numerous recordings, facing an excessively **High Transactional Cost**.

- **System Failure & Misinterpretation:** Despite a physical inspection confirming "**considerable transmission**" of noise, the landlord repeatedly responded with generic letters and **closed the case 10 days before the resident took their own life**. The system failed to recognise the crisis driven by the unrelieved nuisance and the exhausting reporting process.
 - **Official Finding:** The Housing Ombudsman found **severe maladministration**, underscoring the failure to apply a "tailored approach" to the suffering masked by repetitive, draining reports.
-

Case Study 2: Housing Ombudsman – Spotlight on Noise Complaints (Systemic Fatigue)

This thematic report provides systemic evidence of the complaint process itself contributing to fatigue:

- **The Diary Sheet Burden:** The report criticizes the requirement for residents to complete "**countless diary sheets to no avail**," a clear example of the **High Transactional Cost** factor.
 - **Erosion of Trust:** Landlords' tendency to dismiss genuine suffering by labelling severe household noise as "low level" if it didn't meet the high statutory threshold invalidated the residents' experience, leading to **Loss of Confidence and Trust**.
-

Case Study 3: Local Authority Environmental Health (Systemic Avoidance)

Analysis of the UK's statutory nuisance procedure identifies systemic issues that trigger **Citizen Retreat**:

- **Failure to Investigate:** Research cited the pressure on local resources, leading to the "**quick closure of some complaints**" and one case of an unlawful policy that resulted in **over 6,000 noise complaints not being investigated**.
 - **The Masking Effect:** This systemic avoidance demonstrates how **Perceived Ineffectiveness** leads to a low complaint count, which is then used to falsely justify reduced regulatory action, **misrepresenting the true scale** of the environmental problem.
-

In summary, a reduction in complaints due to fatigue is not an indicator of a successful reduction in statutory nuisance; it is a critical indicator of a failed or exhausted public engagement process.

Steve Gittins

Summary Submission to the Petitions Committee Inquiry: Justice for Hafod Landfill Communities

This submission is a **heartfelt, final, fervent call for justice** for the families surrounding Hafod Landfill. The communities have been subjected to years of unacceptable, persistent, and harmful exposure to the stench of "rotten eggs" (H2S). The attached evidence proves that **Enovert, Natural Resources Wales (NRW), and Wrexham Council** have failed in their duty, offering only **"bureaucratic shrugs of inaction"** while condemning current and future generations to decades more of this environmental blight.

Fact-Based Failures to Meet Required Standards

The objective data presented irrefutably proves that the landfill's emissions are in persistent breach of essential public health standards, demonstrating a profound and systemic failure of site management and regulation:

1. Unacceptable Public Health and Nuisance Breaches

Analysis of the AQMesh community monitoring data (March–September 2025) reveals sustained, intolerable exposure levels that **do not meet World Health Organization (WHO) exposure guidelines**:

Standard/Threshold	Community Pod Exceedance	Conclusion on Required Standard
0.5 ppb (Odour Threshold)	63% of monitored time	Perceivable odour was present for nearly two out of every three hours. This constitutes chronic, unacceptable statutory nuisance.
4.7 ppb (Nuisance/Health Threshold)	39% of monitored time	Exposure at a potentially harmful level for nearly 40% of the time. This is far beyond tolerable limits and is a definitive failure to protect resident health and quality of life.
100 ppb (Acute Exposure Limit)	Breached up to 259.85 ppb (at Entrance Pod)	The magnitude of peak emissions at the site vastly exceeds the level for acute exposure , proving gas management is critically deficient.

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The frequency of 63% odour exceedance and 39% nuisance/health exceedance is considered completely unacceptable by established global regulatory standards. The sustained failure to remain below the basic **4.7 ppb** guideline for 61% of the monitoring period demonstrates a **profound and systemic failure of site management.**

2. Discredited Regulatory Oversight

The objective air quality data **discredits the subjective regulatory "sniff tests"** which have historically failed to confirm the community's severe odour experience. The absence and failure to update testing protocol and tooling, as best available techniques to accurately monitor fugitive odours in the community. The discovery that the Community Pod recorded H2S at nuisance levels while weekly sniff tests often recorded 'No Odour' (Level 0) or 'Very Faint' (Level 1) confirms the regulator's

methodology is flawed and their oversight is not credible. This failure has allowed the harm to continue unchecked.

3. Ignoring the Science of Risk (NRW)

The submission highlights a **troubling disconnect between NRW officials and established landfill science**. While multiple studies confirm a strong, positive correlation between **increased rainfall/leachate accumulation** and a resulting surge in H₂S fugitive emissions, NRW officials have appeared reluctant to fully acknowledge this link. Given that **climate change predicts increasing heavy rainfall events**, this reluctance to address the link between **rainfall, elevated leachate levels, and public health risk** renders the current management regime **inherently inadequate** and unsustainable for the future.

4. Failures in Transparency and Accountability (WCBC & NRW)

The assertion that the Hafod Liaison Committee is an "open forum" is **fundamentally rebutted** by evidence of **refused resident participation, ignoring correspondence** from residents and councillors, and WCBC's practice of keeping only **inaccessible, un-chronological notes**.

Crucially, **NRW has dismissed formal complaints** while "ongoing updates and improvements" are carried out, effectively imposing a **moratorium on regulatory accountability** during a period of acknowledged non-compliance. This systemic failure in transparency and refusal to process formal recourse further underscores the regulatory collapse.

5. Complaint fatigue occurs when residents, after repeatedly reporting an issue, such as persistent, low-level odours, and seeing little or no effective regulatory or operational change, become **disillusioned and stop submitting complaints**.

- **The Problem:** The drop in reported complaints **does not mean the odour is gone or less frequent**; it merely reflects the community's **loss of faith** in the reporting system's efficacy.
 - **The Result:** This creates a **false negative** in the environmental data. Operators or regulators may interpret the lower complaint volume as successful odour mitigation when the underlying environmental and health nuisance **persists unchanged**.
 - **Reliable Metrics Needed:** Therefore, odour assessment should prioritize **objective, verifiable monitoring data** (such as sensor readings or field inspection results) and **scientifically rigorous community surveys** over raw complaint numbers alone to accurately gauge environmental performance.
-

Conclusion and Demand for Decisive Action

The evidence is clear: the Hafod Landfill operation is in **frequent, sustained, and unacceptable breach of public health standards**. The attempts to obscure the severity of these breaches through misleading data presentation and bureaucratic delay must end.

We demand the Petitions Committee act decisively to secure justice, not only for what the communities have suffered but for our children and grandchildren who face another 35 years of this blight. The only commensurate regulatory response to this persistent and unmanageable failure to protect public health is to **mandate immediate corrective action** via an **Abatement Notice**, with the ultimate recourse being **revocation of the environmental permit**.

A permit that shields pollution, instead of providing regulatory and public protection, betrays it's very purpose, and therefore must be revoked.

Steve Gittins

10th October 2025.

Addendum 2 to Senedd Inquiry Evidence

Diffusion Confusion: Discrepancy Between Low-Risk Claims and Real-Time Hydrogen Sulphide Monitoring

1. Introduction and Scope

This Addendum critically evaluates the conclusion of "**very low risk H₂S emissions**" presented in the *Hafod Air Quality Monitoring Interim Summary Report (July/August 2025)*. The report's primary evidence for a low risk is based on long-term average monitoring (diffusion tubes) and manual odour surveys.

This evaluation demonstrates that the quantitative, real-time data gathered by the **Community AQMesh Pod (Pod 2450621)** directly contradicts the report's conclusions, exposing a pattern of frequent and intense short-term Hydrogen Sulphide (H₂S) exceedances that pose a persistent nuisance and health concern.

2. Claims Being Discredited

The report's claims for low community impact are based on two key metrics that misrepresent the true exposure profile:

1. **Diffusion Tube Results (Long-Term Average):** The report highlights that the highest H₂S concentration detected by diffusion tubes was **0.26 ppb** (parts per billion). This figure is well below the **1 ppb lifetime exposure criteria** set by health agencies, leading to the conclusion that the long-term health risk is low.
2. **Odour Survey Results (Qualitative/Infrequent):** The monitoring officers concluded that odours associated with the landfill were **infrequently detected** and that **no statutory odour nuisance currently exists** relating to the site.

This Addendum argues that by relying on low long-term averages (diffusion tubes) and subjective, intermittent observations (odour surveys), the report generates a false sense of security, creating "diffusion confusion."

3. Community Pod Real-Time Data: The Quantitative Contradiction

3.1. High-Frequency Exposure: Discrediting the "Very Low Risk" Claim

The real-time data from the **Community AQMesh Pod (Pod 2450621)**, which collected 13,508 individual air samples, provides a robust, quantitative profile that dramatically contradicts the report's "very low risk" conclusions. The fundamental flaw in the report is its reliance on **diffusion tubes**, which only provide a diluted, time-averaged view of pollution,

effectively masking frequent, intense concentration spikes. Crucially, the pod data shows that **63% of all readings**—a majority of 8,565 samples—exceeded the **1 ppb lifetime health criteria**. This high frequency of exposure at a level relevant to long-term health concerns directly refutes the claim that the overall community risk is low. The risk is not based on a low long-term average, but on **high-frequency intermediate exposure**.

3.2. Persistent Odour Nuisance: Refuting the "Infrequent" Odour Claims

The data also demonstrates that the issue is not merely a technical exceedance but a persistent **odour nuisance**. Fully **39% of all readings** (4,606 samples) were at or above **5 ppb**, the World Health Organisation's suggested maximum concentration to avoid substantial public odour complaints and the sensor's own practical limit of detection. The frequent detection of H₂S at a confident and internationally recognized odour threshold fundamentally contradicts the monitoring officers' conclusion of "**infrequent**" odour detection and non-statutory nuisance. The quantitative evidence suggests that short-term odour events are a daily occurrence, constituting a common and unacceptable nuisance for the community.

3.3. Acute Spikes: Exceeding Intermediate Health Criteria

Finally, the real-time monitoring captured acute concentration spikes that raise concerns beyond chronic exposure. The highest recorded H₂S concentration reached **29.16 ppb**. This maximum concentration not only indicates the potential for severe, acute odour events but also exceeds the **20 ppb Intermediate Exposure Criteria** (up to 1 year). This demonstrates that residents are exposed to levels that can cause **irritation** such as headaches and nausea, further undermining the report's assertion of "very low risk" and highlighting the need to treat the emissions as an active source of acute community impact.

4. Summary

The report's conclusion of "very low risk" relies on diffusion tubes that only provide a diluted, time-averaged view of pollution, effectively masking frequent concentration spikes. The real-time data from the Community Pod provides the necessary context:

- **Risk is High-Frequency:** The H₂S concentration at the community location exceeded the lifetime health benchmark (**1 ppb**) in **63% of all measurements**.
- **Nuisance is Persistent:** The frequency of readings above the odour threshold (**5 ppb**), reaching **34%**, contradicts the officers' conclusion of **infrequent** detection and non-statutory nuisance.

Therefore, the quantitative, real-time data indicates that the residents are subject to frequent, high-intensity exposures and persistent odour nuisance, rendering the report's "very low risk" claims inaccurate and extremely misleading.

Steve Gittins

To: The Chair, Welsh Government

From: Steve Gittins

Reference : P-6-1510

Subject: Request for Scrutiny - NRW's Non-Adoption of Updated Odour Assessment Standards (EN 13725 +A1:2014 and EN 16841:2016)

Date: 12th October 2025

Dear Petition Committee Members

1. Purpose of late Submission

This letter is submitted to request that, in support of my earlier evidential submission (Doc SG#03, in the event that Natural Resources Wales (NRW) has rejected, deferred, or otherwise declined to apply the European Norms EN 13725 +A1:2014 and EN 16841:2016, the Welsh Government Inquiry examine the basis of that decision and require the regulator to provide clear technical and legal justification for doing so.

2. Background

The European Norm EN 13725:2003, which standardises dynamic olfactometry, was amended in 2014 to strengthen quality-assurance criteria relating to assessor selection, calibration traceability, and measurement uncertainty.

In 2016, EN 16841 introduced field-based assessment methods for ambient odour exposure, providing a scientifically robust means of evaluating community impact under real environmental conditions.

These revisions represent significant advances in the accuracy, repeatability, and relevance of odour measurement with handheld digital devices, directly influencing regulatory confidence in protecting public health from odorous emissions.

3. Grounds for Inquiry Consideration

Should NRW consider these updated standards “not applicable,” due to our exit from the European union, it is essential that the Inquiry seek the following clarifications:

1. Justification for non-adoption – What technical, economic, or legal grounds were relied upon to determine that EN 13725 (A1:2014) and EN 16841:2016 are inapplicable in Wales?
2. BAT evaluation process – Has NRW reviewed these standards as part of its **statutory duty to apply Best Available Techniques (BAT) under the Environmental Permitting (England and Wales) Regulations 2016 and the Industrial Emissions Directive 2010/75/EU?**
3. Public-health assessment – What evaluation has been undertaken of the public-health implications of continuing to use legacy odour assessment methods?
4. Consistency across UK regulators – How does NRW’s position compare with that of the Environment Agency (England), SEPA (Scotland), or other competent authorities that have already recognised these updated EN methods?

4. Public Health and Legal Context

Odour nuisance and exposure have recognised health and wellbeing implications, including stress, sleep disturbance, and reduced quality of life.

By declining to adopt the most up-to-date QA standards, NRW may risk breaching:

The precautionary principle and the duty to pursue continuous improvement in environmental monitoring;

The Well-being of Future Generations (Wales) Act 2015 objective to protect health and environmental quality; and

The regulator's positive obligations under Article 8 of the European Convention on Human Rights, to safeguard individuals from serious environmental nuisance.

5. Requested Action

In light of these considerations, I respectfully request that the Inquiry:

1. Formally examine NRW's position on the applicability of EN 13725 (A1:2014) and EN 16841 (2016);
2. Require a written justification where NRW has declined to adopt or implement these standards; and
3. Recommend policy or guidance updates ensuring that the best available and most reliable odour-assessment techniques are applied in Wales, in line with the precautionary and public-health duties of environmental regulation.

6. Conclusion

The decision to disregard or defer adoption of these updated European Norms carries direct implications for public confidence, regulatory credibility, and the health protection of affected communities.

A transparent review of NRW's reasoning, supported by evidence, is therefore in the public interest and consistent with Wales's commitment to high standards of environmental governance.

Yours faithfully,
Steve Gittins
Lead Petitioner
P-6-1510 – Revoke Hafod Landfill Permit

Agenda Item 3.1

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

This petition was submitted by Eleri Lewis, having collected a total of 267 signatures.

Text of Petition:

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

Additional Information:

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

Senedd Constituency and Region

- Cardiff West
- South Wales Central

Agenda Item 3.2

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

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

Text of petition:

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

Senedd Constituency and Region:

- Llanelli
- Mid and West Wales

P-06-1494 Welsh Government to protect funding in education from WG and Local Authority cuts - Correspondence from the Petitioner to the Committee, 13 October 2025

I would like to thank Members of the Senedd and the Petitions Committee for debating our petition, which gathered over 11,000 signatures calling on the Welsh Government to protect education funding and ensure that children with Additional Learning Needs (ALN) are not left behind.

While I welcome the Cabinet Secretary's acknowledgement of the pressures schools are facing and her commitment to supporting ALN provision, the reality shared by families, teachers and professionals across Wales remains stark. Every week, parents contact us describing children who are without the right support, unable to access learning, or experiencing "school distress" because their needs are unmet. These are not isolated cases, they are systemic symptoms of a system under strain.

We recognise and appreciate that education funding has been prioritised at a national level. However, as many Members noted in the debate, money is not always reaching the children who need it most. There is little transparency in how local authorities allocate funding to schools, and significant variation in how the ALN Code is applied. Parents continue to face exhausting and expensive tribunal processes simply to secure basic support. That is not an equitable system.

We strongly urge the Welsh Government to go further by:

Ring-fencing ALN funding to ensure it reaches the learners it is intended for.

Publishing clear data showing how ALN funds are distributed and spent by each local authority.

Investing in professional training for teachers and support staff to better meet neurodiverse and complex needs.

Reducing waiting times for assessment and diagnosis, which directly affect school attendance and mental health.

Listening to families and learners as partners in reform not as adversaries in legal disputes.

Children with ALN are entitled to thrive, not merely survive, in our education system. Wales has an opportunity to lead the way in inclusive education but that can only happen when funding, accountability, and compassion align.

We remain ready to work with the Welsh Government, the Senedd, and local authorities to ensure that the promises made to Wales's most vulnerable learners are turned into real outcomes on the ground.

Catherine Drews

Petitioner – ALN Reform Wales

Agenda Item 3.3

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

P-06-1489 Legislate to ensure swift bricks are installed in all new buildings in Wales - Correspondence from the Petitioner to the Committee, 10 October 2025

Dear Petition Committee Members

SWIFT BRICK PETITION

Thank you for giving me a further opportunity to respond on this issue – this time to the Senedd debate.

Whilst it was heartening to see the support for swifts from a number of Members of Senedd (including representatives of all 3 main parties), I am concerned that there does not seem to be a Welsh Government strategy to halt the decline in swift nest sites.

The current approach to biodiversity within the planning system relies largely on 'avoid, minimise, mitigate, compensate' (Planning Policy Wales 12, but also a feature of earlier iterations of PPW). This has not resulted in the routine use of swift bricks within new builds.

This example might illustrate the problem -

A developer applies to build a housing estate on a greenfield site. There will not be any swifts nesting here because swifts in Wales nest almost exclusively in buildings - not in trees, hedges or on the ground. So, there will be nothing to mitigate or compensate for as far as swifts are concerned and swift bricks are unlikely to be routinely included. At the same time, existing buildings are being refurbished, re-roofed, etc, resulting in the loss of existing nest sites. The effect is a net loss of swift nest sites and hence a decline in the number of swifts.

Some developers do include a small number of swift bricks in new developments, but for swifts, finding these is like looking for a needle in a haystack. Were they to be included routinely in all new builds, the chances of swifts finding them would be higher.

Installing a swift brick (which benefits multiple species) in a building is exactly the same as installing a normal brick. There is no reason why something this simple, measurable and effective could not be mandated quite separately and in addition to the more holistic and qualitative Net Benefit for Biodiversity (NBB) requirements, which will vary from site to site. As a completely separate requirement, this would therefore not cut across NBB, which is an important part of addressing the nature emergency.

If Welsh Government acknowledges the need for urgent action on (red listed) swifts, but is not minded to mandate swift bricks, I feel they need to demonstrate how they otherwise plan to reverse the loss of swift nests and hence the decline in swifts, given the failure of existing processes to deliver swift provision routinely.

Without nest sites, swifts will become extinct as a breeding bird in Wales.

Yours faithfully,

Julia Barrell (Petitioner)

Agenda Item 3.4

P-06-1423 Reinstate the 552 Cardi Bach coastal bus service in South Ceredigion!

This petition was submitted by Wyck Gerson Lohman, having collected a total of 842 signatures.

Text of Petition:

Recently it was announced by Deputy Minister for Climate Change Lee Waters that the Cardi Bach service was to continue. Then, as a bolt from the blue, came the news that the service is to be scrapped. The reason, so we are told, is that 'European funding has not been replaced as promised.' This is very bad news indeed for local residents who don't have access to a car, as well as for the tourist industry.

Additional Information:

The Welsh Government is working to reestablish a service as part of the new contract for the T5 service. It is vital that this happens as soon as possible to ensure that communities along the route are not isolated for a moment longer than necessary.

Launching the Year of Trails 2023, Economy Minister, Vaughan Gething, stated: 'This year is all about finding forgotten treasures, embracing journeys of the senses and making memories along pathways around attractions, activities, landscapes and coastlines. We're starting 2023 with a new campaign to make sure Wales is visible and look forward to encouraging visitors to different corners of the country throughout the year ahead.'

The visitor economy is a key contributor and driver of the economy in Wales. It has been hard hit by Covid. Services such as the Cardi Bach are absolutely vital to help restore that damage!

Senedd Constituency and Region

- Ceredigion
- Mid and West Wales



Ein cyf/Our ref KSNWT/00996/25

Carolyn Thomas MS
Chair - Petitions committee

09 July 2025

Dear Carolyn,

Thank you for your letter of 16 June regarding Petition P06-1423 – the reinstatement of the 552 Cardi Bach coastal bus service.

Unfortunately, we have been unable to source an operator to provide the Cardi Bach bus service. Transport for Wales (TfW) have issued two invitations to tender's for the operation of this service, but these has attracted no operator interest. Officials have also spoken to key players within the community transport sector in the area, but again unfortunately this has not led to any firm interest in operating this service.

Looking forwards, Transport for Wales are working with Ceredigion County Council to prepare for a large-scale bus retendering exercise across the County next year, and we have asked that they include a replacement for Cardi Bach as part of this wider network retendering exercise.

I am sorry that we cannot give you more positive news at this time.

Yours sincerely,

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

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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.

**P-06-1423 Reinstate the 552 Cardi Bach coastal bus service in South Ceredigion!
- Correspondence from the Petitioner to the Committee, 07 October 2025**

Dear Mr Skates AS/MS and Petitions Committee,

many thanks for your update on my petition to reinstate the 552 Cardi Bach Service. I appreciate your effort in trying to get the service going again and fully understand the problem. I am pleased with Mr Skates suggestion to include the service in the retendering exercise next year in the hope that a new operator might be by then found

Kind regards,

Wyck Gerson Lohman,



Cwmttydu

Agenda Item 3.5

P-06-1444 Women of North Wales have the right to have a Menopause Services/Clinic in Ysbyty Gwynedd

This petition was submitted by Delyth, having collected a total of 1,347 signatures.

Text of Petition:

Not everyone can afford to travel to Wrexham.

Not everyone can afford to pay privately to go to a Menopause clinic.

Not everyone has the time to go to Wrexham, maybe they care for children and family members etc.

Everyone should have the choice.

This should be on our doorstep in Ysbyty Gwynedd with more specialist services local to North Wales including regularly updates for GP's, Gynaecologists, practitioners and employers supporting them on Menopause and the benefits of HRT.

Additional Information:

The health board expect women to travel to the nearest NHS menopause clinic in Wrexham, as they are cutting back the little support we have in Ysbyty Gwynedd, this is not acceptable and especially in the current financial crisis.

We need resource on our doorstep local to us; the health board do not meet the demands of women suffering the ordeal, misery, pain, and discomfort along with all the other symptoms of the Menopause and the impact on their family.

Welsh Government must invest more in menopause resources and services in Wales.

Women are struggling to stay in their employment, along with sometimes having caring responsibilities. Women leave work as they cannot cope with the some of the symptoms.

Senedd Constituency and Region

- Ynys Môn
- North Wales



Eich cyf/Your ref P-06-1444
Ein cyf/Our ref SM/00316/25

Carolyn Thomas MS
Chair
Petitions Committee

Petitions@senedd.wales

07 July 2025

Dear Carolyn,

Thank you for your letter of 21 May regarding Petition P-06-1444 – Women of North Wales have the right to have a menopause service/clinic in Ysbyty Gwynedd and enclosing the further comments of the petitioner.

As previously outlined, menopause is a priority area in the Women's Health Plan, which includes seven specific actions – short, medium and long-term – which, once delivered, will improve the experience of women when accessing services.

The Women's Health Plan was published six months ago, in December. It was developed by the Women's Health Strategic Network, a clinically-led, strategic group to improve quality, sustainability and outcomes of NHS services for women in Wales. The plan was shared with stakeholders, and patient voice groups including Fair Treatment for the Women of Wales (FTWW) and the Women's Health Wales Coalition for feedback, before being finalised.

FTWW is a patient-led charity dedicated to achieving health equality for women, girls and people registered female at birth. It advocates for women's healthcare needs locally, nationally and at UK-level. The Women's Health Wales Coalition brings together more than 60 charities, UK-wide umbrella organisations, Royal Colleges and patient representatives in Wales.

The Women's Health Plan is a 'living' plan. We will be listening to feedback from women as the it is implemented. It provides an opportunity for us to make a real difference to how the women's health services are delivered. The Women's Health Strategic Network will continue to work with both FTWW and the Women's Health Wales Coalition during delivery. There will be mechanisms within the network where those with lived and learnt experiences and

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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.

expertise will be invited to participate, including reference groups and task and finish Groups.

There is an expectation in the plan that health boards adopt a co-production approach as they implement the actions within the plan. To support this, the Women's Health Strategic Network will be working across NHS Wales Performance and Improvement (the new name for the NHS Executive), and with the public as partners, to create a framework of co-production.

The Women's Health Plan has been published in an Easy Read version and can be accessed at the following link: [The Women's Health Plan for Wales - NHS Wales Performance and Improvement](#)

Work is underway to identify available data, and data gaps, to inform the development of a women's health dashboard. We will take the petitioner's comments into consideration as part of this work.

Health boards are scoping out the delivery in their geographical area of pathfinder Women's Health Hubs that support the timely diagnosis and treatment of women's health conditions including menopause. These will be operational by March 2026.

In relation to research, Health and Care Research Wales, supported by the Welsh Government, have provided £3m for the first women's health research centre in Wales to enhance the quality and scope of women's health research. This is in addition to the previously announced £750,000 allocated to a focused call on women's health research, which was launched in April 2025.

Health and Care Research Wales has a thriving public involvement community. It routinely requires and supports public involvement in its research centres and within any funding schemes and does not fund anything unless there is good quality public involvement built into the development and delivery of research projects. Public partners are routinely part of assessment panels and funding boards, and people with lived experience are also peer reviewers.

The focused call launched in April followed a women's health prioritisation exercise, which involved women in setting the research agenda from the outset. This included two public surveys and a facilitated workshop with women and practitioners. They determined the top 10 research priorities, including a question about menopause. This was then included in a research funding call, which closed in May. The committees which will assess the applications will include people with lived experience.

Yours sincerely,

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

Sarah Murphy AS/MS

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



Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

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

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Park, St Asaph, LL17 0JG

Carolyn Thomas MS,
Chair,
Petitions Committee,
Welsh Parliament,
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Ein cyf / Our ref: CS/CT(CE25/0453)

☎: 01745 448788 ext 6382

Gofynnwch am / Ask for: Emma Hughes

E-bost / Email: emma.hughes19@wales.nhs.uk

Dyddiad / Date: 10th July 2025

By email – seneddCovid@Senedd.wales

Dear Chair,

RE: Petition P-06-1444: Women of North Wales have the right to have a Menopause Services/Clinic in Ysbyty Gwynedd.

Thank you for your further letter of 21st May 2025, requesting additional information about the Health Board's menopause services, following further consideration of the above petition on 12th May 2025.

I am grateful to you for sharing the latest comments from the petitioner, Ms Delyth Owen, and I am pleased to have a further opportunity to address her concerns.

I share Ms Owen's desire to see women have access to menopause care as close to their homes as possible. Since our first correspondence with the Petitions Committee about this issue, the Health Board's ability to provide such local support has improved considerably, with a number of Consultant Gynaecologists undertaking the British Menopause Society's (BMS) Menopause Certificate.

As I indicated in my previous response, Consultants who hold the BMS Certificate are able to manage 90% of referrals for menopause support, and appointments are now being delivered in each of our three acute hospitals (Ysbyty Gwynedd, Glan Clwyd Hospital, and Wrexham Maelor Hospital).

As more of these BMS qualified Consultants are based in Ysbyty Gwynedd than in Glan Clwyd Hospital or Wrexham Maelor Hospital, there is a greater opportunity for women from North West Wales to be invited to an appointment at their local hospital.

That said, as we operate a treat in turn policy, based on our Women's Services pan North Wales capacity, it is possible that some women from Gwynedd and Môn may be invited to appointments at Glan Clwyd or Wrexham Maelor, if this means that they can be seen more quickly.

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

Paec Page 75 www.bcu.cymru.nhs.uk / **Web:** www.bcu.wales.nhs.uk

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

I must stress that this pan-North Wales, treat-in-turn approach has a number of key benefits, which include:

- **Fairer access** for all patients, not limited by postcode.
- **Better use of capacity** across the region, reducing delays.
- **Resilience** against local staff shortages or recruitment gaps.
- **Shorter waiting times**, as patients can be treated where slots are available.

In contrast, dividing waiting lists by geography can lead to unequal access and underused capacity.

Ms Owen has also raised concerns that not all women will be able to travel to appointments offered at venues further away from their local acute hospital. Where this is the case, the Health Board will explore options available to the patient, including the Non-Emergency Patient Transport Service (NEPTS) or financial reimbursement for using public transport to travel to an appointment.

Should patients decline to travel, and they are part of a registered vulnerable group or have additional requirements, yet are unable to access NEPTS or reimbursement for transport costs, the service will review their circumstances on a case-by-case basis.

While our BMS qualified Consultants are able to support women with 90% of menopause related issues – often with appointments at their local hospital, our three Menopause Specialists are continuing to provide more specialist advice and support to the smaller number of women (c10%) with more complex presentations, through both face-to-face and virtual appointments.

In her letter to you, Ms Owen queried whether this more specialist support was being provided in face-to-face clinics at Ysbyty Gwynedd. Unfortunately, it is not always possible to arrange face-to-face clinics with our Menopause Specialists across all three of our acute hospital sites, however, additional activity has now been introduced during the weekends at Glan Clwyd Hospital.

This arrangement is similar to how NHS bodies across Wales and the wider UK provide access to more specialist care, with services provided at regional centres, or at a limited number of venues across a smaller geographical area, in order to make the best use of resources.

Ms Owen also queried the allocation of face-to-face and virtual appointments. I can confirm that our Menopause Specialists triage all referrals and decide on the most appropriate mode of appointment, based on a patient's clinical complexity and any pertinent additional information from their clinical notes or letter of referral. Women are always asked if they are agreeable to a virtual appointment and the vast majority of patients are happy to proceed on this basis. As a consequence, we are increasing the number of follow up appointments provided on a virtual basis.



Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

I do hope that Ms Owen finds these additional comments helpful, and I thank her once again for highlighting this important issue. I can assure you and Ms Owen that the Health Board will continue to closely monitor its menopause service arrangements, including feedback provided by women who access care and treatment, in order to ensure that we provide the best possible experience and outcomes.

Yours sincerely,

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

Carol Shillabeer
Prif Weithredwr/Chief Executive

P-06-1444 Women of North Wales have the right to have a Menopause Services Clinic in Ysbyty Gwynedd - Correspondence from the Petitioner to the Committee, 09 October 2025

I am grateful for the responses from Carol Shillabeer and Sarah Murphy AS/MS; however, despite their thoughtful and measured replies, they do not adequately address the core concerns of the petition. In fact, their responses are largely similar to previous ones and fail to confront the key issue.

The urgent need remains: women in North Wales require a clinic at Ysbyty Gwynedd. Deeside Hospital, Wrexham Maelor, and Flintshire are not central to North Wales and cannot serve the population effectively. The petition highlights a real and pressing gap in healthcare access for women in this region, which must be addressed immediately.

I again urge the committee to refer to the maps sent in my previous reply, which clearly demonstrate that Ysbyty Gwynedd is the central location for North Wales patients.

My reply to both letters below:

Frist one Carol Shillabeer

Below my reply to : Sarah Murphy AS/MS

I share Ms Owen's desire to see women have access to menopause care as close to their homes as possible. Since our first correspondence with the Petitions Committee about this issue, the Health Board's ability to provide such local support has improved considerably, with a number of Consultant Gynaecologists undertaking the British Menopause Society's (BMS) Menopause Certificate

Thank you for the update. While it is welcome news that several Consultant Gynaecologists have undertaken the British Menopause Society's (BMS) Menopause Certificate, this appears to be the same information previously provided. Could you please explain how these developments will translate into improved access to menopause care locally, particularly at Ysbyty Gwynedd? In addition, will the Health Board be able to provide statistics on the number of women who have received support at Ysbyty Gwynedd so that progress can be properly measured?

This information would help the Committee assess whether local services are meeting women's needs effectively.

As I indicated in my previous response, Consultants who hold the BMS Certificate are able to manage 90% of referrals for menopause support, and appointments are now being

delivered in each of our three acute hospitals (Ysbyty Gwynedd, Glan Clwyd Hospital, and Wrexham Maelor Hospital).

This is encouraging news, and I particularly welcome confirmation that clinics are being held at Ysbyty Gwynedd. Could you please provide further detail on how often clinics are being delivered at each of the three hospitals? In addition, it would be helpful to receive statistics on attendance, as well as feedback from patients both those who are able to attend and those who may be prevented from doing so due to travel, work, family, or other commitments.

This information would help the Committee assess whether local services are meeting women's needs effectively.

As more of these BMS qualified Consultants are based in Ysbyty Gwynedd than in Glan Clwyd Hospital or Wrexham Maelor Hospital, there is a greater opportunity for women from North West Wales to be invited to an appointment at their local hospital. That said, as we operate a treat in turn policy, based on our Women's Services pan North Wales capacity, it is possible that some women from Gwynedd and Môn may be invited to appointments at Glan Clwyd or Wrexham Maelor, if this means that they can be seen more quickly.

If there are more BMS qualified Consultants based at Ysbyty Gwynedd than at the other sites, it is unclear why women living in Ynys Môn, Gwynedd and the surrounding areas would be directed to clinics elsewhere. Could you please explain the rationale for this approach? It would also be helpful to see the statistics on how many women from the Ysbyty Gwynedd catchment area have been offered appointments at other hospitals, and the reasons behind these allocations.

This information would help the Committee assess whether local services are meeting women's needs effectively.

I must stress that this pan-North Wales, treat-in-turn approach has a number of key benefits, which include:

- **Fairer access** for all patients, not limited by postcode. Thank you for outlining the benefits you see in the pan North Wales, treat-in-turn approach. However, I have a number of concerns about the points raised:

- **Fairer access for all patients:** As the maps I submitted previously demonstrate, this approach does not appear to deliver fair access. I have suggested that Ysbyty Gwynedd be designated as the central hospital for North Wales menopause services, with the other hospitals acting as satellite hubs. This would provide a fairer model of access for women across the region.

- **Better use of capacity, reducing delays:** Could you please provide the statistics that evidence this claim, so that the Committee can better understand the impact on waiting times?
- **Resilience against staff shortages:** It is important to note that staff are able to travel more easily than the number of patients to one consultant who would see in a single clinic. Allowing staff to move between sites may be both more efficient and more environmentally sustainable, helping to reduce the carbon footprint.
- **Shorter waiting times through available slots:** It seems that a more effective booking system could achieve this outcome without requiring women to travel significant distances.

This information would help the Committee assess whether the current approach is the most effective and equitable way of delivering menopause services across North Wales.

In contrast, dividing waiting lists by geography can lead to unequal access and underused capacity.

While I understand the concern about dividing waiting lists by geography, it is not clear why this should lead to unequal access or underused capacity. If a more effective booking system were implemented, as is common practice elsewhere, this issue could be mitigated. As noted previously, if staff are able to travel more easily than the number of patients one consultant can see in a single clinic, this would allow for more flexible scheduling. Additionally, reducing unnecessary travel for patients and staff would have clear environmental benefits by lowering the overall carbon footprint.

This information would help the Committee assess whether the current approach is the most efficient, equitable, and sustainable way of delivering menopause services.

Ms Owen has also raised concerns that not all women will be able to travel to appointments offered at venues further away from their local acute hospital. Where this is the case, the Health Board will explore options available to the patient, including the Non-Emergency Patient Transport Service (NEPTS) or financial reimbursement for using public transport to travel to an appointment.

I am fully aware of the Non-Emergency Patient Transport Service (NEPTS), having used it myself and worked within the third sector supporting many others who rely on such services. However, the issue for women is not solely about financial support. I would suggest that Health Board representatives, including Ms Carol Shillabeer, consider personally experiencing the journey from locations such as Llandona Ynys Môn / Pwllheli, or any other parts of the island and Gwynedd to Ysbyty Gwynedd or Glan Clwyd to a menopause clinic appointment. This includes factoring in travel time, family or work commitments, and the challenge of returning home promptly. Words alone do not capture the practical difficulties faced by patients in accessing these services.

This information would help the Committee assess whether current arrangements are genuinely accessible to all women in the region.

Should patients decline to travel, and they are part of a registered vulnerable group or have additional requirements, yet are unable to access NEPTS or reimbursement for transport costs, the service will review their circumstances on a case-by-case basis.

Could you clarify whether access to NEPTS or transport reimbursement is means tested? If it is, there is a risk that some patients could be excluded and potentially signed off due to nonattendance, despite having legitimate health or accessibility needs.

This information would help the Committee assess whether vulnerable patients are able to access menopause services without being disadvantaged.

While our BMS qualified Consultants are able to support women with 90% of menopause related issues – often with appointments at their local hospital, our three Menopause Specialists are continuing to provide more specialist advice and support to the smaller number of women (c10%) with more complex presentations, through both face-to-face and virtual appointments.

In her letter to you, Ms Owen queried whether this more specialist support was being provided in face-to-face clinics at Ysbyty Gwynedd. Unfortunately, it is not always possible to arrange face-to-face clinics with our Menopause Specialists across all three of our acute hospital sites, however, additional activity has now been introduced during the weekends at Glan Clwyd Hospital.

Why are face-to-face clinics not being offered at Ysbyty Gwynedd, given that it would be more cost effective and efficient for a single consultant to travel to Ysbyty Gwynedd rather than for multiple patients to travel to Glan Clwyd Hospital? As previously suggested, Ysbyty Gwynedd could serve as the central hospital for North Wales menopause services, with the other sites operating as satellite hubs. This model would provide fairer and more accessible care for women across the region.

This information would help the Committee assess whether current arrangements are the most effective way of delivering specialist menopause support.

This arrangement is similar to how NHS bodies across Wales and the wider UK provide access to more specialist care, with services provided at regional centres, or at a limited number of venues across a smaller geographical area, in order to make the best use of resources.

While I understand that specialist services are often concentrated at regional centres to make the best use of resources, Ysbyty Gwynedd remains the better choice as the central hospital for North Wales. Staff are able to travel more easily than the number of patients

one consultant can see in a single clinic, making this approach more efficient. Additionally, reducing patient travel would have clear environmental benefits by lowering the overall carbon footprint.

This information would help the Committee assess whether the current service configuration is the most effective, equitable, and sustainable option for women across the region.

Ms Owen also queried the allocation of face-to-face and virtual appointments. I can confirm that our Menopause Specialists triage all referrals and decide on the most appropriate mode of appointment, based on a patient's clinical complexity and any pertinent additional information from their clinical notes or letter of referral. Women are always asked if they are agreeable to a virtual appointment and the vast majority of patients are happy to proceed on this basis. As a consequence, we are increasing the number of follow up appointments provided on a virtual basis.

Could you please provide the actual numbers underlying this statement? Specifically, I would like to know how many patients have agreed to virtual appointments, and how many follow up appointments are now being conducted virtually, rather than percentages.

This information would help the Committee assess the practical impact of virtual consultations on access to menopause services.

I do hope that Ms Owen finds these additional comments helpful, and I thank her once again for highlighting this important issue. I can assure you and Ms Owen that the Health Board will continue to closely monitor its menopause service arrangements, including feedback provided by women who access care and treatment, in order to ensure that we provide the best possible experience and outcomes.

I welcome the Health Board's commitment to monitoring its menopause service arrangements and gathering feedback from women who access care. I am available to offer my help and support regarding consultation, patient participation, and ensuring that the voice of patients is fully represented in the development and delivery of these services.

This information would help the Committee ensure that menopause services continue to meet the needs of women across North Wales effectively.

Yours sincerely, **Carol Shillabeer Prif Weithredwr/Chief Executive**

My reply to : Sarah Murphy AS/MS

As previously outlined, menopause is a priority area in the Women's Health Plan, which includes seven specific actions – short, medium and long-term – which, once delivered, will improve the experience of women when accessing services

Could you please clarify when the Women's Health Plan, including the seven specific actions relating to menopause, will be formally launched and when these actions are expected to be delivered?

This information would help the Committee assess the timeline for improvements in women's access to menopause services.

The Women's Health Plan was published six months ago, in December. It was developed by the Women's Health Strategic Network, a clinically-led, strategic group to improve quality, sustainability and outcomes of NHS services for women in Wales. The plan was shared with stakeholders, and patient voice groups including Fair Treatment for the Women of Wales (FTWW) and the Women's Health Wales Coalition for feedback, before being finalised.

FTWW is a patient-led charity dedicated to achieving health equality for women, girls and people registered female at birth. It advocates for women's healthcare needs locally, nationally and at UK-level. The Women's Health Wales Coalition brings together more than 60 charities, UK-wide umbrella organisations Royal Colleges and patient representatives in Wales

If the Women's Health Strategic Network is clinically-led, why was it not structured as a balanced partnership steering group including a strong patient voice? Could you clarify exactly which stakeholders and patient voice groups the plan was shared with prior to finalisation?

I have been in touch with Fair Treatment for the Women of Wales (FTWW) and understand that it is a newly formed organisation with a relatively small membership of around 67 members and 202 Facebook followers. How, therefore, can engagement with such small-scale groups be considered sufficient to reflect the needs and experiences of women across Wales in the development of the NHS Women's Health Plan? and what work have they done specifically with the women of North Wales ?

This information would help the Committee assess whether the plan genuinely incorporates a broad and representative patient perspective.

The Women's Health Plan is a 'living' plan. We will be listening to feedback from women as the it is implemented. It provides an opportunity for us to make a real difference to how the women's health services are delivered. The Women's Health Strategic Network will continue to work with both FTWW and the Women's Health Wales Coalition during delivery. There will be mechanisms within the network where those with lived and learnt experiences and expertise will be invited to participate, including reference groups and task and finish Groups.

As noted previously, the groups mentioned are still very small and in the early stages of development, with limited membership and support. It is unclear how they will be able to provide a representative and effective patient voice. There are many other organisations

and services that could contribute to this work. A strong, balanced network is needed, supported by an experienced coordinator who can actively engage with people with lived experience, understand what is truly needed, and ensure their input shapes service delivery. The network should not be solely clinically led, as these risks overlooking the practical and lived realities of women accessing menopause services.

This information would help the Committee assess whether the current arrangements are sufficient to capture a meaningful and representative patient perspective in the implementation of the Women's Health Plan.

There is an expectation in the plan that health boards adopt a co-production approach as they implement the actions within the plan. To support this, the Women's Health Strategic Network will be working across NHS Wales Performance and Improvement (the new name for the NHS Executive), and with the public as partners, to create a framework of co-production.

I welcome the expectation in the plan that health boards adopt a co-production approach. I am available to assist with this work, drawing on my previous experience as the Making the Connections Officer within the third sector. In that role, I supported the development of better people-focused public services by enabling Local Service Boards to deliver the Single Integrated Plan, and strengthened the capacity of third sector organisations to contribute effectively to public service design, development, and delivery.

My work ensured that third sector organisations were:

- Better prepared to deliver public services, including co-produced services
- Equipped to work through consortia or collaborations
- More informed and able to engage meaningfully with service users
- Better able to influence decisions affecting the design and delivery of public services

I worked collaboratively with many organisations, including the Local Authority and Betsi Cadwaladr University Health Board, which strengthened my knowledge and understanding of voluntary, health, and social care sectors, including legal frameworks, policy, funding, structures, and systems. I would welcome the opportunity to contribute this expertise to support co-production within the Women's Health Plan.

This information would help the Committee assess whether co-production is being implemented effectively and meaningfully across NHS Wales.

The Women's Health Plan has been published in an Easy Read version and can be accessed at the following link: [The Women's Health Plan for Wales - NHS Wales Performance and Improvement](#)

Work is underway to identify available data, and data gaps, to inform the development of a women's health dashboard. We will take the petitioner's comments into consideration as part of this work

This is encouraging news, and I welcome the development of a women's health dashboard. I am available and willing to offer my support in this work, drawing on my experience in co-production and engagement with patient and voluntary sector groups.

This information would help the Committee assess whether the dashboard effectively captures data that reflects the needs and experiences of women across Wales.

Health boards are scoping out the delivery in their geographical area of pathfinder Women's Health Hubs that support the timely diagnosis and treatment of women's health conditions including menopause. These will be operational by March 2026.

Could you please clarify where these Pathfinder Women's Health Hubs will be located?

This information would help the Committee assess how accessible these hubs will be for women across different regions of Wales.

In relation to research, Health and Care Research Wales, supported by the Welsh Government, have provided £3m for the first women's health research centre in Wales to enhance the quality and scope of women's health research. This is in addition to the previously announced £750,000 allocated to a focused call on women's health research, which was launched in April 2025. Could you please clarify where the new Women's Health Research Centre is based?

Health and Care Research Wales has a thriving public involvement community. It routinely requires and supports public involvement in its research centres and within any funding schemes and does not fund anything unless there is good quality public involvement built into the development and delivery of research projects. Public partners are routinely part of assessment panels and funding boards, and people with lived experience are also peer reviewers.

I understand that Health and Care Research Wales has a strong commitment to public involvement in research. It routinely requires and supports public participation within its research centres and funding schemes, ensuring that no projects are funded without meaningful public involvement. I appreciate that public partners are represented on assessment panels and funding boards and that individuals with lived experience also act as peer reviewers.

However, while reviewing Health and Care Research Wales' work on public involvement, I found it difficult to locate detailed information on specific projects in North Wales, particularly those related to menopause and women's health.

I have been informed that there are plans to connect with local leads in November 2025, which is encouraging. I have requested further details about this, including whether there are any current or upcoming local initiatives focusing on menopause in North Wales.

I also sought clarification on how public partners especially those with lived experience of menopause are selected to participate in panels or act as peer reviewers. A clearer understanding of this process would help in assessing the depth and inclusivity of public involvement at this stage.

At present, I remain somewhat unclear about how individuals like myself can get involved. I have not seen any advertisements or calls for involvement, and I was previously unaware of Health and Care Research Wales. I have therefore asked whether an Expression of Interest (EOI) can be submitted proactively, or if it must only be in response to active adverts, which I have never come across.

It was also mentioned that Health and Care Research Wales plans to meet with a menopause support group and Fair Treatment for the Women of Wales (FTWW). This suggests that engagement with menopause support networks in North Wales has not yet taken place. I have asked for clarification on which menopause group they intend to meet and for more information about any past collaboration with FTWW, particularly around menopause and women's health in North Wales.

Finally, I was informed that meetings are planned with an organisation called "Menopause Connect." Unfortunately, I have been unable to locate much public information about this group and would appreciate a contact number or further details to enable me to follow up directly.

This information will be valuable in helping the Committee assess whether local services and research initiatives are effectively meeting the needs of women in Wales.

The focused call launched in April followed a women's health prioritisation exercise, which involved women in setting the research agenda from the outset. This included two public surveys and a facilitated workshop with women and practitioners. They determined the top 10 research priorities, including a question about menopause. This was then included in a research funding call, which closed in May. The committees which will assess the applications will include people with lived experience.

Could you please provide further details about the women's health prioritisation exercise? Specifically:

- Where did the facilitated workshop take place, how many people attended, and how were participants invited?

- Regarding the two public surveys, I am not aware of these; could you clarify how they were shared with the public?
- Could you provide figures on how many women participated in total and where they were from?

This information would help the Committee assess how representative the research prioritisation process was and whether it genuinely captured the views and experiences of women across Wales.

Sarah Murphy AS/MS

Minister for Mental Health and Wellbeing

North Wales maps below :

As members can see from the maps of North Wales, the hospitals mentioned are clustered far from the central area, making them less accessible to many North Wales patients. This highlights the importance of ensuring that Ysbyty Gwynedd is treated as an equal partner, not an afterthought.

I would therefore suggest that Ysbyty Gwynedd should serve as the Central Hospital for the North Wales Menopause Clinic, with the other hospitals operating as satellite hubs.



Agenda Item 3.6

P-06-1426 Install traffic lights at the McDonald's Pontypool roundabout.

This petition was submitted by Jenny Williams, having collected a total of 256 signatures.

Text of Petition:

There have already been a number of accidents at this roundabout (A472/A4042). With the increase of traffic using the new Aldi store it can only be a matter of time before there will be fatalities.

Additional details:

Senedd Constituency and Region

- Monmouth
- South Wales East

Install traffic lights at the McDonald's Pontypool roundabout - Correspondence from Gwent Police to the Committee, 08 July 2025

All,

Please see the data below. These RTC's and the narrative around them will inform you of the circumstances and suggest a possible cause. Whether or not any mitigation has been applied by careful engineering is relevant/impactive I am unsure? But this is the data that we hold with some detail added for your convenience.

If however you need or want more please let me know and I'll do what I can. These are ALL the recorded incident by police.

Hope this helps,

Jason.

Accident Ref No.00228/25

15:41hrs on Wednesday 30/04/2025 involving two vehicles with casualty.

V1 and V2 were on the inside lane on the roundabout from Pontypool travelling in the direction of New Inn, when negotiating the roundabout V1 has clipped the rear of V2. When exiting the roundabout. Causation factors recorded as V1. Possible following too close, failed to judge vehicles path/speed, poor turn/manoeuvre, careless/reckless/in a hurry and road layout. In relation to V2. Possible fail to signal/misleading signal.

Easting 329487. Northing 199864.

Accident Ref No.00244/23

10:15hrs on Thursday 15/06/23 involving two vehicles one casualty, V1 travelling east with V2 travelling behind V1. V1 pulling off, when a vehicle already on roundabout came around quickly and startled driver of V1, who performed an emergency stop causing V2 to collide with rear of V1.

Causation factors recorded as very likely V1 sudden braking, failed to look properly and V2 failed to look properly.

Easting 329410 Northing 199963.

Accident Ref No.00102/23

12:40hrs Sunday 025/0/2023 involving two vehicles two casualties on A472 on approach to roundabout due to build up of traffic 50 yards from roundabout V2 has slowed V1 has not allowed enough distance and driven into rear of V1. Causation factor recorded as possible driving too close.

Easting 329377 Northing 199978

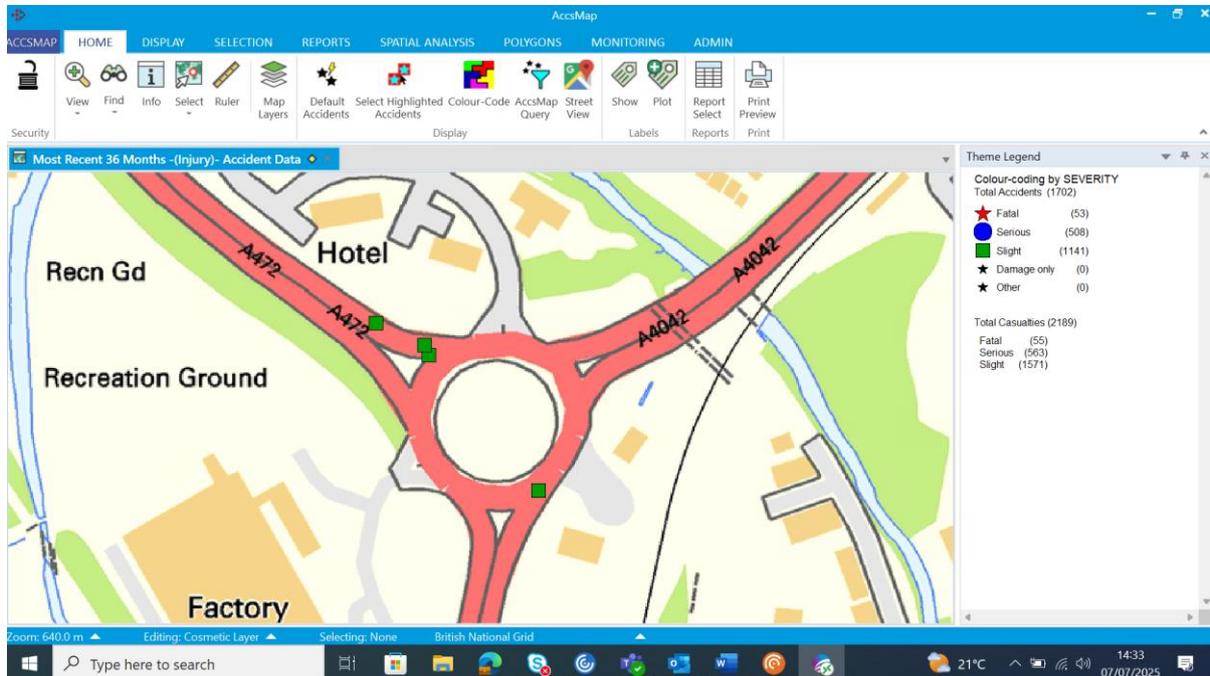
Accident Ref. No. 00514/22

12:30hrs Thursday 29/09/22 involving two vehicles one casualty on A472 on the approach to the roundabout with the A4042 . V2 motorbike approached roundabout and stopped due to traffic on the roundabout with V1 travelling behind V2 V1 didn't see that vehicle 2 had stopped and collided with V2 causing rider to fall off motorbike.

Causation factor not recorded.

Easting 329413 Northings 199956

Below is a screenshot showing the locations of the collisions at/on the roundabout.



Agenda Item 3.7

P-06-1440 Establish a Welsh under 18 gender service in Wales for Welsh children and young people asap

This petition was submitted by TransVision Cymru, having collected a total of 544 signatures.

Text of petition:

Following the long term and current poor performance of the English under 18 gender service and their extortionate waiting lists that Welsh children and young people have been subjected to, We (Transvisioncymru) have been discussing with the Welsh Government and Commissioner for Wales for over two years about having our own exemplary under 18 Welsh service. The commissioner wants change too but WG health have not moved forward at all yet.

Additional information:

We are a group established by parents of transgender children who have found the current system impossible to navigate and no support to our wonderful children. Over time we have grown into a group that consists of young people, parents/carers and allies. We also have combined in this campaign with lots of other groups to make a strong voice for trans young peoples rights.

There is an amazing, inclusive, all wales LGBTQ+ action plan published in January 2023 that excitingly states one of the main outcomes in to improve health provision and health and social care. They state they will review the Gender Identity Development pathway for young people in Wales and continue to develop the Gender Identity Service. In a recent meeting with WG health this is not the route they are taking and are going to continue making Welsh young people wait a further 4-5 years on the waiting list for an unsatisfactory service. We need a service now.

Senedd Constituency and Region

- Cardiff North
- South Wales Central

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-06-1440
Ein cyf/Our ref JMHSC/01629/25

Carolyn Thomas MS
Chair
Petitions Committee

petitions@senedd.wales

15 July 2025

Dear Carolyn,

Petition P-06-1440: Establish a Welsh under 18 gender service in Wales for Welsh children and young people asap - update

Thank you for your letter of 20 June for an update about progress towards establishing an under-18 gender service in Wales. We are continuing to develop the pathway for young people to access the gender identity service. Referrals from the waiting list are being seen by the three regional providers in England, which includes a service in Bristol.

As a result of joint working with the NHS Wales Joint Commissioning Committee (JCC), the service in Bristol has opened a satellite outpatient clinic in Cardiff and the JCC is exploring additional provision in North Wales.

This reflects our commitment to move services closer to home and our continued commitment to delivering against set ambitions in the *LGBTQ+ Action Plan*.

Yours sincerely,

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

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

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

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

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

Agenda Item 3.8

P-06-1445 Change Land Transaction Tax for First Time Buyers in Wales to be in line with the UK Government

This petition was submitted by Taylor Reynish, having collected a total of 268 signatures.

Text of Petition:

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

Additional Information:

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

Senedd Constituency and Region

- Newport East
- South Wales East

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



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MDFWL/00341/25

Carolyn Thomas MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN
Government.Committee.Business@gov.wales

10 July 2025

Dear Carolyn,

Thank you for your letter of 19 June 2025, and for forwarding the petitioner's response to the Committee of 24 September 2024.

I refer to my predecessor, Rebecca Evans MS's, responses of 27 June and 23 August 2024 to the Petitions committee Chair. The Welsh Government's position has not changed.

The Welsh Government's approach is to assist all of those buying their primary homes, regardless of whether this is their first home. Our approach has been consistently to provide the most help to those with the greatest need, rather than to target support at first-time buyers.

We continue to keep LTT rates and bands under review. In October 2022 we raised the LTT lower threshold by 25%, from £180,000 to £225,000. As a result of that change, the majority of homebuyers continue to pay no LTT.

Yours sincerely,

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

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.

Agenda Item 3.9

P-06-1487 Provide a pedestrian crossing on A4042 Llanover; make safe for bus users and reduce the speed limit

This petition was submitted by Janet Elizabeth Butler, having collected 269 signatures.

Text of petition:

The busy A4042 runs directly through the heritage village of Llanover. Residents and visitors need to cross the road to use the bus service, access the amenity of the Mon and Brecon Canal and visit the renown Llanover Gardens which open to the public at intervals through the year. The speed limit is currently 40mph. Residents of all ages do not feel safe to use the bus service. The village attracts visitors at all times of the year. The bus stops are located near to the garden entrance.

Additional information:

Llanover is a Monmouthshire village steeped in Welsh history. The character of this village can be envisaged through its street scene. The road that goes through it is winding. The buildings themselves are characterised by the walls that bound them. Each building is unique. Llanover House and gardens is also bounded by stone walls.

SWTRA have recognised the danger in this twisty road that is bounded on both sides by stone walls and have double white lined the carriageways to discourage overtaking.

The speed limit remains at 40 mph. The bus stops are located near the gates to Llanover gardens. Traffic enters the village from the south where the National Speed limit applies - often without slowing sufficiently. The speed limit changes down to 40mph only c.100 metres from the bus stops. This is where a crossing is most needed and would be the logical location. Large lorries and tractors pass through the village. The walls have a funnelling effect and the backdraft is significant.

Senedd Constituency and Region

- Monmouth
- South Wales East

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-06-1487
Ein cyf/Our ref KSNWT/01024/25

Carolyn Thomas MS
Chair - Petitions committee

17 July 2025

Dear Carolyn,

Thank you for your further letter of 23 June regarding petition P-06-1487 Provide a pedestrian crossing on A4042 Llanover.

A meeting took place on 31st January 2025 between Welsh Government officials, local community councillors, Peter Fox MS and Catherine Fookes MP. During this meeting, representations were made advocating for a pedestrian crossing over the A4042 trunk road near the village.

Following this discussion, a Stage 1 Crossing Investigation has been commissioned and is currently underway, assessing two alternate locations within the village. Once this investigation is complete, it will determine whether pedestrian crossing movements in the village are sufficient to justify the provision of a crossing at the identified locations.

Yours sincerely,

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

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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.

P-06-1487 Provide a pedestrian crossing on A4042 Llanover; make safe for bus users and reduce the speed limit - Correspondence from the Petitioner, 11 October 2025

I note that two possible sites for a crossing are being considered but the number of pedestrian movements is still under review.

I don't believe I have received any feedback on the outcome of the initial assessment despite originally being promised the outcome in July.

Covert speed monitoring in August 2025 between 19th and 28th recorded a total of 112,495 vehicle movements through the village. A huge volume given the lack of any controlled crossing place.

Community Councillor Lewis Carter in his recent letter to Welsh Government set out arguments for both a reduced speed limit and crossing. This has universal political support locally from Peter Fox MS, Catherine Fookes MP, myself CCIr Jan Butler and Goytre Fawr Community Council. All supporting the need for a crossing and reduced speed limit.

My position on this is that it's not just about the number of pedestrian movements now but rather about those in the future. If we are serious about active travel, then we must do this.

The lack of a safe crossing is a barrier to use of public transport (particularly during peak times),

As County Councillor for Goytre Fawr I am in regular contact with residents, many of them elderly and we have an aging demographic. I know our elderly residents won't currently use the bus service because they consider the road too dangerous not because they don't want to.

Two miles down the road in Goytre people are already talking to me about using the bus service more once our crossing is in place (expected installation imminent) especially now that the last bus home from Abergavenny is at 10:30 pm.

It's been very noticeable there have been far more Llanover Garden Open events this year. The opening of the Retreat Café with its Arts events has also had impact. In fact social activities in both Goytre and Llanover have also increased this year and what better way to encourage community cohesion across the whole ward of Goytre Fawr than by jumping on the bus to get about confident that you will be able to safely cross the road in Llanover.

In short Llanover needs this crossing to make active travel possible.

Kind Regards,

Jan Butler

County Councillor

Agenda Item 3.10

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

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-06-1464
Ein cyf/Our ref SM/00396/25

Carolyn Thomas MS
Chair - Petitions committee

Petitions@senedd.wales

24 July 2025

Dear Carolyn,

Thank you for your letter of 25 June on behalf of the Petitions Committee requesting an update on baby loss certificates scheme being extended into Wales.

My officials are working with NHS Business Services Authority (BSA), the supplier of the baby loss certificate for England to extend the scheme into Wales. An assessment of the technical options for delivery has been undertaken, and we will shortly be commencing a discovery phase of the chosen option. We remain committed to the delivery of a baby loss certificate scheme in Wales, unfortunately this has not been as straightforward technically as initially anticipated.

Yours sincerely,

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

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Agenda Item 4

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-06-1427
Ein cyf/Our ref KSNWT/01022/25

Carolyn Thomas MS
Chair - Petitions committee

15 July 2025

Dear Carolyn,

Thank you for your letter of 23 June regarding Petition P-06-1427 Create a sustainable traffic plan for the Rhiangoll Valley.

A speed survey for the A479 is due to be carried out this financial year. We will review the data to determine if any further measures are required and will share the survey data with GoSafe.

We will be happy share the information once finalised.

Yours sincerely,

Ken Skates AS/MS

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

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