

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

Submission by Wrexham County Borough Council

Dated 28th August 2025

1. Overview and Purpose

To brief Members of the Welsh Parliament, Petition Committee on the work undertaken by Wrexham County Borough Council in relation to concerns raised by the local community against Hafod Landfill Site, operated by Enover Ltd. The report will outline:

- Historical summary
- Community Engagement
- Wrexham Council Scrutiny Committee
- Wrexham Council Notice of Motion
- Wrexham Council's Regulatory Role
- Complaints received by Wrexham Council
- Environmental Monitoring & Assessment
- Conclusion

2. Hafod Landfill Site History Summary

2.1 Hafod Landfill site is a former clay quarry. The earliest planning permission for clay extraction dates to 5 November 1952. Further planning permissions relating to clay extraction were granted in 1959, 1973, 1979, 1988, 1992, 2001 and 2006. Mineral extraction from the site created the void that was subsequently utilised as a landfill site.

2.2 On 6 December 1990, a planning application was submitted to the former Clwyd County Council seeking planning permission to infill the void created by mineral extraction with domestic, commercial and industrial waste, the erection of an associated site control building, engineering operations and ancillary development, together with the restoration of the site to agriculture and amenity once landfill operations were completed. Clwyd County Council refused planning permission on 13 November 1991. The applicants exercised their statutory right of appeal, and their appeal was subsequently allowed by the Secretary of State for Wales on 10 July 1995.

2.3 Following the appeal decisions, further applications were submitted to Wrexham County Borough Council proposing the following:

- Relaxation of a condition imposed on the 1995 planning permission to allow additional time for the submission of certain reserved matters. Granted 17 September 1998.

- The formation of a new vehicular access (amendment to conditions imposed on the 1995 planning permission). Granted 17 September 1998.
 - Approval of matters reserved for subsequent approval by the 1995 planning permission, including details of Great Crested Newt translocation, wheel wash facilities, surface water management, site control area, fencing, dust control and landscaping. Granted 11 March 1999
 - Construction and operation of clear water storage lagoons. Granted 14 May 2002.
- 2.4 On 29 October 2003, two identical applications were submitted to vary a planning condition imposed on the 1999 reserved matters approval to substitute amended phasing, post settlement and restoration plans.
- 2.5 The Stryt Las a'r Hafod Site of Special Scientific Interest (which was designated after planning permission had been granted) and the (then Johnstown Newts Site Special Area of Conservation) occupied part of the area where landfilling works had originally been permitted. The amended plans proposed a reduced area of landfilling, this removing the SSSI/candidate SAC from the landfill area. The overall height of the pre-settlement height of the landfill site, once works were completed, was proposed to remain as previously permitted.
- 2.6 The first of the two applications was refused by Wrexham County Borough Council on 5 March 2004. The second application was subject to an appeal on the grounds of non-determination. The appeal was allowed on 26 August 2004; however the decision was later quashed by the High Court on 28 June 2005.
- Landfilling operations commenced at the site in 2006.
- 2.7 On 2 May 2007 two Modification Orders made under Section 97 of the Town and Country Planning Act 1995 were confirmed by Welsh Ministers. The effect of the Orders was to modify the landfill planning permission by excluding the area of the SSSI and the SAC (formally designated in December 2004) from the landfill area, which had both been designated since the grant of planning permission. The Modifications were sought by Wrexham County Borough Council in order to protect the integrity of the statutory protected sites.
- 2.8 Finally, planning permission was granted on 2 March 2009 for the installation of gas engines on the site. The gas engines utilise landfill gas to generate electricity and also form part of the on-site infrastructure for managing landfill gas.

3. Community Liaison

- 3.1 The Hafod Liaison Group is well established and is over twenty years old. The group has been chaired by a local councilor. The group's attendees include:

The Site operator now Enovert
 Natural Resources Wales
 Local Members for Johnstown and Ruabon
 Rubaon Community Council
 Johnston Community Council
 Four local residents
 Wrexham Council Mineral's Planning & Public Protection Officers

- 3.2 The Group's purpose is to provide a forum for open and constructive dialogue between the Landfill operator and the local community. Ensuring that information regarding landfill operations, future plans and environmental performance is shared with the aim to build trust between the landfill operator and its neighbours.
- 3.3 The frequency of meetings for the above group was increased from 2 per year to 4 per year following the increase in odour complaints and concerns from the community.
- 3.4 It is good practice to establish Liaison Group's for sites such as landfills, and other sites within Wrexham County Borough also benefit from liaison groups to ensure continued dialogue between operators and the community.
- 3.5 Natural Resources Wales Citizen Page provides a dedicated space to collate all ongoing efforts to address the community's concern.

4. Wrexham Council's Homes and Environment Scrutiny Committee

- 4.1 Wrexham Council's Homes and Environment Scrutiny Committee role is to ensure that we are an environmentally responsible County Borough.
- 4.2 The Homes and Environment Scrutiny Committee agreed a topic selection form in respect of the Hafod Landfill site that was submitted to their June 2024 meeting. It was agreed that a report be considered regarding the site's compliance with the Environmental Permitting (England and Wales) Regulations 2016. A report was prepared for the meeting on the 14th October 2024, which included:
 - Progress on mitigation interventions being taken at the Hafod Landfill Site to prevent continued public complaints as a result of activities being undertaken;
 - Consideration of National Resources Wales Enforcement Actions; and
 - Consideration of separate formal options available to the Council within statutory powers.
- 4.3 In line with the recommendations of the Committee at the June and July meetings, representatives of NRW, Enovert, WCBC Public Protection, Public Health Wales and Flintshire County Council have been invited to attend this meeting.
- 4.4 The full report and webcast of the meeting is available to view on Wrexham Council's website (www.wrexham.gov.uk), with weblink below (<https://moderngov.wrexham.gov.uk/ieListDocuments.aspx?CId=173&MID=9596&LLL=0#AI18860>)

The key recommendations:

- That an update report on the issues raised be submitted to this Scrutiny Committee within the next six months detailing the following –
 - The level of complaints;
 - Further information in respect of the monitoring of the air quality on site and the impact of carbon on site;
 - The air monitoring equipment data for on and off the site;
 - That all parties co-operate and work with each other; and
 - That Public Protection Officers endeavour to attend the Hafod Landfill Site Liaison Meetings on a quarterly basis.

4.5 The Homes and Environment Scrutiny met again on the 29th April 2025 to consider progress regarding enforcement, liaison and monitoring action at Hafod Landfill Site.

The full report and webcast of the meeting is available to view on Wrexham Council's website (www.wrexham.gov.uk) with the weblink below:

<https://moderngov.wrexham.gov.uk/ieListDocuments.aspx?CId=173&MID=9602&LLL=0#AI19826>

The key recommendations:

- That the report be noted and that the Committee support the ongoing work to reduce odour from the site and its impact on public health;
 - That a further update report be considered in 6 months;
 - That this report also contain details of any toxicity and any resultant impacts on the health of nearby residents;
 - That the Council explore the expansion of the monitoring stations in the surrounding community;
 - That if the monitoring data continues to show odours being above the accepted limits, the Council explores under its powers via the Environmental Protection Act to tackle any statutory nuisance caused by odours emitted by the site.
- 4.6 The scrutiny process has also availed an opportunity for the community to view progress on the work undertaken. It has provided a transparent opportunity for the public to assess the actions of the Council, Natural Resources Wales, Enovert Ltd and Public Health Wales.

5. Notice of Motion

5.1 A Notice of Motion was submitted to the Council for consideration on the 19th February 2025 by seven members. The report and discussion can be viewed on the Council's website (www.wrexham.gov.uk) and via the below weblink:

<https://moderngov.wrexham.gov.uk/ieListDocuments.aspx?CId=128&MId=9475&LLL=0>

The Council Motion is attached as Appendix A.

5.2 This Motion outlines a plan to support Natural Resources Wales to properly regulate and monitor the operations in line with the Environmental Permitting (England and Wales) Regulations 2016. This supports the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.

5.3 This Council resolved to undertake dedicated actions to support the Motion. A Hafod Landfill Stakeholder Group has since been established, to include WCBC local members, Lead Member for Planning & Public Protection, WCBC Officers, representative of Ruabon, Rhos Community Council, Natural Resources Wales, Constituency Member of the Senedd – Clwyd 5.4 South, Member of Parliament for Montgomeryshire & Glyndwr and representatives of Enovert. The Group have taken forward the actions committed to in the motion and will adjust strategies as needed based on ongoing assessments and community feedback. The group has met twice and the contents of this report outline the work undertaken thus far.

6. Regulatory Responsibility

- 6.1 Hafod Landfill site is permitted and regulated by Natural Resources Wales (NRW) for the landfilling of a wide range of domestic and commercial waste under the Environmental Permitting (England & Wales) Regulations 2016 (EPR). These regulations provide a regulatory regime for activities that have different types of industrial emissions generally to air, water or land. The Local Authority has a role for regulating smaller industrial activities with atmospheric emissions and then Natural Resources Wales regulate the larger industries including landfill sites.
- 6.2 The Chief Officer of Economy and Planning has delegated powers of enforcement to Public Protection Officers to enforce the provisions Environmental Protection Act 1990, and a wide range of Environmental Health based legislation. In addition, the planning permission for the site, includes a list of planning related conditions.

Enforcement Policy

- 6.3 The Council approach to enforcing Environmental legislation is outlined in the Council's enforcement policy. The policy outlines how good enforcement principles are embedded in practice. Our key regulatory aims include achieving less pollution from industrial sites and we will adopt a positive, proactive and balanced approach to ensure compliance.

The Council's Enforcement Policy is available to view via:

<https://www.wrexham.gov.uk/service/public-protection-service-enforcement-policy>.

- 6.4 During the period of elevated odour emissions and complaints (October 2024 to February 2025), Enover was subject to formal action, brought by NRW, requiring a large amount of physical and operational improvements.
- 6.5 Additionally, the policy states that: *'On occasion, it will be more appropriate for other agencies or other local authorities to deal with particular breaches of legislation. In carrying out shared duties, we will still comply with our Enforcement Policy, but the other agencies will maintain the right to take any action they consider necessary'*. As such, the policy dictates that the organisation with primacy (NRW) is the most appropriate to implement formal actions.
- 6.6 The Council's Public Protection Team considered that the only available formal action would have been to serve a section 80 Abatement Notice (should in-person monitoring have indicated there was a statutory nuisance occurring). The conditions required by such a Notice would have essentially mirrored the requirements imposed by NRW.
- 6.7 The regulatory landscape was considered by the Homes and Environment Scrutiny Committee in October 2024. The Council has reviewed its relevant enforcement powers and is committed to ensure that the local community are protected from nuisance odours.

Environmental Permitting & Statutory Nuisance

- 6.8 Due to the type of activities carried out by many regulated activities, such as those undertaken on the landfill sites, there the Local Authority may routinely receive complaints about Statutory Nuisances e.g. odour, dust or noise. However, where the same event might also be prosecuted by the regulator under the Environmental Permitting Regulation, a Local Authority must obtain the Secretary of State's or Welsh Ministers' consent before prosecuting under Part III EPA. Section 79(10) EPA states:

6.9 “A local authority shall not without the consent of the Secretary of State [or, in Wales, Welsh Ministers] institute summary proceedings under this Part in respect of a nuisance falling within paragraph (b), (d), (e), (fb) or (g) ... of subsection (1) above if proceedings in respect thereof might be instituted under ... regulations under section 2 of the Pollution Prevention and Control Act 1999’.

Environmental Protection Act 1990 (Part III) - Local Authority duties

The Local Authority must:

- Inspect their area from time to time, to detect anything that might be a statutory nuisance;
 - Take such steps as are reasonably practicable to investigate any complaint of a statutory nuisance made by a person living within their area; and
 - If satisfied that a statutory nuisance exists or is likely to occur or recur, serve an abatement notice (in accordance with section 80 EPA).
- 6.10 A local authority may then prosecute a person or a company who contravenes or fails to comply with an Abatement Notice without reasonable excuse. The statutory nuisances referred to by section 79(1) EPA refers to “any dust, steam, smell or other effluvia arising on industrial, trade or business premises, so far as they are prejudicial to health or a nuisance”.
- 6.11 For the issue to count as a statutory nuisance, it must unreasonably and substantially interfere with the use or enjoyment of a home or other premises; and / or injure health or be likely to injure health.

Considerations with section 80 of the EPA

- 6.12 There is no fixed point at which something becomes a statutory nuisance. Councils will rely on suitably qualified Officers (generally an Environmental Health Officer, or EHO) to gather evidence. They may ask the complainant to complete diary sheets but would generally try to make site visits upon receipt of a complaint at the time the alleged nuisance is occurring.
- 6.13 Once the evidence-gathering process is complete, the EHO will assess the evidence. They will consider factors such as the timing, duration, and intensity of the alleged nuisance. The EHO will use their professional judgement to decide whether a statutory nuisance exists. If the EHO is satisfied that a statutory nuisance exists, a Notice can be served that prescribes actions necessary to abate the nuisance. There is no power to cease or prohibit actions, as the power to serve a Notice does not allow for this (unlike EPR).
- 6.14 However, there is a defence known as Best Practicable Means, which is a defence available to commercial activities who are essentially taking all steps to mitigate a problem. Consideration has to be given to the ability of the process operator to do something about the nuisance, as some activities will have inherent impacts that are not possible to eliminate.

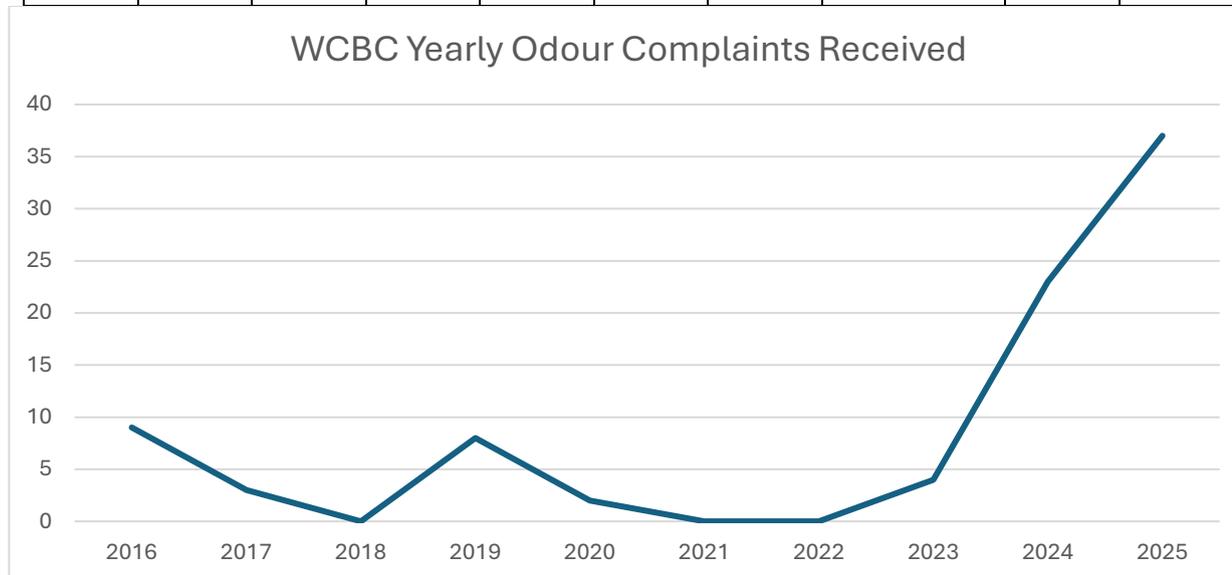
Grounds of appeal

- 6.15 A person who receives an Abatement Notice has a right to appeal in the Magistrates’ Court. There are a number of possible routes of appeal if a Notice is served including that there is no nuisance, that the authority is refusing alternative requirements or that the requirements are unnecessary. One could see the latter being used as the company may very well decide to appeal a Notice and highlight that they are already involved in enforcement and actions with NRW.

7. Complaints received by Wrexham County Borough Council

7.1 The table and graph below details odour complaints received from residents to Wrexham County Borough Council's Public Protection Service between 2016 and 20th August 2025;

2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
9	3	0	8	2	0	0	4	23	37



7.2 Over the last 6 months, there has been a significant decrease in the number of odour complaints received following a peak in the Winter of 2024/25. The decrease in odour has also been noted by and commented on by the most frequent complainant.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2024	1	0	0	0	1	1	0	0	1	7	6	8
2025	31	4	0	0	0	0	1	2				

Detail for whole complaint period

7.3 In summary, the most frequent complainant contacted Public Protection (PP) 14 times, with the next most frequent contacting PP 6 times. [REDACTED]

[REDACTED] The street with the highest number of complaints is Hoel Kenyon, (16 contacts), with the next highest number of complaints from residents on Y Fron (7 contacts)

Hafod Landfill Site – Planning Enforcement

7.4 On 12 March 2025, a complaint was received relating to mud on the road and a potential breach of planning control regarding the requirement for vehicles to pass through wheel wash facilities prior to exiting the site.

7.5 The site was monitored by the Council's Planning Enforcement Officers over a period of 3 months, with a total of 8 site visits taking place over this this period. On no occasion was evidence of mud on the road was observed. The case was therefore closed on 28 May 2025.

8. Environmental Monitoring & Assessment

8.1 Since the initial community related concerns, Officers from Wrexham Council's Public Protection, Natural Resources Wales and Public Health Wales have worked together to address community concerns, meeting on several occasions to review current matters. The primary focus of all parties was to reduce the odour emission from the landfill site, ensuring the best available techniques are employed on site.

Air Quality Monitoring

8.2 It was agreed at the Housing and Economy Scrutiny Committee meeting of 16th October 2024 that an update report on the issues raised at the meeting was to be submitted to the Scrutiny Committee within the six months detailing the following:

- The level of complaints;
- Further information in respect of the monitoring of the air quality on site and the impact of carbon on site; and
- The air monitoring equipment data for on and off the site.

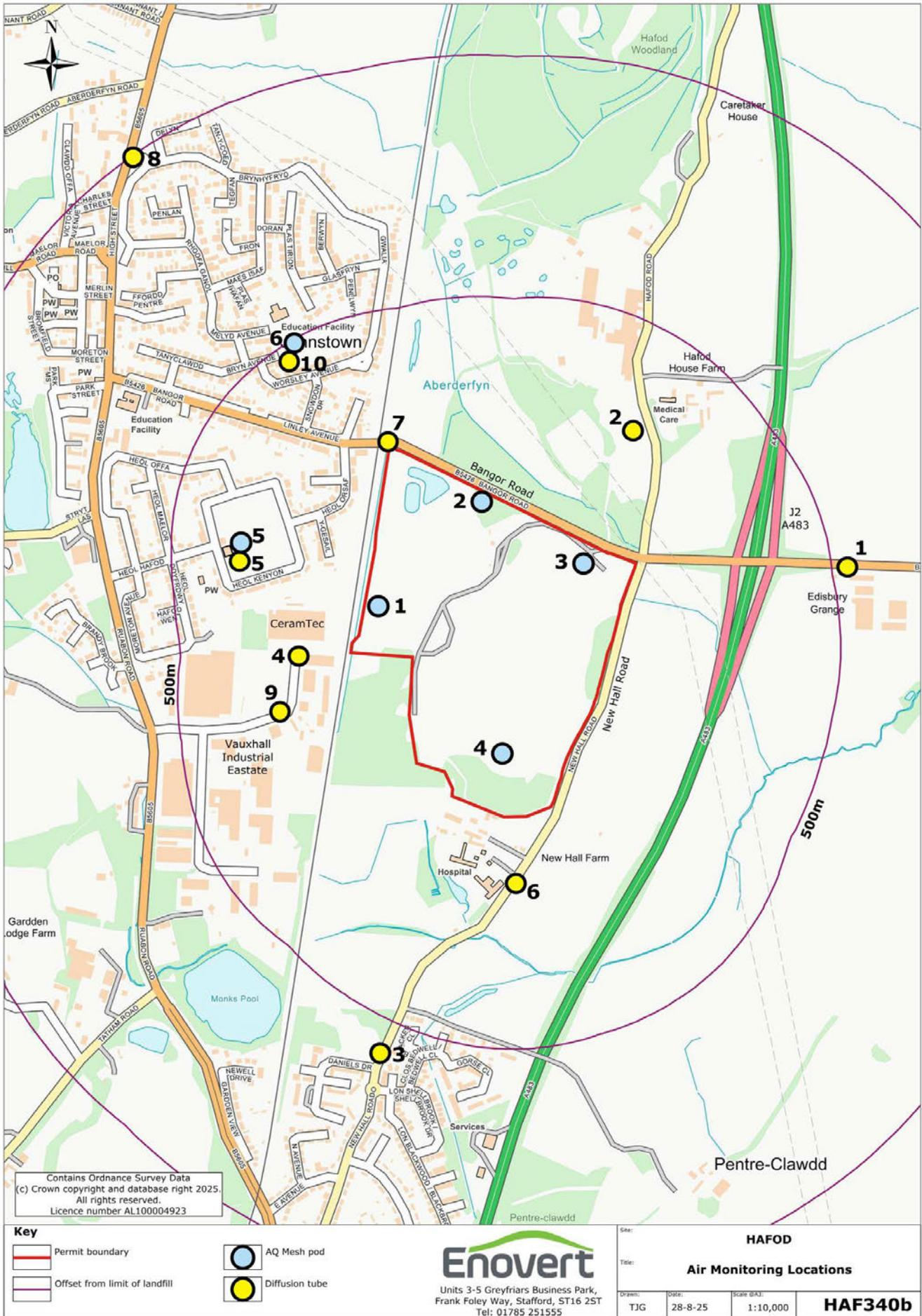
8.3 In response the Council's Public Protection Team undertook an investigation to ascertain the best type of air quality monitoring devices that were capable to detecting hydrogen sulphide (H₂S) and volatile organic compounds (VOCs) at extremely low concentrations, at short intervals (1/10/30 minutes etc.), 24 hours a day monitoring and remote internet access to data.

8.4 Three similar systems were considered, all employing electro-chemical analysers, which means that the Air Quality Monitoring (AQM) pods are both small, lightweight, low powered and can be easily located at sites with or without power. AQM pods designed and manufactured by AQMesh, a UK based company, were chosen and installed during late February and March 2025

8.5 Four AQMesh pods have been installed and operated by Enovert, being sited on the perimeter of the Hafod Landfill site. An additional pod has been installed and operated by Wrexham CBC Public Protection, sited at the Johnstown Community Centre. 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.

8.6 At the request of the local community, an additional pod (including an ultrasonic wind sensor that captures real time wind speed and direction) is to be installed at the Johnstown and Nant Parc Bowling Pavilion (position 6).

8.7 The location of the monitors, shown as blue circles, is shown on the map below. The individual pods measure H₂S in parts per billion (ppb) and also Total Volatile Organic Compounds (TVOCs) again in ppb.



- 8.8 The results from the monitors can be checked in real-time by Public Protection, NRW and Enovert personnel.
- 8.9 An image of the AQMesh pod system (together with the solar power pack and ultrasonic wind sensor) is shown below.



- 8.10 At the suggestion of Enovert's air quality consultants, H₂S diffusion tubes have been co-located with the Wrexham CBC air quality monitoring pods (and a number of other sites surrounding the landfill site) to determine the accuracy of the real time monitors and check for other sources of H₂S. The locations are shown on the Enovert map shown as yellow circles on page 9.
- 8.11 Assessment of all monitoring undertaken by Enovert and the Council is being provided to Geotechnology, consultants employed by Enovert. Reports have been and will continue to be distributed to the Council's EHO, NRW and Enovert and will be accessible to the public via NRW's citizen web pages. The monitoring undertaken in the community will be collated by the Council's EHO with further analysis undertaken with support from PHW and BCUHB. Monitoring results and assessments have been discussed with the Hafod Liaison Group.
- 8.12 Initially the odour threshold guidance standard (4.7ppb – 15 minute average) and Health and Safety Executive EH40 regulatory standards were taken to assess the first results contained in the Homes and Environment Scrutiny Committee report of 29th April 2025. Since this report Public Health Wales have advised that the most appropriate standards to apply to the gathered data should be:

Hydrogen sulphide (H₂S)

Source	Time period	Guideline value	Note
WHO air quality guidelines	30-minute (average)*	7 µg/m ³ (5 ppb)	Based on odour annoyance
	24-hour (average)	150 µg/m ³ (107 ppb)	Based on eye irritation in humans
Acute Exposure Guideline Levels (AEGLs)****	10 minutes	750 ppb	Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure.

It is these standards that will be applied to all future and historical data. Other guideline standards are also being considered.

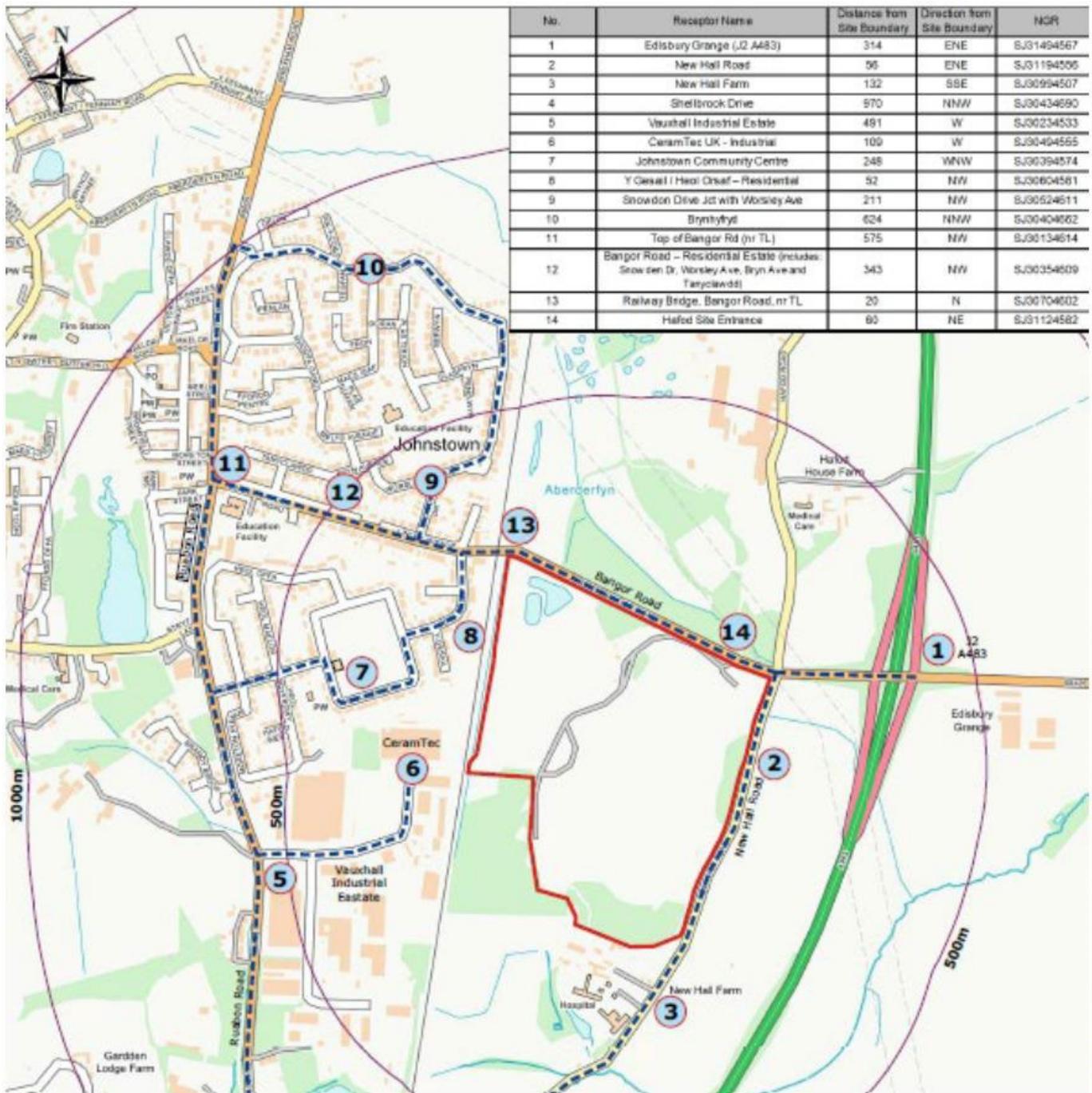
Officer Odour Monitoring 14 July 2025 – 15 August 2025

8.13 In order to assess the current situation in Johnstown, odour monitoring was carried out with regard to landfill odours, by Public Protection Officers at Wrexham CBC, at the below off-site locations:

These locations are:

- 1) Junction 2 - A483 slip road / Edisbury Grange
- 2) New Hall Lane
- 3) New Hall Farm
- 4) Shellbrook Drive
- 5) Vauxhall Industrial Estate
- 6) Ceram Tec UK
- 7) Johnstown Community Centre
- 8) Y Gesail/ Heol Orsaf
- 9) Snowdon jct Worsley
- 10) Brynhyfryd
- 11) Top of Bangor Road
- 12) Bangor Road (Linley Drive, etc)
- 13) Bangor Road Railway Bridge
- 14) Hafod Site Entrance

8.14 These positions are shown on the route highlighted below and an Odour Assessment is made at all 14 locations, with Officer recording their findings. To aid consistency and fair comparison, Officers used the same Odour Intensity Rating Scale as that identified in the AQ report. This is specified on page 13



Rating**Key**

0	No Odour
1	Faint and Intermittent
2	Faint and Continuous
3	Strong and Intermittent
4	Strong and Continuous
5	Very Strong and Intermittent
6	Very Strong and Continuous

8.15 The table below identifies the instances where odour was detected (i.e. 1 and above), dates and times, location and the rating applied using the Odour Intensity Scale

Date	Day	Time	Position	Rating	Location
14/7/25	Monday	10:44	2	4	New Hall Lane
			3	4	New Hall Farm
15/7/25	Tuesday	14:30	2	2	New Hall Lane
			14	4	Site Entrance
16/7/25	Wednesday	11:40	2	4	New Hall Lane
17/7/25	Thursday	16:30	2	3	New Hall Lane
			14	4	Site Entrance
18/7/25	Friday	09:08	14	3	Site Entrance
21/7/25	Monday	11:55	2	2	New Hall Lane
22/7/25	Tuesday	10:50	2	3	New Hall Lane
			3	1	New Hall Farm
			14	1	Site Entrance
23/7/25	Wednesday	13:48	3	4	New Hall Farm
24/7/25	Thursday	09:20	2	3	New Hall Lane
			3	4	New Hall Farm
28/7/25	Monday	14:20	3	4	New Hall Farm
			5	1	Vauxhall Ind Est
			13	1	Railway Bridge
29/7/25	Tuesday	13:30	3	4	New Hall Farm
30/7/25	Wednesday	08:50	2	4	New Hall Lane
			3	6	New Hall Farm
31/7/25	Thursday	14:40	2	4	New Hall Lane
			14	4	Site Entrance
1/8/25	Friday	18:30	1	2	Jct 2 A483
			2	4	New Hall Lane
			3	4	New Hall Farm
5/8/25	Tuesday	14:30	3	4	New Hall Farm
			3	2	New Hall Farm
			5	1	Vauxhall Ind Est
6/8/25	Wednesday	18:00	3	4	New Hall Farm
			14	3	Site Entrance
8/8/25	Friday	10:36	2	4	New Hall Lane
			3	1	New Hall Farm
			14	1	Site Entrance
11/8/25	Monday	10:45	9	1	Snowdon Jct
			13	3	Railway Bridge

Date	Day	Time	Position	Rating	Location
			14	3	Site Entrance
12/8/25	Tuesday	14:30	8	3	Y Gesail/ Heol Orsaf
			9	1	Snowdon Jct
			13	2	Railway Bridge
13/8/25	Wednesday	10:15	12	1	Bangor Road (Linley Dr)
			13	2	Railway Bridge
14/8/25	Thursday	11:00	2	3	New Hall Lane
			3	3	New Hall Farm
15/8/25	Friday	09:20	3	2	New Hall Farm

The points below summarise our findings:

- i. The assessments were carried out Monday-Friday each week from 14 July 2025 ending on 15 August 2025, totalling five weeks.
 - ii. 60% of the checks were carried out in the mornings and 40% in the afternoons but this did not seem to have any impact on the levels of odour detected.
 - iii. The wind direction for almost all of the days recorded, included westerly elements to some degree, NW, W and SW. There was only one occasion where the wind was recorded as having any level of easterly element, on 11/8.
 - iv. There were nine different locations where odour was recorded at some point within that five week period of checks. These locations are 1, 2, 3, 5, 8, 9, 12, 13 and 14 as shown on the previous list.
 - v. Our assessments have determined that over the period 14/7 to 15/8 the locations majorly impacted were 2 (New Hall Lane), 3 (New Hall Farm) and 14 (Site Entrance)
 - vi. Out of the 25 day period, 3 records are not available.
 - vii. Out of the remaining 22 records there was some level of landfill odour recorded each day. The locations 2 & 3 at New Hall Lane and New Hall Farm both recorded odour on over 50% of the days assessed. 55% at location 3 and around 60% at location 2.
- 8.16 The odour checks for Hafod Landfill, carried out by Officers from the Council, have found that levels on New Hall Lane and New Hall Farm are still recording as strong smelling with a mixture of intermittent and continuous landfill odour present. Additionally, there have been many occasions where the odour at the entrance to the Landfill site has also been recorded as strong smelling (a mix of both intermittent and continuous).

Location	Number of occasions odour recorded	Number of occasions odour NOT recorded	Odour level recorded
1	1	21	2
2	13	9	3-4
3	12	10	3-4
4	0	22	0
5	2	20	1
6	0	22	0
7	0	22	0
8	1	21	3
9	2	20	1
10	0	22	0
11	0	22	0
12	1	21	1
13	4	18	2
14	9	13	3-4

- 8.17 During the monitoring period of 22 days, all 14 locations were monitored giving a total of 308 occasions when monitoring points were assessed. On 263 monitoring occasions, NO odour was detected.
- 8.18 The Officer odour monitoring results indicate that no statutory odour nuisance currently exists, relating to the Hafod landfill site at the current time due to infrequency, odour level, area where the odour was detected. The monitoring outcome reflects the current low numbers in community odour complaints, which is welcomed.
- 8.19 Public Protection Officers will continue to carry out Odour Intensity Assessments over the coming weeks to try and ascertain any difference in levels to include more easterly wind. However, this is obviously weather dependent.
- 8.20 Officers will continue to assess alleged odour nuisance where complaint information allows. This cannot be undertaken where complaint is of a historical nature and there is no odour at time of the visit. The likelihood that a complaint could have been at a level considered to be a statutory nuisance can also be checked with reference to the data provided by the AQ monitors.

9. Conclusion

- 9.1 The effective and efficient running of the Hafod Quarry as a landfill site is essential to protect public health, preserve the environment, and enhance the quality of life for local residents. The Council has committed to a responsible and transparent monitoring process.
- 9.2 Failure to meet any necessary actions to safeguard and protect the health of residents and the local environment will result in the necessary plans being drawn up for the closure and effective restoration of the Hafod site to ensure environmental safety and community well-being.

END

Appendix A

Council Motion

We the undersigned submit this Motion to Full Council for debate and consideration:

Councillor David A Bithell, Councillor Steve (Joe) Jones, Councillor Paul Pemberton, Councillor John Phillips, Councillor Mark Pritchard, Councillor Fred Roberts, Councillor Alison Tynan

Notice of Motion:

Introduction: The Hafod Quarry, currently operated by Enovert as a landfill site, has raised significant environmental and public health concerns among local residents and stakeholders. The continued operation of the landfill poses risks such as groundwater contamination, air pollution, and negative impacts on biodiversity.

This motion outlines a plan to support Natural Resources Wales to properly regulate and monitor the operations in line with the Environmental Permitting (England and Wales) Regulations 2016 which supports the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.

This Council resolves to take the following actions:

1. **Conduct a Community Concerns Assessment:**
 - Commission a community concerns assessment, which will capture health, ecological and environment as a whole and put the community first (following advice from Public Health Wales and BCUHB).
 - To ensure that local residents are included in a participatory stakeholder workshop as part of the assessment to gather all health related concerns.
2. **Review and demand on-going robust evidence of appropriate performance environmental monitoring and emissions regulation:**
 - Review and examine the evidence of all monitoring undertaken at the site to ensure it is in line with Environmental Permitting (England and Wales) Regulations 2016.
 - Review the evidence of actions taken following the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.
 - Assess the impact of the landfill on the local environment, air quality and local biodiversity.
 - Statutory Nuisance – Under the Environmental Protection Act 1990 Local Authorities (under Part III EPA) have a duty to ensure all legislative framework is followed.
3. **Full examination of potential Waste Management & Alternatives:**
 - Identify and establish alternative waste management solutions to reduce dependency on landfill disposal for local businesses.
 - Promote waste reduction, recycling, and composting initiatives within the business community.
 - Establish composition of waste analysis at Hafod Quarry Landfill Site.
4. **Full and Effective Community Engagement and Communication:**
 - Ensure transparent communication with the local community about the processes, timelines, and potential impacts, including regular updates on progress.

5. **Review and Report Progress:**

- Provide regular updates to the Homes & Environment Scrutiny Committee on the progress of measures included in this motion and the monitoring and activities.
- To establish a Hafod Landfill Stakeholder Group, to include WCBC local members, Lead Member for Planning & Public Protection, WCBC Officers, representative of Ruabon, Rhos Community Council, Natural Resources Wales, Constituency Member of the Senedd – Clwyd South, Member of Parliament for Montgomeryshire & Glyndwr and representatives of Enover. The group can take forward the actions committed to in this motion and can adjust strategies as needed based on ongoing assessments and community feedback.

Conclusion: The effective and efficient running of the Hafod Quarry as a landfill site is essential to protect public health, preserve the environment, and enhance the quality of life for local residents. This Council commits to a responsible and transparent review process and any repeated failure of performance, call for all necessary actions to safeguard and protect the health of residents and the local environment.

Resolution: The Full Council adopts this Motion and instructs the relevant departments to initiate and work closely with NRW and partners to ensure the effective operation of the site. Failure to address this should result in the necessary plans being drawn up for the closure and effective restoration of the Hafod site to ensure environmental safety and community well-being.

The Petitions Committee
Welsh Government

Your Ref/Eich Cyf
Our Ref/Ein Cyf
Date/Dyddiad
Ask for/Gofynner am

DAB
20 August 2025
Councillor David A Bithell

Dear Chair and Members of the Petitions Committee

We are writing to you as Local Members in relation to the ongoing concerns raised by residents living near Hafod Quarry. The issue of odour from the site has been a persistent source of complaints and distress within our communities, and we wish to set out the current position from a local perspective.

Residents have long reported unacceptable odour levels, which have a direct impact on quality of life and public confidence in how the site is regulated. In December 2023, the site operator was issued with an Enforcement Notice for permit breaches which are recorded on the public register. Following the submission of a topic request on this matter in October 2024, Hafod Quarry was considered by the Council's Scrutiny Committee. Subsequently, in February 2025, a motion was submitted and passed at Full Council (copy attached) which called for stronger action, including:

- Improved and more transparent links to the established Liaison Committee.
- The creation of a new stakeholder group to strengthen accountability and ensure residents' voices are heard.
- Installing monitoring equipment and to carry out a health assessment.

Since then we have seen some progress. Complaints have reduced during 2025, with the operator working more proactively alongside key stakeholders. New monitoring equipment has also been installed, which has the potential to reassure the public that issues are being properly measured and addressed.

However, there is still a great deal of work to do. Better communication with residents is essential if we are to rebuild trust and demonstrate that action is being taken when problems arise. Residents need confidence that the systems in place and public bodies are effective and that their concerns are treated seriously.

As Local Members we remain fully committed to supporting measures which will reduce odour, provide public health assurance, minimise complaints, and ensure accountability. While there are signs of improvement, the situation remains fragile and ongoing support and oversight are essential.

We would, therefore, urge the Petitions Committee to note the progress made, but also to continue pressing for further action to ensure residents feel properly protected and engaged in the progress about Hafod Quarry.

Yours sincerely



Councillor David A Bithell
Local Member for
Johnstown and Pant Ward



Councillor Steve Joe Jones
Local Member for
Johnstown and Pant Ward



Councillor Dana Davies
Local Member for
Ruabon Ward

Motion to Council – Hafod Quarry Landfill Site

We the undersigned submit this Motion to Full Council for debate and consideration:

Councillor David A Bithell, Councillor Steve (Joe) Jones, Councillor Paul Pemberton, Councillor John Phillips, Councillor Mark Pritchard, Councillor Fred Roberts, Councillor Alison Tynan

Notice of Motion:

Introduction: The Hafod Quarry, currently operating by Enovert as a landfill site, has raised significant environmental and public health concerns among local residents and stakeholders. The continued operation of the landfill poses risks such as groundwater contamination, air pollution, and negative impacts on biodiversity. This motion outlines a plan to support Natural Resources Wales to properly regulate and monitor the operations in line with the Environmental Permitting (England and Wales) Regulations 2016 which supports the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.

This Council resolves to take the following actions:

1. **Conduct a Community Concerns Assessment:**
 - Commission a community concerns assessment, which will capture health, ecological and environment as a whole and put the community first (following advice from Public Health Wales and BCUHB).
 - To ensure that local residents are included in a participatory stakeholder workshop as part of the assessment to gather all health related concerns.

2. **Review and demand on-going robust evidence of appropriate performance environmental monitoring and emissions regulation:**
 - Review and examine the evidence of all monitoring undertaken at the site to ensure it is in line with Environmental Permitting (England and Wales) Regulations 2016.
 - Review the evidence of actions taken following the recommendations of the Homes & Environment Scrutiny Committee held on 16th October 2024.
 - Assess the impact of the landfill on the local environment, air quality and local biodiversity.
 - Statutory Nuisance – Under the Environmental Protection Act 1990 Local Authorities (under Part III EPA) have a duty to ensure all legislative framework is followed.

3. **Full examination of potential Waste Management & Alternatives:**
 - Identify and establish alternative waste management solutions to reduce dependency on landfill disposal for local businesses.
 - Promote waste reduction, recycling, and composting initiatives within the business community.
 - Establish composition of waste analysis at Hafod Quarry Landfill Site.

4. **Full and Effective Community Engagement and Communication:**
 - Ensure transparent communication with the local community about the processes, timelines, and potential impacts, including regular updates on progress.

5. **Review and Report Progress:**
 - Provide regular updates to the Homes & Environment Scrutiny Committee on the progress of measures included in this motion and the monitoring and activities.
 - To establish a Hafod Landfill Stakeholder Group, to include WCBC local members, Lead Member for Planning & Public Protection, WCBC Officers, representative of Ruabon, Rhos Community Council, Natural Resources Wales, Constituency Member of the Senedd – Clwyd South, Member of Parliament for Montgomeryshire & Glyndwr and representatives of Enover. The group can take forward the actions committed to in this motion and can adjust strategies as needed based on ongoing assessments and community feedback.

Conclusion: The effective and efficient running of the Hafod Quarry as a landfill site is essential to protect public health, preserve the environment, and enhance the quality of life for local residents. This Council commits to a responsible and transparent review process and any repeated failure of performance, call for all necessary actions to safeguard and protect the health of residents and the local environment.

Resolution: The Full Council adopts this Motion and instructs the relevant departments to initiate and work closely with NRW and partners to ensure the effective operation of the site. Failure to address this should result in the necessary plans being drawn up for the closure and effective restoration of the Hafod site to ensure environmental safety and community well-being.