

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

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

Dear Petitions Committee,

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

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

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

#### **1. Misplaced Concerns Over Site Closure**

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

#### **✦ Legal Reference:**

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

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

#### **2. Documented Failures in Infrastructure and Monitoring**

The most recent Hafod Landfill Gas Audit Report (LERP), referenced in Compliance Assessment Report CAR\_NRW0045947, reveals a litany of technical and structural failures that fundamentally undermine confidence in site management. These include:

- Wells with missing or poorly installed bentonite seals;

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

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

### **3. Complicity by Inaction — Not Collaboration**

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

#### **Legal Reference:**

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

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

### **4. Flawed Community Engagement Structures**

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

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

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

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

### **5. The Need for Ministerial Oversight and Intervention**

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

### **Legal Reference:**

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

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

### **Legal and Policy Grounds to Revoke Permit PP3129GB**

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

### **Final Thought**

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

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

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

I look forward to your considered response.

Yours sincerely,  
**Steve Gittins**

[REDACTED]

(Office of Public Protection)

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

Dear [REDACTED]

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

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

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

This very same issue has left our community suffering from the stench of hydrogen sulphide (H<sub>2</sub>S) from Hafod Landfill for two decades, with three more decades pending.

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

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

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

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

### **The Critical Difference: Particulate Compliance vs. Odour Nuisance**

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

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

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

#### **2. Odour Pollution: The Overlooked Crisis**

- The unbearable stench from Hafod Landfill is caused by gaseous emissions, including hydrogen sulfide (H<sub>2</sub>S), volatile organic compounds (VOCs), and ammonia (NH<sub>3</sub>).
- These gases are NOT particles and are therefore **not detected by standard air quality monitors used for particulate matter.**
- Odour pollution is not just a distressful nuisance—it is a statutory issue under environmental law and a serious threat to quality of life.

### **A Regulatory Loophole Allowing Inaction**

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

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

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

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

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

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



**Cllr Hugh Jones**

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

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

**Dear Cllr Jones,**

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

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

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

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

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

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

**Regulatory Failure and the Need for Stronger Enforcement**

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

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

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

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

## **Flawed Permit Framework**

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

Hydrogen sulphide (H<sub>2</sub>S), a primary landfill emission, is:

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

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

## **Immediate Action Required**

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

I look forward to your prompt response.

Steve Gittins



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

24<sup>th</sup> March 2025

Dear Sir/Madam,

I am writing to formally challenge the adequacy of the **5 µg/m<sup>3</sup> (micrograms per cubic metre) threshold** for **Hydrogen Sulphide (H<sub>2</sub>S) emissions** in relation to odour nuisance and its severe impact on the local community.

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

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

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

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

#### **The Regulatory Blind Spot: Why Odour is Being Ignored**

The EPA permit framework focuses on easily measurable pollutants like PM<sub>2.5</sub> and PM<sub>10</sub>, while **odour, despite its immediate and severe impact on communities it is sidelined as a secondary issue.** This regulatory failure stems from the fact that:

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

### **Misleading Dismissal of Odour Transience**

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

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

### **Analogy: The Neighbour with Screeching Music**

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

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

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

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

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

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

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

### **Failure to Account for Public Distress & Quality of Life**

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

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

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

### **Adding Insult to Injury – Importing Waste from England**

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

### **Immediate Demand for Site Closure Until Odour is Controlled**

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

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

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

### **Request for Formal Response**

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

Yours sincerely,

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

Copies to:

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

## **Note to Huw Irranca Davies – Deputy First Minister**

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

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

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

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

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

We deserve better. Will you finally listen?

**ENOUGH IS ENOUGH !!**

**'Against Hafod Landfill' campaigners.**

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

Dear [REDACTED]

Thank you for your response dated 25 March.

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

### 1. The "Sniff Test" — Subjective and Insufficient

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

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

### 2. NRW's Paradoxical Enforcement Logic

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

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

### 3. Pattern of Prevarication

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

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

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

### 4. Monitoring and Measurable Standards

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

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

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

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

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

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

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

Sincerely,

Steve Gittins

Sent via BT Email App

From: Central Correspondence Team [REDACTED]

Sent: 3 April 2025 10:26:36 BST

To: Steve Gittins [REDACTED]

Subject: ATI-28202a - Response

Dear Mr Gittins,

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

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

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

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

1. *NRW and Wrexham Council urgently review the inadequacy of the 5 µg/m<sup>3</sup> threshold in addressing odour nuisance and implement a lower, more appropriate intervention level.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Best wishes

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

**Subject:** Further Submission – Hafod Landfill Petition

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

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

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

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

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

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

Kind regards,  
**Steve Gittins**

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

Dear Sir/Madam,

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

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

Dear Sir / Madam,

**I am prompted to write to you following the latest Compliance Assessment Report (CAR\_NRW0045947), arising from an audit in October 2024. raised on November 12-13, 2024, and submitted on 12<sup>th</sup> February 2025, to formally raise serious concerns regarding the ongoing mismanagement and environmental failings at Hafod Landfill, as This report, highlights extensive and severe breaches of the site's environmental permit (PP3139GB) held by Enovert North Limited.**

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

**The CAR confirms multiple critical breaches, including:**

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

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

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

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

We call on NRW to take decisive action by:

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

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

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

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

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

Yours sincerely,

Steve Gittins

Copy to :

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



## Compliance Assessment Report CAR\_NRW0046256

**Permit being assessed:** PP3139GB.

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

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

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2024.

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

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

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

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

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

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

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

## 2. What action is required?

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

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

## 3. What will happen next?

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

**You are non-compliant with your permit.**

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

## 4. Details of our assessment

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

### Leachate

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

A total of 7,424 m<sup>3</sup> of leachate was removed from site for treatment during Q4.

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

the compliance limit of 2m. NRW considers this a breach of permit condition 2.7.1. A non-compliance score for this permit breach (IR21-Leachate levels) has already been applied for this quarter following the landfill gas audit at the site in November 2024 (see CAR\_NRW0045947) and will therefore not be applied in this CAR.

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

Action 1: continue to complete actions in Leachate Management Action Plan (LMAP) dated November 2024 and actions proposed following the Landfill Emissions Reduction Project (LERP) landfill gas audit (CAR\_NRW0045947)

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

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

### Landfill gas

Perimeter gas monitoring was undertaken in accordance with Condition 3.5.1(d) and Table 3.6 (Landfill gas in external boreholes). With reference to Schedule 5 notifications Haf375 (October), Haf379 (November) and Haf383 (December) there were 26 instances during Q4 where methane (CH<sub>4</sub>) levels in perimeter gas wells exceeded the 1% permitted Emission Limit Value (ELV). Values between 0-30.3% CH<sub>4</sub> were recorded during Q4. NRW considers this a breach of permit condition 3.1.7 and a non-compliance score has been applied (IR3A-Emissions to water, air or land-C3).

Action3: Continue to complete actions specified in updated Landfill Gas Action Plan (LFGAP) dated 24/01/25 and those proposed following LERP audit (CAR\_NRW0045947)

### Groundwater

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

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

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

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

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

The operator was scored for breaching the compliance limit of chloride in monitoring point BH HA 12C(B) during the review of Q2 2024 (CAR\_NRW0045313) monitoring returns and given the following action

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

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

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

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

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

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

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

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

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

### **Surface water**

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

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

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

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

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

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

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

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

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

### **Annual report**

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

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

Volume tipped = 89,419 m<sup>3</sup>

Void Space remaining = 1,841,499 m<sup>3</sup>

LFG to engines m<sup>3</sup>/year = 7,439,635

LFG to Flare m<sup>3</sup>/year = 1,136,405

Total LFG = 8,576,040

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

Dear Members of the Senedd Petitions Committee,

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

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

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

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

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

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

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

We therefore respectfully request that the Committee:

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

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

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

Thank you once again for considering this updated submission.

Sincerely,  
**Steve Gittins**

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

Dear Sir/Madam,

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

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

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

### **Emerging Scientific Evidence**

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

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

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

### **Lack of Health Impact Assessment**

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

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

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

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

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

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

### **Request for Comparative Health Data**

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

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

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

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

### **Request for Action**

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

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

Ensure continuous, real-time air quality monitoring at multiple locations around the site, focusing on key pollutants including PM2.5, VOCs, heavy metals, H<sub>2</sub>S, and bioaerosols.

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

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

## **Conclusion**

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

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

Yours faithfully,

Steve Gittins

Sent to :

Jeremy Miles MS Minister for Health and Social Services - [ministerforhealth@gov.wales](mailto:ministerforhealth@gov.wales) / [jeremy.miles@gov.wales](mailto:jeremy.miles@gov.wales)

Huw Irranca-Davies MS Minister for Climate Change - [climatechange@gov.wales](mailto:climatechange@gov.wales) / 

Dr. Tracey Cooper, Chief Executive, Public Health Wales - [phw.enquiries@wales.nhs.uk](mailto:phw.enquiries@wales.nhs.uk)

Dr. Frank Atherton, Chief Medical Officer for Wales - [healthandcmo@gov.wales](mailto:healthandcmo@gov.wales)

Director of Public Health, Betsi Cadwaladr University Health Board - [BCU.PublicHealth@wales.nhs.uk](mailto:BCU.PublicHealth@wales.nhs.uk)

Cllr Mark Pritchard, Leader, Wrexham County Borough Council - [cllr.mark.pritchard@wrexham.gov.uk](mailto:cllr.mark.pritchard@wrexham.gov.uk)

Lesley Griffiths MS, Member of the Senedd for Wrexham - [lesley.griffiths@senedd.wales](mailto:lesley.griffiths@senedd.wales)

Steve Withenden MP, Member of Parliament for Wrexham - [steve.withenden@parliament.uk](mailto:steve.withenden@parliament.uk)

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

[CabinetHealthSocialCare@gov.wales](mailto:CabinetHealthSocialCare@gov.wales)

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Wrexham County Borough Council – [EnvironmentalHealth@wrexham.gov.uk](mailto:EnvironmentalHealth@wrexham.gov.uk)

Natural Resources Wales – [customerhub@naturalresourceswales.gov.uk](mailto:customerhub@naturalresourceswales.gov.uk)

Public Health Wales – [publichealthwales.communications@wales.nhs.uk](mailto:publichealthwales.communications@wales.nhs.uk)

Betsi Cadwaladr University Health Board – [bcuhb.communications@wales.nhs](mailto:bcuhb.communications@wales.nhs).