

## Agenda – Petitions Committee

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Meeting Venue:

Committee Room 5 – Tŷ Hywel

Meeting date: 9 January 2023

Meeting time: 14.00

For further information contact:

Gareth Price – Committee Clerk

0300 200 6565

[Petitions@senedd.wales](mailto:Petitions@senedd.wales)

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### 1 Introductions, apologies, substitutions and declarations of interest

(Pages 1 – 18)

### 2 New Petitions

2.1 P-06-1309 The Welsh Government should hold a referendum before expanding the size of the Senedd

(Pages 19 – 24)

2.2 P-06-1310 Protect Mynydd Eglwysilan and Cefn Eglwysilan

(Pages 25 – 26)

2.3 P-06-1311 Exert Welsh interests and defend international law against EdF-Hinkley fish-kill in Severn Estuary

(Pages 27 – 33)

2.4 P-06-1312 To help improve water quality in the River Usk by upgrading sewage systems in the Usk valley

(Pages 34 – 44)

2.5 P-06-1313 Allow exemptions to the 182-day occupancy rule to reduce harm to real Welsh self-catering businesses

(Pages 45 – 54)

2.6 P-06-1314 Insulate all Welsh homes against both the heat and the cold...introduce grants that are open to all!

(Pages 55 – 62)

### 3 Updates to previous petitions



- 3.1 P-06-1302 Protect Mid-Wales' unique Cambrian Mountains: designate them an Area of Outstanding Natural Beauty  
(Pages 63 – 65)
- 3.2 P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Wales  
(Pages 66 – 71)
- 4 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting**
- 5 Forward work programme**
- 6 Round table discussion arising from P-06-1314 Insulate all Welsh homes against both the heat and the cold...introduce grants that are open to all!**  
(15.00)

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# The Welsh Government should hold a referendum before expanding the size of the Senedd

Y Pwyllgor Deisebau | 09 Ionawr 2023  
Petitions Committee | 09 January 2023

Reference: SR22/4474-5

Petition Number: P-06-1309

Petition title: The Welsh Government should hold a referendum before expanding the size of the Senedd

Text of petition: Welsh Labour in a cooperation agreement with Plaid Cymru are proposing to increase the numbers of Members of the Senedd from 60 to 96. Neither party laid out this number in their manifestos in recent elections. The people of Wales should be asked via a referendum if they want to expand the Senedd, as this proposal will lead to a lack of proportionality in representation. Public services and the NHS in Wales are suffering badly and this should not be the Welsh Government's priority costing Welsh tax payers millions.



# 1. Background

Since 2004, a series of reports have recommended that the size of the Senedd should increase from its current size of 60 Members. The [Wales Act 2017](#) gave the Senedd powers over its size and electoral arrangements without requiring a referendum. Any Bill introduced on Senedd Reform requires a supermajority (40 of the Senedd's 60 Members) to pass. [Section 64 of the Government of Wales Act 2006](#) gives the Welsh Government the power to hold a poll to ascertain the views of the people of Wales relating to functions of the Welsh Ministers. This is not a mechanism for a direct vote or direct referendum on a particular proposal.

## 1.1. Expert Panel on Electoral Reform

In February 2017, the Llywydd and Assembly Commission appointed an [Expert Panel on Assembly Electoral Reform](#) to examine whether the Assembly needed more members to fulfil its scrutiny and legislative functions.

The Expert Panel recommended that the Assembly increase in size to at “least 80, and preferably closer to 90, Members”. It found that a 60 Member legislature was small compared to most similar legislatures, and that Members’ time was severely limited due to a lack of capacity.

## 1.2. Committee on Senedd Electoral Reform

Following the findings of the Expert Panel, the [Committee on Senedd Electoral Reform](#) (CSER) was established to examine options for Senedd reform. The CSER published its findings in September 2020. It recommended that the Senedd should increase in size to between 80 and 90 Members with effect from the 2026 election. It also recommended that [the Single-transferable vote \(STV\)](#) electoral system be used. The Conservative Party did not put forward a Member for the Committee. The Committee was also disrupted by Brexit Party Member, David Rowlands, [resigning](#) before it had concluded its work, as well as by the Covid-19 pandemic.

## 1.3. The Special Purpose Committee on Senedd Reform

The [Special Purpose Committee on Senedd Reform](#) was established in October 2021, tasked with making recommendations for policy instructions for a Welsh Government Bill on Senedd reform.

The Special Purpose Committee recommended that the Senedd increase in size to 96 Members. It recommended that a closed list proportional representation system be introduced, and 16 new constituencies be created by pairing together existing UK Parliamentary constituencies. The Committee also said the new Senedd should include gender quotas, improved measures around collecting candidate diversity data and procedures for job sharing.

The Conservative representative on the Committee resigned before the Committee's report was agreed. Some of the key recommendations were agreed by a majority on the Committee but not by all Members.

## 2. Welsh Government action

The First Minister, Mark Drakeford, and the leader of Plaid Cymru, Adam Price, issued a joint statement on 10 May 2022, arguing that the Senedd should have 96 Members and should be elected using a closed list proportional system.

In the Welsh Government's response to this petition, the First Minister said:

"The Wales Act 2017 provided power to the Senedd to change its size, without a referendum. There are many precedents for changes to the number of elected members being made without referenda, including the boundary review changes for the UK Parliament, which will reduce the number of MPs that Wales returns to Westminster from 40 to 32.

A commitment to Senedd reform was an explicit part of the manifestos of both Labour and Plaid Cymru in last year's election. On this basis and given the many precedents for introducing electoral changes without referenda, there are no plans to hold a referendum on any element of Senedd reform."

The Welsh Government will bring forward a Senedd Reform Bill in due course, which will then be debated and scrutinised in the Senedd.

## 3. Welsh Parliament action

The Senedd debated the Special Purpose Committee's report on 8 June 2022. The Chair of the Committee, Huw Irranca-Davies, said:

"there is no one single unadulterated perfect package of electoral reform that will satisfy everyone. [...] Our committee set out [...] to find proposals

that must win support across the whole Senedd, not to seek some vision of perfection, and thereby sacrifice practicality and delivery by 2026.”

Mr Irranca-Davies said that the Senedd needed more capacity to meet additional responsibilities taken on since the Assembly was first established in 1999. These include primary law-making powers, tax-varying and borrowing powers, additional work created as powers return from the EU post-Brexit, heightened public awareness of the Senedd’s responsibilities caused by the Covid-19 pandemic, and the “not-unrealistic potential of additional future responsibilities”.

Shadow Minister for Constitution, Darren Millar, criticised the proposals, arguing that it was not the right time for an increase in the size of the Senedd. Plaid Cymru's then spokesperson for the constitution, Rhys ab Owen, argued that a larger Senedd was necessary to “scrutinise the Welsh Government more effectively and more efficiently”.

The Senedd **voted in favour** of the motion to accept the recommendations of the Special Purpose Committee’s report, with 40 Members voting for the proposals and 14 voting against. This met the requirements for a ‘supermajority’ of two thirds of the Senedd to allow a Bill on Senedd reform to be introduced.

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



Eich cyf/Your ref P-06-1309  
Ein cyf/Our ref FM -/00600/22

Jack Sargeant MS  
Chair  
Petitions committee  
Senedd Cymru  
Cardiff Bay  
[Petitions@Senedd.Wales](mailto:Petitions@Senedd.Wales)

29 November 2022

Dear Jack,

I am writing in response to your letter of 25 October regarding a petition calling on the Welsh Government to hold a referendum before expanding the size of the Senedd.

The Wales Act 2017 provided power to the Senedd to change its size, without a referendum. There are many precedents for changes to the number of elected members being made without referenda, including the boundary review changes for the UK Parliament, which will reduce the number of MPs that Wales returns to Westminster from 40 to 32.

A commitment to Senedd reform was an explicit part of the manifestos of both Labour and Plaid Cymru in last year's election. On this basis and given the many precedents for introducing electoral changes without referenda, there are no plans to hold a referendum on any element of Senedd reform.

As you are aware, the Senedd has voted in favour of taking forward the recommendations of the Special Purpose Committee on Senedd Reform report [Reforming our Senedd: A stronger voice for the people of Wales](#).

This report includes a recommendation that the Senedd should have 96 Members to reflect the way the role and responsibilities of the Senedd has grown since it was first established in 1999. The Richard Commission (2004); the McAllister report (2017) and subsequently the Committee on Senedd Electoral Reform (2020), have all concluded that there is clear and compelling evidence that the Senedd must increase in size to fulfil its responsibilities effectively and in the best interests of the people of Wales.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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

[Gohebiaeth.Mark.Drakeford@llyw.cymru](mailto:Gohebiaeth.Mark.Drakeford@llyw.cymru)  
[Correspondence.Mark.Drakeford@gov.wales](mailto:Correspondence.Mark.Drakeford@gov.wales)

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

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

The Senedd is currently the smallest of all the devolved legislatures in the UK and has remained the same size since the establishment of the National Assembly in 1999, despite assuming extra law-making and tax-raising powers. The proposed increase in the number of Senedd Members reflects the changes in the political landscape of Wales including, when the UK left the EU, Wales losing its MEPs and the current proposals to reduce the number of MPs from 40 to 32.

The scrutiny role of the legislature is vital for a healthy democracy. It is essential that the Senedd has appropriate capacity to carry out its role in holding the government to account.

A handwritten signature in black ink that reads "Mark Drakeford". The signature is written in a cursive, slightly slanted style.

**MARK DRAKEFORD**

Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

Llywodraeth Cymru  
Welsh Government

Your ref: P-06-1310  
Our ref: JJ/02435/22

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

15 November 2022

Dear Jack,

Thank you for your letter of 27 October regarding a petition seeking the protection of Mynydd Eglwysilan and Cefn Eglwysilan. I note the petition specifically requests the Welsh Government formally recognise the archaeological, historic and prehistoric environments, as there is concern that a proposed wind farm will cause irreparable damage. I will be responding from a planning perspective given that my colleague, Dawn Bowden MS Deputy Minister for Arts and Sport, and Chief Whip, has responsibility for the historic environment in Wales, including CADW and the Royal Commission on Ancient and Historical Monuments.

A Development of National Significance (DNS) proposal for a wind farm, which includes the area of Mynydd Eglwysilan and Cefn Eglwysilan, is listed on the Planning and Environment Decisions Wales (PEDW) website - DNS/3272053 - Twyn Hywel Wind Farm (<https://planningcasework.service.gov.wales/> - Search for 3272053). At the time of writing, the proposal has not been formally submitted as a DNS application. The applicant, Twyn Hywel Energy Park Limited, has submitted a valid notice of intention to submit an application.

DNS applications are determined by Welsh Ministers and as the Minister with responsibility for planning it is likely, that should it formally be submitted, I will take the decision on this proposal. For this reason, I offer no comment on the proposal itself and this letter is written without prejudice to any future decision made by Welsh Ministers. However, I can provide you with information on the process and the policy framework.

The DNS process is rigorous and includes engagement and consultation with stakeholders, relevant local authorities and the public. Should an application be formally submitted and accepted, the applicant is required to undertake statutory pre-application consultation and engagement. Guidance on the process, consultation, how proposals are examined and a guide for communities are available on the [Welsh Government](#) website.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Julie.James@llyw.cymru](mailto:Gohebiaeth.Julie.James@llyw.cymru)  
[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

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National planning policy is set out in [Planning Policy Wales](#) and [Future Wales](#). Both have policies for managing the development of renewable energy proposals, which include the consideration of the historic environment. Future Wales Policy 17 identifies 10 Pre-Assessed Areas for Wind Development. Parts of the potential development area of the proposed Twyn Hywel Wind Farm lie within Pre-Assessed Area 10. Within these areas there is a presumption in favour of large scale wind energy development subject to the criteria in Future Wales Policy 18. Future Wales Policy 18 focuses on the determination of DNS renewable energy proposals and sets out the criteria against which schemes are determined. The relevant Local Development Plan(s) will also contain policies which will be taken into account in the determination of any application.

Yours sincerely,



**Julie James AS/MS**

Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

# Exert Welsh interests and defend international law against EdF-Hinkley fish-kill in Severn Estuary

Y Pwyllgor Deisebau | 9 Ionawr 2023  
Petitions Committee | 9 January 2023

Reference: SR22/4475-2

Petition Number: P-06-1311

Petition title: Exert Welsh interests and defend international law against EdF-Hinkley fish-kill in Severn Estuary

Text of petition:

We call on the Welsh Government to urgently approach Westminster's George Eustice over England's regulators blatantly disregarding the 'no harm principle' in relation to the Marine Protected Area (MPA) status of the Severn Estuary. This relates to permitting the dumping of Hinkley sediments and solid materials into the Severn and continuing the licence for Hinkley's seawater cooling system which kills fish and juveniles on a massive scale with significant ecological damage.

Stewardship of the Severn MPA is shared between Welsh and English authorities so the Welsh Gov. needs to press England's regulators to comply. The MPA was jointly-designated in 2018 under the international OSPAR Commission. The Welsh National Marine Plan (NMP) prevents harm to fish and further dumping of capital dredgings on the Welsh side of the Estuary.

The Hinkley report to Wales' First Minister said Hinkley Point C power station should use a land-based cooling system.

We call on the Welsh Government to follow this expert advice and challenge George Eustice to instruct England's regulators to uphold the MPA status of



the Severn Estuary and adhere to jointly agreed policies on protection and management of activities in the MPA.

These common policies should develop and include the no-harm principle as in the Welsh NMP, which would include no waste dumping and ending the Hinkley cooling water intake that is estimated to kill ½ million fish each day of its 60yr life.

## 1. Background

EDF Energy is developing a nuclear power plant at Hinkley Point near Bridgwater, Somerset. Called Hinkley C, it will be the first new nuclear power station for a generation.

In the response to this petition, the Minister for Climate Change, Julie James MS highlights that the Severn Estuary is a site of important ecological interests. She says it is recognised and protected by a range of nature conservation designations including the Severn Estuary Special Area of Conservation (SAC) and Special Protection Area (SPA), and that these are:

... transboundary sites between England and Wales. The site conservation objectives have been set jointly by Natural England and Natural Resources Wales. Where development in the designated site occurs in England, the Secretary of State would seek advice from the relevant Statutory Nature Conservation Body. Natural Resources Wales would only be consulted if there are potential impacts to features of the site within Wales.

### 1.1.a. Sediment dredging and disposal

As part of the site construction, EDF is dredging sediment from the seabed in the estuary to drill six vertical shafts for the cooling water system.

As the area being dredged is within a recognised SAC, any sediment removed from this area must be put back into the same area to maintain the natural balance of sediment in the SAC. This is a condition of the dredging licence.

Dredging first began in September 2018, where dredged material was deposited at Cardiff Grounds, an established disposal site for marine dredged materials off the coast of south Wales. The proposals were controversial, and the then Fifth Assembly's Petitions Committee gave detailed consideration to a petition on this subject.

New proposals were put forward in 2020 for a second phase of dredging sediment. Again these proposals were the subject of Senedd Petitions Committee scrutiny.

At the time, EDF was pursuing three marine licences for activities in Welsh and English waters. Two licences were sought from the Marine Management Organisation (MMO) in England; one to collect samples on the dredge, and the second conduct the dredge of the sediment.

EDF would have also required a marine licence from NRW for the disposal of the sediment in Welsh waters (as per the first phase of dredging). However, following a variation of EDF's marine licence from the MMO, the material will be deposited at the Portishead licenced disposal site, located in England. A marine licence is no longer required from NRW.

Currently, there are no proposals to dispose of Hinkley derived dredge material in Welsh waters.

### 1.1.b. Environmental permit appeal – fish deterrent

In developing an Environmental Permitting Regulations (EPR) permit for the site, the Environment Agency had specified, amongst many other conditions, that the cooling water intake should have an acoustic fish deterrent (AFD). This is to minimise the entrainment and killing of potentially millions of fish every year.

However the site owners, NNB Genco, sought a change to the EPR conditions which would allow it not to install the AFD. It argued that the change would not adversely affect the integrity of the designated sites.

The Environment Agency publically consulted on the application to vary the permit, but was “unable to conclude that removing the AFD would have no adverse effect on the protected habitats and species in the Severn Estuary”.

A public inquiry to consider the appeal was held by the Planning Inspectorate in June 2021. The Planning Inspectorate produced a report presenting recommendations for final determination by the Defra Secretary of State.

On 2 September 2022 [Defra wrote to NNB Genco](#) to say that its appeal was rejected, and that the requirement for an AFD was to be retained.

Further details of the Environment Agency's regulation of Hinkley Point can be [found on the UK Government website](#).

## 1.2. Welsh National Marine Plan

The [Welsh National Marine Plan \(WNMP\)](#) states the Welsh Government's policies for, and in connection with, the sustainable development of the marine plan area. There are two types of policies in the WNMP; general and sector policies, which are designed to work together to support sustainable development.

The plan includes sector policies on 'dredging and disposal', and 'fisheries'.

It does not prevent "harm to fish" or further disposal of sediment in Welsh waters, but seeks to ensure activities are being carried out in a sustainable way.

Further details on the WNMP can be found in this [Senedd Research publication](#).

## 2. Welsh Government action

The Welsh Government convened the [Hinkley Stakeholder Reference Group](#) to provide an independent assessment of implications for Wales of the Hinkley Point nuclear power station. The group [reported in March 2021](#).

The Minister for Climate Change, Julie James MS, considered the findings of the report. The [Minister wrote to the UK Government](#) to highlight "the importance of infrastructure developments in cross-border areas considering devolved legislation".

## 3. Welsh Parliament action

The development of Hinkley Point C has been subject to two petitions, both considered during the Fifth Senedd:

- [P-05-785 Suspend Marine Licence 12/45/ML to dump radioactive marine sediments from the Hinkley Point nuclear site into Wales coastal waters off Cardiff](#)
- [P-05-1003 Demand an EIA now on the dumping of radioactively contaminated mud in Welsh waters](#)

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Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref JJ/02436/22

Jack Sargeant MS  
Chair - Petitions committee

11 November 2022

Dear Jack,

Thank you for your letter of 27 October with regard to Petition P-06-1311 'Exert Welsh interests and defend international law against EdF-Hinkley fish-kill in Severn Estuary' from Cian Ciaran.

The petition calls on the Welsh Government to approach the (as was) Defra Secretary of State George Eustice in relation to the Severn Estuary Marine Protected Area. It points to the dumping of Hinkley sediments into the Severn and licensing of the seawater cooling system with respect to ecological damage.

The Welsh Government convened the Hinkley Stakeholder Reference Group to provide an independent assessment of implications for Wales of the Hinkley Point nuclear power station. The Group reported on its work in March 2021. I have considered their findings and published a written statement on this matter: [Written Statement: The response to the Hinkley Point C Stakeholder Reference Group report \(2 December 2021\) | GOV.WALES](#).

In the Written Statement I highlighted our ambitions for resilient marine ecosystems and the sustainable management of natural resources. In addition, as stated, I wrote to the UK Government highlighting the importance of infrastructure developments in cross-border areas considering devolved legislation. In reply to my letter, The UK Government has acknowledged the important work of the Hinkley Stakeholder Reference Group and the need to work jointly in the management of Severn Estuary.

Specifically, with respect to nature conservation, the Severn Estuary is a site of important ecological interests. It is recognised and protected by a range of nature conservation designations including the Severn Estuary Special Area of Conservation (SAC) and Special Protection Area (SPA).

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Julie.James@llyw.cymru](mailto:Gohebiaeth.Julie.James@llyw.cymru)  
[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

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

Relevant legislation requires that any developments, where there is potential for interaction with a protected site (such as the SAC or SPA), be subject to a Habitat Regulatory Assessment (HRA). Competent Authorities (which includes the Secretary of State) must carefully assess any proposed project. Where there is the potential for significant impacts the developer can seek to mitigate this. Where this is not possible, the Competent Authority must set out compensatory measures in view of the site's conservation objectives.

The Severn Estuary SPA and SAC are transboundary sites between England and Wales. The site conservation objectives have been set jointly by Natural England and Natural Resources Wales. Where development in the designated site occurs in England, the Secretary of State would seek advice from the relevant Statutory Nature Conservation Body. Natural Resources Wales would only be consulted if there are potential impacts to features of the site within Wales.

With regard to the disposal of dredged material, any proposal is considered on its merits and only consented subject to strict regulatory controls. Currently, there are no proposals to dispose of Hinkley derived dredge material in Welsh waters.

I am aware that the Defra Secretary of State recently rejected the company's appeal against the Environment Agency decision in England on proposals to remove the permit condition requiring an acoustic fish deterrent system.

I continue to expect Welsh interests and policy to be taken into account in any decision related to cross border areas including with respect to the resilience of marine ecosystems.

Yours sincerely



**Julie James AS/MS**  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

# Help improve water quality in the River Usk by upgrading sewage systems in the Usk valley

Y Pwyllgor Deisebau | 09 Ionawr 2023  
Petitions Committee | 09 January 2023

Reference: SR22/4475-3

Petition Number: P-06-1312

Petition title: To help improve water quality in the River Usk by upgrading sewage systems in the Usk valley

Text of petition:

The River Usk is a Site of Special Scientific Interest and a Special Area of Conservation. Yet water quality in the River Usk is such that 88% of its water bodies are failing to meet their targets. Improvement targets could be set. (For example: 50% by the end of 2023, 25% by 2024 & so on). Salmon, sea trout and eels are all seriously on the decline. Ranunculus weed growth in the river has virtually disappeared. People who wild swim in the river are at risk of picking up infections.

Yet what is happening to help prevent this decline? Welsh Water is a not for profit organization and has been for 20 years. Without the need to pay dividends to shareholders, such funds could have been invested into upgrading sewage systems throughout Wales. It is ironic that water from the River Usk is pumped from Prioress Mill to Llandegfedd Reservoir for consumption in South Wales. Natural Resources Wales is meant to enforce water quality standards, but it is widely perceived as ineffective. Agricultural pollution and soil run off are also significant parts of the problem. Climate change with increased droughts and flooding also causes complications. The Well-being of Future Generations Wales Act 2015 is meant to help the natural environment for future generations, but this is clearly not happening. We call



on the Senedd to ensure that Welsh Water invests sufficient funds to upgrade sewage treatment systems in the Usk valley to help the River Usk to return to its former glory.

## Background

The River Usk is one of seven Rivers in Wales designated as a Special Area of Conservation (SAC) where key species are protected under the [Habitats Regulations](#). It is designated for [seven key feature](#).

### 1.1. Assessing water quality

The [Water Framework Directive \(England and Wales\) Regulations 2017](#) (WFD) are the primary mechanism for assessing and managing the water environment. They place a statutory duty on the Welsh Ministers to prevent deterioration and improve all water bodies to good status by 2027.

'All water bodies' refers to all surface waters - rivers, lakes, transitional and coastal waters - as well as groundwater. The WFD aims to:

- reduce pollution and improve the condition of aquatic ecosystems;
- promote the sustainable use of water; and
- reduce the effects of floods and droughts.

The WFD is implemented in stages based on river basins, rather than national or political boundaries, through [River Basin Management Plans](#) (RBMPs), developed for each River Basin District (RBD). The River Usk is featured in the [Severn RBMP](#), which the Environment Agency leads on due to the cross-border geography of this river basin.

The RBMPs describe the challenges that threaten the water environment and how these can be managed and funded. There is a separate [Welsh part of the Severn RBMP](#), which contains information on the River Usk.

Natural Resources Wales (NRW) runs a [network of water quality monitoring](#) points across the River Usk catchment. In the response to this petition, the Minister for

Climate Change, Julie James MS, highlights that NRW “has numerous proactive projects and programmes” designed to achieve the aims set out in the RBMPs to improve water quality.

## 1.2. Pollutants

The Minister identifies numerous pollution sources in the Usk, including private sewage treatment systems, urban run-off, agriculture, and water company discharges.

### Water company discharges

The pressures facing Wales’ sewage infrastructure include pressure from climate change, changes in population density and distribution, and new development, all of which can increase the number of spills from storm overflows. This [Senedd Research briefing](#) provides information on the management, level of understanding and water quality impact of Welsh storm overflows.

### Agricultural pollution

[Diffuse pollution](#) from agriculture is one of the main reasons Welsh waterbodies [fail to achieve ‘good status’](#) under the WFD, with the dairy sector responsible for most agricultural pollution incidents. This is being tackled through [agricultural pollution regulations](#), which are discussed further in this [Senedd Research article](#).

[NRW data from 2021](#) identifies agriculture as the most frequent cause of WFD failures in Wales, being linked to 21% of all failures to reach good status. The water industry is linked to 15%.

### Phosphate pollution

Phosphorus is an essential element for plant life, but too much of it can speed up [eutrophication](#) in rivers, causing excessive growth of plants and algae leading to depletion of oxygen available for other organisms.

NRW has undertaken a [compliance assessment](#) of Welsh river SACs against phosphate targets which found “the Usk to be in poor condition with respect to phosphorus targets, with widespread failures often of large magnitude”.

[Updated phosphorous targets](#) have since been set.

The Minister highlights that:

Coordinated action across organisations is essential if we are to achieve a change and improvement to the management and environmental regulation of overflows in Wales.

## 2. Welsh Government action

In the response to this petition, the Minister said that addressing “the intractable and multi-faceted issue of pollution entering our rivers is a Welsh Government priority”.

The Minister highlights the First Minister’s River Pollution Summit on 18 July at the Royal Welsh Show. Senior representatives from regulators, water companies, developers, local government, farming unions, academia and environmental bodies, agreed eight areas of intervention, for which the Welsh Government will be providing support. Further details on the development of solutions to address phosphorus pollution have since been shared with the Senedd, including that:

...nutrient management boards have been established, for which [the Welsh Government has] been providing funding support of up to £415,000. A database of mitigation measures has been produced and is currently being considered...

... A catchment consenting proposal has been developed and is being considered by Natural Resources Wales. A catchment market model project has been established and is working on a pilot trial in the Usk.

The Minister highlighted further areas where the Welsh Government is providing support:

- The Four Rivers for LIFE project, which includes the Usk in its remit, is backed with £9 million of EU funding over four years with part-funding from the Welsh Government (£3.4 million) and Dŵr Cymru. The project is being delivered as a partnership between NRW, Brecon Beacons National Park Authority, River Restoration Centre, Coleg Sir Gâr, and the Woodland Trust.
- Funding via the Brecon Beacons National Park Authority for the Usk Catchment Management Partnership. The partnership is a responsible body for ensuring the delivery of the Conservation Objectives for the

River Usk SAC. It will provide oversight and direction to all involved in delivering their nutrient management plan, which is principally concerned with tackling the intractable issue of phosphorous pollution.

The Minister also draws attention to the [Better River Quality Taskforce](#) (the taskforce), which is evaluating the current approach to management and regulation of overflows in Wales, and developing detailed plans to drive rapid change and improvement. [The taskforce](#) comprises NRW, the Welsh Government, Ofwat, both Welsh water companies, [Afonydd Cymru](#) and [Consumer Council for Water](#).

It has identified [five areas for change and improvement](#) requiring additional action. It published an action plan for each area in July 2022:

- [Reducing visual impact: installation of screens: action plan](#);
- [Capacity of the network \(drainage and wastewater management plan\): action plan](#);
- [Improving effluent quality and river quality: action plan](#);
- [Environmental regulation of overflows: action plan](#); and
- [Public understanding and engagement: action plan](#)

However the Minister acknowledges that overflows are only one of many elements that need to be addressed to improve river quality in Wales.

The [Programme for Government makes further commitments](#) to improving water quality by beginning to designate inland waters for recreation and strengthening water quality monitoring. [The Minister recently told the Senedd](#) that this work is being progressed through a survey an pilot approach next year.

The Minister says the Welsh Government has “made provision for a multi-year multi-million-pound programme of works to improve water quality totalling over £40 million over the next 3 years.”

### 3. Dŵr Cymru (Welsh Water) action

The Minister sets out work Dŵr Cymru is undertaking to improve poorly performing assets in the Usk. This includes investing over £10 million in three years to “improve the way their treatment works operates and reduce the number of spills that come from CSOs at the Mill Street sewage pumping station”.

Between now and 2025, the work will be undertaken in three phases, as set out by the Minister:

Phase 1 – Work at Usk Sewer Pumping Station Upgrading the assets at the local sewage pumping station to install a screening chamber and a 6mm screen that will remove large solids such as rags, wet wipes etc. from any CSO discharge. This work is underway and will be completed by the middle of December.

Phase 2 – Work to transfer more waste to the wastewater treatment works. Making improvements to the network that runs between the sewage pumping station and the wastewater treatment works, increasing its capacity so more diluted wastewater and stormwater can be treated instead of using the CSO.

Phase 3 – Building new assets at Usk Wastewater Treatment Works. Transferring more waste to the wastewater treatment works, to ensure that it has the capacity to treat the waste. Installing brand new assets and storage tanks.

## 4. Welsh Parliament action

The [Climate Change, Environment, and Infrastructure Committee](#) has undertaken a [short piece of work on water quality and sewage discharges](#).

The Committee published its [Report on storm overflows in Wales](#) on 15 March 2022, which made a number of recommendations to the Welsh Government, water companies and NRW. The Welsh Government [responded](#) on 9 May 2022. Responses have also been received from [Hafren Dyfrdwy](#) and [Dŵr Cymru](#).

A [debate](#) was held in Plenary on 15 June 2022 on the Committee's report.

A previous [Plenary debate took place in March 2022](#) on a Member's legislative proposal on the impact of storm overflows. The motion was agreed.

The Economy, Trade and Rural Affairs Committee undertook an [inquiry into the Welsh Government's regulations to control agricultural pollution](#). The Committee published its report [Review of The Water Resources \(Control of Agricultural Pollution\) \(Wales\) Regulations 2021](#) on 8 June 2022. The [Welsh Government responded](#) on 5 October and a [Plenary](#) debate took place on [12 October 2022](#).

The following petitions on the subject of agricultural pollution have been considered:

- P-06-1263 Control pollution from agriculture in the parts of the Wye and Severn River located in Wales
- P-06-1232 Stop the proliferation of intensive poultry units (IPUs) by legislating and introduce a moratorium until this can be achieved

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

Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref  
Ein cyf/Our ref JJ/02488/22

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

15 November 2022

Dear Jack,

Thank you for your letter of 27 October concerning the petition to improve water quality in the River Usk by upgrading sewage systems in the Usk valley.

Addressing the intractable and multi-faceted issue of pollution entering our rivers is a Welsh Government priority. This is reflected in the First Minister's River Pollution Summit on 18 July at the Royal Welsh Show and our support of Natural Resources Wales' (NRW) Four Rivers for LIFE project, which I launched on 28 October.

The River Pollution Summit brought together senior representatives from regulators, water companies, developers, local government, farming unions, academia and environmental bodies to discuss the development of a strategic and joined-up approach to dealing with river pollution. You can read the First Minister's Written Statement about the River Pollution Summit along with the 'Tackling Phosphorus Pollution in Special Area of Conservation (SAC) Rivers: information and evidence pack' that accompanied summit at the link below. Written statement link - <https://gov.wales/written-statement-river-pollution-summit-royal-welsh-show#:~:text=Written%20Statement%3A%20River%20Pollution%20Summit%20at%20the%20Royal,we%20can%20work%20together%20to%20improve%20the%20situation.>

The Four Rivers for LIFE project, which includes the Usk in its remit, is backed with £9 million of EU funding over 4 years with part-funding by the Welsh Government (£3.4 million) and Dŵr Cymru Welsh Water. The project is being delivered as a partnership between NRW, Brecon Beacons National Park Authority, River Restoration Centre, Coleg Sir Gâr, and the Woodland Trust. You can read more about the Four Rivers for LIFE project on NRW's website.

Four Rivers for LIFE link - <https://naturalresources.wales/about-us/our-projects/nature-projects/4-rivers-for-life/?lang=en>

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Julie.James@llyw.cymru](mailto:Gohebiaeth.Julie.James@llyw.cymru)  
[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

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

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

Welsh Government also provides funding via the Brecon Beacons National Park Authority for the Usk Catchment Management Partnership. The partnership is a responsible body for ensuring the delivery of the Conservation Objectives for the River Usk Special Area of Conservation (SAC). It will provide oversight and direction to all involved in delivering their nutrient management plan, which is principally concerned with tackling the intractable issue of phosphorous pollution.

NRW is committed to the improvement of water quality throughout Wales and has numerous proactive projects and programmes ongoing designed to achieve this aim. These are a key component of the River basin Management Plans (RBMP). The RBMPs form the basis of our compliance with the EU Water Framework Directive and provide the overarching picture for water quality across Wales. You can read more about RBMPs on NRW's website. For reference, Usk is featured in the Severn river basin management plan, which the Environment Agency currently leads on due to the cross-border geography of this river basin. River basin management plans - <https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/river-basin-management-plans/?lang=en>

NRW run a network of water quality monitoring points across the River Usk catchment to assess if sample sites are meeting the threshold for the presence of particular chemical compounds and biological contaminants and assessing this data for compliance with environmental standards. The monitoring data for Wales may be viewed at NRW's Water Watch Wales website - <https://waterwatchwales.naturalresourceswales.gov.uk/en/>

Sources of pollutants in the Usk are numerous, including private sewage treatment systems, urban run-off, agriculture, and water company discharges.

The infrastructure in Wales to deal with our sewage is under pressure from climate change, changes in population density and distribution, and new development. Without action, these pressures will contribute to an increase in the flows at treatment works, risking an increase in the number of spills from storm overflows the potential to adversely impact on our water environment. Coordinated action across organisations is essential if we are to achieve a change and improvement to the management and environmental regulation of overflows in Wales.

Together, Welsh Government, Natural Resources Wales, Ofwat, Dŵr Cymru Welsh Water (DCWW) and Hafren Dyfrdwy (the partner organisations) recognise this need for action and have established a Better River Quality Taskforce (the taskforce) to evaluate the current approach to the management and regulation of overflows in Wales and to set out detailed plans to drive rapid change and improvement. Afonydd Cymru and Consumer Council for Water are providing independent advice to the taskforce, offering insight and challenge from a stakeholder and customer perspective.

Tackling overflows is only one of many elements that need to be addressed if we are to improve river quality in Wales. In Wales the water companies have been working over a number of years to improve poorly performing assets, this includes improving monitoring to identify where further action is required. The Welsh Government has also made provision for a multi-year multi-million-pound programme of works to improve water quality totalling over £40 million over the next 3 years.

Over the next three years, DCWW are investing over £10 million in Usk to improve the way their treatment works operates and reduce the number of spills that come from CSOs at the Mill Street sewage pumping station. Between now and 2025, the work will be undertaken in three phases as detailed below:

**Phase 1 – Work at Usk Sewer Pumping Station**

Upgrading the assets at the local sewage pumping station to install a screening chamber and a 6mm screen that will remove large solids such as rags, wet wipes etc. from any CSO discharge. This work is underway and will be completed by the middle of December.

**Phase 2 –Work to transfer more waste to the wastewater treatment works (WwTW)**

Making improvements to the network that runs between the sewage pumping station and the wastewater treatment works, increasing its capacity so more diluted wastewater and stormwater can be treated instead of using the CSO. .

**Phase 3 – Building new assets at Usk Wastewater Treatment Works**

Transferring more waste to the wastewater treatment works, to ensure that it has the capacity to treat the waste. Installing brand new assets and storage tanks.

DCWW are also committed to working collaboratively with all organisations involved to help further enhance river water quality. DCWW are working with the Wye & Usk Foundation and Hereford Council to support additional phosphorus removal – phosphorus causes an increase in problematic algae growth in ponds, lakes, and rivers. This phosphorus removal uses natural treatment such as low carbon wetland systems, which will also enhance local biodiversity. The proposals will remove more phosphorus than developments in the catchment will introduce. The benefits of adopting this approach are twofold as it will reduce the phosphorus entering the river and do so in a sustainable and low carbon way.

I have been clear that we need to take an integrated catchment approach focussing on multi-sector co-operation and nature-based solutions to drive water quality improvements. By taking this approach and improving community engagement we will be better able to take account of local circumstances and priorities. Citizens and local groups can play a key role in helping tackle water quality pollution through providing monitoring intelligence and public awareness.

Yours sincerely,



**Julie James AS/MS**

Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

**P-06-1312 To help improve water quality in the River Usk by upgrading sewage systems in the Usk valley, Correspondence – Petitioner to Committee, 10.12.22**

With regard to my petition, I would like to make the following additional points:

1. Welsh Water have announced plans to upgrade the sewage systems at Brecon, Llanfoist and Usk over the next three years. Provided that these plans are carried out, this should lead to a significant improvement in water quality in the River Usk.
2. The problem of Newport's sewage has not been addressed.
3. There are some 60 Combined Storm Overflows entering the River Usk. All of these should be looked at.
4. Agricultural pollution remains a large problem.
5. I would like the new Commissioner for Future Generations to be made aware of my petition and also this e mail.

# Petition: Allow exemptions to the 182-day occupancy rule

Y Pwyllgor Deisebau | 9 Ionawr 2023  
Petitions Committee | 9 January 2023

Reference: SR22/4475-4

**Petition Number:** P-06-1313

**Petition title:** Allow exemptions to the 182-day occupancy rule to reduce harm to real Welsh self-catering businesses

**Text of petition:** The Trade Associations that represent genuine self-catering businesses in Wales (Wales Tourism Alliance, UK Hospitality Cymru and PASC UK Wales Branch) will meet Welsh Government with a view to agreeing mitigation measures to reduce the harm that the introduction of the 182-day occupancy rule will cause real Welsh-owned self-catering businesses. These are not second homes or casual lets. Over 30% of these businesses have said that they will have to close or sell without these exemptions.

The Body of Evidence of harm: <https://www.pascuk.co.uk/wales-182-days-reports/>

## KEY ASKS

- The day count not to start from April 22, ie retrospectively.
- An appeal process

## EXEMPTIONS

- Lets limited by planning permission
- Lets that lie within the curtilage of a primary residence
- Multiple units on one site can average occupancy across the units.



- Where the units are not housing stock withdrawn from the market but can be proved through recorded planning and building control that they have been created from vacant commercial or agricultural buildings or farm diversification.
- The property is run by a charity
- Weeks given by owners to charities should count towards days let.
- If your short-let business is VAT rated
- Review of 182 days if Wales officially goes into recession, pandemics or forced local closure.
- Period of grace for new business entrants

#### DISPENSATION

Account taken of days to carry out repairs/property improvements or for ill-health or caring responsibilities

## 1. Background

The *Non-Domestic Rating (Amendment of Definition of Domestic Property) (Wales) Order 2022* (the Order) was laid before the Senedd on 24 May 2022. It came into force on 14 June 2022 and will have practical effect from 1 April 2023.

The Order amends section 66 of *the Local Government Finance Act 1988 (the 1988 Act)*, which defines domestic property for the purposes of Part 3 (non-domestic rating) of that Act. Section 66(2BB) of the 1988 Act sets out when buildings, or self-contained parts of buildings, that are let commercially for short-periods as self-catering accommodation are not to be considered domestic property.

The Order increases the number of days that a property must have been let to be classified as non-domestic from at least 70 days to at least 182 days in the 12 months prior to assessment. The Order also increases the number of days a property must have been made available for letting (in the previous year) and intended to be available for letting (in the following year) from 140 days or more to 252 days or more. Self-catering properties that do not meet the new criteria will be classified as domestic and will be liable for council tax, including any

applicable premium. The Order contains transitional provisions so any property assessed prior to 1 April 2023 will be subject to the existing criteria.

## 2. Welsh Government action

Changing the definition of domestic property is part of a wider series of legislative and policy changes relating to the impact of second homes and short-term lettings that have been made since the start of the Sixth Senedd. The Welsh Government's **three-pronged approach** to address the impact of second homes focuses on **support** for local people; the **regulatory framework** (including the planning system); and also ensuring property owners make a **fairer contribution** through local and national taxation systems. Additionally, a **Welsh Language Communities Housing Plan** has been consulted on in order to support and protect Welsh-speaking communities.

The Minister's response to the petition notes that the letting thresholds apply nationally and consistently because they define a key aspect of the system, namely whether a property is treated as a domestic dwelling or a non-domestic holiday let for local tax purposes and, in turn, whether it is liable for council tax or non-domestic rates. Other aspects of the local tax system, such as the powers for individual local authorities to apply reductions, reliefs or premiums, allow for the system to be tailored to local circumstances. The Minister states:

"I have explained this to the petitioners and their subsequent correspondence has focussed the request on exceptions from a council tax premium, where a property does not meet the letting criteria and is classified as domestic. Some self-catering properties are restricted by planning conditions preventing permanent occupation as someone's main residence. An exception from a council tax premium is already provided for one type of planning condition and I am exploring whether an exception should apply to other planning conditions. My intention is that any necessary changes are brought into effect from 1 April 2023, alongside the increased thresholds. It is important that statutory exceptions are clearly definable in legislation and would be appropriate in all circumstances where they apply. Planning conditions satisfy those requirements as they have their own legislative basis and, where they apply, would limit the options of property owners in a consistent way.

I will also be issuing revised guidance to local authorities on additional options that are available to them if self-catering properties restricted by

planning conditions do not meet the thresholds. These options include discretion to reduce standard rate of council tax liability for certain properties, where considered appropriate by the local authority. Local authorities may apply this discretion to particular properties or to classes of property. Authorities could use this discretion, for example, to support operators in particular circumstances or facing particular challenges.”

The Welsh Government consulted on the [draft Council Tax \(Exceptions to Higher Amounts\) \(Wales\) \(Amendment\) Regulations 2023](#) (‘the draft Regulations’) and [draft guidance for local authorities](#) mentioned above between 11 November and 22 December 2022.

The draft Regulations extend class 6 of the exceptions to council tax premiums to add properties subject to a planning condition which specifies that a dwelling may only be used for short-term holiday lets or which prevents occupancy of the property as a person’s sole or main residence. Such properties would become liable for council tax at the standard rate if they do not meet the letting criteria for definition as non-domestic property but they could not be charged a premium.

### 3. Welsh Parliament action

On [6 July 2022](#), the Senedd debated a motion tabled in the name of Tom Giffard MS (Conservative) to annul the *Non-Domestic Rating (Amendment of Definition of Domestic Property) (Wales) Order 2022*. In the debate, Mr Giffard said the increases in the thresholds would “...have a hugely damaging impact on the businesses being able to operate within Wales and damage our economy, with many businesses that will simply just be forced to close.” He also highlighted concerns about the changes from within the sector.

For Plaid, Mabon ap Gwynfor MS said:

...we shouldn't look at the 182-day policy in isolation; this policy of 182 days is part of a broader package—in this case specifically, the announcement on Monday on the establishment of a new statutory licensing system for holiday lets.

Responding for the Welsh Government, Minister for Finance and Local Government Rebecca Evans MS said that:

I do recognise that the stronger criteria might be challenging for some operators, but it's important to recognise that there is evidence that

average occupancy of self-catering properties exceeded 50 per cent over the three years prior to the pandemic. So, many operators in all parts of Wales are already meeting the new criteria. And I think it is reasonable to expect businesses to adopt an operating model that maximises the use of their property and the benefit that it brings to local communities.

The motion to annul the Order was [rejected](#) by 35 votes to 14.

In June 2022, the Senedd's Local Government and Housing Committee published a series of recommendations following its [inquiry into second homes](#). The Committee noted that the increased letting requirements for self-catering accommodation go further than many of the respondents to the Welsh Government's own consultation suggested.

In July 2022, the Senedd's Economy, Trade and Rural Affairs Committee published a report, [Raising the Bar: Securing the future of Hospitality, Tourism and Retail](#), which included a recommendation for the Welsh Government to set out the rationale behind the 182-day rule. The Welsh Government's response can be found [here](#). The Committee's report was debated in the Senedd on 9 November 2022 and the transcript is available [here](#).

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



Eich cyf/Your ref: P-06-1313

Ein cyf/Our ref: RE/00883/22

Jack Sargeant MS  
Chair of the Petitions Committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
[petitions@senedd.wales](mailto:petitions@senedd.wales)

7 November 2022

Dear Jack,

Thank you for your letter in relation to a petition to allow exemptions to the recently increased letting criteria used to classify self-catering properties for local tax purposes. I appreciate the opportunity to provide my views before the Petitions Committee considers the matter.

Views on the policy behind these plans were invited as part of a 12-week [consultation](#) which looked at local taxes for second homes and self-catering accommodation. The consultation was open from 25 August to 17 November 2021 and received almost 1,000 responses. A summary of responses was published on 1 March.

The views conveyed in response to the consultation, including those from respondents representing the wider tourism industry, clearly supported a change to the criteria for self-catering accommodation to be classified as non-domestic property. Respondents were of the view that the majority of genuine holiday accommodation businesses would be able to satisfy increased letting thresholds, and a wide range of possible alternatives was suggested.

The new thresholds take account of the responses to the consultation, and factors such as the operation of the current thresholds and the thresholds applied for other purposes. The Welsh Government is of the view that properties let out as self-catering accommodation on an infrequent basis should be liable for council tax. The increased letting criteria will ensure that self-catering properties are classed as non-domestic only if they are being used for business purposes for the majority of the year. This will provide a clearer demonstration that the properties concerned are being let regularly and are making a substantial contribution to the local economy.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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

[Correspondence.Rebecca.Evans@gov.wales](mailto:Correspondence.Rebecca.Evans@gov.wales)  
[Gohebiaeth.Rebecca.Evans@llyw.cymru](mailto:Gohebiaeth.Rebecca.Evans@llyw.cymru)

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

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

On 2 March, I announced an increase to the number of days, within any 12-month period, that a self-catering property is required to be made available to let, from 140 to 252 days, and actually let, from 70 to 182 days. This ensured self-catering operators and the wider tourism sector were alerted to the changes more than 12 months before the new criteria would take practical effect.

A [technical consultation](#) on the draft Non-Domestic Rating (Amendment of Definition of Domestic Property) (Wales) Order 2022 ran from 1 March to 12 April 2022. The consultation sought views on the clarity and practical application of the draft legislation. It received 499 responses, the vast majority of which were from self-catering property owners and representative bodies who expressed the view that the criterion of 182 days actually let is too high. The response to the technical consultation was, therefore, very sector-specific, capturing only part of the broader set of stakeholders who responded to the previous policy consultation. This is generally expected for technical consultations, which mainly attract responses from stakeholders for whom the relevant legislation will be directly applicable.

On 24 May 2022, I [confirmed](#) that the Welsh Government has made the legislation as drafted and consulted upon. It came into force on 14 June 2022 and will have practical effect from 1 April 2023. The legislation was subject to a motion to annul, which was debated in the Senedd on 6 July 2022. The Senedd voted against the motion, confirming support for the changes. Any further debate could only replicate that which has already taken place.

I recognise the strength of feeling among self-catering operators and I have listened to the representations from individual businesses and industry representative bodies. There is limited evidence available in relation to some of these considerations and the additional information provided by the sector has been welcomed. This has been taken into account in completing the Explanatory Memorandum and Regulatory Impact Assessment, which makes use of the available evidence and was [published](#) alongside the legislation.

This policy is about property owners making a fair contribution to the communities where they have homes or run businesses. Self-catering operators above the thresholds will make their contribution through the higher economic activity they support. Operators below the thresholds will make their contribution through council tax, in the same way as those who do not meet the current thresholds.

The matter of exemptions from the criteria has been raised as part of the engagement which I and my officials have had with sector representatives, including the petitioners. The letting criteria apply to all properties classified as self-catering accommodation without any exceptions: this is not a new principle. The letting thresholds apply nationally and consistently because they define a key aspect of the system, namely whether a property is treated as a domestic dwelling or a non-domestic holiday let for local tax purposes and, in turn, whether it is liable for council tax or non-domestic rates. Other aspects of the local tax system, such as the powers for individual local authorities to apply reductions, reliefs or premiums, allow for the system to be tailored to local circumstances.

I have explained this to the petitioners and their subsequent correspondence has focussed the request on exceptions from a council tax premium, where a property does not meet the letting criteria and is classified as domestic.

Some self-catering properties are restricted by planning conditions preventing permanent occupation as someone's main residence. An exception from a council tax premium is already provided for one type of planning condition and I am exploring whether an exception should apply to other planning conditions. My intention is that any necessary changes are brought into effect from 1 April 2023, alongside the increased thresholds. It is important that statutory exceptions are clearly definable in legislation and would be appropriate in all circumstances where they apply. Planning conditions satisfy those requirements as they have their own legislative basis and, where they apply, would limit the options of property owners in a consistent way.

I will also be issuing revised guidance to local authorities on additional options that are available to them if self-catering properties restricted by planning conditions do not meet the thresholds. These options include discretion to reduce standard rate of council tax liability for certain properties, where considered appropriate by the local authority. Local authorities may apply this discretion to particular properties or to classes of property. Authorities could use this discretion, for example, to support operators in particular circumstances or facing particular challenges.

Many properties of the specific types suggested by stakeholders for exceptions will be subject to planning conditions preventing permanent occupation. Where a self-catering property does not meet the letting criteria and is not subject to such a condition, I want to ensure that local authorities have as much discretion as possible to consider the approach to take for the benefit of their communities. Some of the circumstances suggested for exceptions would not necessarily preclude owners from making their properties available for long-term let to a member of the local community, rather than continuing with short-term letting for less than half the year.

The new criteria do not require properties to be made available for let throughout the whole year, allowing for periods of closure for maintenance or other reasons. There are also a number of discounts and exemptions within the existing council tax system which provide for particular circumstances.

The assessment and valuation of domestic and non-domestic property is a matter for the Valuation Office Agency (VOA), which is independent of Welsh Government. The VOA is responsible for classifying properties based on their use and will do so on a case-by-case basis, considering a range of evidence in more complex scenarios. There are established routes of appeal for owners who consider that their property has been incorrectly classified and valued by the VOA.

I consider that these changes will help to strike the right balance between capacity within the self-catering tourism sector, and the economic benefits that brings, and supporting viable communities of local residents to live and work in these areas. These changes should be considered in the context of the wider package of measures which form our three-pronged approach to tackling the impact of second homes and holiday lets on communities

in parts of Wales. Where second home owners let out their homes on an occasional and casual basis, they enter into direct competition with genuine self-catering businesses. We know that businesses providing self-catering accommodation share our concerns about the number and quality of casual operators entering the sector, and support proposals for a statutory registration scheme.

Our local taxation changes form part of the Welsh Government's three-pronged approach to tackling the issues that can arise from large numbers of second homes in communities and to helping people to live affordably in their local areas. As part of the Co-operation Agreement, we are taking immediate action. The approach comprises a package of measures to provide support, make improvements to the regulatory framework, and ensure people make a fair contribution through the local and devolved tax systems.

The package includes the consideration of a range of options for enabling empty and underused properties to be brought back into use, increasing the availability of affordable housing and driving up standards. The Welsh Government is also working closely with the tourism sector to develop a system for the registration of tourist accommodation to ensure a level playing field for tourism businesses, provide clarity and assurance for visitors, and improve our understanding of the tourism offer in Wales.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The signature is written in a cursive style with a large initial 'R'.

**Rebecca Evans AS/MS**

Y Gweinidog Cyllid a Llywodraeth Leol  
Minister for Finance and Local Government



# Insulate all Welsh homes against both the heat and the cold...introduce grants that are open to all!

Y Pwyllgor Deisebau | 9 January 2023  
Petitions Committee | 9 Ionawr 2023

Reference: SR22/4475-1

Petition Number: P-06-1314

Petition title: Insulate all Welsh homes against both the heat and the cold...introduce grants that are open to all!

Text of petition: With energy prices sky rocketing and millions of Welsh families facing extreme fuel poverty, its time to introduce grants, open to all, which would allow all the people of Wales to properly insulate their homes against both the heat and the cold.

It is shocking that Wales has some of the worst insulated homes in the whole of Europe. A grant of 25to50% towards the cost of insulating properties would encourage people to invest in making their homes more energy efficient and reduce their emissions

Years of underinvestment in properly insulating Welsh homes has led to the situation where people are vulnerable to energy price rises.

That's why we are calling for emergency grants that are available to all so households facing the prospect of cold and damp homes this winter can pay for simple insulation measures. We need a Green New Deal open to homeowners, landlords and councils which will ensure homes are warm and comfortable, reduce carbon emissions and create thousands of green jobs.

Everybody has the right to a warm home, yet this year could see millions of Welsh people having to choose between heating their homes or eating...this simply cannot be allowed to happen!



Insulation is one of the most efficient ways to save energy since it keeps you warm in the winter and cool in the summer.

The energy companies, who are making billions of profit when so many are fearful about keeping warm this winter, should use their profits to pay for an emergency national insulation programme.

## 1. Background

In July 2019, the Welsh Government's [Decarbonisation of Homes in Wales Advisory Group](#) published the "[Better Homes, Better Wales, Better World](#)': [Independent review on decarbonising Welsh homes](#)' report. The report noted:

Wales has some of the oldest and least thermally efficient housing stock in the UK and Europe. 32% of the Welsh housing stock was built before 1919, when there were no construction standards in terms of thermal performance. Just 10% of Welsh homes were built in the last 18 years, during which time energy performance requirements have changed dramatically.

The report recommended large-scale retrofitting to ensure that all existing homes in Wales reach EPC A by 2050. This recommendation supports the Welsh Government's aim of achieving [net zero carbon emissions in Wales](#) by 2050.

There are a number of Welsh and UK Government schemes that can provide support for householders seeking to better insulate their home. However, much of

the support is targeted, focusing on social housing properties and households on low incomes.

## 2. Welsh Government action

The Welsh Government has made a commitment to decarbonise more homes through retrofit in its [Programme for Government](#).

In social housing, the Welsh Government funds the [Optimised Retrofit Programme](#) (ORP). As detailed in the Minister for Climate Change's letter to the Chair, ORP can help improve insulation as part of a suite of measures to support decarbonisation. ORP is testing a number of approaches to decarbonisation that it is hoped will be rolled out to other tenures from 2023.

In the private sector, Welsh Government support for insulation retrofit is carried out through the Nest programme. Nest offers free energy efficiency installations, which can include insulation, to applicants who meet the following [eligibility criteria](#):

- You own or privately rent your home (not from a local authority or housing association)
- Your home is energy inefficient and expensive to heat
- You or someone you live with receives a means tested benefit OR has a chronic respiratory, circulatory or mental health condition and an income below the defined thresholds

In March 2021, the Welsh Government published the [Tackling Fuel Poverty 2021-2035 Plan](#). This plan aims to ensure that no more than 5% of households in Wales will be living in fuel poverty by 2035 'as far as is reasonably practicable' and recommends improving the energy efficiency of households to achieve this. The Welsh Government is due to review progress on the plan in 2023.

Between December 2021 and April 2022, the Welsh Government ran a [consultation on the next iteration of the Warm Homes programme](#), in advance of the Nest scheme's end in March 2023. The Welsh Government has not yet published a response to this consultation.

On 14 June 2022, the First Minister [ruled out an emergency insulation programme](#) for vulnerable households this winter, citing a lack of both UK Government investment and skilled labour. The First Minister also noted that the variation in

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housing types across Wales made it impossible to formulate a 'one size fits all' approach to insulation retrofit.

On 8 November, the Minister for Climate Change made a Plenary statement on [improving the energy efficiency of Welsh homes](#). In it she outlined the Welsh Government's focus will continue to be on supporting lower income homes who are in fuel poverty to reduce their bills and their carbon emissions.

### 3. UK Government action

The Great Britain-wide [Energy Company Obligation \(ECO\)](#) can provide support with retrofit insulation, but is generally restricted to households receiving benefits or living in social housing (in both cases the property must have a low energy efficiency rating). However, local authorities have some flexibility to widen the eligibility criteria if they participate in the [ECO4 Flex scheme](#).

In November 2022, the UK Government announced a consultation on the [ECO+ scheme](#), which it is proposed will extend the benefits of ECO to any home within council tax bands A-C (in Wales) that has an energy performance certificate rating of D or lower. ECO+ is scheduled to begin in April 2023.

### 4. Welsh Parliament action

In January 2022, the [Equality and Social Justice Committee](#) launched an [inquiry into fuel poverty and the Warm Homes programme](#). The Committee published a [report](#) on 18 May 2022, which was followed by a [joint response](#) from the Minister for Social Justice and the Minister for Climate Change on 11 July. All the recommendations were accepted either in full, or in principle. The report was [debated in plenary](#) on 21 September.

The [Climate Change, Environment, and Infrastructure Committee](#) has been running a multi-phase inquiry since March 2022 on the decarbonisation of Welsh homes. The Committee began [initial scoping work](#) from March to May 'to assess progress made to date before determining the areas [the Committee] would like to investigate in detail as part of a longer-term programme of work.' The Committee is now undertaking [an inquiry](#), assessing decarbonisation of homes in the private rented and owner occupied housing sectors. A report on the Committee's findings is due to be released soon.

Title:

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

Julie James AS/MS  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref JJ/02502/22

Jack Sargeant MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

25 November 2022

Dear Jack,

Thank you for your letter of 1 November regarding Petition P-06-1314 calling for the introduction of grants to insulate all Welsh homes against both the heat and cold.

Whilst we recognise the need for all homes in Wales to have adequate insulation, Ministers have agreed to prioritise investment in social housing decarbonisation through the funding made available to social landlords through the Optimised Retrofit Programme (ORP) which prominently includes insulation as one of a suite of measures. We are starting in social housing, before moving to other tenures as this is where we have the most levers.

The ORP has already funded circa £60million in works and has committed a further £60million this year along with indicative amounts of £70million for each of next two years.

Channelling ORP investment through social landlords supports a 'test and learn' approach to how to decarbonise homes effectively and efficiently. As well as evaluating the technical and tenant aspects of the work, actual costs will be monitored and used in the assumptions of future models of residential decarbonisation which includes different types of insulation. This will provide the springboard to start the decarbonisation and insulation of homes in other tenures from 2023.

In Wales, we have a strong history of working in partnership with social landlords to provide high-quality homes for our most vulnerable households and communities. We are using those trusted relationships to ensure that, in a new and rapidly evolving market, we can assure ourselves of the quality and appropriateness of interventions. Working with the social housing sector first also helps support the growth of the skills base and offers opportunities to develop the secure materials and supply chains that are needed to decarbonise and insulate Welsh homes at scale and pace.

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

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Julie.James@llyw.cymru](mailto:Gohebiaeth.Julie.James@llyw.cymru)  
[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

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

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

We are clear that in terms of retrofit, there are few simple solutions and indeed no one size fits all in terms of the housing stock here in Wales. Considering this, we are committed to getting as clear an understanding of the issues and committed to working with partners across the sector to ensure that our approach is evidence based and, while ambitious, also ultimately achievable.

We are gathering evidence and collecting baseline data from properties currently being retrofitted. This data will ensure we can measure the impact of our investment activities. Only through an evidence-based approach can we ensure that future investment relies on solutions that we can be confident work across different homes and different tenures.

Decarbonisation and insulation of privately owned homes, those in the privately rented and owner-occupied sectors is undoubtedly more complex, we know that innovative funding models will be needed to pay for the decarbonisation of these homes, the costs of which cannot rest fully on Welsh Government and that the UK Government as well as the private sector will need to contribute. However, we are confident that the learning from ORP, and other schemes, along with learning from the wider system (such as other government schemes), will put us in a strong position to start the work in other tenures.

Welsh Government NEST scheme also offers support, to qualify for a package of home energy improvements, the householder must meet qualifying criteria, which are set out in the Home Energy Efficiency Scheme Regulations. These include the requirements that they or someone they live with are in receipt of a qualifying means tested benefit (MTB); live in a privately owned or privately rented home; and live in an energy inefficient home (Energy Performance Certificate (EPC) rating of E, F, or G

We are continuing to invest in our Warm Homes Programme which has been in operation since 2010. This provides home energy efficiency measures including insulation recommended following a whole house assessment, which are designed to best meet the needs of the householder and the home.

The programme has benefitted more than 67,100 households since its launch with funding of between £5,000 and £12,000. Our programme is designed to provide support to lower income households experiencing difficulty maintaining a warm home at an affordable cost. The current programme runs until March 2023.

Yours sincerely,



**Julie James AS/MS**

Y Gweinidog Newid Hinsawdd  
Minister for Climate Change

**P-06-1314 Insulate all Welsh homes against both the heat and the cold...introduce grants that are open to all!, Correspondence – Petitioner to Committee, 11.12.22**

Thank you for the opportunity to respond to the Ministers comments. Firstly I welcome the support that the Welsh Government has given to people who are on benefit but would point out that there are hundreds of thousands of people in Wales who receive no benefit and are working but are in fuel poverty.

If we are serious about tackling fuel poverty and climate change then the Welsh Government need to expand its home insulation grants to all properties in EPC rating of E, F or G. Supporting homeowners with a partial grant of 50% or even 25% would assist people to do the right thing and select the right insulation for their property (following an expert survey).

We should not allow the experience of Bridgend and Caerphilly Council's where we are still dealing with the legacy of some very poorly designed and delivered schemes from a decade ago, to dominate future home insulation grant schemes.

It's shocking that the Welsh Government's energy efficiency improvement scheme will take 135 years to insulate every fuel poor household in Wales.

That means implementing an emergency nationwide home insulation programme and introducing green upgrades to homes. This would create 10,000 full time equivalent jobs across Wales over 15 years and generate around £2.2bn for the Welsh economy in addition to reducing the £67 million per year spent by the Welsh NHS on conditions caused by poor housing.

The Welsh Government needs to take action to insulate Welsh homes who need it. It is not just the correct environmental policy but also the correct moral policy for the people of Wales."

Robert Curtis

# Agenda Item 3.1

## **P-06-1302 Protect Mid-Wales' unique Cambrian Mountains: designate them an Area of Outstanding Natural Beauty**

This petition was submitted by Lorna Celia Brazell, having collected 3,571 signatures online and 17,285 signatures on paper, making for a total of 20,856 signatures collected.

### **Text of Petition:**

The Cambrian Mountains: endless open skies, outstanding biodiversity, spectacular hills and valleys, 5000 years' heritage of Welsh language, farming and mining. Their sense of immense space and peace is rare. Sadly, conservation of these uplands gets little attention. Farms are bought up for conifer planting or for large wind farms despite the lack of infrastructure.

So beautiful a region needs protection AND longer term rural employment. Designate the Cambrians as Mid-Wales' first AONB!

### **Additional Information:**

The Cambrian Mountains' peatlands mitigate climate change by absorbing manmade carbon, and reduce river flooding. Biodiverse native woodlands and fens nurture precious plants, animals and birds. Birds of prey cruise the skies; red squirrels, otters and pine martens roam; butterflies, dragonflies, ladybirds and 15 kinds of dung-beetles call it home! Scattered farms, cairns, chapels and ruins record people's lives and work here since the Bronze Age. AONB designation would bring balance between development, local communities' needs AND people's need for green space. Existing AONBs like Gower, Anglesey, Clwydian Hills and Dee Valley thrive while promoting and preserving Welsh landscapes for all.

We need to stop and think: Politicians raise concerns over windfarm plans ([mynewtown.co.uk](http://mynewtown.co.uk)). Large scale afforestation will decimate rural communities warns farming union ([nation.cymru](http://nation.cymru)). Give the Cambrian Mountains prestige AONB branding and coherent management and watch the region flourish!

### **Senedd Constituency and Region**

- Brecon and Radnorshire
- Mid and West Wales

**P-06-1302 Protect Mid-Wales' unique Cambrian Mountains: designate them an Area of Outstanding Natural Beauty – Correspondence from the Petitioner, 03 January 2023**

My apologies for missing the deadline for further comment, but I hope given that the Committee's meeting is not until next week there is still time for a brief observation.

Overall, the Petition process has been extremely valuable in moving our proposal forward and we are very grateful to the Committee and staff for your assistance in getting it to this point.

We watched the Senedd's debate with interest and noted that most of the contributions were broadly positive save for that from Plaid Cymru. Plaid's contribution appeared to be founded on a lack of understanding of what an Area of Outstanding Natural Beauty is and how it would affect land use and in particular farmers. In our view, the impact of an AONB designation on the farming community would be minimal compared to, and in any event entirely complementary to, the changes already being brought forward under the new Sustainable Farming Scheme, which have already been approved. Accordingly, any objection on that basis is misconceived. We will now focus our efforts on correcting that misapprehension in the community at large in the run up to further consideration of the proposal. Following our meeting with the Minister's team in December, we understand it is likely to take a year or more due to conflicting workloads in the relevant team at NRW.

Best wishes for the New Year to you and your colleagues

Lorna

## Agenda Item 3.2

### **P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Wales**

This petition was submitted by Dr Linda Evelyn Joyce-Jones, having collected a total of 308 signatures.

#### **Text of Petition:**

In 1999 legislation was changed by the UK Government which allowed veterinary practices to be owned not just by qualified veterinary surgeons. This paved the way for private equity stakeholder corporates to buy into this market. These profit driven organisations have changed the profession so that it is barely recognisable. In many parts of Wales, it is virtually impossible to find an independently run veterinary practice. The corporate buyout now extends to out of hours provision, referral practices as well as general practice. The corporates also own laboratories, drug companies, pet crematorium as well as shares in many pets' food companies. Such a monopoly makes the few remaining independently run practices presence virtually untenable. From vet school to recruitment through to practice the corporates have the advantage. Set in this context their influence on bodies such as the RCVS and BVA is predicable.

#### **Additional Information:**

For those of us with companion animals this monopoly has had devastating consequences. From lack of choice in finding an independent practice, seeing the same Veterinary Surgeon for continuity of care through to cost. But most of all clinical decisions being made with the policies of the corporate's taking centre stage.

My experience with My Cat Rosa sadly means I will always mistrust some within the profession. Companion animals are part of people's families. Covid, the isolation and mental health issues have made these relationships even more precious.

I dread to think (but have been informed) how the animal rescue sector in Wales copes. Because they must deal with some of the most abused and clinically challenged animals who have significant and often complex medical needs.

Despite numerous petitions to the UK Government, Department for Environment Food & Rural Affairs etc have failed to take any action whatsoever. Cymru has led the way before on animals and their welfare, so we ask our Senedd to do so again.

#### **Senedd Constituency and Region**

- Ynys Môn
- North Wales

**Pwyllgor yr Economi,  
Masnach a Materion Gwledig**

**Economy, Trade and  
Rural Affairs Committee**

**Senedd Cymru**

Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddEconomi @senedd.cymru  
senedd.cymru/ SeneddEconomi  
0300 200 6565

**Welsh Parliament**

Cardiff Bay, Cardiff, CF99 1SN  
SeneddEconomy@senedd.wales  
senedd.wales/ SeneddEconomy  
0300 200 6565

Jack Sargent MS

Chair, Petitions Committee

Date: 9 December 2022

Subject: Petition P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Wales

Dear Jack,

Thank you for your letter dated 1 November about the petition above. The Committee noted its content at its meeting on 9 November.

The Committee's work programme during the autumn and spring terms has been largely committed to legislative scrutiny. Nevertheless, when we next have an opportunity to consider our future work programme, I will ensure that consideration is given to any work the Committee may usefully be able to undertake in relation to the topic of the petition.

Kind regards,



Paul Davies MS

Chair: Economy, Trade and Rural Affairs Committee

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

**P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Wales, Correspondence from the Petitioner to the Committee, 31.12.22**

**To the Chair and Members of the Petitions Committee of Senedd Cymru.**

**Petition P-06-1291 Hold an enquiry into the corporate takeover of the veterinary profession in Cymru.**

I would like to thank you for having the above petition on your agenda today and asking me to comment.

**Correspondence from the Chair of the Economy, Trade and Rural Affairs Committee.**

I wish to thank the Members of the Committee for considering my petition and their Chair Paul Davies MS for his correspondence. I value Paul's honesty and I understand completely in regards to the time frame. However as many Members know the matters I raise are also being compounded by the cost of living crisis . So I feel animals welfare together with the wellbeing of their owners is being seriously impacted. I would like a meeting with Paul to discuss these matters directly.

**Professor Noel Fitzpatrick  
MVB DSc (Hon) DUniv Cert SAO CertVR DipACVSMR DipECVSMR DSAS (Orth)  
MRCVS**

Some Members may be aware of Noel's work in Fitzpatrick Referrals which is the only remaining independently run referral practice of his discipline the UK. Noel and his team treat patients from all over the world including Wales. Like many in his profession he has expressed concern though the years in regards to the corporate equity shareholder companys. Recently he has gone on record stating his profession "is at a crossroads ".

Below I have **paraphrased** Professor Noel Fitzpatrick from his recent publication Beyond Supervet.

" My issue isn't with the individuals within the system, but rather with the system itself. But I feel strongly that corporate entities should also be authentic in total integrity and transparency about which primary care and specialist referral centres they own .Where there may be a financial vested interest in keeping patients within their groups. The reason there are so many complications I think warrants investigation.

My personal opinion is that there are incentives to keep what are perceived as simpler surgeries "in house", and to have them performed by less experienced (and thus less expensive) surgeons. In my experience, most clients do not know this and are not always being offered a full range of options, due to financial imperatives. This may seem like a damning and uncalled for incitement of lack of authenticity in my profession, but if an investigation of fact is warranted, I have spreadsheets of cases to demonstrate that this is my factually evidenced personal experience in scores of patients. In the past year alone my colleagues and I have seen more than twenty devastating complications after poorly performed surgeries of this kind in general practice.

I am sincerely and profoundly concerned that my profession is ignoring shoddy surgical technique performed by inexperienced vets without appropriate in- depth training and with suboptimal implants because they have a vested interest in monetary gain. It seems *wrong* to me, from a perspective of consumer choice and patient well-being, that a client should only have access to a very limited number of referral centres that are owned by the same company that owns your local vets.

I worry that animals, and indeed love itself, are being com-modified. I have seen dogs and cats referred to in paperwork as "RGUs" ( revenue generating units). This terminology for our patients is anathema to me . Many of the corporate groups also have as part of their portfolio crematoria, own - brand drugs, online pharmacies, laboratories, out-of-hours surgeries, locum agencies, and online or retail shops which they can market to the human families of their RGUs over their lifetimes. This is good business, but is it transparent?

**I worry that the principles I hold so dear will fade away within a generation. "**  
**1.**

During October and November Professor Fitzpatrick embarked on a tour of the Republic of Ireland and the UK . During which in venues containing thousands of people he briefly explained his concerns from the angle of animal welfare the impact the private equity shareholder companys are having on his beloved profession. I went to see him in Cardiff and also had the privilege to meet him in Manchester. Where I was able to tell him about our CIC (Community interest Group) venture Rosa's Milfeddygon Symudol- Mobile Vets Ynys Môn .

Professor Fitzpatrick's observations above are the reason I intend to travel to our Senedd for your meeting to sit in the public gallery.

#### **Next steps.**

I am organising an event in the Senedd's Oriel on Wednesday 21st June between 11- 2 . An invitation will be extended to all Senedd Cymru Members so that they can learn directly from rescues, animal welfare groups, veterinary professionals and companion animals families the impact on animal welfare the present situation is having.

I have requested a meeting with your Chair Jack Sargeant MS as I know Jack will want to have the opportunity to fully understand the situation.

I would like to meet with Lesley Griffiths MS in her capacity as Minister for Rural Affairs and North Wales and Trefnydd.

I would like to meet with Dr Richard Irvine the Welsh Government's new Chief Veterinary Officer. As our previous CVO expressed her concerns in regards to the situation and stated that it was being closely monitored. I would like to ensure this is still the case .

Once again I would like to thank the support staff of the Petitions Committee and yourselves for your consideration of this matter. As always if I can assist you further I will endeavour to do so .

Cofion Cynnes Dr Linda Joyce-Jones.

Ynys Môn Cymru 1/01/2023 .

**1:** Beyond Supervet- How animals make us the best we can be Noel Fitzpatrick .  
Orion books 2022.