

Agenda – Climate Change, Environment, and Infrastructure Committee

Meeting Venue:

Committee room 4 Tŷ Hywel
and video Conference via Zoom

Meeting date: 11 February 2026

Meeting time: 09.30

For further information contact:

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Hybrid

Private pre-meeting (09.15–09.30)

Public meeting (09.30–11.30)

1 Introductions, apologies, substitutions, and declarations of interest

(09.30)

2 General scrutiny of the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

(09.30–11.30)

(Pages 1 – 42)

Huw Irranca-Davies MS, Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Claire Bennett, Director, Climate Change & Environmental Sustainability – Welsh Government

Attached Documents:

Research brief – General scrutiny of the Cabinet Secretary for Climate Change and Rural Affairs

Research brief – Water Green Paper

Paper – Welsh Government



3 Papers to note (11.30)

3.1 Welsh Government Draft Budget 2026–27

(Pages 43 – 111)

Attached Documents:

Response from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs in relation to the Committee's report: Scrutiny of the Welsh Government Draft Budget 2026–27

Response from the Cabinet Secretary for Transport and North Wales in relation to the Committee's report: Scrutiny of the Welsh Government Draft Budget 2026–27

3.2 Holyhead Port Storm Damage and Closure

(Pages 112 – 114)

Attached Documents:

Response from the Road Haulage Association to the Chair of the Economy, Trade, and Rural Affairs Committee in relation to the Holyhead Port closure

Response from the Irish Road Haulage Association to the Chair of the Economy, Trade, and Rural Affairs Committee in relation to the Holyhead Port closure

3.3 The Aarhus Convention and its importance in Wales

(Pages 115 – 130)

Attached Documents:

Letter from the Interim Environmental Protection Assessor for Wales to the Chair in relation to the IEPAW report on Aarhus Convention and its importance in Wales

3.4 A charter for a just transition to net-zero

(Pages 131 – 134)

Attached Documents:

Letter from Non Davies to the Chair in relation to the charter for a just transition to net-zero

3.5 Petition P-06-1566 Welsh Government must legislate for full regard to Local Nature Reserves including Cosmeston LNR

(Pages 135 – 136)

Attached Documents:

Letter from the Chair of the Petitions Committee to the Chair in relation to Petition P-06-1566 Welsh Government must legislate for full regard to Local Nature Reserves including Cosmeston LNR

4 Motion under Standing Order 17.42 (vi) and (ix) to resolve to exclude the public from the remainder of this meeting

(11.30)

Private meeting (11.30-12.30)

5 Consideration of evidence received under item 2

6 Forward work programme

(Pages 137 – 149)

Attached Documents:

Forward work programme – Spring 2026

Document is Restricted

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

Document is Restricted



Evidence paper for Cabinet Secretary for Climate Change and Rural Affairs for General Scrutiny at CCEI Committee

11/02/2026

Information on key achievements provided to aid the Committee in advance of the Cabinet Secretary's attendance at General Scrutiny on 11 February.

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Overview of progress

Climate mitigation

In Wales, we exceeded our first carbon budget target. The latest data published in June 2025 shows that we are largely on track to meet our second carbon budget, which requires an average 37% reduction in emissions. This represents a significant achievement, with Wales having already reduced emissions by more than a third since 1990. Wales Fourth Carbon budget (CB4) runs 2031-2035. In December, this Government set the level of CB4 at an average 73% reduction against the baseline. This is an ambitious but credible target, informed by the advice of the Climate Change Committee alongside other evidence required by the Environment (Wales) Act 2016.

Climate adaptation

We published our Climate Adaptation Strategy for Wales in 2024. The Strategy provides a clear vision of what a well-adapted Wales looks like – a positive future that addresses the risks from our changing climate, embraces the opportunities, and reduces inequalities across our society. We have developed a comprehensive monitoring framework for the strategy, based on both actions but also outcomes for the people of Wales.

During [Wales Climate Week](#) 2024, we highlighted some of the positive actions farmers are already taking to adapt to our changing climate, with examples provided through Farming Connect's wide network of demonstration farms as well as innovative research into climate resilient crops and adaptive farming techniques. An evaluation report has been published: [Climate Conversations Fund Summary Report](#), which summarises outcomes of the community conversations which followed the main week/virtual conference.

Public sector decarbonisation

The Welsh Government Energy Service is a key driver in supporting public sector organisations across Wales by providing funding along with technical, commercial and procurement advice to help deliver the collective ambition of a Net Zero public sector by 2030.

In 2024/25, the Welsh Government Energy Service achieved record levels of investment and supported a broader range of organisations than ever before. Its impact has grown substantially in recent years, reaching more communities and driving greater change. To date, projects supported by the Energy Service are expected to generate more than £367m through savings and power generation.

Between 2018 and 2024, the Welsh Government Energy Service supported over 400 projects which range from newly installed renewables, to advancing energy efficiency work and zero emission vehicle fleet replacements. The renewable energy projects alone have introduced 44.5MW of new capacity, equivalent to enough electricity to power 18,000 homes.

A total of £210 million has been invested in projects across public sector organisations, including health boards, local authorities, national parks and colleges. The projects ranged from LED streetlamp installations to low carbon heat solutions. The support will save 857,000 tonnes of CO₂ over their lifetime.

Biodiversity

In December 2025, we published the [Welsh Government section 6 report](#) which outlines the actions taken across government, outcomes delivered and funding awarded to projects to manage and improve our land, freshwater and marine ecosystems. The report provides a comprehensive overview of the Welsh Government's actions to maintain and enhance biodiversity and promote ecosystem resilience.

A key initiative is The Nature Networks Programme which was launched in response to the nature emergency and supports nature recovery in Wales by improving the condition of the protected sites and their features and building ecological connectivity between them.

The Nature Networks Programme has already had a significant positive impact, with over £54million awarded since 2021 working in partnership with Natural Resources Wales and the National Lottery Heritage Fund.

Welsh Government has also agreed to extend legal protection to European beavers in Wales in line with our support to facilitate the managed reintroduction of European beavers in Wales. The legislative amendments will be introduced in this Senedd term in conjunction with the establishment of a Wales beaver Forum recognizing that there will be areas of concern that need careful, collaborative management and robust evidence which will guide our next steps.

Work on revising our Nature Recovery Action Plan (NRAP) to align with the section 6 plan is progressing well. The vision and aims were shared and well received at the Wales Biodiversity Conference with stakeholders providing input to help shape the revised plan. Further engagement has taken place with a range of stakeholders and delivery partners to help inform and update some of the key collective actions needed to achieve our aims and objectives. The refreshed NRAP is due to be published in Spring 26 however it will need to be updated further as an iterative process to reflect the additional requirements in section 6 and the emerging targets being developed as part of the requirements under the Environment (Principles, Governance and Targets) (Wales) Bill once it becomes law. The Bill includes provision to strengthen cross-government biodiversity integration and delivery by requiring future Section 6 plans to include proposals that cover the areas of responsibility of each Welsh Minister.

The Environment (Principles, Governance and Targets) (Wales) Bill is a landmark piece of legislation. The Bill amends Part 1 of the Environment (Wales) Act 2016 to introduce a biodiversity target setting framework. Welsh Ministers have a power to set biodiversity targets in regulations, provided they are satisfied that meeting the target would contribute to halting and reversing the decline in biodiversity, in particular through increasing the abundance of native species, enhancing the resilience of ecosystems, or increasing genetic diversity. This is accompanied by a duty for Welsh Ministers to achieve the targets.

The Bill enhances the Welsh Ministers' planning and reporting functions under section 6 of the Environment (Wales) Act 2016, to include the action they intend to take to achieve biodiversity targets, monitoring and reporting progress toward achieving targets (including setting indicators), as well as a new evaluation report assessing the impact and effectiveness of those policies and actions. The Bill provides the Welsh Ministers with a power to designate public authorities which will have the effect of requiring those public authorities to take action to contribute to achieving the biodiversity target for which they have been designated – further strengthening the current section 6 duty. The Welsh Ministers will also have a duty to promote awareness in Wales of the importance of, and threats to, biodiversity.

Marine

In 2025–26, the Marine Protected Area (MPA) Network Management Grant Scheme successfully funded seven new projects, contributing to a total of 24 projects and over £500k of investment this Senedd Term. These projects contribute valuable benefits, enhancements, and improved understanding of the management of the Welsh Marine Protected Area network.

Alongside this, I have commenced a review of the MPA Network Management Framework (2018–2023) to ensure it remains fit for purpose, reflects progress and future ambitions for Wales’s MPA network; the updated framework will be finalised by Summer 2026.

Additionally, in June 2025, funded by the Nature Network Programme, Natural Resources Wales published the first comprehensive assessments of our Marine Protected Area Network as part of the Improving Nature Conservation Advice project. These assessments provide critical information to help us understand the health of our Marine MPAs and are the first comprehensive assessments of our Marine MPAs at designated feature level. The MPA features were assessed using indicators to identify what pressures are causing failures, enabling us to focus management efforts on activities that will have greatest impact.

In 2025, Welsh Government with the Statutory Nature Conservation Bodies have refined and identified six proposed Marine Conservation Zones (MCZs). Following this, the first iteration of the Regulatory Impact Assessment for these proposed MCZs has been delivered; this is crucial before a consultation can be held. This iteration of the Regulatory Impact Assessment has identified that evidence needs to be strengthened in some of the proposed sites which will be commenced in Spring 2026.

The Wales Coasts and Seas Partnership has developed the MARINE Fund Cymru, a long-term voluntary contributions fund to enable, maintain and enhance the resilience of marine and coastal ecosystems. Welsh Government has provided £85,000 for a Development Manager for 3 years to set up and test this innovative approach. The Fund opened for contributions on 29th January 2026 with £500,000 of seed funding from the Crown Estate and a call for projects will follow as soon as possible.

Welsh Government continues to operate the UK’s only nationwide fishing gear collection and recycling scheme. Now in its 3rd year, the scheme operates at more than 10 harbours across the country collecting a variety of different materials. As of 2025 over 15 tons of fishing gear has been collected and recycled which may otherwise have been discarded at sea.

Since 2021 Welsh Government has awarded nearly £1.12million funding to seagrass and saltmarsh restoration projects through the Nature Networks Programme and the Coastal Capacity Building scheme. In 2024-25 we awarded an additional £100,000 of funding to support Seagrass Network Cymru's (SNC) National Seagrass Action Plan. Led by Project Seagrass, Seagrass Network Cymru comprises of a range of delivery partners including NGO's, academics and Natural Resources Wales. The plan is an excellent example of how Welsh Government funding is supporting a collaboration by bringing together key stakeholders across Wales. This additional funding will help Wales to halt seagrass loss and will support recovery of 266 hectares of seagrass by 2030 in line with our "30x30" conservation targets. Project Seagrass's community focused approach will provide a blueprint for national implementation, supporting skills development and sustainable green jobs across Wales now and into the future.

Fisheries

12 months on from publishing the Strategic Approach to Welsh Fisheries and Aquaculture, we've made good progress against our priority areas. Significant progress has been made on Fisheries Management Plans (FMP), including steps to implement Bass and Scallop, development of Wales's first Crabs and Lobsters FMP, and contributions to seven joint UK plans. To support sustainable economic benefit domestically from our valuable natural resources, we have continued to manage permitted fisheries based on the latest scientific evidence. This has included the introduction of a new adaptive cockle management system, adaptive management of our whelk fishery and the launch of a recreational bluefin tuna fishery.

We are supporting sector resilience through seafood supply chain initiatives, wellbeing projects, and funding schemes, including £1,146,984 awarded under Welsh Marine and Fisheries Scheme (WMFS) Round 5, £430,132 through the Coastal Capacity Building Fund. An additional £1.29 million is being added to the Fisheries BEL in 2026/27 to support and enhance the important fisheries sector and our coastal communities across Wales. The [WMFS Round 6](#), which opened for applications on 7 January, includes an uplift in its budget to provide the first opportunity for the fisheries sector and our coastal communities to access this additional funding.

Circular economy

We have taken significant steps forward in delivering Wales's circular economy strategy, which include continuing to improve Wales's recycling to the point that we are second in the world. We have rolled out reuse and repair hubs across the whole of Wales and brought forward the Extended Producer Responsibility scheme for packaging in line with our programme for government commitments, putting the producer paid principle into action. We are successfully implementing the Workplace Recycling reforms which mean that businesses and workplaces across Wales are now recycling in a way which follows the successful approach for households.

Waste and pollution reduction

A number of actions have been undertaken to reduce the production of waste as well as tackling pollution and littering which impact on public health and the environment. Wales is the first in the UK to prohibit the supply of wet wipes containing plastic, this ban will come into force in December 2026. We also brought a ban on single use vapes into force on 1 June 2025, helping to end throwaway culture and clean up our neighbourhoods. We have delivered a communication campaign to support this and increased funding for our enforcement bodies who ensure the ban is being implemented successfully. Working in partnership with Local Authorities to tackle littering and funding the Fly-tipping Action Wales programme helps ensure a coordinated approach to tackling these blights on our local environments. This includes supporting the use of new technologies to help increase enforcement.

Air quality and pollution control

Supporting citizens and companies in being better informed is vital in minimising air pollution and in being resilient to instances when air quality negatively impacts public health. We have consulted on proposals to strengthen existing stationary idling offences and the Promoting Awareness of the Air Pollution Delivery Plan. Furthermore, we continue to seek views on the current, live consultation on Fine Particulate Matter (PM2.5) Air Quality Targets, proposing draft regulations to reduce annual mean PM2.5 concentrations to 10 $\mu\text{g}/\text{m}^3$ by 2035 and reduce average population exposure by 25% by 2035. Citizens, including through schools, are benefitting from published updated guidance for smoke control and Local Air Quality Management, being underpinned by

allocating nearly £1 million to Local Authorities via the Local Air Quality Management Fund for local air quality projects in their areas.

Environmental permitting and guidance

There continues to be support and information regarding industrial practices so improving public and environmental health with updated Guidance notes for Crematoria and Small Waste Incineration Plants, Combustion Plants (20–50 MW), Waste Wood Combustion and Roadstone Coatings. To help ensure adherence to permitting requirements there continues to be vital funding for Local Authorities to efficiently undertake technical environmental permitting duties. Alongside an array of local and national partners including Natural Resources Wales, there has been strategic and operational support and advice regarding permitting and remediation for Tata Steel's transition to low-carbon electric arc technology.

Peatland restoration

Working with partners, we successfully met our previous peatland restoration target a year ahead of time. Now, our National Peatland Action Programme aims to increase delivery from 600 ha to 1,800 ha per year by 2030. 3,600 ha have been restored and 8,000 ha have been improved to date. This means 2.2 m tonnes of carbon safeguarded with a further 3 m tonnes targeted and over 12 m m³ of water storage restored since 2020 with 17 m m³ more planned.

Timber industrial strategy

Our timber industrial strategy *Making Wood Work for Wales* was published in July 2025 to grow and add value to Wales's timber sector, supporting decarbonisation, jobs and long-term sustainable forest use.

Local Places for Nature programme

We have invested £66 m since 2020 to create or improve 4,000+ green spaces, including 3,100 pollinator sites, 1,000 orchards, 100 food-growing sites and 110 therapeutic gardens. 15,000 volunteers across Wales have engaged with the programme, gaining important experiences and skills. The expanded focus of the scheme now supports wider biodiversity and 30x30 goals.

Progress toward Glyndŵr National Park

Natural Resources Wales (NRW) has agreed to make a Designation Order to Welsh Ministers following three years of assessment and public engagement. We will consider NRW's evidence alongside our own assessments to inform a final decision on Designation. If designated this would be the first 'made in Wales' National Park.

National Forest for Wales

The National Forest for Wales is expanding, it is now over 90,000 ha, including 72 Welsh Government Woodland Estate sites totalling 4,080 ha; supported by Welsh Government's new Landscape Grant Scheme to enhance economic, biodiversity and community benefits. The also includes 23 Coetiroedd Bach (Tiny Forests) across Wales. These are small plots the size of tennis courts created using the Miyawaki method of dense native tree planting. Sites joining the National Forest receive Welsh Larch signs produced by Merthyr Tydfil Institute for the Blind, a social enterprise employing disabled and disadvantaged people throughout South Wales. The signs are made from Welsh Larch which is grown, felled and processed in Wales, and is FSC certified.

Eco-Schools

We are the Eco-Schools global leaders. Wales is the first nation to exceed UNESCO's 2030 target, with 53% of schools achieving Green Flag accreditation. Working with Keep Wales Tidy, we established the Climate Challenge Cymru event to encourage young learners to put forward their ideas for helping climate and nature. Funding and an expanded event have been confirmed for 2026.

Coal tips

The Coal tips Act was given Royal Assent and had the first Bill sealing ceremony outside of the Welsh Government estate or Senedd, at Blaenavon's Big Pit, to celebrate the Welsh Seal being applied to the Disused Mine and Quarry Tips (Wales) Bill. Implementation of the new coal tips body is going well, with the

appointment of a Chair – Fiona Jones in November, alongside confirmation that its headquarters will be in Merthyr, on a reclaimed coal tip site, and the organisation will be represented in other parts of Wales. The Authority is expected to create 60 new jobs. Overall programme of inspections continues with landmark 3000th inspection and UK Government funding of £118m secured. We recently confirmed a new multiyear grant scheme which will enable vital maintenance works on over 400 former coal tip sites across Wales thanks to over £80 million of funding.

Flood and Water

There has been a record level of investment of £377m in this Senedd term for flood defences including increasing funding in Natural flood Management. The final schemes of the £291m Coastal Risk Management Programme are approaching completion. We will continue our record investment in flood risk management next year, increasing funding to more than £83 million, an increase from £77 million last year and the highest annual investment ever made in Wales.

We have delivered a joint Independent Water Commission Review with Defra that had real Wales focus offering a once in a generation opportunity to shape the regulation of the water industry in Wales that reflects devolution and the needs and aspirations of the people of Wales.

As a result of the Price Review process, Welsh Water companies will invest £6.26 billion in Wales up to 2030, including £2.45 billion on new investments to deliver improvements. The determination provides funding for water companies to maintain and improve services, meet Ofwat's targets, and invest in infrastructure. Bill increases are necessary to enhance drinking water quality, reduce leaks and waste, and improve treatment processes. DCWW's not-for-profit model ensures that all financial surpluses are reinvested for the benefit of customers and communities and not paid in dividends.

The Welsh Government has made it clear to Ofwat and water companies in Wales that customers expect real improvements in services, infrastructure, and environmental outcomes. We expect water companies to deliver on their commitments, with regulators holding them to account. If companies fail to meet their obligations, any financial penalties should be returned to bill payers.

We have modernised Wales's bathing water framework by ending automatic de-designation, strengthening site criteria, introducing flexible bathing seasons, and updating technical standards for clarity and effectiveness. The new

Regulations will come into force in Wales on 1 April 2026, ensuring a smooth and well-managed transition. With applications received being assessed under the existing 2013 framework, maintaining consistency and fairness.

Our Programme for Government commits us to delivering more inland bathing waters and strengthening water-quality monitoring. Since 2021, we have moved from a single designated site to a modern, evidence-led programme that has delivered two new inland bathing waters, with a further site under consideration for designation this year.

In 2025–26, Natural Resources Wales received an additional £5 million to strengthen regulation and enforcement activities related to water. This represents a major commitment to improving environmental outcomes and supporting sustainable economic growth. In a short timeframe, NRW has developed a comprehensive programme of work to maximise the impact of this funding. This includes establishing new enforcement capacity, investing in technology, and piloting innovative approaches. This additional funding is enabling NRW to build long-term regulatory capability, modernise enforcement through innovative pilots and new technology, strengthen collaborative catchment approaches to tackle pollution, and lay the groundwork for strategic, sustainable solutions that will protect water quality for years to come.



Climate Change, Environment, and Infrastructure Committee

Scrutiny of the Welsh
Government Draft Budget
2026-27

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Climate Change

Recommendation 1:

The Welsh Government should set out its existing and future plans for increasing levels of funding to scale up the delivery of climate adaptation, particularly through private investment, and how those plans align with the sustainable investment principles.

Response: Accept

Ensuring there is sufficient funding for climate adaptation activity is the responsibility of individual portfolio Ministers. This is considered as part of the Budget process each year. Additionally, the Climate Adaptation Strategy for Wales sets out the action leads are taking across different portfolios to explore and secure the funding needed to achieve a well-adapted Wales, including private investment. We will continue to address this recommendation through our Budget publications, as well as through updates against the Strategy. We will also continue to ensure work on adaptation funding across portfolios, including on private investment, aligns with and learns from our work on the sustainable investment principles.

Financial implications – this work will be accommodated within existing budgets, through the Budget process.

Recommendation 2:

The Welsh Government should set out how it is prioritising scaling up nature based solutions in adapting to climate change, and ensure sufficient levels of funding for that purpose.

Response: Accept

We are committed to expanding our use of nature based solutions to deliver a range of ecosystem services from carbon sequestration to water filtration to flood risk mitigation.

We are making significant investment in tree planting, both to support climate change mitigation, biodiversity and water and air quality. We have committed to providing sufficient funding through the Sustainable Farming Scheme to achieve at least 21,500ha of tree planting via the scheme by 2030. The most recent Climate Change Committee advice includes a recommendation that Wales plants 22,000 ha of woodland by 2030, and 208,000 by 2050 as well as 766ha annually of agroforestry. We are currently considering the implications of this advice for the role of trees and woodland in contributing to delivering Wales' net zero pathway.

We continue to invest in restoration of Wales' peatland habitats via our National Peatland Action Programme improving their ability to store and safeguard carbon, boosting biodiversity and regulating the supply of water through the

catchment. The second phase of the **National Peatland Action Programme (2025-30)** was published on 5th December 2025, World Soils Day. This sets a target of increasing the annual restoration rate from 600ha p.a. to 1,800ha p.a. by the end 2030. A cumulative target of 5,000ha has been set for the Programme period. £5.2m capital and £0.55m revenue is allocated for the 2025/26 financial year.

Our work to develop a nature finance framework will look to mobilise finance from a range of sources to increase the resources to minimise the impacts of climate change and build resilience. This includes financial resources, capacity building and collaboration.

Financial implications - this work will be accommodated within existing budgets as described above.

Coal Tips and reservoir safety

Recommendation 3:

The Welsh Government should provide a breakdown of which tips received support from the Coal Tip Safety Grant Scheme in 2025-26, including the amount of funding received and category of the tip. It should also clarify the total allocation for the grant scheme for 2026-27, including the projected number of disused tips that will benefit from maintenance and remediation works, their location and the category of tips they fall into.

Response: Accept

Tips breakdown 2025-26

A breakdown of the tips that received support from the Coal Tip Safety Grant Scheme in FY2025-26, along with the amount of funding received and category of tip are attached at Annex A.

Allocations for the grant scheme 2026-27

The total allocation for the grant scheme in 2026-27 will be £39.4million. This is inclusive of the UK Government investment of £31million for 2026-27.

The funding will be distributed in the first allocation of a three-year multiyear grant, and I want to acknowledge the contribution of the UK Government, which has committed £25 million in this financial year and a further £118 million over the next three years, bringing the total UK investment to £143 million.

When combined with Welsh Government funding, this means more than £230 million has now been committed to coal tip safety across Wales and reflects the reality that these tips pre-date devolution and that the responsibility to address them is shared.

The multiyear grant is vital, it will allow local authorities to plan, develop and deliver larger more complex schemes and will enable works on over 400 sites across Wales.

The disused tips that will benefit from maintenance and remediation works, along with their category and location are attached at Annex B.

Financial Implications – this work will be accommodated within existing budgets.

Natural Resources Wales

Recommendation 4:

The Welsh Government should set out the latest position in terms of the loan to Natural Resources Wales and the agreed payment plan. It should also set out how it will monitor and evaluate any impact on NRW's delivery of their core functions and statutory duties.

Response: Accept

Natural Resources Wales, supported by Welsh Government, made a payment on account of £19 million, regarding the IR35 liability, to HMRC in March 2024. Subsequently, the resolution of this issue between HMRC and Natural Resources Wales resulted in the liability settlement being reduced to £14.6m. HMRC has returned the remaining payment on account to Natural Resources Wales, who in turn will return this to the Welsh Government.

Budget reduction arrangements have been agreed with Natural Resources Wales, commencing FY25/26, to recoup the residual cash and budget cover provided.

There continues to be regular, pre-arranged conversations between Welsh Government and Natural Resources Wales. These include quarterly performance/delivery conversations between the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs and the organisation's Chair, between senior officials and the organisation's acting Chief Executive Officer in which any risks/issues affecting delivery of Natural Resources Wales' core functions and statutory duties are raised, discussed and managed.

Financial implications – None. The continued delivery of Natural Resources Wales' core functions and statutory duties will be accommodated within its existing budgets.

Coastal Risk Management Programme

Recommendation 5:

The Welsh Government should provide an update on the review of the Coastal Risk Management Programme before the end of the Sixth Senedd.

Response: Accept

The Coastal Risk Management Programme (CRMP) has seen £291m worth of concentrated investment over five years. Once all construction schemes are complete the 15 funded schemes around Wales' coastline will benefit almost 14,000 properties. As of January 2026, 11 schemes have completed while four schemes remain in mid-construction (Llandudno, Kinmel Bay, Cardiff Rover Way and Barmouth Viaduct Gardens) are expected to complete in 2026 and 2027.

Delivery of construction schemes faced significant challenges due to a series of unprecedented events. In early 2020, severe storms (Ciara, Dennis, and Jorge) caused widespread flooding and disruption across Wales. Shortly after, the COVID-19 pandemic and subsequent lockdowns led to major interruptions within the construction industry. Further complications arose in 2022 with the war in Ukraine, which triggered global oil and gas supply issues, driving fuel inflation and increasing costs across the sector. Recognising these exceptional circumstances, the Welsh Government introduced extensions to allow schemes to commence by March 2024 aimed to mitigate the impact of these external factors and support delivery despite the challenging environment.

Following the completion of the construction phase for any scheme, local authorities must also resolve any issues with contractors before submitting final accounts to the Welsh Government. We expect the majority of schemes to have completed this process by the summer of 2026, at which point we will commence our review of the CRMP Programme. Concurrently, we will liaise with Risk Management Authorities over the development of a new funding programme for major flood risk management schemes in Wales. Financial Implications – this work will be accommodated within existing budgets.

Circular Economy

Recommendation 6:

We would be grateful for more information on the specific allocations within the BEL, and further information on economic opportunities, including how much is spent on initiatives and consultancy services to support the transition to a circular economy. The Welsh Government should set out how it is monitoring and evaluating its investment.

Response: Accept

The detail of expenditure against BEL 2190 was outlined in the CCEI Committee Report Draft Budget 2026-27 Annex 1. The link can be found here: -

[*Draft Budget 2026-2027: evidence to the Senedd Climate Change, Environment, and Infrastructure Committee - Written evidence by the Cabinet Secretary for Climate Change and Rural Affairs: November 2025*](#)

In relation to the economic and job opportunities, those associated with a move to a Circular Economy are substantial with McKinsey's¹ estimating an annual net economic benefit to Europe of up to €1.8 trillion and a 2021 assessment by WRAP³ estimating the creation of c90,000 net new jobs, a boost of c£82 billion to GVA, and a reduction of c34 million tonnes CO₂e per annum for the UK as a whole. In supporting the transition to a circular economy as a priority, the Welsh Government has funded expert services from organisations that provide advice and guidance to both Welsh Government and Local Authorities, helping to improve recycling rates and shape new policies such as Workplace Recycling and Extended Producer Responsibility for packaging. Support is also provided to organisations that facilitate the redistribution of surplus food, promote repair and reuse activities, and deliver important research and evaluation, such as in reviewing the effectiveness of repair and reuse activities.

The Welsh Government monitors and evaluates its funding to support the transition to a circular economy through regular reviews, independent evaluations, and ongoing engagement with delivery partners and stakeholders. The evidence gathered informs both ongoing delivery and future policy development to ensure the investment supports the transition to a circular economy.

Financial implications - This work will be accommodated within existing budgets

Sustainable Waste Management Grant

Recommendation 7:

The Welsh Government should undertake a lessons learned exercise in relation to delivering complex local authority recycling schemes and assess how the findings can be applied to improve the delivery of future projects.

Response: Accept

Officials engage regularly with Local Authorities, expert delivery partners and relevant stakeholders to gather a wide range of input to continually improve the delivery of future projects. In addition, the expert support funded by the Welsh Government ensures that Local Authorities can benefit from the lessons learned in delivering improvements elsewhere across Wales.

Financial implications - This work will be accommodated within existing budgets

Extended Producer Responsibility scheme

Recommendation 8:

The Welsh Government should clarify its role in determining Extended Producer Responsibility funding allocations and how EPR payments will compliment existing funding such as the Sustainable Waste Management Grant.

Response: Accept

The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 establish the regulatory framework for the operational delivery of the packaging Extended Producer Responsibility (pEPR) scheme. The appointed Scheme Administrator is PackUK, which operates the scheme on behalf of all four governments. The Regulations require PackUK to administer the assessment of local authority costs, the assessment of producer fees, including their modulation, the collection of fees from producers and the distribution of funding to local authorities.

There is an established governance framework in place between the four governments and PackUK, including a Memorandum of Understanding and Service Level Agreement. The funding allocations from the Extended Producer Responsibility scheme are for a clear legal purpose, to fund the costs of delivering an efficient and effective waste management service for packaging. The purpose of the Sustainable Waste Management Grant is however to support the improvement of services.

Financial implications - None

Biodiversity

30 by 30 nature target

Recommendation 9:

The Welsh Government should clarify the budget allocations for biodiversity. It should set out how this allocation will advance progress towards the 2030 global biodiversity targets. Given the 30 by 30 target is predicted to be missed, the government should consider increasing allocations for biodiversity in light of the nature emergency.

Response: Accept in principle

Over £36m is allocated for the direct benefit for biodiversity in 2026-27 through initiatives such as the Nature Networks and National Peatlands Action Programmes, the Local Places for Nature Programme whilst also supporting species recovery through Natur am Byth.

The Nature Networks Programme is particularly focused on improving the condition and connectivity of our protected sites creating resilient ecological networks that directly contribute to the 30by30 and wider Global Biodiversity targets.

The Sustainable Farming Scheme will provide significant additional support and will be a key mechanism through the universal, optional and collaborative elements in helping to achieve our biodiversity outcomes including the 30by30 target.

The Local Places for Nature Programme has been refocused to prioritise projects that deliver measurable biodiversity outcomes. Central to this approach is the identification and development of Naturfa sites and Resilient Ecological Networks, which serve as core mechanisms for achieving the 30by30 target. These actions complement statutory protected areas and significantly expand the space for nature across Wales.

In addition, the commencement of delivery phases for the innovative Integrated Nature Resources Scheme and Ffermio Bro represents a significant step forward, with a commitment in the initial pilot windows of a further £20 million over three years to implement actions that enhance biodiversity at a landscape scale. Future windows for the schemes have been announced that will further support work across agriculturally active areas that make up the majority of land use in Wales.

Budget will be provided to support the development of biodiversity targets as introduced by the Environment (Principles, Governance and Biodiversity Targets)

(Wales) Bill. Key deliverables include developing targets for four priority areas aligned with global biodiversity targets, supported by technical advice through scenarios and modelling; establishing a monitoring and evaluation framework, and preparing an awareness-raising programme to support the new duty to promote biodiversity awareness.

To support delivery of 30 by 30 within marine biodiversity, the Marine Protected Area (MPA) Grant provides funding to support data and evidence projects which deliver benefits, enhancements or improved understanding of protected features. This will support improved management and increase resilience of the Welsh Marine Protected Area Network to a range of pressures, including climate change. In addition, the completion of the MPA network through the designation of Marine Conservation Zones will further protect sensitive habitats and features, all of which will contribute the achievement of 30 by 30 in the marine environment.

To support restoration of critically important marine habitats the Welsh Government will continue to support Project Seagrass in the development of stage 2 of the Seagrass Action Plan (Recommendation 14) and delivery of actions in the Saltmarsh Action Plan (Recommendation 15).

A further investment of £331000 into coastal capacity building, connecting people with the importance of and their impacts on the marine environment through ocean literacy, and developing the MARINE Fund Cymru, a long term sustainable blended finance mechanism, will underpin support for delivery of the 30 by 30 target in the marine environment.

Potential increases to the allocations will be considered if the opportunities arise but will need to be considered in conjunction with other competing priorities. We will however endeavour to ensure that all budgets maximise their delivery for biodiversity fulfilling our Section 6 duty under the Environment (Wales) Act 2016.

Financial implications - this work will be accommodated within existing budgets.

Nature Networks Fund and private investment

Recommendation 10:

The Welsh Government should commit to increase funding for the Nature Networks Fund and the Local Places for Nature Fund.

Response: Accept in principle

The Nature Networks Fund is a key component of our Nature Networks Programme with over £54m invested in the programme during this Senedd term.

We will continue to as a minimum maintain our investment in the Nature Networks Fund and look for opportunities to increase the funding if they arise. An additional £2.3m was allocated in 2025 allowing a further five projects to be funded and if such additional funding should become available again this year then we would anticipate being able to increase the allocation accordingly. We have continued to invest significant funds into Local Places for Nature (LPfN) and will maintain our commitment to consider opportunities to provide additional funding should it become available during the year. In 2025-26, the LPfN commitment was increased by an additional £2.5 million, and it is anticipated that similar adjustments could be made if further savings are identified elsewhere within the budget during the year. For 2026-27, the current significant allocations have been confirmed as manageable by LPfN Scheme Managers and funded organisations, including Local Nature Partnership lead bodies. Two-year plans are now in place to maximise funding flexibility, aiming to enhance delivery efficiency on the ground and ensure improved value for money for the Welsh Government.

Financial implications – Any in-year increases to LpFN or NN will be managed within existing budgets.

Recommendation 11:

The Welsh Government should clarify how the Nature Networks Fund will be aligned with the Sustainable Farming Scheme, including how it will work in practice and how farmers can utilise the fund.

Response: Accept

The Nature Networks Fund administered by the National Lottery Heritage Fund is a competitive process with farmers able to apply individually or in partnership where appropriate.

It is intended that Nature Networks Fund will complement the Collaborative Layer of the Sustainable Farming Scheme (SFS) and indeed be a possible mechanism to enable coordinated activity as the Collaborative Layer evolves during the Transition Period.

We intend to work with stakeholders to inform the development of the Collaborative Layer building upon initiatives such as the Nature Networks Fund, Integrated Natural Resources Scheme (INRS) and Ffermio Bro forming a package that farmers could potentially access to deliver actions at a landscape scale with the Nature Networks Fund focussing on the Protected Sites Network. The requirement to have a Designated Sites Management Plan under the Universal Layer of SFS will help to identify such opportunities. The exact mechanisms by which these different finance streams can be coordinated / blended are yet to be determined.

Financial implications - None

Recommendation 12:

The Welsh Government should provide an update on how it is increasing funds for nature through private investment, following the Sustainable Investment Principles consultation.

Response: Accept

We are committed to developing a nature finance framework for Wales which will provide the safeguards required to support private investment. We have increased our capacity and have a dedicated resource focussed on increasing funds for nature. This work will look at the strategic long-term approach to sustainable finance for nature's recovery in Wales. This approach is intended to increase and diversify the funding available so that we can effectively tackle the nature emergency and the pressures that drive biodiversity loss – including climate change, pollution, and unsustainable management of natural resources. This will include funding from the private sector, community-led initiatives and philanthropic giving.

It is about looking at financial resources from all sources; ensuring accessibility of resources in an effective, efficient and transparent manner; identifying different mechanisms through which the private sector could contribute, these include blended finance, developing funding strategies, impact funds and other instruments that encourage private sector involvement. The developing MARINE Fund Cymru is one such example. This voluntary fund will open for donations soon and will invest in projects which enhance the health, resilience and biodiversity of Welsh marine and coastal ecosystems.

We are looking at innovative finance schemes, such as payment for ecosystem services, green bonds, biodiversity offsets and credits, and benefit-sharing mechanisms. However, it is important that such schemes have environmental and social safeguards. This is why we developed our sustainable investment principles.

We continue to work with the UK Government on the development of standards under the BSI Nature Investment Standards Programme which aim to establish a framework for investing in nature, promoting transparency, and preventing greenwashing in nature markets. These standards are designed to provide a consistent framework for measuring and reporting environmental benefits, ensuring that investments genuinely contribute to nature conservation and restoration efforts.

Financial implications - None

Ecological skills gap

Recommendation 13:

The Welsh Government should develop a strategy for identifying and filling the skills and capacity gaps in the ecology sector.

Response: Accept in principle

The Welsh Government is committed to developing the skills we need for nature recovery. We recognise the vital role that the ecology sector, alongside other specialists like marine biologists and scientists play in tackling the nature emergency.

Recruiting, managing and developing staff is primarily the responsibility of each independent employer, who are best placed to identify the paid roles they have to offer, and the skills required in those roles. It is important that employers build a resilient workforce, who can adapt to their current and future priorities, as well as emerging challenges. A key issue for all employing authorities will be to access a wide range of funding routes, both to support their work and to recruit, train and retain the required staff. It is not sustainable to foster too great a reliance on taxpayer funding, either for creating roles, or training and developing existing staff.

The CIEEM report referred to in the Report, is not specific to Wales, but as noted, above many of the generic recommendations are targeted towards employers to recruit, train and develop their staff. In terms of the specific recommendation on a strategy, The Welsh Government consider skills and capacity across all a range of sectors engaged in tackling the nature and climate change emergencies, but would not develop a strategy purely for the ecology sector; a more holistic view of the workforce is taken.

The Welsh Government has recently gathered its own evidence via the Nature Workforce Survey in 2025. Of those that responded, 745 reported that they were in paid employment, supporting nature recovery in Wales. As noted above, they covered a wide range of roles, not just ecologists. The survey identified staff in a range of organisations, engaged in nature and climate change priorities and evidenced their ongoing skills development.

Financial implications - None

Seagrass and saltmarsh

Recommendation 14:

The Welsh Government should set out how it will ensure long term funding for Seagrass Network Cymru to develop a Seagrass Action Plan.

Response: Accept

The Welsh Government are committed to supporting habitat restoration of seagrass and saltmarsh recognising the benefits they have for biodiversity, water quality and carbon sequestration.

In 2024-25 we awarded an additional £100,000 of funding to support Seagrass Network Cymru's (SNC) National Seagrass Action Plan. Led by Project Seagrass, Seagrass Network Cymru comprises of a range of delivery partners including NGO's, academics and Natural Resources Wales.

Welsh Government officials have worked with Project Seagrass and partners to progress phase 1 of the National Seagrass Action Plan (2025–26) established governance and evidence foundations.

Welsh Government will continue to work with Project Seagrass to support the development of Phase 2 of the National Seagrass Action Plan. Phase 2 will advance the plan to implementation readiness, focusing on strengthening the evidence base, activating community-led restoration at priority sites, embedding seagrass in policy and public awareness, and establishing sustainable governance and long-term finance mechanisms.

To ensure that effective delivery and transition to a long-term funding plan the Welsh Government will provide an additional ca £70k in funding to Project Seagrass in 2026-27, dependent on budget confirmation.

Financial implications - This work will be accommodated within existing budgets

Recommendation 15:

The Welsh Government should publish a Saltmarsh Action Plan by the end of this Senedd and ensure that it is appropriately resourced to enable implementation by the next Welsh Government.

Response: Accept

In 2025-26 through our MPA Network Grant Scheme, £30,000 was awarded to North Wales Wildlife Trust to support the development of a Saltmarsh Network Cymru, which will bring together experts on saltmarsh restoration across Wales to establish an action plan.

To maintain momentum and ensure a clear pathway for implementation in the next Senedd, the Saltmarsh Action Plan includes measures for network

sustainability beyond the current financial year. This will involve exploring long-term hosting arrangements.

The outline Saltmarsh Action Plan will be delivered by the end of March 2026 and key deliverables will be agreed. Funding allocations to support delivery will be considered when the action plan is finalised.

Financial implications - None

Annexes

ANNEX A

Local Authority	Site/Tip Name	Amount of funding received 25-26	Category
Blaenau Gwent	Pullinger Level	£57,450.00	B
Blaenau Gwent	Victoria Tip	£45,700.00	B
Blaenau Gwent	Beaufort (South of Frost Road)	£42,050.00	D
Blaenau Gwent	Oliver Jones Crescent, Tredegar	£74,700.00	D
Blaenau Gwent	Pochin Colliery, Tredegar – phase 2	£216,000.00	C
Blaenau Gwent	Brynmawr, Rear of Aneurin Place	£43,200.00	C
Blaenau Gwent	Bedwellty Quarry South	£833,000.00	B
Blaenau Gwent	Henwaun Colliery, Blaina	£15,000.00	C
Blaenau Gwent	Cwmtillery Tip No 577	£110,000.00	A
Blaenau Gwent	Cwmtillery Tip, Abertillery	£5,000.00	D
Bridgend	Old Rhaglan Tip, Heol-y-cyw. Tip No. 109	£250,000.00	D
Bridgend	Garw Fechan West Tip A – Tip No. 48	£30,000.00	D
Bridgend	Tip No. 36/35 Pontycymmer, Garw Valley	£1,300,000.00	C
Bridgend	Tip No. 64	£10,000.00	C
Bridgend	Tip No.79	£25,000.00	C
Bridgend	Tip No.32/33	£30,000.00	C
Bridgend	Tip No. 122	£20,000.00	C
Caerphilly	Bargoed	£83,250.00	C
Caerphilly	Parc Cwm Darren, Deri	£615,875.00	B
Caerphilly	Fochriw	£208,125.00	C
Caerphilly	Pontlottyn Link road, Rhymney	£171,000.00	C
Caerphilly	Penallta Road, Penallta	£4,162.50	B
Caerphilly	Pen-y-garreg farm lane, Bargoed	£62,437.50	A
Caerphilly	Darren Cottages, Deri	£52,031.25	C

Caerphilly	Bedllwn Rd, Philipstown	£93,786.91	B
Caerphilly	White Rose Way, Elliotstown	£8,325.00	A
Caerphilly	Bailey Street, Deri	£93,656.25	D
Caerphilly	Windsor Way, Abertridwr	£391,625.00	D
Caerphilly	Windsor Way, Abertridwr	£8,325.00	B
Caerphilly	Heol Tir-Y-Lan, Aberbargoed	£145,687.50	C
Caerphilly	Navigation Street, Trethomas - Bedwas Colliery - Central North	£77,968.94	D
Caerphilly	Navigation Street, Trethomas - Bedwas Colliery - Central South	£297,037.59	D
Caerphilly	Navigation Street, Trethomas - Bedwas Colliery - North	£166,500.00	D
Caerphilly	Newport Road, Markham	£4,162.50	A
Caerphilly	Trinant Road, Trinant	£167,256.97	B
Caerphilly	Pengam Road, Bedwellty	£10,406.25	A
Cardiff	Lan Colliery	£50,000.00	D
Merthyr	NANT-YR-ODYN Pentrebach	£4,000,000.00	D
Merthyr	CWM BLACKS	£50,000.00	C
Merthyr	INCLINE TOP PENYDARREN	£50,000.00	D
Merthyr	DAN Y DERI	£100,000.00	D
Monmouthshire	Gellyfelen Clydach North West	£12,157.00	C
Monmouthshire	Gellyfelen Clydach North East & Gellyfelen Clydach North West & likely others	£4,000.00	C
Neath Port Talbot	Dyffryn Rhondda Colliery Riverside	£5,850,000.00	B
Neath Port Talbot	Complex at Centre of Cwmafon	£35,000.00	C
Neath Port Talbot	Torymynydd Rhondda Colliery	£35,000.00	C
Neath Port Talbot	Bryn (Navigation), Port Talbot	£20,000.00	B
Neath Port Talbot	Cwmgors	£35,000.00	B

Neath Port Talbot	Cilmaengwyn	£50,000.00	D
Neath Port Talbot	Tre-Shenkin Colliery East	£45,000.00	C
Neath Port Talbot	Old Dyffryn Rhondda Aerial Tips	£150,000.00	B
Neath Port Talbot	Pen Rhiw Colliery - Tip B	£25,000.00	D
Neath Port Talbot	Various	£100,000.00	
Natural Resources Wales	Pen Yr Englyn	£379,500.00	D
Natural Resources Wales	Cwmgrach tip	£544,750.00	D
Natural Resources Wales	Afan Vale / West End Colliery	£100,000.00	B
Natural Resources Wales	Bedwas	£50,000.00	D
Natural Resources Wales	The Warren	£50,000.00	C
Natural Resources Wales	Georgetown	£50,000.00	D
Natural Resources Wales	Drysiog	£70,000.00	B
Natural Resources Wales	Bleanrhondda	£35,000.00	D
Natural Resources Wales	Georgetown	£5,000.00	D
Natural Resources Wales	Bedwas	£1,500.00	D
Natural Resources Wales	Garw Fechan	£10,000.00	D
Natural Resources Wales	Dare	£48,500.00	D
Natural Resources Wales	Maendy 2 (Coed Maendy)	£20,000.00	D
Natural Resources Wales	Tyn y Bedw	£33,000.00	D
Natural Resources Wales	Gelliwion	£12,000.00	D
Natural Resources Wales	Cwmgwrach	£48,000.00	D
Natural Resources Wales	Nant Ynys Feio	£12,000.00	D
Natural Resources Wales	Carn Parc	£5,000.00	C
Natural Resources Wales	Playground	£5,500.00	C
Natural Resources Wales	Llynfi	£25,000.00	C
Natural Resources Wales	Craig Pwyllfa Minor	£500.00	C

Natural Resources Wales	Bedwlwyn Colliery Old Level North Tip Complex	£15,000.00	C
Natural Resources Wales	Pleasant View(MV)	£500.00	C
Natural Resources Wales	TynyBedw A	£8,000.00	C
Natural Resources Wales	Cerrig Llwydion	£618.00	C
Natural Resources Wales	Cynon Argoed	£5,000.00	C
Natural Resources Wales	Garn Wen	£500.00	C
Natural Resources Wales	Coed Golynos	£1,200.00	B
Natural Resources Wales	Risca above bypass	£3,000.00	B
Natural Resources Wales	Nant Gwyn Bach	£5,000.00	B
Natural Resources Wales	Darren y Bannau	£5,500.00	B
Natural Resources Wales	International No 2 South	£21,500.00	B
Natural Resources Wales	Maerdy/Penrhys	£1,000.00	B
Natural Resources Wales	Pendyrys	£7,500.00	B
Natural Resources Wales	Ty n y Coed quarries and walls north	£1,000.00	B
Natural Resources Wales	Llwynon A, B & C	£5,000.00	B
Natural Resources Wales	Llwynon	£115,000.00	B
Natural Resources Wales	Nant y Stalwyn	£500.00	B
Natural Resources Wales	Ynysarwed	£5,000.00	B
Natural Resources Wales	Craig Ynysarwed	£5,000.00	B
Natural Resources Wales	Tweedle	£25,000.00	B
Natural Resources Wales	Hebog	£500.00	B
Natural Resources Wales	Glyncastle Upper	£1,000.00	B
Natural Resources Wales	Rheola	£500.00	B
Natural Resources Wales	Cwmgwrach East	£500.00	B

Natural Resources Wales	Garth No 3	£500.00	B
Natural Resources Wales	Cwm Ifan Bach	£500.00	B
Natural Resources Wales	Bryn Troed	£500.00	B
Natural Resources Wales	Ty Draw/Ash	£500.00	B
Natural Resources Wales	Bute Colliery	£16,000.00	B
Natural Resources Wales	Lady Margaret	£1,000.00	B
Natural Resources Wales	Ty Talwyn	£500.00	B
Natural Resources Wales	Bryn Cwm no 4	£6,000.00	B
Natural Resources Wales	Rhaedr Colliery	£7,500.00	A
Natural Resources Wales	Nant Melyn and Hir	£15,000.00	A
Natural Resources Wales	Mynydd Bychan Tip Complex	£5,000.00	A
Natural Resources Wales	Cerrig Lywydon and Craig-y-Fedw Colliery - Tip A, B, C	£37,000.00	A
Rhondda Cynon Taf	Upper Llanwonno Tip	£3,700,000.00	D
Rhondda Cynon Taf	Tylorstown	£835,000.00	C
Rhondda Cynon Taf	Wattstown National Tip	£639,000.00	D
Rhondda Cynon Taf	Penygraig	£70,000.00	B
Rhondda Cynon Taf	Ynyshir Park	£16,600.00	C
Rhondda Cynon Taf	Graig Ddu Dinas	£2,950,000.00	D
Rhondda Cynon Taf	N. of Gilfach Goch	£220,000.00	B
Rhondda Cynon Taf	Abergorki	£484,500.00	D
Rhondda Cynon Taf	Graig Nant Melyn	£77,500.00	C-D
Rhondda Cynon Taf	Aberdare	£111,500.00	D
Rhondda Cynon Taf	Penrhiwceiber	£105,000.00	A
Rhondda Cynon Taf	Cefnpennar	£442,250.00	D
Rhondda Cynon Taf	Cilfynydd (Lower)	£53,000.00	D
Rhondda Cynon Taf	Cwm Colliery	£120,000.00	D
Rhondda Cynon Taf	Mynydd yr Eglwys	£31,000.00	C
Torfaen	Lower Navigation Colliery Tips A, B and C	£1,160,000.00	B,C,D
Torfaen	Cwmbrygwyn Colliery Tips 1 - 7	£586,000.00	B,C,D

Torfaen	Blaenserchan Colliery Tip No 541 Cwm Du South Blaenserchan Colliery Tip No 542 Cwm Du	£35,000.00	D & C
Wrexham	Gresford Wilderness Tip, Gresford, Wrexham	£823,928.93	C

ANNEX B

Tip Unique	Tip Name	Tip	
T21982	Clydach Dingle Terrace (Brynmawr	B	Blaenau Gwent
T76733	Pullinger's Level rear of Hill Crest	B	Blaenau Gwent
T46283	Cwmtillery (Land to rear of Upper	D	Blaenau Gwent
T40442	Oliver Jones Crescent Tredegar (East)	D	Blaenau Gwent
T57530	Georgetown Reservoir	D	Blaenau Gwent
T95316	Victoria (Tip 119) above Hall St.	B	Blaenau Gwent
T71443	Land south of Tredegar	B	Blaenau Gwent
T71393	Cwmtillery Tip No. 577 (Abertillery	A	Blaenau Gwent
T63652	Henwaun Colliery	C	Blaenau Gwent
T60469	Brynmawr - Rear Brynmawr	A	Blaenau Gwent
T29096	Beaufort (South of Frost Road)	D	Blaenau Gwent
T66578	Garn Wen Tip 5	C	Bridgend
T80589	Ty Talwyn Farm Western Tip	A	Bridgend
T19176	Blaengarw Colliery Blaengarw A.B.	C	Bridgend
T15332	Darren Fawr	A	Bridgend
T44081	Garw Fechan West Tip C	A	Bridgend
T25395	International Colliery Tip Four	B	Bridgend
T16088	Garn Wen Tip 3	C	Bridgend
T32779	Coegnant Colliery East Tip 374 375	B	Bridgend
T17377	Garn Wen Tip 4	C	Bridgend
T79775	Garn Wen Tip 8	C	Bridgend
T72477	Garn Wen	C	Bridgend
T18431	Garw Fechan West Tip A	D	Bridgend
T29388	Cwm-y-Fuch Colliery Eastern Tip	A	Bridgend
T18915	Darren y Bannau	B	Bridgend
T22623	Garn Wen Tip 6	C	Bridgend
T54078	Cribbwr Colliery Fountain Aberkenfig	A	Bridgend
T56365	Garw Fechan Southern Tip B	D	Bridgend
T98300	Garn Wen Tip 2	C	Bridgend
T57724	Maesteg Deep Colliery South	C	Bridgend
T51749	Ocean Colliery Blaengarw Colliery	C	Bridgend
T82870	Lewistown Central Tip	A	Bridgend
T10727	International Colliery Tip Five	B	Bridgend

T83928	Ty Talwyn	B	Bridgend
T23295	Garw Fechan Southern Tip A	D	Bridgend
T96040	Garn Wen Tip 1	C	Bridgend
T60402	Nantyyffyllon Quarry	B	Bridgend
T48664	Maestag Central Washery Tip 388 and	C	Bridgend
T48095	Garn Wen Tip 7	C	Bridgend
T95228	Garw Fechan West Tip D	A	Bridgend
T81976	Lewistown Northern Tip	A	Bridgend
T83902	Garw Fechan West Tip B	C	Bridgend
T69663	Coed Graig Fawr / Deri Front No 5	A	Caerphilly
T80974	Risca above Bypass	B	Caerphilly
T79945	Fochriw Tunnel Pit	C	Caerphilly
T82491	Groesfaen Colliery - Tip B / Deri S/O	C	Caerphilly
T25046	Wern Caiach Allotments	A	Caerphilly
T24757	Windsor Mountain Ropeway	D	Caerphilly
T83368	Butetown / West of Pentre	B	Caerphilly
T77500	Brithdir Spion Cop - Cefn Brithdir	B	Caerphilly
T64048	Pengam Road / Bargoed Woodland	B	Caerphilly
T53475	Cwm Gelli	A	Caerphilly
T57822	Fochriw Tunnel - Tunnel Tir	C	Caerphilly
T50768	Penallta Tips	B	Caerphilly
T49975	Brithdir Spion Cop - Cefn Brithdir	B	Caerphilly
T49562	Bedwas Colliery - Central North	D	Caerphilly
T60313	Groesfaen Deri	A	Caerphilly
T47749	Bedwellty Church	C	Caerphilly
T70809	Wyllie Colliery - West	A	Caerphilly
T63518	Abercarn Colliery / Rear of Empress	A	Caerphilly
T76146	Deri	D	Caerphilly
T64587	Hengoed Quarry	B	Caerphilly
T36552	Britannia Colliery (Tip 404)	A	Caerphilly
T36144	Bedwas Colliery - North	D	Caerphilly
T34994	Phillipstown	B	Caerphilly
T71214	Van Colliery	C	Caerphilly
T71315	North Of Deri Country Park - Parc	B	Caerphilly
T32058	Groesfaen Colliery - Tip C / Deri	C	Caerphilly
T72897	Oakdale Colliery - South	A	Caerphilly
T63334	Bryn Playing Fields / The Bryn	A	Caerphilly
T15548	Pantside Playing Fields	A	Caerphilly
T92338	Fochriw Level	C	Caerphilly
T85119	Heads Of The Valleys Industrial Estate	C	Caerphilly
T97835	Wernganol Colliery Tip	A	Caerphilly
T18817	Uplands Playing Fields/ Old Treowen	A	Caerphilly
T86783	Brithdir Spion Cop - Cefn Brithdir	B	Caerphilly
T97057	Parc Cwm Darran	B	Caerphilly
T14926	Angel Lane/ Bargoed	B	Caerphilly
T95587	McLaren Colliery	C	Caerphilly
T10817	Bedwas Colliery - Central South	D	Caerphilly
T84302	Tywn Carno / Helid Opencast Mine -	B	Caerphilly

T84584	Britannia Colliery - East		Caerphilly
T84259	Britannia Gilfach Colliery - Central	B	Caerphilly
T98651	Brithdir Spion Cop - Cefn Brithdir	B	Caerphilly
T84107	Groesfaen Colliery - Tip D / Deri	C	Caerphilly
T99258	Tywn Carno / Helid Opencast Mine -	B	Caerphilly
T91742	Llanbradach Colliery - South east	A	Caerphilly
T96790	North Celynen	B	Caerphilly
T11117	Abertridwr / Windsor Hotel	B	Caerphilly
T90319	Bedwas Colliery - South	D	Caerphilly
T95719	Cardiff Coed Forestry	A	Cardiff
T47719	South Cambria Colliery - Tip A	B	Cardiff
T57619	Craig-Gwilym Mines - Tip B	B	Cardiff
T47637	Craig-Gwilym Mines - Tip A	B	Cardiff
T52371	South Cambria Colliery - Tip B	B	Cardiff
T71934	Rhyd-y-Car	A	Merthyr Tydfil
T34811	Upper Abercanaid/ Nant Cannaid S	C	Merthyr Tydfil
T34645	Deep Navigation	C	Merthyr Tydfil
T29269	Dowlais Great Tip	A	Merthyr Tydfil
T62903	Taff Merthyr Tynewydd Treharris	B	Merthyr Tydfil
T63075	Bryn y Gwyddel Twyncarmel	C	Merthyr Tydfil
T15356	Troedyrhiw Tip	B	Merthyr Tydfil
T37017	Graig Pit Nant-Yr-Odyn	D	Merthyr Tydfil
T31835	Trelewis Stormtown	B	Merthyr Tydfil
T36885	Wern Las Upper- Pentrebach	D	Merthyr Tydfil
T92576	Cefn-Glas	B	Merthyr Tydfil
T77837	Old Dowlais Station	C	Merthyr Tydfil
T54152	Incline Top (N)	D	Merthyr Tydfil
T86649	Ysgubor Newydd	B	Merthyr Tydfil
T76665	Upper Abercanaid Conical Tip	A	Merthyr Tydfil
T25194	Pleasant View (Mv) Tip 2	C	Merthyr Tydfil
T22263	Dan-y-Deri	D	Merthyr Tydfil
T98529	Cae Harris	B	Merthyr Tydfil
T10140	Ivor Tip	B	Merthyr Tydfil
T55136	Brandy Bridge	A	Merthyr Tydfil
T63781	Ffos-y-Fran	D	Merthyr Tydfil
T37879	Graig Pit Lower-Pentrebach	D	Merthyr Tydfil
T86786	Pen-Yr-Heolgerrig	D	Merthyr Tydfil
T37747	Bedd-y-Gwyddel - Swansea Road	D	Merthyr Tydfil
T81701	Gellyfelen Clydach North West	C	Monmouthshire
T13178	Cwm Ifan Bach Tip D	B	Neath Port Talbot
T41752	Tyrau Colliery / Lyn Mine	A	Neath Port Talbot
T41848	Venalt Upper	A	Neath Port Talbot
T41860	Cwm Ifan Bach Tip C	B	Neath Port Talbot
T44352	Cwmgwrach East	B	Neath Port Talbot
T13187	Godre'r Graig higher level and	D	Neath Port Talbot
T13726	Drysiog Colliery - Tip C	B	Neath Port Talbot
T43420	Emel / Graig Nedd - Hebog Tip B	B	Neath Port Talbot
T14559	Rheola Tyrau Wood Level	B	Neath Port Talbot

T43092	Avan Hill Collieries	B	Neath Port Talbot
T14554	Garth No. 3 Colliery - Tip B	B	Neath Port Talbot
T43105	Crugau Colliery / Ivy Rock - Tip E	B	Neath Port Talbot
T14252	Drysiog Colliery - Tip E	B	Neath Port Talbot
T43473	Forestry Houses Tip B	B	Neath Port Talbot
T41943	Avon Level Collieries - Tip D / Ffald	B	Neath Port Talbot
T11592	Byr-nant Tip / Dan-y-Graig No. 2	B	Neath Port Talbot
T53890	Heol Hen - Tip B	A	Neath Port Talbot
T53323	Ynysarwed Colliery	A	Neath Port Talbot
T52567	Argoed Colliery - Tip C	B	Neath Port Talbot
T52099	Bryndulais No. 1 / Rhaedr Mine - Tip C	B	Neath Port Talbot
T51818	Sunnyside	B	Neath Port Talbot
T10196	Craigavon Colliery - Tip C / Cwm	B	Neath Port Talbot
T10502	Craig y Tewgoed / Graiglyn Colliery	B	Neath Port Talbot
T51660	Taren Cefn-Mawr - Tip B	A	Neath Port Talbot
T50565	Avan Vale / West End Colliery - Tip A	B	Neath Port Talbot
T50517	Rheola Tyrau - Tip A	B	Neath Port Talbot
T50336	Cwm Gwynfi Level	A	Neath Port Talbot
T11671	Tewgoed Fawr Upper	B	Neath Port Talbot
T49737	Bwlch Ton 1 Mine	A	Neath Port Talbot
T44690	Nant y Stalwyn - Tip A	B	Neath Port Talbot
T49435	Cwm Ifan-bach Level (North)	A	Neath Port Talbot
T49394	Blaen Nant Ddu - Tip A	A	Neath Port Talbot
T37157	Cerrig Llwydion - Tip A	C	Neath Port Talbot
T49090	Rhaedr Mine - Tip A	A	Neath Port Talbot
T41601	Llyn Fach and Craig y Llyn	A	Neath Port Talbot
T11719	Lletty-llywd	A	Neath Port Talbot
T47697	Pen Rhiw Colliery - Tip B	D	Neath Port Talbot
T47399	Rhaedr Mine - Tip B	A	Neath Port Talbot
T47281	Blaen Cregan	A	Neath Port Talbot
T46925	Wernavon Colliery - Tip A	B	Neath Port Talbot
T13073	Pwll-Bach Colliery	C	Neath Port Talbot
T50008	Nant y Stalwyn - Tip B	B	Neath Port Talbot
T19985	North End Colliery	A	Neath Port Talbot
T18468	Craig Llwyd	A	Neath Port Talbot
T18513	Nantewlaeth	B	Neath Port Talbot
T57331	Bryn-Troed - Tip D	B	Neath Port Talbot
T29091	Tir Garw	A	Neath Port Talbot
T18774	Crugau Colliery / Ivy Rock - Tip B	B	Neath Port Talbot
T28806	Dinas Rock Mine	B	Neath Port Talbot
T28351	North End Colliery - Tip C	B	Neath Port Talbot
T28197	Craig y Tewgoed / Wernavon Colliery -	B	Neath Port Talbot
T26464	Glyncastle Colliery- Tip A	A	Neath Port Talbot
T26363	Argoed Colliery - Tip D	B	Neath Port Talbot
T26232	Craig Colliery - Wernavon Colliery	A	Neath Port Talbot
T25513	Avon Level Collieries - Tip E / Ffald	B	Neath Port Talbot
T37552	Godre'r-Graig Quarry Higher /		Neath Port Talbot
T19338	Argoed Colliery - Tip B	B	Neath Port Talbot

T30668	Drysiog Colliery - Tip A	B	Neath Port Talbot
T24393	Brynawei Colliery / Lluest Bryn-	A	Neath Port Talbot
T24098	Craig-y-Fedw Colliery - Tip A	A	Neath Port Talbot
T24097	Cwm Clydach Colliery / Clydach Brook	A	Neath Port Talbot
T23974	North End Colliery - Tip D	B	Neath Port Talbot
T23968	Crugau 2	A	Neath Port Talbot
T20054	Bryn-Troed - Tip B	B	Neath Port Talbot
T23801	Emel / Graig Nedd No. 3 / Crugau	B	Neath Port Talbot
T23649	Tyrau Colliery / Bryn Cwm No.4 - Tip A	B	Neath Port Talbot
T22881	Glyncastle Upper	B	Neath Port Talbot
T20205	Clochi Mine	B	Neath Port Talbot
T22291	Llwyn-On Colliery Tip A	B	Neath Port Talbot
T20684	Drysiog Colliery - No. 6 Adit	A	Neath Port Talbot
T21352	Craigavon Colliery - Tip A / Cwm	B	Neath Port Talbot
T25299	Craig Colliery Tip C - Craig y Tewgoed	B	Neath Port Talbot
T35155	Rheola Mine	B	Neath Port Talbot
T41062	Tynewydd - Tip C	B	Neath Port Talbot
T40984	Pen Rhiw Colliery - Tip C	D	Neath Port Talbot
T40960	Nant Hir Colliery	A	Neath Port Talbot
T40401	Tynewydd Level Tip	A	Neath Port Talbot
T15110	Whites Coch - East	A	Neath Port Talbot
T40091	Evawill Mine Lagoon	R	Neath Port Talbot
T40028	Bryn Level	A	Neath Port Talbot
T40014	Parc y Bryn Colliery - Tip B	A	Neath Port Talbot
T39440	Drysiog Colliery - Tip D	B	Neath Port Talbot
T39081	Blaen Gwenffrwd Colliery	A	Neath Port Talbot
T37552	Godre'r-graig Quarry / Cilmaengwyn	D	Neath Port Talbot
T21843	Drysiog Colliery - Tip B	B	Neath Port Talbot
T36071	Whites Coch / Coedcae / Tynypant	A	Neath Port Talbot
T30329	Abbey Mine	A	Neath Port Talbot
T16954	Cwm Ifan-bach Level (South)	A	Neath Port Talbot
T41566	Taren Cefn-Mawr - Tip A	A	Neath Port Talbot
T31626	Cwm Ifan Bach Tip E	B	Neath Port Talbot
T18438	Bryn-Troed - Tip A	B	Neath Port Talbot
T17854	Cwm Gwen Ffrwd	B	Neath Port Talbot
T17618	Bryn-troed-y-garn Uchaf - Tip B	B	Neath Port Talbot
T35809	Forestry Houses Tip D	B	Neath Port Talbot
T32925	Tyrau Colliery / Bryn Cwm No.4 - Tip B	B	Neath Port Talbot
T35454	Cwm Clydach Colliery / Clydach Brook	A	Neath Port Talbot
T16606	Craig Colliery Tip B	B	Neath Port Talbot
T33671	Oakland Colliery - Tip A	A	Neath Port Talbot
T34072	Godre'r Graig higher level and	D	Neath Port Talbot
T34628	Craig y Daren old level - Tip B	A	Neath Port Talbot
T15396	Nant-y-Bar Colliery	C	Neath Port Talbot
T30381	Bryn-troed-y-garn Uchaf - Tip A	B	Neath Port Talbot
T17274	Parc y Bryn Colliery - Tip C	A	Neath Port Talbot
T66999	Cynon Argoed Colliery - North Tip	C	Neath Port Talbot
T89676	Llwyn y Ffynnon - Tip B	B	Neath Port Talbot

T84394	Rheola Tyrau Colliery - Tip B	B	Neath Port Talbot
T69297	Garth No. 3 Colliery - Tip C	B	Neath Port Talbot
T84764	Llwyn-On Colliery Tip C	B	Neath Port Talbot
T69274	Mynydd Bychan - Tip B	A	Neath Port Talbot
T69104	Argoed Colliery - Tip E	B	Neath Port Talbot
T68909	Cynon Argoed Colliery - South Tip	C	Neath Port Talbot
T85050	Pen Rhiw-Trwyn	A	Neath Port Talbot
T68886	Craig-y-Fedw Colliery - Tip B	A	Neath Port Talbot
T68809	Byr-nant Levels	B	Neath Port Talbot
T87160	Forestry Houses Tip C	B	Neath Port Talbot
T70149	Ynisavon Level	A	Neath Port Talbot
T67079	Cwmgwrach Tip No. 27	D	Neath Port Talbot
T70181	Graig Fach	A	Neath Port Talbot
T87294	Heol Hen	A	Neath Port Talbot
T87452	Garth No. 3 Colliery - Tip A	B	Neath Port Talbot
T87562	Penhydd Newydd Level (Upper)	A	Neath Port Talbot
T78995	Parc-y-Bryn Level	A	Neath Port Talbot
T66123	Pantyeifr - East	B	Neath Port Talbot
T72428	Welsh Main Colliery / Twyn y Crug -	A	Neath Port Talbot
T65803	Southend / Lower Corrwg Colliery	A	Neath Port Talbot
T65504	Cwm Ifan Bach Tip A	B	Neath Port Talbot
T89034	Drysiog Colliery - Tip F	B	Neath Port Talbot
T89458	Cefn Mawr No. 2 Mine	A	Neath Port Talbot
T89516	Oakwood - Tip B	B	Neath Port Talbot
T67184	Drysiog Trackway	B	Neath Port Talbot
T74669	Pantyeifr	B	Neath Port Talbot
T80395	Garwed (South)	B	Neath Port Talbot
T78591	Craig y Daren old level - Tip A	A	Neath Port Talbot
T78174	North End Colliery - Tip A	B	Neath Port Talbot
T80515	Crugau Colliery / Ivy Rock - Tip D	B	Neath Port Talbot
T80641	Tyn y Graig	A	Neath Port Talbot
T80929	Avon Level Collieries - Tip B / Ffald	B	Neath Port Talbot
T77299	Lower Ynysarwed Drift / Minewater	A	Neath Port Talbot
T81270	Oakwood - Tip C	A	Neath Port Talbot
T76262	Godre'r Graig higher level and	D	Neath Port Talbot
T81660	Cerrig Llwydion - Tip B	C	Neath Port Talbot
T81911	Parc y Bryn Colliery - Tip A	A	Neath Port Talbot
T70143	Tyn y Graig - Tip C	B	Neath Port Talbot
T82626	Garwed / Upper Ynysarwed Drift - Tip	C	Neath Port Talbot
T65978	Argoed Colliery - Tip A	A	Neath Port Talbot
T73697	Oakland Colliery - Tip B	A	Neath Port Talbot
T73601	Avon	B	Neath Port Talbot
T56535	Craig-y-Fedw Colliery - Tip C	A	Neath Port Talbot
T82645	Efail-fach old level - Tip B	A	Neath Port Talbot
T71778	Llwyn-On Colliery Tip B	B	Neath Port Talbot
T83455	Evawill Mine Tip	R	Neath Port Talbot
T83456	Craig Colliery	A	Neath Port Talbot
T83765	Graig Ddu (East)	A	Neath Port Talbot

T70815	Bryn Navigation - Tip A	A	Neath Port Talbot
T70382	Rheola Tyrau Colliery - Tip A	B	Neath Port Talbot
T70378	Cwmnanto Levels	A	Neath Port Talbot
T82571	Graig Nedd No. 1	B	Neath Port Talbot
T96466	Tyn y Graig - Tip A	B	Neath Port Talbot
T61206	Crugau Colliery / Ivy Rock - Tip A	B	Neath Port Talbot
T93419	Garwed (North) / Upper Ynysarwed	C	Neath Port Talbot
T60700	Tirbach Colliery	D	Neath Port Talbot
T89856	Tyn y Graig - Tip B	B	Neath Port Talbot
T60167	Venallt	A	Neath Port Talbot
T66144	Nant Melyn	B	Neath Port Talbot
T59699	Cwm Clydach Colliery / Clydach Brook	A	Neath Port Talbot
T59407	Tynewydd - Tip A	B	Neath Port Talbot
T59190	Tweedle	B	Neath Port Talbot
T95448	Crugau Colliery / Ivy Rock - Tip C	B	Neath Port Talbot
T92775	Tynewydd - Tip B	B	Neath Port Talbot
T95979	Cefn-mawr	A	Neath Port Talbot
T60544	Mynydd Allt-y-Grug - Tip A	A	Neath Port Talbot
T57750	Blaen Nant Ddu - Tip B	A	Neath Port Talbot
T99993	Ynysarwed Levels	C	Neath Port Talbot
T97117	Craig Colliery Tip A	B	Neath Port Talbot
T56681	Avon Level Collieries - Tip A / Ffald	B	Neath Port Talbot
T97429	Drysiog Colliery - No. 5 Adit	A	Neath Port Talbot
T97827	Forestry Houses Tip A	B	Neath Port Talbot
T99409	Welsh Main Colliery / Twyn y Crug -	A	Neath Port Talbot
T56445	Gwenffrwd old level	A	Neath Port Talbot
T56268	Mynydd Bychan No. 38 - Tip C	A	Neath Port Talbot
T56075	Dan-y-Graig No 4 Colliery	A	Neath Port Talbot
T55968	North End Colliery - Tip B	B	Neath Port Talbot
T95691	Cwm Ifan Bach Tip B	B	Neath Port Talbot
T92744	Whitworth Colliery - Tip A	A	Neath Port Talbot
T92286	Wernavon Colliery - Tips D and E	C	Neath Port Talbot
T63668	Higher Patches / Gilwen Colliery - Tip	D	Neath Port Talbot
T62931	North End Colliery - Tip E	B	Neath Port Talbot
T92233	Efail-fach old level - Tip A	A	Neath Port Talbot
T62574	Argoed	B	Neath Port Talbot
T91496	Avon Level Collieries - Tip C / Ffald	B	Neath Port Talbot
T92701	Bryndulais No. 2	B	Neath Port Talbot
T63683	Ynysarwed	B	Neath Port Talbot
T92095	Pant-y-Celyn Colliery	C	Neath Port Talbot
T61274	Oakwood - Tip A	B	Neath Port Talbot
T63018	Efail-fach old level - Tip C	A	Neath Port Talbot
T59718	Emel / Graig Nedd - Hebog Tip C	B	Neath Port Talbot
T61327	Tyrau Colliery (NRW Reclaimed Mine)	A	Neath Port Talbot
T62866	Graigarw Colliery	D	Neath Port Talbot
T83173	Byr-nant Tip / Farteg Hill Opencast	B	Powys
T42345	Byr-nant Tip / Farteg Hill Opencast	B	Powys
T82153	Graig Nant Melyn- West	D	Rhondda Cynon

T81524	Cilfynydd West	D	Rhondda Cynon
T18355	Cwar Yr Offeiriad	B	Rhondda Cynon
T90717	Penygraig Middle	B	Rhondda Cynon
T88951	Bedwlwyn Colliery Old Level South	C	Rhondda Cynon
T16461	Gadlys New Pit	R	Rhondda Cynon
T16477	Cefnpennar	D	Rhondda Cynon
T81564	Cwmparc Central	B	Rhondda Cynon
T92638	Treherbert	A	Rhondda Cynon
T14496	Graig Nant Melyn- Graig Lwyd	D	Rhondda Cynon
T19550	Dunraven Colliery	B	Rhondda Cynon
T85255	Bute Colliery	B	Rhondda Cynon
T13575	Pontypridd	B	Rhondda Cynon
T94048	Graig Nant Melyn	D	Rhondda Cynon
T94294	Nant Ynys Feio	D	Rhondda Cynon
T86495	Graig Nant Melyn- Graig Lwyd 2	C	Rhondda Cynon
T18647	Nant Erw Cwm	B	Rhondda Cynon
T83769	Penygraig West	B	Rhondda Cynon
T23125	Penrhiw	C	Rhondda Cynon
T83512	Tyn y Bedw	D	Rhondda Cynon
T21598	Pontypridd Remediated	A	Rhondda Cynon
T94781	Caroline	A	Rhondda Cynon
T82751	Ynyshir Park Eastern Tip A	C	Rhondda Cynon
T22810	Cwm Saebren	A	Rhondda Cynon
T23106	Ferndale South	A	Rhondda Cynon
T96205	Dare	D	Rhondda Cynon
T86554	Gelliwion	D	Rhondda Cynon
T41543	Ty Draw	C	Rhondda Cynon
T37520	North Of Maerdy	B	Rhondda Cynon
T64228	Maerdy Upper Tip	C	Rhondda Cynon
T42505	Mynydd Ynysfeio	B	Rhondda Cynon
T64696	Tylorstown - East	D	Rhondda Cynon
T65208	Pen Yr Englyn Eastern Tip	D	Rhondda Cynon
T65248	Foel Goch	C	Rhondda Cynon
T62455	Blaenrhondda Western Tip	A	Rhondda Cynon
T41586	Maendy 2 (Coed Maendy)	D	Rhondda Cynon
T47468	Abercwmbol Tip B	A	Rhondda Cynon
T66145	Pentre Tip C	C	Rhondda Cynon
T25855	Tyle Forest C	B	Rhondda Cynon
T66713	Penrhiwceiber Tip 145	D	Rhondda Cynon
T67255	Tyn-y-Bedw A	C	Rhondda Cynon
T67328	Lady Margaret	B	Rhondda Cynon
T68702	Craig Pwllfa Minor	C	Rhondda Cynon
T65411	Lewis Merthyr	D	Rhondda Cynon
T58499	Pentre Tip D	D	Rhondda Cynon
T54487	Cwmparc North	B	Rhondda Cynon
T54048	Abergorky	D	Rhondda Cynon
T52902	Graig Ddu Dinas	D	Rhondda Cynon
T52312	Blaenrhondda	C	Rhondda Cynon

T57806	National Colliery	D	Rhondda Cynon
T63345	Tylorstown - West	D	Rhondda Cynon
T58486	Nant Gwair	B	Rhondda Cynon
T40206	Clydach Vale	B	Rhondda Cynon
T50225	Graig Nant Melyn- Graig Lwyd 4	C	Rhondda Cynon
T60711	Coed Pen-y-Parc	A	Rhondda Cynon
T49004	Graig Nant Melyn- Graig Lwyd 1	C	Rhondda Cynon
T61160	Ynysybwll- Lady Windsor Colliery	B	Rhondda Cynon
T47957	Aberdare Tip C	D	Rhondda Cynon
T61741	Graig Nant Melyn- Graig Lwyd 5	C	Rhondda Cynon
T57937	Cwmbach Tip F	B	Rhondda Cynon
T54294	Pendyrys	B	Rhondda Cynon
T78899	Aberdare Tip B	B	Rhondda Cynon
T27502	Penrhiwceiber Tip 157	A	Rhondda Cynon
T77634	Bedwlwyn Colliery Old Level North	C	Rhondda Cynon
T76812	Sw Cwmparc	B	Rhondda Cynon
T76603	Graig Nant Melyn- Graig Lwyd 3	C	Rhondda Cynon
T76136	Cwm Coedely Colliery Tip 215	D	Rhondda Cynon
T29496	Carn Parc South	C	Rhondda Cynon
T29743	Maerdy Lower Tip	A	Rhondda Cynon
T29815	Tylorstown Eastern Tip	C	Rhondda Cynon
T74504	Ynyshir Park Eastern Tip B	C	Rhondda Cynon
T72862	Graig y Dyffryn	B	Rhondda Cynon
T32609	Carn Parc North	C	Rhondda Cynon
T72058	Graig Arw South	A	Rhondda Cynon
T32893	Tylw Coch / Graig Arw	B	Rhondda Cynon
T69512	Cwmparc East	B	Rhondda Cynon
T34216	Ty Draw (Ash) Blaen y Cwm	B	Rhondda Cynon
T70927	Y Fwrdd Mt Ash	D	Rhondda Cynon
T71213	Bedwlwyn Colliery Old Level	A	Rhondda Cynon
T33333	N Of Gilfach	B	Rhondda Cynon
T36801	Penrhiwceiber Tip D	D	Rhondda Cynon
T36672	Llwyn-heiernin Pits - 1	A	Swansea
T57882	Llwyn-heiernin Pits - 2	A	Swansea
T70898	Llwyn-heiernin Pits - 3	A	Swansea
T27962	Tirpentwys Colliery - Tip No. 543	C	Torfaen
T80591	Blaenserchan Colliery - Tip No. 542 /	C	Torfaen
T48545	Blaenserchan Colliery - Tip No. 541 /	D	Torfaen
T32531	Lower Varteg Colliery (R)	R	Torfaen
T70817	Cwm Carn Water Level	A	Torfaen
T20695	Cwmsychan Red Ash Colliery (West) -	C	Torfaen
T74893	Tirpentwys Colliery - Tip No. 553	B	Torfaen
T28445	Blaenserchan Colliery - Tip No. 539 /	C	Torfaen
T62426	Blaenserchan Colliery - Tip No. 537 /	C	Torfaen
T21112	Cwmsychan Red Ash Colliery (West) -	A	Torfaen
T22059	Cwm-bran Colliery - Main Slope Tip C	C	Torfaen
T92931	Cwmsychan Red Ash Colliery - Tip 1 2	B	Torfaen
T47794	Blaenserchan Colliery - Tip No. 541 /	C	Torfaen

T61491	Llanerch Colliery - Tip B / Cwm du	B	Torfaen
T44285	Lower Varteg Colliery (R) - West	R	Torfaen
T63923	Cwm-brygwn Colliery - Tip 7	D	Torfaen
T83024	Blaenserchan Colliery - New Tip No.	C	Torfaen
T64784	Cwm-byrgwm Colliery	C	Torfaen
T88498	Glyn Tillery Colliery - Quarry Level	B	Torfaen
T40240	Gresford Wilderness Tip No. 2	C	Wrexham
T37317	Bersham	C	Wrexham
T53286	Llay Hall Colliery Tip	C	Wrexham

Ken Skates MS
Cabinet Secretary for Transport and North Wales
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: MA/RE/0157/26

Llyr Gruffydd, MS
Chair
Climate Change, Environment and Infrastructure Committee

26 January 2026

Dear Llyr

Thank you for the recommendations following scrutiny of the Welsh Government's 2026-27 Draft Budget. The Draft Budget was published in two stages. The Outline Draft Budget 2026-27 (Stage 1) was published on 14 October 2025, and the Detailed Draft Budget 2026-27 (Stage 2) on 3 November 2025. Followed by a scrutiny session on 20 November 2025.

The enclosed paper provides detail of the Transport MEG's plans as set out in the draft budget, and responses to the specific recommendations requested by the Committee.

Yours sincerely

Ken Skates MS
Cabinet Secretary for Transport & North Wales
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

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

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



Climate Change, Environment and Infrastructure Committee

Scrutiny of the Welsh Government Draft Budget 2026- 27 - Transport MEG

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1. Introduction

The Welsh Government Draft Budget for 2026-27 was published in two stages. The outline draft budget 2026-27 was published on 14 October 2025 with the detailed draft budget 2026-27 published on 3 November 2025. It set out revenue and capital spending plans for the period April 2026 to March 2027.

As part of the budgetary process written evidence was provided by the Cabinet Secretary for Transport and North Wales to inform scrutiny of the Draft Budget 2026-27. This paper provided information to the Climate Change, Environment and Infrastructure Committee (CCEI) on budget allocations relevant to the Transport budgets.

Oral evidence sessions were held on the 26 November 2025 where the CCEI Committee took evidence from the Cabinet Secretary for Transport and North Wales.

The Committee published its report on [Scrutiny of the Welsh Government Draft Budget 2026-27](#) on 15 December. We thank the Committee for the report.

The Welsh Government has considered the Committee's report and responds to recommendations 16-38 in relation to the Transport budgets below.

2. Recommendation 16

The Welsh Government should provide summary details of the programmes and services funded by each of the BELs in the restructured Transport MEG, along with a technical note explaining the purpose of the two AME BELs, and how these relate to the non-cash revenue BELs.

Response: Accept

Information is detailed at **Annex A** for the Committees information.

3. Recommendation 17

The Welsh Government should set out how much of the 2026-27 draft transport budget is allocated for climate adaptation and mitigation, and provide its assessment of the investment levels needed over the next ten years in both devolved and non-devolved transport infrastructure.

Response: Accept

In relation to the Strategic Road Network (SRN) the Welsh Government have responded to the Lugg review recommendations on Climate Change Adaptation and Mitigation by improving the way assets are managed on the network. It will take time to assess future climate adaptation funding requirements, however, a comprehensive study to ascertain this has started in 25/26 and will be able to report fully in 26/27. For mitigation, the SRN policy area has adopted the PAS 2080 carbon accounting approach and will be assessing carbon reduction possibilities on all projects over £1m in 26/27.

Transport for Wales works closely with Network Rail to strengthen the resilience of the Wales and Borders rail network. This includes proactive vegetation clearance and targeted infrastructure interventions to mitigate against the impacts of climate change.

170km of railway track will be electrified as part of our over £1bn investment to upgrade the Core Valley Lines. Alongside our £800m investment in new rolling stock, this is enabling Transport for Wales to deliver cleaner, faster and more efficient services as part of modern and sustainable rail network.

Part of the Bus capital allocation totalling over £39m will be used to purchase strategic bus depots which are required for bus franchising. In due course depots will be electrified as we work towards a decarbonised bus fleet, though it will take time to achieve this. The total capital costs associated with bus franchising were identified as £308.7m in the Regulatory Impact Assessment, which it is acknowledged will take a number of years to deliver, based on funding allocations to be determined by the next government.

4. Recommendation 18

Recommendation 18.

The Welsh Government should provide details of the allocation formula applied to the Regional Transport Fund, including the specific allocations for each of the four regions, as well as further detail on how the remainder of the Regional Transport & Active Travel BEL will be spent.

Response: Accept.

In our new Regional Transport Fund, funding will be distributed by formula. The General Capital Fund (Road Maintenance) formula will be used to allocate capital funding. This is made up of three elements: enhanced population, weighted road length and traffic flow. The largest weighting (41%) is based on enhanced population, which accounts for residents and visitors in the region. However, adjusting for road length reflects the fact that the costs of transport are greater in rural areas, which have more roads (and other transport infrastructure) per person than urban areas. Traffic flow has also been found to affect transport costs. Revenue funding will be allocated using the road safety formula.

Full indicative allocations are:

Region	Capital (£)	Revenue (£)	CJC Admin (£)	Total (£)
North Wales	28.3m	0.38m	0.1m	28.8m
Mid Wales	12.8m	0.17m	0.1m	13.1m
South West Wales	24.3m	0.35m	0.1m	24.7m
South East Wales	42.5m	0.7m	0.1m	43.3m
Total	107.9m	1.60m	0.4m	109.9m

Each region will produce a single prioritised programme, agreed by the **Corporate Joint Committees (CJC)** and constituent Local Authorities (LAs). This will be based on their agreed Regional Transport Plans. The application for each region will be submitted to Welsh Government, including financial profiles and details of schemes.

Welsh Government will review each application to check its consistency with the Regional Transport Plan (which has already been approved by Welsh

Government), deliverability and value for money. We will work collaboratively with regions to ensure the final programmes meet these criteria.

Final decisions will be made by the Cabinet Secretary for Transport and North Wales. Once approved, Welsh Government will issue grants to Local Authorities based on the agreed regional programme. This process will allow each region to take a more collaborative and long-term approach, will give them a greater say in decisions, and will reduce admin burdens.

5. Recommendation 19

The Welsh Government should set out details of how the Regional Transport Fund, and Regional Transport Plans more generally, will be monitored and evaluated.

Response: Accept.

CJCs are responsible for monitoring progress on Regional Transport Plans. Each CJC has produced a monitoring and evaluation plan setting out how this will be achieved.

Delivery of schemes funded by the Regional Transport Fund will be monitored on a quarterly basis. Local authorities will be required to submit information to the Welsh Government each quarter to enable this. The Regional Transport Fund as a whole will be evaluated after the first 3 years of implementation.

6. Recommendation 20

The Welsh Government should provide further details on the wider funding it believes can be used to support Regional Transport Plan delivery, including the likely level of funding, the types of schemes which can be funded by each and details of any geographical limits on the use of these sources.

Response: Accept.

The delivery of Regional Transport Plans means that each region of Wales now has a single plan setting out their policies for improving transport, with a delivery plan identifying priority scheme. This puts them in a good position to utilise different sources of funding to achieve their objectives.

This includes the Local Growth Fund, which will be worth £547m in the years from 2026-27 to 2028-29; the Investment Zones in Wrexham/Flintshire and Cardiff/Newport, each of which are backed by £160m of government funding; and the North Wales Growth Deal. It also includes opportunities to leverage private sector investment.

7. Recommendation 21

The Welsh Government should provide details of how far developer contributions are currently used to fund related transport infrastructure, and how it is seeking to address the barriers to their use including whether this could be included in the Wales Planning Performance Framework.

Response: Accept.

Planning Policy Wales (Edition 12 – 2024) states that planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate. Where additional public transport would be required to allow development to proceed, an appropriate policy must be included in the development plan, and financial contributions secured through planning conditions and/or planning obligations. New public transport infrastructure and services should be put in place early on in a development, and before the people living there move in, to support sustainable travel patterns from the outset.

Wales Planning Performance Framework, Planning Performance Framework has been reinstated following Covid and Local Authorities are currently compiling data in order to report on performance later this year.

Looking at future reviews of the Framework, it could be possible to consider how data on S106 obligations could be incorporated into returns.

8. Recommendation 22

The Welsh Government should provide details of the how large multiannual projects such as the Llanbedr Transport Improvements will be managed through the Regional Transport Planning process in general, and specifically the Regional Transport Fund. A copy of the guidance issued to local authorities and CJsCs on accessing the fund should be provided or published in the interests of transparency.

Response: Accept.

Guidance for the Regional Transport Fund can be found here: [Regional Transport Fund: guidance for applicants 2026 to 27 | GOV.WALES](#)

Welsh Government has awarded over £1.4m to Cyngor Gwynedd towards the development of a solution to the issues in Llanbedr. The recent study has recommended that the preferred option is a relief road combined with safety, public transport and active travel improvements. The estimated cost of the road element is £39m.

This year, we expect North Wales to receive around £29m from the Regional Transport Fund – if funding remains at a similar level over five years, North Wales will receive around £150m from the Regional Transport Fund. The region can also draw on other sources of funding such as the North Wales Growth Deal and new Local Growth Fund.

Funding large transport projects will always require difficult decisions to prioritise funding, but we are convinced that involving local leaders in that decision making will lead to better decisions.

9. Recommendation 23

The Welsh Government should ensure that annual reporting on spending by mode in delivery of Regional Transport Plans includes and itemises all sources of funding, not just the Regional Transport Fund.

Response: Accept in principle.

Funding awarded through the Regional Transport Fund will be reported by mode. Spending on Regional Transport Plan delivery will include other funding sources as well as Welsh Governments. We will discuss with CJsCs regarding the best way to report progress in delivery.

10. Recommendation 24

The Welsh Government should publish the review of the Active Travel (Wales) Act 2013 no later than the end of January.

Response: Accept in principle.

The review of the Active Travel (Wales) Act 2013 will be finalised in January 2026, considering findings from the Public Administration and Public Accounts Committee's inquiry published just before Christmas recess and will be published as soon as possible, and before the end of the Senedd term.

11. Recommendation 25

The Welsh Government should set out details of the initial draft active travel programmes they expect to be funded via the Regional Transport Fund, how it will monitor and evaluate these and how delivery of the Fund will maintain momentum, particularly in areas where significant investment has already been made.

Response: Accept.

Details of the Regional Transport Fund programmes will be published in March 2026. As set out under recommendation 19, delivery of schemes funded by the Regional Transport Fund will be monitored on a quarterly basis. The Regional Transport Fund as a whole will be evaluated after the first 3 years of implementation.

12. Recommendation 26

As soon as the allocations are confirmed, the Welsh Government should provide a table setting out total and per capita allocations to support bus and community transport for 2026-27, compared with each of the preceding three years with revenue and capital allocations separated, and the table broken down by individual funding stream.

Response: Accept

Once allocations are confirmed and agreed we are happy to provide a breakdown of funding and details from previous years to the Committee.

13. Recommendation 27

The Welsh Government should provide details of the latest multi-annual estimate of the revenue and capital requirement for delivery of bus reform and associated infrastructure which is being used in planning the roll out of franchising. This should be broken down by revenue and capital and provide assurance that this will both protect existing services and support their enhancement under the reformed system.

Response: Accept in principle

The Regulatory Impact Assessment (RIA), published as part of the Explanatory Memorandum for the Bus Services (Wales) Bill, sets out the costs associated with the Bill and wider bus reform agenda. There will be transitional staff and capital costs incurred over the initial 5 years for the process of planning all aspects of future bus reform arrangements, including devising plans for franchised networks, developing contracts, setting up ticketing and data systems, purchasing and setting up bus depots for fleet operations and maintenance. These total £372.3m, of which £308.7m of these costs are classed as capital costs related to bus depots, IT and ticketing systems. The remaining transition costs relate to the staff required to design and implement franchised networks.

The recurrent costs total £466.5m over the remainder of the 30-year appraisal period considered in the RIA, which include ongoing staff and operational costs.

The revenue allocated to Bus Service Support BEL in the draft budget for 2026/27 is £143.169m (increased by £2.669m) and the capital allocation is £39.92m (increased by £8.92m). There have since been further allocations made in the final budget of £5.977m revenue and £10m capital. The additional allocations will help us maintain this existing bus network ahead of franchising and accelerate our plans for bus reform.

We cannot provide multi-annual details of revenue and capital requirements, as these will be decisions for the next government to consider. However, officials and TfW are actively making plans to support the rollout of bus reform across Wales, allowing the next government to make informed choices.

14. Recommendation 28

The Welsh Government should provide further details on how it is challenging Transport for Wales on its bus reform budget proposals to ensure this is both sufficient and value for money. This should include details of the specific issues being challenged, and the basis on which the 2026-27 budget for fleet and depot acquisition is being set.

Response: Accept

As part of the process of establishing budgets and allocating funding in every year, the Welsh Government challenges Transport for Wales (TfW) to maximise resources, identify efficiencies and look for economies of scale. On bus reform proposals this includes looking at opportunities to minimise cost associated with the tendering of bus routes, seeking economies of scale in the purchase of fleet and developing a contact centre workforce who can respond passenger queries across a range of services.

The budget for fleet and depot, which has been uplifted by nearly £9m in 2026/27, will allow TfW to invest in additional vehicles and infrastructure to support the coming rollout of bus franchising. Whilst we must of course balance the availability of funding with other priorities, this signals our intention to accelerate preparations following the passage of the Bus Services (Wales) Bill through Stage 4 of the scrutiny process.

15. Recommendation 29

The Welsh Government evaluation of the children and young person's £1 pilot fare should include consideration of whether more young people feel able to access education, training and / or employment in the context of the findings of the Young People's Guarantee National Conversation.

Response: Accept

We will very shortly be issuing tenders for the evaluation of the scheme. Understanding whether children and young people feel better able to access education, training and/or employment will be an important aspect of the evaluation. We will engage directly with children and young people as part of this process, as well as those who represent their views. Through the Young People's Guarantee National Conversation young people told us that transport was a barrier to accessing education, training and/or employment – our £1 fares scheme is part of our response to that message.

16. Recommendation 30

The Welsh Government should publish the Child Rights Impact Assessment for the £1 bus fare policy.

Response: Accept

We will publish the Children's Rights Impact Assessment in the coming weeks.

17. Recommendation 31

The Welsh Government should write to the committee outlining the revenue implications of the Cabinet's decision on regulated rail fares when it is made regardless of whether fares are frozen or increased.

Response: Accept

The UK Government announcement to freeze train fares mainly affects England, but will also impact some cross border (Wales to England) fares. Options to freeze some or all Transport for Wales rail fares are currently under consideration. We will provide information on the financial implications to the committee when a decision is taken.

18. Recommendation 32

The Welsh Government should outline how the long-term revenue implications and affordability of future service levels are assessed when planning future rail service level increases.

Response: Accept

There are many potential additional public transport opportunities across Wales, but delivering these requires very careful consideration of whether rail is the correct mode to deploy given the high cost of such services. Transport for Wales assesses a range of factors when considering rail service increases, including estimates of passenger usage, revenue generation and operational and infrastructure requirements necessary to deliver the service. Almost every current Transport for Wales rail service requires a subsidy to enable it to run. Therefore, careful consideration is always given to the affordability of potential further service increases, noting the linkage with any increases in fares to help fund services.

19. Recommendation 33

The Welsh Government should provide details of compensation paid by TfW over the past three years, broken down by length of delay (15 to 30 minutes, 30 to 60 minutes and 60 minutes or longer).

Response: Accept

The requested information is provided in the table below for the past 12 months, rounded to the nearest £1000:

Delayed By:	Claim Value (£)
15 – 29 Minutes	228k
30 – 59 Minutes	443k
60 – 119 Minutes	758k
120+ Minutes	870k
Total	2.299k

20.Recommendation 34

The Welsh Government should ensure the Wales Rail Board project pipeline is published by the end of this calendar year as promised. This should be accompanied by estimated costings.

Response: Accept

Transport for Wales is leading the development of an industry-led vision for rail enhancements in Wales. This builds on the initial Wales Rail Board project pipeline and sets out a comprehensive overview of the long-term ambition for rail in Wales. This work will be key in securing sustainable investment into Welsh railways, led by the Wales Rail Board.

Transport for Wales aims to publish the vision document early in 2026.

21. Recommendation 35

Given the increasing importance of the Wales Rail Board, the Welsh Government should ensure that terms of reference, membership and details of its work programme and decisions are published in the interests of transparency and accountability.

Response: Accept

In December, the Wales Rail Board agreed to establish a working group to propose the future remit and format of the Wales Rail Board and associated sub-groups. It was agreed that this review should include the involvement of relevant stakeholders and the format and frequency of public communications regarding the work of the Board.

22. Recommendation 36

The Welsh Government should provide us with its current assessment of the value of the maintenance backlog on both the trunk and local road network.

Response: Accept

For the SRN the current maintenance backlog for highway structures alone (bridges, retaining walls, foot bridges, culverts, etc.) is over £1.2bn. For roads (surfacing and road construction, repairing potholes, etc.) this figure is approximately £100m. The data for assessing backlog on other highways infrastructure assets (drainage, safety fences, signs, etc.) is not as mature, and is subject to improvements at present, however, it is estimated that the requirement is over £100m. The total, therefore, is estimated to be over £1.4bn. The current asset replacement value of the SRN is approximately £21bn.

CSS Wales and the WLGA undertake an annual assessment of their local road network condition. The Welsh Government do not hold information on the backlog of maintenance on the local road network as individual local authorities maintain their roads as highways authority.

23. Recommendation 37

The Welsh Government should provide details of the Strategic Road Network Asset Renewal Programme and the multi-annual plan to address the "approximately £1bn of capital maintenance backlog on the SRN" referred to in the Lugg review.

Response: Accept

The Welsh Government manages several programmes of work that have been established from the Lugg review recommendations, namely:

Major Asset Renewal (MAR) programme which manages large scale, complex refurbishments and renewals on key strategic routes. Examples are the A494 River Dee Bridge renewal which is a £150m bridge replacement scheme. There are several planned bridge replacements which will replace life expired critical infrastructure over the next 10 to 15 years.

Multi Asset Schemes (MAS) programme manages medium scale asset renewals such as the M4 Swansea North scheme involving the replacement of road surface, drainage system and safety barrier between junctions 45 and 46. These schemes maximise road space use and minimises disruption by renewing or replacing as many assets as possible in the same scheme.

Asset renewal programmes target infrastructure defects of a specific type such as carriageway resurfacing or drainage repairs and renewal. These programmes are the main method of reducing backlogs of maintenance and require high levels of capital to ensure backlog reduction rather than unsustainable reactive or steady state maintenance regimes.

Data led decision support tools and systems ensure priorities are addressed and best practice construction methods, materials and techniques are employed to introduce preventative maintenance strategies. This has a longer-term benefit of reducing maintenance intervention frequency, saving costs and carbon in line with Lugg principles and recommendations.

Sustained high levels of Capital are essential to be able to reduce the backlog, build experience, resilience and maintain Welsh interest with the supply chains, and continue to develop and implement innovative long term maintenance strategies.

The Welsh Government completed an Asset Management Policy and Strategy in 2024 and are currently developing asset management plans which will be completed by the end of 25/26.

24.Recommendation 38

The additional £5 million allocated for the Local Government Borrowing Initiative in the draft budget had already been announced in March. While we understand that the 2026-27 allocation is made in this budget, the Welsh Government should take care in describing funding allocations to make clear where they have already been announced.

Response: Accept

The Welsh Government will ensure clarity when describing budget commitments that span financial years.

Annex A - Detailed breakdown of each Budget Expenditure Line (BEL), including AME BEL's

Transport MEG – Description by BEL

RESOURCE BUDGET			£'000	£'000
Action	BEL No.	BEL Description	2025-26 Final Budget	2026-27 Draft Budget
Strategic Infrastructure	3830	Strategic Infrastructure Development	950	1,001
Motorway and Trunk Road Operations	1884	SRN Contractual Payments	57,857	67,668
	1885	SRN Ops and Renewals	60,050	60,067
	1886	Network Operations Non-Cash	188,691	188,691
Road, Rail, Air and Sea Services and Investment	1883	National & International Connectivity	4,100	4,100
	1895	Rail Service Support	381,950	400,999
	1895	Network Operations Non cash	38,000	38,000
Sustainable Travel	1880	Bus Service Support	140,500	143,169
	1882	Regional Transport and Active Travel	8,800	12,800
	2030	National Policy Developments and Projects	7,200	7,200
Armed Forces	1250	Armed Forces	370	370
TRANSPORT - TOTAL RESOURCE BUDGET			888,468	924,065

CAPITAL BUDGET			£'000	£'000
Action	BEL No.	BEL Description	2025-26 Final Budget	2026-27 Draft Budget
Strategic Infrastructure	3830	Strategic Infrastructure Development	5,000	5,000
Motorway and Trunk Road Operations	1885	SRN Ops and Renewals	186,800	195,320
Road, Rail, Air and Sea Services and Investment	1895	Rail Service Support	181,597	180,333
	1880	Bus Service Support	31,000	39,920

Sustainable Travel	1882	Regional Transport and Active Travel	120,000	126,000
	2030	National Policy Developments and Projects	4,800	4,800
TRANSPORT - TOTAL CAPITAL BUDGET			529,197	551,373

AME BUDGET			£'000	£'000
Action	BEL No.	BEL Description	2025-26 Final Budget	2026-27 Draft Budget
Motorway and Trunk Road Operations	1940	Roads Impairment - AME	-	44,936
Road, Rail, Air and Sea Services and Investment	1896	Transport for Wales - AME	2,000	2,000
TRANSPORT - TOTAL AME BUDGET			2,000	46,936

1. Strategic Infrastructure Development

BEL	Resource Budget £'000	Capital Budget £'000
3830 - Strategic Infrastructure Development	1,001	5,000
Overview		
<p>Strategic Infrastructure Development is a commercially focussed division that supports delivery of key transport infrastructure projects and transport policy objectives along with implementing major carbon reduction initiatives. This is achieved through a collaborative approach to develop innovative solutions whilst working with partners from the Private Sector and also engaging the resources of UK Government and Welsh Local Authorities to optimise external funding. The commercial financing skills and expertise of the division are also made available as an internal consultancy to support colleagues across Economic Infrastructure, The Economy Directorate and Tourism.</p> <p>A number of the projects managed by the team have a strong cross portfolio impact whilst revenue resource is used to develop delivery solutions and business cases that enable third party and public capital investment. In addition</p>		

to core budget the Division regularly makes investments and loans through utilisation of FT monies.

The PfG commitment to deliver the GCRE project remains an ongoing priority that is not fully funded.

Director	Peter McDonald
Deputy Director	Duncan Hamer

Motorway and Trunk Road Operations

2. Motorway and Trunk Roads

BEL	Resource Budget £'000 (inc. non-cash)	Capital Budget £'000
1884 – SRN Contractual Payments	67,668	-
1885 - SRN Ops and Renewals	60,067	195,320
1886 - Network Operations Non-Cash	188,691	-
Overview		
<p>Welsh Government is directly responsible for the Motorway and Trunk Road Network, one of Wales’ most important infrastructure assets. It has a depreciated replacement cost of circa £17bn. Appropriate maintenance is essential for the Welsh Government to meet its statutory duties for safety and achieve its wider policy objectives for Wales.</p> <p>Forecast spend includes an allowance for ‘over-programming’ to take advantage of additional funding that may become available through slippage in other programme spend that become evident late in the year. Should no additional funding materialise the over-programmed element will be managed into next year.</p>		

Non-cash totals £188.691m covering depreciation of the Strategic Road Network.	
Director	Peter McDonald
Deputy Director	Andy Falley

Road, Rail Air and Sea Services & Investment

3a. National & International Connectivity

BEL	Resource Budget £'000	Capital Budget £'000
1883 - National & International Connectivity	4,100	
Overview		
<p>The Aviation function seeks to ensure air connectivity is part of the integrated transport system in Wales, connecting Wales with the world and the world with Wales, to support the socioeconomic wellbeing of the nation. The activity includes support for and development of Wales' Aviation facilities, including airports both directly and indirectly owned as well as those operated independently as private businesses.</p>		
Director	Peter McDonald	
Deputy Director	Stephen Rowan	

3b. Rail Service Support

BEL	Resource Budget £'000 (Inc. non-cash)	Capital Budget £'000
1895 - Rail Service Support	400,999	180,333
1895 – TfW Non Cash	38,000	
Overview		

Transport for Wales is a not-for-profit company, wholly owned by the Welsh Government, it exists to drive forward the Welsh Government’s vision of a high quality, safe, integrated, affordable, and accessible transport network that the people of Wales are proud of.

This BEL is focused on the costs of operating and managing the rail network. It includes revenue funding for operating rail services, maintaining the Core Valley Lines network, and some unallocated corporate costs for running CVL. The Capital funding is predominantly the major investment in the Core Valley Lines Transformation programme but also includes smaller capital investment programmes such as station improvements.

Non-cash totals £38m representing the budget allocation for depreciation received from DfT on devolution of Core Valleys Line.

Director	Peter McDonald
Deputy Director	Alexendra Walters

Sustainable Travel

4a. Sustainable Travel

BEL	Resource Budget £'000	Capital Budget £'000
1880 – Bus Service Support	143,169	39,920
1882 - Regional Transport and Active Travel	12,800	126,000

Overview

This budget supports delivery and development of sustainable transport modes and for supporting local transport initiatives. A significant element of the funding is focussed on free bus services for the elderly and disabled, and discounted bus travel for young travellers, as well as providing other socially necessary services. Free concessionary bus travel is protected as a universal benefit. The funding shown is direct funding for the scheme from Welsh Government Transport budgets, but this is supplemented by additional funding from local authorities. The discounted bus travel scheme for younger persons (aged 16-18 years old, but to be extended to also include 19- to 21-year-olds), enabling them to access opportunities for work, education, training and apprenticeships is of particular benefit to people from low-income households

and helps to tackle poverty. This also includes an element of grant funding for local authorities for capital projects related to modal shift and climate adaptation, money related to the transition of the bus fleet to electric vehicles and to support the ambitions of Bus Cymru. Some of the Local Transport budget will be used to support Local Authorities with the implementation of the 20MPH Programme for Government commitment in this financial year.

Director	Peter McDonald
Deputy Director	Alexandra Walters

4b. Active Travel

BEL	Resource Budget £'000	Capital Budget £'000 (inc. FTC)
2030 - National Policy Developments and Projects	7,200	4,800
Overview		
<p>With the Active Travel (Wales) Act 2013, we have set Wales on a path to help transform our country into an 'active travel nation'. The Active Travel Fund represents a substantial investment to increase and improve routes that will enable a larger number of people in Wales to walk and cycle safely. Active Travel schemes are further funded from Safe Routes in Communities grant. Road Safety Grant funding also frequently supports active travel- through safety improvements as part of capital schemes, and through providing extensive funding for pedestrian and cycle training as part of revenue grant. This also includes an element of funding to support the transition to electric vehicles.</p>		
Director	Peter McDonald	
Deputy Director	Alison Thomas	

Armed Forces

5. Armed Forces

BEL	Resource Budget £'000	Capital Budget £'000
1250 – Armed Forces	370	-
Overview		
<p>This reflects CSTNW role in supporting the Armed Forces Community in Wales. It includes funding for Armed Forces Liaison Officers working with local authorities supporting the Armed Forces Covenant and encouraging regional co-ordination in this area. It also includes continued support to a host local authority to deliver a Wales Armed Forces Day each year and funding for engagement and other activities to support policy development. This budget line does not reflect the totality of Welsh Government support to the Armed Forces Community as other departments support activity also e.g Health support for Veterans NHS Wales.</p>		
Director	Emma Williams (DG)	
Deputy Director	Mike Connolly	

Annually Managed Expenditure (AME)

AME budgets are for items which are volatile and difficult to forecast.

6a. Motorway and Trunk Road Operations

BEL	Resource Budget £'000
1940 – Roads Impairment - AME	44,936
Overview	
<p>This BEL funds any 'cost' relating to reductions from the total cost of new road schemes to the opening value placed upon them by our independent valuers - known as 'impairments'. Traditionally, in the public roads building industry, this</p>	

has been estimated at up to 30% of the total cost price of a scheme, with the exact amount being completely unique to each scheme. This BEL has seen an increase in this budget of £44.936m. This represents approximately 15% of two schemes that are expected to be brought into the total SRN valuation in financial year 2026-27, which currently stands at approximately £20.5 billion.

Director	Peter McDonald
Deputy Director	Andy Falley

6b. Road, Rail Air and Sea Services & Investment

BEL	Resource Budget £'000
1896 – Transport for Wales - AME	2,000
Overview	
<p>This BEL funds any 'cost' relating to the movement in total provision balance in TfW. Provisions for future expenditure are funded through AME budgets until they crystallise into actual payments, at which point the provision is reversed. This means the balance could increase or decrease from previous year and will not be known until the very end of the financial year. The budget recognises the potential for £2m increase in provisions.</p>	
Director	Peter McDonald
Deputy Director	Alexandra Walters

Agenda Item 3.2

Andrew RT Davies MS
Economy Trade & Rural Affairs Committee
Welsh Parliament
Cardiff Bay
Cardiff, CF99 1SN

23rd January 2026

Dear Chair

Thank you for contacting me regarding this feedback but also thanks for the opportunity to speak to the Committee last year.

I have found the Irish Sea Resilience Task Force to be extremely useful. I think it was imperative that lessons were learned as the closure of Holyhead in Dec 24 had far reaching implications for all the Western Sea Ports and for road haulage movements to the island of Ireland through them.

I do believe those hard lessons have been learned to an extent and that communication between the Govts on both sides of the water have improved. For our sector, however, the key question was around how communications between the Welsh Govt and our sector had improved. I for one was critical of how information (or lack of it) was disseminated at the time and I am happy to say that the quality of information about the recent closures has been better. This good news comes with the caveat that I had to reach out to the Welsh Govt to get that information, but what I was given was clear, concise, and accurate. I was also told that had I not called first, I was on a list of people they were going to contact.

It is imperative that this progress continues through the creation of a Welsh Freight group where many of those called to the Taskforce can contribute to a two-way flow of information between those driving the economy and those responsible for the Economy.

I hope this feedback proves to be useful to you but please free to contact me via email on m.reid@rha.uk.net if you have any further questions or if I can be of any further help..

Yours sincerely,



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Andrew RT Davies
MS Chair: Economy, Trade and Rural Affairs Committee
Welsh Parliament
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27th January 2026

Holyhead Port Closures

Dear Mr. Davies,

The handling of the most recent incident was notably improved when compared with the events of 2024/2025. That progress should be acknowledged. However, as with all incidents of this nature, there remain clear lessons to be learned and further improvements that must be made.

On this occasion, Stena were slow to recognise the severity of the damage and to notify either the Welsh or Irish Governments and their respective Departments of Transport. The damage occurred at approximately 08:00–08:30 and was clearly visible, including a hole in the vessel’s hull. It would be reasonable for any competent operator to understand that such damage would inevitably require delay, inspection, and contingency planning.

Despite this, it was the Irish Road Haulage Association that alerted the Irish Government at approximately 10:00. The Irish authorities then informed the Welsh Government while simultaneously seeking clarity from Stena. Only following this intervention was the incident classified as major or severe, triggering the appropriate level of inspection and response.

This raises a fundamental issue. In incidents of this scale, there should be a mandatory requirement for ferry operators to immediately notify the relevant authorities. Whether this obligation is established through legislation, protocol, licence conditions, or binding regulation, it must be unequivocal and enforceable.

At a minimum, ferry operators such as Stena and Irish Ferries should immediately alert freight and coach operators holding direct accounts with them. There remains a reluctance to do so, which we believe is driven more by market protection and commercial interests than by the needs of Wales, Ireland, the travelling public, tourism, and the haulage and transport sectors.

Notably, the ferry operator did not initiate any discussion regarding alternative routing or contingency arrangements. Such discussions should commence immediately upon the occurrence of an incident and continue throughout the inspection process.

In fairness, a decision and reopening timeline was communicated at approximately 15:00, representing a significant improvement. However, we firmly believe this was influenced by the direct involvement of both Welsh and Irish Government officials. Our association was actively pressing Departments, Ministers, Politicians, and Media outlets. Without that level of pressure, it is doubtful that the same urgency or responsiveness would have been achieved.

One striking observation from this response is the continued absence of pre-prepared alternative plans or route scenarios, despite the experiences of 2024/2025. We have not been informed, nor do we believe either Government has seen the completion of the promised interoperability trials allowing ferries to berth and manoeuvre at all ports serving Wales and Ireland. These trials were repeatedly committed to at meetings and forums, with completion promised by November 2025.

Once these trials are completed, there should be ready-made scenario templates for alternative routing. These must account for freight logistics, departure and arrival ports, and include Birkenhead, Liverpool, and all ferry operators, not solely Ro-Ro services. Such planning is essential for worst-case scenarios arising from weather, climate impacts, human error, or unforeseen accidents.

We would also ask the Welsh authorities to assess whether any older berths further within the port remain available or could be reactivated, even for smaller vessels, particularly when shelter is required.

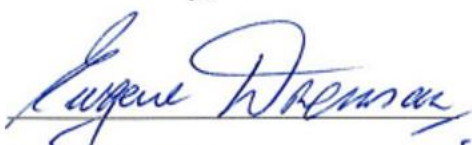
In addition, we strongly encourage a detailed review of the current single-berth scheduling system. From our observations, this approach is now well embedded and functioning effectively. During two test periods over Christmas, the single-vessel scheduling allowed heavy seasonal traffic to flow steadily, with reduced congestion, less clustering, and improved safety on the A55. It also improved access for local traffic and reduced emissions, contributing positively to carbon reduction.

From a safety perspective, this system significantly improves conditions within the port for employees, users, and statutory agencies, allowing them to operate more effectively and securely. The efficiencies gained benefit all stakeholders.

While ferry companies are private entities, there are wider public, economic, and safety considerations that must take precedence over purely commercial interests. If operators believe they have incurred losses, they should quantify these and engage constructively so that such concerns can be incorporated into workable solutions. However, under no circumstances should we revert to scenarios where multiple ferry arrivals and departures are scheduled simultaneously, as this creates unnecessary risk and congestion while reducing flexibility for all ferry Customers. With eight sailings constrained to just four available time slots, the resulting compressed timetable forces ferries to arrive and depart at the same time. This leads to traffic congestion within ports and on surrounding road networks, as well as excessive vehicle stacking inside port areas, particularly in Dublin, where space is already severely limited.

We respectfully request a thorough and in-depth review of these matters.

Yours sincerely,


Eugene Drennan

Independent Environmental Protection Assessor for Wales
Welsh Government Offices
Cathays Park 2
King Edward VII Avenue
Cardiff
CF10 3NQ

January 2026

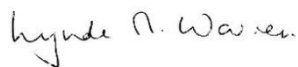
Dear Chair

I am providing you with the following report on the Aarhus Convention (and its importance in Wales) in response to a submission we received in 2023

This letter is for information only and I am not requesting a formal response from you.

I have also provided this report to the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs for his information.

Yours sincerely



Interim Environmental Protection Assessor for Wales

Report on Aarhus Convention

Introduction

In March 2025 the IEPAW received a submission which alleged that the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill will not be able to deliver its intended objectives without the inclusion of the so-called 'Aarhus Principles'. A redacted version of the full submission is included in Appendix 1. This report describes our response to that submission and also addresses other issues relating to the Convention.

The Aarhus Convention

The Convention¹ grants rights to members of the public under three pillars:

- access to environmental information;
- public participation in environmental decision-making; and
- access to justice in environmental matters.

The UK is a contracting party to the Convention. Because it is an international treaty, responsibility for its implementation rests with the UK Government. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 enable public access to environmental information. There are numerous pieces of legislation providing for public participation in environmental decision-making and consultations on policy are routinely held by government at all levels. There is no specific legislation, however, enshrining the public right of access to justice on environmental matters. Instead, this right is delivered through judicial review procedures which are governed by the Civil Procedure Rules (CPR).

The Submission

The submission, which was made before the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill was published, argued that the rights of access

¹ UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters

to environmental information, public participation in environmental decision-making and access to justice in environmental matters should be introduced into Welsh law by adding them to the Bill alongside the principles of integration, precaution, prevention, rectification at source and polluter pays. The submitter cites several references on the Aarhus Convention included in the summary of responses to the Welsh Government's consultation on its White Paper *Securing a Sustainable Future Environmental Principles, Governance and Biodiversity Targets for a Greener Wales* but notes that neither the White Paper itself nor the Government's response to the consultation refer to the Aarhus Principles.

The submitter is of the opinion that these principles should be embedded in Welsh planning and environmental law and that the ways in which Aarhus rights are secured for Welsh citizens should be clearly identified where this falls within Welsh competence. It is alleged that a failure to embed these principles limits the rights of Welsh citizens and puts them at a disadvantage in comparison with other nations. They go on to say that this would make it challenging for the Bill to deliver its intended objectives and is plainly out of step with the progressive environmental ambitions of Wales.

The Status of the Aarhus Convention in Wales

As a constituent part of the UK, it is indisputable that the UK Government's ratification of the Convention in 2005 was intended to include its application in Wales. The legislation giving effect to the UK's commitments under the Convention included both primary and secondary legislation some of which is specific to Wales. The CPR, under which effect is given to access to justice, come under the remit of the Ministry of Justice (MOJ) and are not devolved so there is no body of legal rules governing access to environmental justice, specific to Wales.

The IEPAW's Views

We agree with the submitter that the three areas of environmental rights covered by the Aarhus Convention are of fundamental importance. We are not convinced,

however, of the need to include specific reference to them as principles as proposed in the submission. In our view, the rights are already implied in Welsh law and policy, for example in provisions relating to sustainable development in the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

During the course of discussions about the submission it was drawn to our attention that it has been asserted that the Aarhus Convention is not environmental law. We consider that this statement may have been taken out of context. The meaning of 'environmental law' in clause 29 of the Bill is essentially the same as that included in legislation for the establishment of the Office for Environmental Protection (OEP)² and Environmental Standards Scotland (ESS).³ The term is restricted to legislative provisions that come within the competence of the relevant national administration. It follows that, while the Aarhus Convention is undoubtedly law about the environment it does not come within the definition of environmental law for any of the environmental governance bodies. It is a creature of international law and, as such, is only applicable to the extent that it has been incorporated into domestic legislation. The various provisions relating to public participation in environmental decision-making will therefore come within the definition. The Environmental Information Regulations would also be included but for the fact that they are expressly excluded presumably to avoid conflict with the legal regimes governing access to information.

We do, however, think that there is lacuna in the Bill with respect to the proposed Office of Environmental Governance Wales (OEGW) and the third pillar, access to justice in environmental matters. The option to apply for judicial review under prescribed circumstances is expressly included in the functions of the OEP and ESS.⁴ They may also apply to intervene in judicial review proceedings. These provisions are not included in the Bill in respect to the OEGW. The Welsh Government's view is that there is no need to expressly state this function because the OEGW's supplementary

² Environment Act 2021 s. 46.

³ UK Withdrawal from the EU (Continuity) (Scotland) Act 2021 s. 44.

⁴ Environment Act 2021 s. 39 and UK Withdrawal from the EU (Continuity) (Scotland) Act 2021 s. 38 respectively.

powers would enable it to do anything it considers appropriate for the purposes of, or in connection with, its functions, or incidental to, or conducive to the exercise of those functions.⁵ It was also suggested in evidence to the Climate Change, Environment, and Infrastructure Committee (CCEIC)⁶ that it was better not to follow the OEP/ESS format because the OEGW would be able to apply for judicial review without any constraint whereas OEP and ESS can only do so in urgent cases where the conduct of a public authority constitutes a serious failure to comply with environmental law. Given this assurance, the CCEIC has stated that it is content that the Bill does not include express reference to judicial review.⁷

We are not reassured. Whilst we accept that anyone can apply for judicial review, it does not follow that their application will be successful. As noted by the Cabinet Secretary, it would be for the courts to decide whether the OEGW had standing based on a test of sufficient interest.⁸ We acknowledge that this would be the case regardless of whether or not judicial review is included as one of OEGW's functions. In our view, however, establishing standing will be more difficult if judicial review is not included in the functions. While the power to apply could be considered to be included in the supplementary powers, we think this approach might well be challenged in court by those opposed to the application on the grounds that there is no specific reference to a function that is clearly stated on the face of the Acts governing the OEGW's sister bodies. We note the comments made by Professor Bob Lee in his evidence to the CCEIC.⁹ He contrasts the judicial review of a specific incident or decision with the powers of the OEGW to look at systemic problems rather than at individual decisions. Without express reference to judicial review there is a real danger that the courts will deny standing. Given the acknowledged success of OEP's intervention in judicial review cases, we think Wales would be put at a serious disadvantage if the OEGW

⁵ Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill Schedule 1, Part 9, paragraph 23(1).

⁶ CCEIC Session 18/09/2025 paragraph 195; Huw Irranca-Davies.

⁷ CCEIC Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill Stage 1 Report, October 2025 at paragraph 257.

⁸ CCEIC Session 18/09/2025 paragraph 193; Huw Irranca-Davies.

⁹ CCEIC Session 09/07/2025 paragraph 124.

were to be denied standing by a court because of the lack of express reference to its functions with respect to judicial review.

The question was raised by the CCEIC whether it was true that the provision had not been included due to limitations on the Senedd's legislative competence.¹⁰ This was stated not to be the case. Instead, it was not included because it is not necessary to do so. Furthermore, the OEGW would not be subject to the restrictions imposed in UK and Scottish Acts which require applications to relate to serious failures to comply with environmental law.¹¹ It is understandable why some stakeholders have misunderstood the situation, however. It was stated in stakeholder meetings that because the MOJ is responsible for the governance of access to justice proceedings it would not have been possible to include such provisions without prior MOJ agreement. The practicalities involved in obtaining this agreement could have led to unacceptable delays in finalising the Bill. This may have led stakeholders to believe that the Welsh Government would have liked to include the provision if time had allowed.

Judicial review proceedings are not entered into lightly and we think it would be extremely unlikely that the OEGW would be seeking review in anything other than the most urgent serious cases. We remain of the view that express provisions comparable to those applicable to OEP and ESS would be preferable but accept that there is no real prospect of the Bill being changed. We do think however that the effectiveness of the Bill would be improved by appropriate wording, setting out the Welsh Government's view, as summarised above, in the Explanatory Notes accompanying the Act when it is passed and in any statement of the OEGW's functions and powers. In the longer term, we suggest that the Act be amended to include provisions for judicial review and intervention.

¹⁰ CCEIC Session 18/09/2025 paragraph 194; Julie Morgan.

¹¹ CCEIC Session 18/09/2025 paragraph 195; Huw Irranca-Davies.

We recommend that the Welsh Government ensures the Explanatory Notes to the Act include reference to judicial review and to intervention in proceedings in respect of the supplementary powers in Schedule 1, Part 9, paragraph 23.

We recommend that the Welsh Government, in the next Senedd term, work with the MOJ to amend the Act to include express provision for the OEGW to apply for judicial review in urgent cases and to intervene.

Aarhus Convention Compliance

The submission also referred to the consistent criticism of the UK for failing to adhere to its obligations under the Aarhus Convention. The latest National Report from the UK has been presented as an updated addendum to the 2021 report.¹² It was produced following a call for evidence issued by the MOJ in September 2024.¹³ Some of the issues addressed in the report date back more than a decade and relate to decisions of the Aarhus Convention Compliance Committee (ACCC) and the Meeting of the Parties (MoP). The most recent decision adopted by the MoP in October 2021 expressed concern over failures to comply with a previous MoP decision¹⁴ and a number of ACCC findings.¹⁵

Although some of the findings adopted by the MoP in the past relate solely to Scotland and Northern Ireland, the bulk of them relate to issues in England and Wales.

As the Aarhus Convention is an international agreement, responsibility for addressing any issues of non-compliance rests primarily with the UK Government's MOJ. It would seem that, despite the fundamental importance of the environmental rights established by this Convention, oversight of the UK's compliance with it does not come within the remit of either the OEP or ESS or the proposed OEGW. The IEPAW has not powers to consider compliance. Nevertheless, we would like to take this opportunity to

¹² Available at <https://aarhusclearinghouse.unece.org/national-reports/reports>

¹³ Available at <https://www.gov.uk/government/calls-for-evidence/access-to-justice-in-relation-to-the-aarhus-convention>

¹⁴ VI/8k.

¹⁵ ACCC/C/2013/90, ACCC/C/2015/131 and ACCC/C/2016/142.

express our concerns that the UK has been found to be in breach of the Convention in several ways for a number of years.

Appendix 1 Submission on Aarhus Principles

Q1. Please provide a brief summary of your concern:

The Aarhus Principles – the rights of access to environmental information, public participation in environmental decision-making and access to justice in environmental matters – should be introduced into Welsh law alongside the principles of integration, precautionary principle, prevention, rectification at source and polluter pays in the Environmental Principles and Biodiversity Bill.

Q2. Which of these three categories best describes your concern? You may select more than one category if appropriate.

- a. The law does not deliver the intended objectives and outcomes.*
- b. Guidance or information about the law is not accessible.*
- c. Practical delivery of the law is impeded.*

Q3. Please explain why your concern fits into the category(ies) you selected in response to Q2:

The Environmental Governance Stakeholder Group recommended in their March 2020 Report, 'Environmental Governance in Wales Post-Exit from the European Union Report' that the Aarhus Principles be included in the Environmental Principles and Biodiversity Bill. However, the White Paper published January 2024, 'Securing a Sustainable Future Environmental Principles, Governance and Biodiversity targets for a Greener Wales', does not make reference to the Aarhus Principles.

While the summary of responses to the Consultation on Environmental principles, governance, and biodiversity targets, published July 2024, identifies several references to the Aarhus Principles from respondents – e.g. that 'the Welsh Government use this bill to more effectively implement the Aarhus Convention which gives the public the right to hold public bodies accountable and demand information';

that there is a need for ‘the inclusion of the Aarhus Convention’ and the ‘re-statement of the Aarhus Convention into Welsh Law as part of this legislation’, the Welsh Government response to the White Paper, published July 2024, makes no reference to the Aarhus Principles.

The Bill aims to embed environmental principles in Wales, to strengthen environmental governance and introduce a biodiversity targets framework. The Welsh Government in setting out the White Paper, echoed by the First Minister when he identified the Bill as a legislative priority in the Senedd in 9 July 2024, states that the Bill signals the Government’s ‘clear commitment that action and leadership to tackle the climate and nature emergency will remain as a top priority for this Welsh Government’. **I am concerned that without the inclusion of the Aarhus Principles, this law will not deliver its intended objectives.**

The Aarhus Principles reflect the three procedural environmental rights, the rights of access to environmental information, public participation in environmental decision-making and access to justice in environmental matters. Procedural environmental rights are recognised as key to improving national and international environmental decision-making, and consequently raise national and international standards of environmental protection. Boyle has described them as ‘the most important environmental addition to human rights law since the 1992 Rio Declaration’ (Boyle, in Peters 2018). The essential role of procedural environmental rights in the international response to the climate and nature emergency is evidenced by their inclusion in the UN Framework Convention on Climate Change Paris Agreement, the Convention on Biological Diversity and other international conventions.

The Aarhus Principles help to ensure that the interests and situated knowledge of people affected by an environmental issue are taken into account in the process of decision-making. They encourage implementation of and respect for environmental laws; they improve the quality of environmental decisions and enhance democratic legitimacy of environmental decisions. This democratic benefit is particularly salient to

environmental issues, because the intergenerational, cross-policy and transboundary nature of environmental issues does not fit comfortably into existing structures of representative democracy.

Wales has an additional incentive for ensuring that Aarhus Principles are effectively embedded in our national response to the climate and nature emergency. The Aarhus Principles align with the ‘collaboration’ and ‘involvement’ ways of working set out in Wales’s Well-being of Future Generations Act 2015. The Aarhus Principles link these ways of working to established rights and an international complaints mechanism that monitors adherence to these rights. Wales thus has the opportunity to be an innovative leader in this area, utilising the interconnections between this landmark piece of legislation and the UK’s international obligations under the Aarhus Convention.

The UK has consistently been criticised for failing to adhere to its obligations under the Aarhus Convention (see the most recent report from Aarhus Convention Compliance Committee cited below). Cases have frequently concerned the right of access to justice in environmental matters – one of the more recent cases that considered this right concerned a Welsh planning matter: *R (on the application of Catherine Lewis) v The Welsh Ministers v Velindre University NHS Trust* [2022] EWHC 450 (Admin). The UK needs to be more pro-active in fulfilling its duties under the Aarhus Convention.

Planning and the environment are devolved areas. The Aarhus principles should be embedded in Welsh planning and environmental law, and the ways in which Aarhus rights are secured for Welsh citizens should be clearly identified, where this falls within Welsh competence. A failure to embed these principles limits the rights of Welsh citizens and puts them at a disadvantage in comparison with other nations. This would make it challenging for this law to deliver its intended objectives and is plainly out of step with the progressive environmental ambitions of Wales.

Q4. *Please provide details of the environmental legislation related to your concern, being as specific as possible. This could include the name of the Act(s), Regulations(s), guidance, case law or other relevant documents. Please indicate the relevant section(s) or clause(s), if possible.*

Environmental Principles and Biodiversity Bill

Q5. *Please provide and describe as much evidence as possible in support of your submission to demonstrate that the environmental legislation referred to above is not functioning in Wales. This includes evidence such as documents, correspondence, media articles, statements of fact, photographs or legal advice. If possible, provide details by an attachment, an internet link or references in this form.*

R (on the application of Catherine Lewis) v The Welsh Ministers v Velindre University NHS Trust [2022] EWHC 450 (Admin)

<https://uk.westlaw.com/Document/I54D4FDA09BEA11EC99A3CEBD30D569E3/View/FullText.html>

UNECE Meeting of the Parties to the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, *Decision VII/8s concerning compliance by the United Kingdom of Great Britain and Northern Ireland with its obligations under the Convention*, 18–20 October 2021 (ECE/MP.PP/2021/2/Add.1)

https://unece.org/sites/default/files/2022-02/Decision_VII.8s_eng.pdf

Environmental Governance Stakeholder Group, *Environmental Governance in Wales Post-Exit from the European Union Report*, March 2020

<https://www.gov.wales/sites/default/files/publications/2020-11/report-from-the-environmental-governance-stakeholder-group.pdf>

Securing a Sustainable Future Environmental Principles, Governance and Biodiversity targets for a Greener Wales Date of issue: 30 January 2024

<https://www.gov.wales/sites/default/files/consultations/2024-01/environmental-principles-governance-and-biodiversity-targets-white-paper.pdf>

Securing a Sustainable Future Environmental Principles, Governance and Biodiversity targets for a Greener Wales: Summary of responses to the Consultation on Environmental principles, governance, and biodiversity targets: White Paper

<https://www.gov.wales/sites/default/files/consultations/2024-07/environmental-principles-governance-and-biodiversity-targets-white-paper-summary-responses.pdf>

Securing a Sustainable Future Environmental Principles, Governance and Biodiversity targets for a Greener Wales White Paper: A Welsh Government response to the White Paper

https://www.gov.wales/sites/default/files/consultations/2024-07/environmental-principles-governance-and-biodiversity-targets-white-paper-our-response_0.pdf

Alan Boyle, 'Human Rights and the Environment: Where Next?' (2012) 23 EJIL 613 in Birgit Peters, 'Unpacking the Diversity of Procedural Environmental Rights' (2018) 30(1) JEL 1-27

<https://academic.oup.com/jel/article-pdf/30/1/1/24480658/eqx023.pdf>

Q6. *What environmental impact(s) are associated with your concern? For example, what kind of environmental harm may occur if your concern is not addressed? Please provide any relevant information on the severity of the issue that the Interim Assessor may need to be aware of.*

Poorer environmental decision-making and consequently, poorer environmental protection (see Q3 above).

Q7. *Please provide any evidence below to support your response to Q6. For example, data, statistics and an indication of whether the concern is localised or has an impact across Wales.*

Q8. *Does your concern have any impact outside of Wales? If so, please provide details.*

Failure to fully adhere to the Aarhus Convention is a concern across the UK and beyond. However, the omission of these principles from the Environmental Principles and Biodiversity Bill would only have impact in Wales.

Q9. *Are you aware of any ongoing investigations related to your concern? For example, by a Senedd Committee, a research organisation or an environmental charity. Please include any details of these investigations below:*

I am not aware of any ongoing investigations related to this concern.

Q10. *Have you reported your concern(s) to another organisation such as a regulator or local authority?*

Yes No

Q11. *If you answered **Yes** to Q10, please provide details of which organisation you reported your concern to, the date you reported it, and the outcome of your report. If possible, please provide supporting evidence for this reporting process in the box below via an attachment or an internet link or references in this form.*

Q12. *What action(s) would you like to be taken in response to your submission? For example, would a change to current legislation address your concern? Please provide details of these actions below:*

I would like the Aarhus Principles to be included in the Environmental Principles and Biodiversity Bill.



Agenda Item 3.4

From: Non Davies

Sent: 02 February 2026 12:21

To: Climate Change, Environment, and Infrastructure Committee | Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith <seneddclimate@senedd.wales>

Subject: Siarter PONTIO TEG / JUST TRANSITION - Cais i'r Pwyllgor Hinsawdd 11/2/26 fel a gytunwyd eisioes

Esgair Eithin
Llangernyw
Conwy

Annwyl Llyr Huws Gruffydd, Cadeirydd ac aelodau 'Pwyllgor Newid Hinsawdd, Amgylchedd ac Isadeiledd' Senedd Cymru,

Wrth i'r pleidiau gwleidyddol baratoi eu Maniffesto cyn etholiadau'r Senedd ym mis Mai 2026, rwy'n falch o nodi fod grwp gwaith sy'n cynrychioli grwpiau cymunedol sy'n wynebu datblygiadau ynni enfawr digynsail eu maint, ledled Cymru, wedi cydweithio ac ysgrifennu ein Siarter ni sydd yn galw am 'Bontio Teg i Sero Net' (gweler y ddogfen wedi ei hatodi).

Rydym yn ddiolchgar iawn i fudiad 'Ymgyrch Diogelu Cymru Wledig' am lansio a hyrwyddo ein Siarter. Gofynnwn i chi fel Cadeirydd ac aelodau'r Pwyllgor ystyried y Siarter a datgan eich cefnogaeth iddo. Os am fwy o wybodaeth mae croeso ichi gysylltu a ni ymhellach.

Gweler isod y rhestr ddiweddaraf o'r grwpiau sydd eisioes wedi datgan eu cefnogaeth i'r Siarter, mae'r rhestr hon yn hirhau pob dydd, ac rydym yn derbyn adborth cadarnhaol iawn o amrywiol gyfeiriadau,

Gan ddiolch ichwi am eich cydweithrediad yn y mater hwn

Yn Gywir

Non Davies

Dear Llyr Huws Gruffydd, Chair, and Members of the Welsh Government's 'Climate Change, Environment and Infrastructure Committee'.

As the political parties are preparing their Manifestos in advance of the May 2026 Senedd elections, I am pleased to note that a working group representing community groups across Wales facing energy proposals of an unprecedented size and scale, have come together to produce our own Charter calling for a 'Just Transition to Net Zero' (please see document attached).

We are very grateful to the 'Campaign for the Protection of Rural Wales' for launching and promoting our Charter. We ask that you as Chair and members of the Committee consider our Charter and pledge your support to it. Please contact us further if you require more information.

Please find below the latest list of groups who have already pledged their support to the Charter, this list is growing everyday, and we are receiving very positive feedback from a variety of sources,

thanking you for your cooperation in this matter,

Yours sincerely,

Non Davies

Grwpiau sydd eisioes yn Cefnogi / Groups that have already pledged their Support for the Charter

Cymru / Wales

Society for the Conservation of North Wales Heartland / Cymdeithas Cadwraeth y Berfeddwlad

Mynydd y Gaer Action Group

Save Mynydd Llanelian

Save Radnor Forest

Mynydd Maen Action Group

Saving Banc Du and Rhiwlas from Energy Park Development

Caru Teifi

Dee Valley Environmental Network

Re-Think: Don't Break the Heart of Wales / Peidiwch Torri Calon Cymru

Wild Wales Trust

Save Hirfynydd Energy Park

Twyn Hywel Energy Park Community

Stop Y Bryn & Foel Trawsnant

Grwp Cadw Tir Môn

Waun Hesgog Action Group

Dim Tyrbinau/No Turbines Brechfa East and Pencarreg

Llanddewi/Ffarmers Windfarm Proposal (Lan Fawr & Bryn Rhudd)

Amddiffyn Mynydd Eppynt

Protect the Cynon Valley - say No to Carreg Wen Wind Farm Proposal

Yr Alban /Scotland

Scotland Against Spin - (independent alliance campaigning for the reform of the Scottish Government's Energy Policy)

Lloegr / England:

STOP Green Hill Solar Mears Ashby (Northamptonshire)

Hands off my Marsh (Kent)

Stop East Park Energy (North Bedfordshire)

Stop Lime Down (Wiltshire)

Block East Pye Solar (Norwich & North of Harleston)

Stop Beacon Solar (North Devon)

Villages Against Solar Threat (VAST) - UK based group.

Mallard Pass Action Group (Ryhall & Belmesthorpe)

A Charter for a Just Transition to Net-Zero

We accept the transition to net zero will bring change. This Charter sets out the expectations of, and responsibilities to, communities impacted by large scale renewables development in Wales, by the U.K. and Welsh Governments

We want engagement with, and the views of, all political parties, and any pledges they are prepared to make, as they prepare their manifestos for the May 2026 Senedd election

The Charter

Communities are feeling distressed, disempowered and devalued, and potentially to be displaced, when developments are consented without:

- Full and meaningful consultation of all options
- Holistic analysis of all benefits and losses

Due regard for our welfare, well-being and livelihood

Rigorous checks and balances and robust, defensible decision making

Strategic overview, scrutiny and monitoring of disparate developments

Consideration of the unintended consequences on individuals, communities, livelihoods, language, landscapes and the environment

We believe:

- The current system greatly favours developers, with access to legal, planning and financial expertise
- Our democratic rights are being eroded, and our human rights are being breached
- There is no affordable legal redress, compensation nor remedy for those impacted
- There is no certainty local planning authorities have sufficient resources to enforce conditions, resulting in unconditional approval in practice
- There is an unequivocal and irreconcilable contradiction between current policies for energy, agriculture and biodiversity
- The use of policy checks and balances is not evident
- Current guidance (noise, EMF interference, landscape impact) is not fit for purpose nor future proofed
- There is no clear legal accountability nor liability for health and safety matters during construction, operation and de-commissioning of developments
- There is insufficient regard for the adverse impacts on human health including physical, emotional and mental well-being
- Insulting and derisory terminology is used (eg Nimby) to negate valid objections



Credit: Charles Hawes

We expect governments and regulators to:

.... always ...

- Engage with impacted communities, as they do with commercial developers
- Give our children a balanced view of impacts, free of developer bias
- Provide up to date information about the number and location of applications
- Place a moratorium on approvals until a strategic approach to reviewing and monitoring cumulative effects is used
- Protect our ancient landscapes and heritage including the status of common land
- Exercise their duty of care by updating guidance and policy in light of research into the adverse effects on health and well-being
- Establish a clearly defined health and safety process in the event of accidents and incidents
- Ensure all technologies have appropriate legislative cover

... during consenting ...

- Ensure that all viable development options are considered
- Ensure that developers are not allowed to 'scope out' key elements from Environmental Impact Assessments
- Ensure the consenting system is fit for purpose eg user friendly website, adequately resourced, positively welcome public representation, simplified documentation etc
- Make all planning hearings and inquiries accessible in person and online, with full recording
- Provide impacted communities with professional planning and legal support to make fully informed representations
- Ensure local authorities have sufficient developer funded resources to approve, monitor and enforce planning conditions
- Ensure communities are informed about changes to, and discharge of, planning conditions
- Evidence transparent, robust and defensible decision making

... after consenting ...

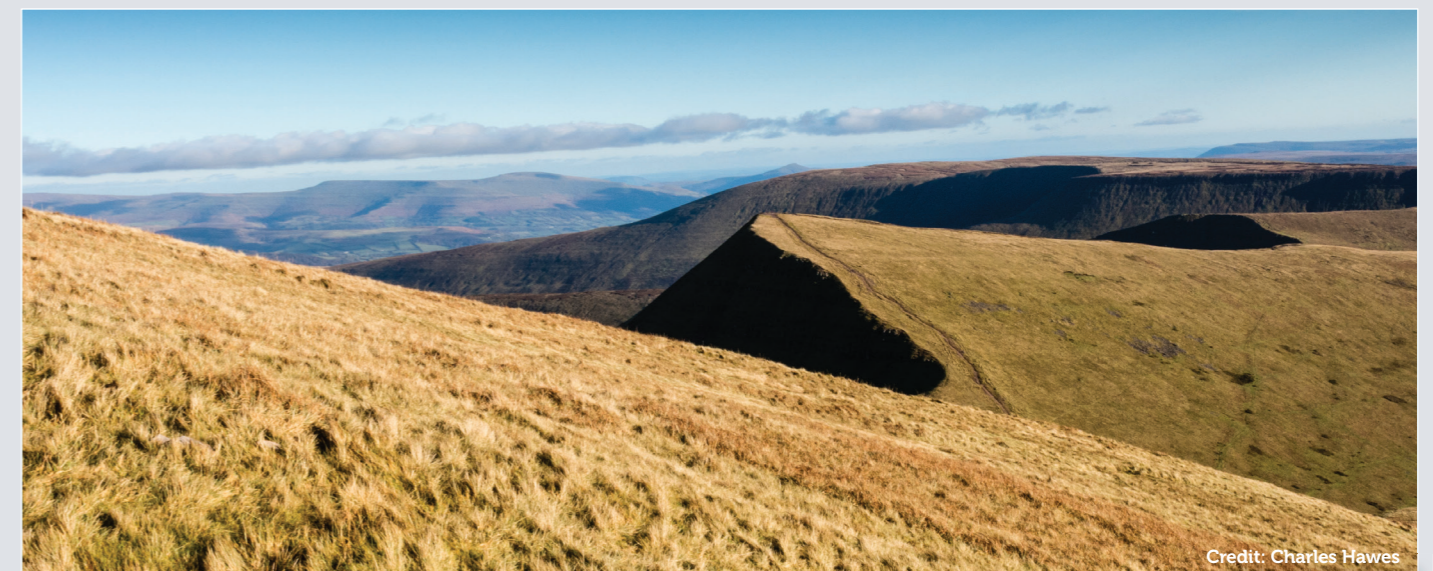
- Provide an accessible legal remedy or recourse that is in keeping with open governance and fair play principles
- Ensure adequate, developer funded, compensation for those adversely impacted
- Future proof community benefit payment pledges and enforce decommissioning arrangements

Notes

- Typically commercial developers have extensive resources at their disposal to progress applications, whereas members of the public have next to none - see for example: *Review the process for pre-assessed status for onshore turbines, which unfairly disadvantages individuals* – (Senedd Petitions 244968 July 2022)
- The current planning and approval process is at odds with:
 - the 'distinctively Welsh values of community, equality and social justice' heralded as priorities in the Welsh Government Programme (2021 – 2026)
 - the principles of the Well-being of Future Generations (Wales Act 2015)
 - the Ethical Standards Framework for Wales (Part 3 of the Local Government Act 2000) which consists of ten general principles of conduct for members (derived from Lord Nolan's 'Seven Principles of Public Life'): honesty, integrity, objectivity, accountability, selflessness, openness and leadership
- the Aarhus Convention (1998)
- the Gunning Principles (1985)
- There is clear contradiction between the renewable energy policies and:
 - Nature Recovery Action Plan (2015)
 - Environment (Wales) Act 2016
 - Nature Emergency (Welsh Government 2021)
 - National Peatlands Action Programme (Welsh Government 2020)
- the forthcoming 'The Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill
- Insulting and derogatory terminology is frequently used to dismiss valid objections
- see for example the cautionary note by Adam Price, Plaid Cymru MS Carmarthen East and Dinefwr (3 April 2025) regarding Green GEN Cymru's proposal to take legal action

against landowners

- and Devine-Wright, P. (2009). "Rethinking Nimbyism: the role of place attachment and place identity in explaining place protective action"
- Checks and balances in Policy 18 of the Future Wales Plan 2040 are not evident in decision making - see for example DNS/3244499 - Garn Fach, Powys, consented 22/10/2024
- Some of the currently available guidance being used is not fit for purpose - see for example
 - Noise - ETSU-R-97: https://assets.publishing.service.gov.uk/media/5a798b42ed915d07d35b655a/ETSU_Full_copy__Searchable_.pdf
 - and https://www.dickbowdler.co.uk/content/publications/ETSU-R-97_-_The_Alternative_-_Incl_figures.pdf
 - Unacceptable impact - the Lavender Test(2010) relates to 10 x 100m high (to blade tip) turbines
 - Designing for Renewable Energy in Wales (Design Commission for Wales November 2023) does not address the size and scale of current projects
- Accountability and liability for health and safety during construction, operation and de-commissioning is at best unclear - for example Pant y Wal (turbine collapse), Gilfach Goch, RCT February 2022, Blaen Bowi (turbine fire), Carmarthenshire, January 2024
- Some local planning authorities have stated they have insufficient resources to enforce planning conditions, resulting in *de facto* unconditional approval, and in some cases such as Henty Wind Farm, Powys, unlawful development
- Some developers have seemingly unrestricted access to schools to "educate" pupils into their approach to renewable energy development - see for example the Bute Energy partnership with Our Classroom Climate and Powys County Council Education Department
- Concerns about application of the Treasury Green Book have been raised repeatedly during consultation, and dismissed as not relevant by PEDW. However advice from leading Council (Right Hon Lord Banner KC) for directly analogous projects is that this is simply wrong in law
- The Llanfabon Cupmarked Stone, a scheduled monument of national importance (CADW GM637 Designation 19/05/2023), is a good example of the need to preserve our heritage.



Credit: Charles Hawes

Siarter ar gyfer Pontio Teg i Sero Net

Rydym yn derbyn y bydd y pontio i sero net yn achosi newid.Mae'r Siarter hon yn nodi disgwyliadau ar gyfer y cymunedau yr effeithir amynt gan ddatblygiad ynni adnewyddadwy ar raddfa fawr yng Nghymru, gan Lywodraethau'r DU a Chymru, a'r cyfrifoldebau amynt

Rydym eisiau ymgysylltu â'r holl bleidiau gwleidyddol, ac unrhyw addewidion y maent yn barod i'w gwneud, wrth iddynt baratoi eu maniffestos ar gyfer etholiad y Senedd ym mis Mai 2026, ynghyd â'u safbwyntiau

Y Siarter

Mae cymunedau yn teimlo'n ofidus, heb awdurdod ac wedi'u dibrisio, ac o bosibl i gael eu dadleoli, pan fydd datblygiadau'n cael cydsyniad heb:

- Ymgynghoriad llawn ac ystyrlon o'r holl opsiynau
- Dadansoddiad cyfannol o'r holl fuddion a cholledion

Ystyriaeth ddyledus i'n lles a'n bywoliaeth

Rhwystrau a gwrthbwysau trylwyr a gwneud penderfyniadau cadarn, amddiffynnol

Trosolwg strategol, craffu a monitro datblygiadau gwahanol

Ystyried y canlyniadau anfwriadol ar unigolion, cymunedau, bywoliaethau, iaith, tirweddau a'r amgylchedd

Rydym yn credu:

- Mae'r system bresennol yn ffafrio datblygwyr yn fawr, â mynediad at arbenigedd cyfreithiol, cynllunio ac ariannol
- Mae ein hawliau democrataidd yn cael eu herydu, ac mae ein hawliau dynol yn cael eu torri
- Nid oes unrhyw iawndal cyfreithiol, iawndal na chywiro fforddiadwy i'r rhai yr effeithir amynt
- Nid oes sicrwydd bod gan awdurdodau cynllunio lleol ddigon o adnoddau i orfodi amodau, gan arwain at gymeradwyaeth ddiamedol yn ymarferol
- Mae gwrthgyferbyniad diamwys ac anghyson rhwng polisiau cyfredol ar gyfer ynni, amaethyddiaeth a bioamrywiaeth
- Nid yw'r defnydd o rwystrau a gwrthbwysau polisi yn amlwg
- Nid yw'r canllawiau cyfredol (sŵn, ymyrraeth maes electromagnetic, effaith ar dirwedd) yn addas i'r diben nac yn addas i'r dyfodol
- Nid oes atebolrwydd cyfreithiol clir nac atebolrwydd am faterion iechyd a diogelwch yn ystod adeiladu, gweithredu a datgomiysynu datblygiadau
- Nid oes digon o sylw i'r effeithiau andwyol ar iechyd dynol gan gynnwys lles corfforol, emosiynol a meddyliol
- Defnyddir terminoleg sarhaus a chwerthinllyd (e.e. Nimby) i negyddu gwrthwynebiadau dilys

Rydym yn disgwyl i lywodraethau a rheoleiddwyr:

.... bob amser...

- Ymgysylltu'n uniongyrchol â chymunedau yr effeithir amynt,



Credyd: Charles Hawes

fel y maent yn ei wneud â datblygwyr masnachol

- Rhoi barn gytbwys i'n plant ar effeithiau, heb ragfam datblygwyr

- Darparu gwybodaeth gyfredol am nifer a lleoliad ceisiadau

- Gosod moratoriwm ar gymeradwyaethau nes bod dull strategol o adolygu a monitro effeithiau cronrus yn cael ei ddefnyddio

- Diogelu ein tirweddau a'n treftadaeth hynafol gan gynnwys statws tir comin

- Ymarfer eu dyletswydd gofal trwy ddiweddarau canllawiau a pholisiau yng ngoleuni ymchwil i'r effeithiau andwyol ar iechyd a lles

- Sefydlu proses iechyd a diogelwch wedi'i diffinio'n glir ar gyfer damweiniau a digwyddiadau

- Sicrhau bod pob technoleg yn cael sylw deddfwriaethol priodol

... yn ystod cydsynio ...

- Sicrhau bod yr holl opsiynau hyfyw yn cael eu hystyried

- Sicrhau nad yw datblygwyr yn cael eu caniatáu i 'bennu cwmpas' elfennau allweddol o Asesiadau Effaith Amgylcheddol

- Sicrhau bod y system cydsynio yn addas i'r diben e.e. gwefan hawdd ei defnyddio, adnoddau digonol, cynrychiolaeth gyhoeddus sy'n cael ei groesawu'n gadarnhaol, dogfennaeth symlach ac ati

- Sicrhau bod yr holl wrandawiadau ac ymholiadau cynllunio yn hygyrch yn bersonol ac ar-lein, â recordiad llawn

- Darparu cynllunio proffesiynol a chymorth cyfreithiol i gymunedau yr effeithir amynt i gynnig sylwadau hollol wybodus

- Sicrhau bod gan awdurdodau lleol ddigon o adnoddau y mae datblygwyd yn eu hariannu i gymeradwyo, monitro a gorfodi amodau cynllunio

- Sicrhau bod cymunedau'n cael eu hysbysu am newidiadau i'r amodau cynllunio a'u cyflawniad

- Tystiolaethu y gwneir penderfyniadau tryloyw, cadarn ac amddiffynadwy

... ar ôl cydsynio ...

- Darparu rhwymedigaeth gyfreithiol hygyrch sy'n cyd-fynd ag egwyddorion llywodraethu agored a chwarae teg

- Sicrhau iawndal digonol, wedi'i ariannu gan ddatblygwyr, i'r rheiny yr effeithir amynt yn andwyol

- Diogelu talu addewidion budd cymunedol yn y dyfodol a gorfodi trefniadau datgomiysynu • Sicrhau iawndal digonol, wedi'i ariannu gan ddatblygwyr, i'r rheiny yr effeithir amynt yn andwyol

- Diogelu talu addewidion budd cymunedol yn y dyfodol a gorfodi trefniadau datgomiysynu

Nodiadau

- Yn nodweddiadol, mae gan ddatblygwyr masnachol adnoddau helaeth ar gael i fwrw ymlaen â cheisiadau, tra bod gan aelodau o'r cyhoedd bron dim - gweler er enghraifft: Dylid adolygu'r broses o ran statws ardaloedd wedi'u rhag-asesu ar gyfer tyrbinau ar y tir, sy'n rhoi unigolion dan anfantais annheg – (Deisebau'r Senedd 244968 Gorffennaf 2022)

- Mae'r broses gynllunio a chymeradwyo bresennol yn groes i:

- y 'gwerthoedd Cymreig nodedig o gymuned, cydraddoldeb a chyfiawnder cymdeithasol' a gyhoeddwyd fel blaenoriaethau yn Rhaglen Llywodraeth Cymru (2021 – 2026)

- egwyddorion Llesiant Cenedlaethau'r Dyfodol (Deddf Cymru 2015)

- Fframwaith Safonau Moesegol Cymru (Rhan 3 o Ddeddf Llywodraeth Leol 2000) sy'n cynnwys deg egwyddor gyffredinol ymddygiad i aelodau (sy'n deillio o 'Saith Egwyddor Bywyd Cyhoeddus' yr Arglwydd Nolan): gonestrwydd, uniondeb, gwrthrychedd, atebolrwydd, anhunanoldeb, bod yn agored ac arweinyddiaeth

- Confensiwn Aarhus (1998)

- Egwyddorion Gunning (1985)

- Ceir gwrthgyferbyniad clir rhwng y polisiau ynni adnewyddadwy a:

- Chynllun Gweithredu Adfer Natur (2015)

- Deddf yr Amgylchedd (Cymru) 2016

- Argyfwng Natur (Llywodraeth Cymru 2021)

- Rhaglen Weithredu Genedlaethol ar Fawndiroedd (Llywodraeth Cymru 2020)

- 'Bil yr Amgylchedd (Egwyddorion, Llywodraethu a Thargedau Bioamrywiaeth) (Cymru) sydd ar ddod

- Defnyddir terminoleg sarhaus a difriol yn aml i wrthod gwrthwynebiadau dilys

- gweler er enghraifft y nodyn rhybuddio gan Adam Price, Aelod Plaid Cymru Dwyrain Caerfyrddin a Dinefwr (3 Ebrill

2025) ynglŷn â chynnig Green GEN Cymru i gymryd camau cyfreithiol yn erbyn tirfeddianwyr

- a Devine-Wright, P. (2009). "Rethinking Nimbyism: the role of place attachment and place identity in explanation place protective action"

- Nid yw rhwystrau a gwrthbwysau Polisi 18 o Gynllun Cymru'r Dyfodol 2040 yn amlwg wrth wneud penderfyniadau - gweler er enghraifft DNS/3244499 - Gam Fach, Powys, a gafodd ganiatâd 22/10/2024

- Nid yw rhai o'r canllawiau sydd ar gael ar hyn o bryd yn addas i'r diben - gweler er enghraifft

- Sŵn - ETSU-R-97: https://assets.publishing.service.gov.uk/media/5a798b42ed915d07d35b655a/ETSU_Full_copy_Searchable_.pdf

- a https://www.dickbowdler.co.uk/content/publications/ETSU-R-97_-_The_Alternative_-_Incl_fi_gures.pdf

- Effaith annerbiniol - mae'r Prawf Lafant (2010) yn ymwneud â thyrbinau 10 x 100m o uchder (i flaen y llafn)

- Nid yw Dylunio ar gyfer Ynni Adnewyddadwy yng Nghymru (Comisiwn Dylunio Cymru Tachwedd 2023) yn mynd i'r afael â maint a graddfa'r prosiectau cyfredol

- Mae cyfrifoldeb ac atebolrwydd am iechyd a diogelwch yn ystod y gwaith adeiladu, gweithredu a datgomiysynu yn aneglur ar y gorau - er enghraifft Pant y Wal (cwymp tyrbîn), Gilfach Goch, Rhondda Cynon Taf Chwefror 2022, Blaen Bowi (tân tyrbinau), Sir Gaerfyrddin, Ionawr 2024

- Mae rhai awdurdodau cynllunio lleol wedi datgan nad oes ganddynt ddigon o adnoddau i orfodi amodau cynllunio, gan arwain at gymeradwyaeth ddiamedol de facto, ac mewn rhai achosion fel Fferm Wynt yr Hendy, Powys, datblygiad anghyfreithlon

- Mae gan rai datblygwyr fynediad digyfyngiad i ysgolion i "addysgu" disgyblion i'w dull o ddatblygu ynni adnewyddadwy - gweler, er enghraifft, partneriaeth Bute Energy â Hinsawdd Ein Dosbarth ac Adran Addysg Cyngor Sir Powys

- Mae pryderon ynglŷn â chymhwysu Llyfr Gwyrdd y Trysorlys wedi cael eu codi dro ar ôl tro yn ystod yr ymgynghoriad, ac wedi'u gwrthod oherwydd nad ydynt yn berthnasol gan PEDW. Fodd bynnag, y cyngor gan y Cwnsler blaenllaw (y Gwir Anrhydeddus Arglwydd Banner CB) ar gyfer prosiectau sy'n uniongyrchol gyfatebol yw bod hyn yn anghywir yn gyfreithiol

- Mae Maen Hoel Cwpan Llanfabon, cofeb cofrestredig o bwys cenedlaethol (CADW GM637 Dyddiad Dynodi 19/05/2023), yn enghraifft dda o'r angen i warchod ein treftadaeth.



Credyd: Charles Hawes

Llyr Gruffydd MS, Chair, Climate Change, Environment and
Infrastructure Committee

3 February 2026

Dear Llyr,

Petition P-06-1566 Welsh Government must legislate for full regard to Local Nature Reserves
including Cosmeston LNR

The Petitions Committee met on 26 January and considered the above petition, submitted by Max
Wallis.

Members recognised the strength of feeling on the issue, and Joel James MS expressed support for
the petition. However, it was also noted that the Environment (Principles, Governance and Biodiversity
Targets) (Wales) Bill was currently under scrutiny by the Climate Change, Environment and
Infrastructure Committee (CCEI). In light of this, the Committee agreed to write to refer the petition to
you as the Chair of the CCEI Committee for awareness and agreed to close the petition.

The full details of the Committee's consideration of the petition, including the correspondence and
the actions agreed by the Committee can be found here: [P-06-1566 Welsh Government must
legislate for full regard to Local Nature Reserves including Cosmeston LNR](#)

I would be grateful if you could send your response by e-mail to the clerking team at
petitions@senedd.wales.

Yours sincerely



Carolyn Thomas MS
Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



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