

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet
dros Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for
Climate Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: PO/HIDCC/0195/25

Llŷr Gruffydd
Chair
Senedd Climate Change, Environment and Infrastructure Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

25 April 2025

Dear Llŷr,

Thank you to the Senedd Climate Change, Environment and Infrastructure Committee for the valuable discussions during my general scrutiny and storm response inquiry sessions on 27 March. I welcome the opportunity to respond to those questions which we did not have time for during the session itself. I have answered each question in turn as follows.

General scrutiny session

1. *What action is being taken to prevent the loss of hedgerow and ancient hedgerow as a result of housing development?*

I refer the Committee to [Planning Policy Wales 12](#) (PPW) which sets out the land use planning policies of the Welsh Government and includes a strong framework for the protection of hedgerows, including ancient hedgerows. Planning policy recognises the significant importance of hedgerows for biodiversity. PPW notes that they are crucial connecting habitats for resilient ecological networks and contribute significantly to landscape character, culture, heritage, sense of place, air quality, and local climate moderation.

It is important that biodiversity and resilience considerations are taken into account at an early stage when proposing or considering development proposals. The Welsh Government expects planning authorities to be proactive and embed appropriate mechanisms and policies to protect against biodiversity loss and secure a net benefit for biodiversity. Securing a net benefit for biodiversity within the context of PPW requires a pragmatic response to the specific circumstances of the site. Working through the step wise approach (PPW para 6.4.15 refers), ancient hedgerows are listed as an irreplaceable habitat, which means that proposals that would result in the loss of an irreplaceable habitat are as a matter of principle to be excluded from site searches and the irreplaceable habitat should be safeguarded.

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
Correspondence.Huw.Irranca-Davies@gov.wales

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

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

For wider hedgerow protection, PPW sets out that the permanent removal of hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where hedgerows are proposed to be removed as part of a development, local planning authorities must follow the step wise approach, with the objective of avoiding loss as the first priority.

2. *The Beyond Recycling Strategy set four 2025 targets: a 26% reduction in total waste, zero waste to landfill, a 50% reduction in avoidable food waste, and a 70% recycling rate. How many of these targets are you on track to achieve this year?*

26% reduction in total waste:

Information about the levels of waste is collected through different data sets for the different waste streams – household, industrial, commercial, and construction and demolition. The latest available data is for different years (2018¹ for industrial and commercial, 2019² for construction and demolition, and 2023-24³ for household). It is therefore difficult to come up with a robust estimate of reduction against the 2006-07 baseline across all waste streams at this point, and further analysis will be done later this year to provide the most robust estimate possible. With that caveat, the latest data published against each waste stream is as follows:

- Household: 1,232 thousand tonnes (2023-24) representing 22 per cent reduction
- Industrial: 1,441 thousand tonnes (2018) representing 24 per cent reduction
- Commercial: 1,453 thousand tonnes (2018) representing 13 per cent reduction
- Construction and demolition: 3,427 thousand tonnes (2019) representing 37 per cent reduction

Therefore, latest data estimates show total waste at 7,552,000 tonnes overall, a 28.7 per cent overall reduction against the 2006-07 baseline of 10,553,261 tonnes.

Zero waste to landfill:

There is also positive progress in respect of the objective of zero waste to landfill and the 2024-25 target of landfilling less than 5 per cent of waste produced in Wales.

The latest published landfill rates are:

- Local Authority collected municipal waste – 0.9 per cent in 2023-24⁴
- Industrial and commercial waste – 11 per cent in 2018⁵
- Construction and demolition waste – 6 per cent in 2019⁶

For our municipal waste, it means that since devolution, the landfill rate has decreased from 95 per cent in 1998 to 0.9 per cent. With the introduction of workplace recycling regulations now in place, we expect that more recyclable material will be captured for re-processing, thereby reducing material to landfill further. In addition, the regulations include a ban on all wood waste going to landfill which will further contribute to delivery against this target.

¹ [Natural Resources Wales / Industrial and Commercial Waste Survey 2018](#)

² [Natural Resources Wales / Construction and demolition waste survey for 2019](#)

³ [Local authority municipal waste management: April 2023 to March 2024 | GOV.WALES](#)

⁴ [Local authority municipal waste management: April 2023 to March 2024 | GOV.WALES](#)

⁵ <https://naturalresources.wales/media/693534/survey-of-commercial-and-industrial-waste-generated-in-wales-2018.pdf>

⁶ [2019 Wales construction and demolition waste arising survey \(naturalresources.wales\)](#)

70 per cent recycling rate:

In relation to the target of 70 per cent recycling for waste from households, commercial and industrial businesses by 2025, the latest data held in each area is as follows:

- Local Authority collected municipal waste 2024-25 – 67 per cent⁷
- Waste-from-households 2022 – 56.7 per cent⁸
- Industrial waste 2018 – 69 per cent⁹
- Commercial waste 2018 – 64 per cent¹⁰
- Construction and demolition waste 2019 – 93 per cent¹¹

In terms of local authority collected municipal waste, our local authorities are working hard to deliver against the 70 per cent target. In 2023/24 there were already seven local authorities delivering at 70 per cent or over, before the target came into force.

As noted in previous correspondence, a range of actions are being taken to further increase recycling rates and work towards the target. This includes continuing the successful model of support to local authorities to help them to improve their performance, consisting of the Sustainable Waste Management Grant; targeted capital funding; advice on performance improvement; and the delivery of the Be Mighty public awareness campaign. Most recently we have implemented the new Workplace Recycling Regulations¹² requiring workplaces to keep their key recyclable materials separate and for those to be collected separately, to improve the quantity and quality of recycling from non-domestic premises. In addition, we have rolled out the provision of advice and support to businesses by Business Wales.

50 per cent reduction in avoidable food waste:

We are currently working with WRAP to develop the methodology to analyse and estimate food waste levels and compare them to the 2007 baseline. We expect to be able to estimate total food waste when the latest data is available. The Wales Food Waste Routemap¹³ published by WRAP in 2023 identified actions to meet the 2030 target for 60 per cent reduction in avoidable food waste. It acknowledged that meeting the targets would be challenging, but that the sectors with the biggest opportunity for food waste reduction were household and manufacturing. We are therefore focussing on reducing household food waste through campaigns like Be Mighty and Climate Action Wales, along with support for businesses to reduce waste in the supply chain from Farming Connect, Business Wales, and FareShare Cymru.

3. *You've highlighted how outperforming the second carbon budget would be beneficial in achieving the "extremely challenging" third budget. Based on current projections, how likely is this to be the case?*

⁷ [Local authority municipal waste management: April 2023 to March 2024 | GOV.WALES](#)

⁸ <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste>

⁹ <https://naturalresources.wales/media/693534/survey-of-commercial-and-industrial-waste-generated-in-wales-2018.pdf>

¹⁰ <https://naturalresources.wales/media/693534/survey-of-commercial-and-industrial-waste-generated-in-wales-2018.pdf>

¹¹ [2019 Wales construction and demolition waste arising survey \(naturalresources.wales\)](#)

¹² [Workplace recycling | GOV.WALES](#)

¹³ [Wales Food Waste Routemap | WRAP - The Waste and Resources Action Programme](#)

The Committee will be aware that Carbon Budget 2 (2021-25) requires a 37 per cent average reduction in greenhouse gas emissions. Official emissions data for 2023 will not be available until June and we will not formally know if we have met the budget until the 2025 data is available in 2027. Consequently, there is naturally some uncertainty, but we have other signals we can point to in the meantime.

The 2023 emissions data for participants of the UK Emissions Trading Scheme (power, industry and aviation) has been published. The participants were responsible for nearly half of Wales' emissions in 2021 and 2022, so this gives us a good indication of whether emissions will fall in 2023. In 2023 emissions for participants of the UK Emissions Trading Scheme were significantly lower in 2023 compared to 2022 and therefore, even if other sectors remained the same, we would see a sizeable reduction in 2023.

As a result, provisional forecasts for 2023 indicate that emissions are expected to decrease by 8 per cent between 2022 and 2023. This would mean a 41 per cent decrease compared to the base year in 2023. This suggests the first three years of Carbon Budget 2 (CB2) emissions were largely on track to deliver the statutory target of a 37 per cent average reduction.

Nevertheless, we must be cautious. The emissions of UK ETS participants can be quite volatile. They can fall dramatically if an installation is undergoing refit or there is an economic downturn. Equally, they can rise dramatically due to geopolitics, economic opportunity and even the weather, so predicting for 2024 and 2025 comes with a high degree of uncertainty. However, we must acknowledge that the closure of a blast furnaces in Port Talbot last year, will also result in much reduced emissions from steel production.

Taking all of these considerations together, whilst it is very difficult to predict where we will find ourselves in 2027, our expectation is that we will meet the level of emission reduction expected in Carbon Budget 2.

4. Wales's decarbonisation progress is significant, but varies substantially between sectors. Which sectors do you expect to prove most challenging in meeting the third carbon budget? How will you address the challenges?

It is important to recognise that every sector has its own challenges. This is why our approach is led by evidence about where the opportunities to reduce emission lie and what works – and why the approach is embedded across the whole Cabinet. In every emissions sector, the relevant Cabinet Secretary is driving the actions needed and is ensuring spending has the greatest impact in delivering our carbon budgets and reaching net zero by 2050.

However, the Committee will be aware that action is being taken by individuals, businesses and the wider public sector. Net Zero is not something that will be achieved just through Government action and increasingly it is being demanded by individuals and global organisations.

From a consumer perspective, we are seeing individuals increasingly buy heat pumps, electric cars and making changes their diet. We are also seeing business and the public sector increasingly using sustainability criteria in their business decisions.

A key role for Government is to build on this public interest and demand and bring everyone with us and ensure we deliver a just transition. The Welsh Government has a key role to support and enable trusted voices to explore, with our communities, the opportunities and risks in transitioning to a low carbon economy. By doing so, we can identify the actions which will maximise the benefits of the transition and mitigate the risks.

Storm response inquiry session

- 1. What mechanisms are in place to enable Welsh Government officials to raise concerns with NRW, and have these been used to address any issues following recent storms?*

My officials engage with their Natural Resources Wales (NRW) counterparts on a regular basis. We also have formal mechanisms in place; for example, Welsh Government hold quarterly sponsorship meetings with acting Chief Executive and the senior team at NRW and NRW are members of Welsh Government's Flood Programme Board. These governance frameworks allow us to raise and discuss any issues in a timely manner and ensure the performance of our flood programme.

We also have mechanisms to engage with NRW before, during and after any flood incident. Following Storms Bert and Darragh in November and December, I convened roundtable discussions with key responders and partner organisations to share lessons learnt and NRW were part of that discussion.

- 2. The Welsh Government's Flood Guidance Framework states it will be updated "every two years or following lessons learned from incidents or exercises, restructuring of organisations or changes in processes." Why has it not been updated since 2016, and when do you plan to update the Framework?*

The Wales Flood Response Framework was developed in partnership with emergency responders and provides an overview of the plans and procedures still in place for preparing for, and responding to, flood events.

Welsh Government's National Security and Resilience Division (NSRD) is currently undertaking a review of pan-Wales resilience governance structures and is expecting to publish the Wales Resilience Framework in May. Once published, my officials will engage with NSRD officials and the Flood Framework will be reviewed to reflect any changes.

- 3. Your climate adaptation strategy says you will consider policy options related to sector-specific risks and contingencies in ICT and telecoms. Are you developing policies in this area, and have the impacts of Storm Darragh affected your thinking on this?*

The UK Government leads on all issues of telecommunications resilience including both immediate and emergency issues and longer-term planning. They have established the Electronic Communications Resilience & Response Group (ECRRG) with the UK telecoms industry to address issues relating to resilience facing the sector. EC-RRG also manages the National Emergency Plan for Telecommunications which sets out processes for handling emergencies, priority customers and services. Nevertheless, telecommunications has dependencies on other areas of devolved competence such as energy and planning and Welsh Government engages with UK Government officials and the industry to understand the issues and amplify the impact in Wales of specific incidents, such as Storm Darragh. We will engage with UK Government and the telecoms regulator, Ofcom, to ensure that Ofcom is given a climate resilience remit across the UK, including all devolved administrations.

Meanwhile, the forthcoming Wales Resilience Framework has been developed in collaboration with partners across the resilience community to provide a clear strategic direction for our resilience partners in Wales. It will be supported by a Delivery Plan which will set out clearly how we intend to deliver tangible changes and benefits for our partners and our communities. To ensure our long-term approach and delivery priorities meet Wales's needs and circumstances, the Framework is underpinned by the following core principles, endorsed by the Wales Resilience Forum, and which have been developed with civil contingencies partners and the third sector:

- An improved and shared understanding of risk.
- A focus on prevention and preparedness.
- A joined-up and streamlined approach to delivery.
- A whole of society approach to resilience.
- A 'Once for Wales' approach.
- A focus on optimising efficiency.

Those core principles help to frame the collective endeavours of government, emergency responders and the voluntary sector to reduce the risk and impact of emergencies and disruptive challenges and build resilience across Wales.

*4. During this inquiry, several stakeholders have told us of their interest in exploring more catchment-scale and nature-based methods to flood mitigation. Do you anticipate a move away from hard engineering approaches to water management in the future, and **will this be reflected in Welsh Government resource allocation?***

There will always be a place for hard engineering solutions, but the Welsh Government recognises the significant role that a catchment-scale and nature-based methods can and will play in managing flood risk. We actively promote Natural Flood Management (NFM) and support Risk Management Authorities (RMAs) to work in collaboration with landowners and farmers to pursue nature-based solutions which reduce flood risk and protect and enhance our natural environment.

We currently have two schemes in our main flood programme that are currently at the final business case stage: the Gwyfrai Catchment in Snowdonia, Conwy, and the Ogwen Catchment in Gwynedd. Previously, four schemes in Cardiff, Monmouthshire, and Powys have been designed or completed with NFM aspects.

With the £2 million investment from the flood budget for 2025-2026, we will support 23 projects across Wales. These projects aim to enhance the natural environment and reduce flood risk for up to 2,800 properties.

5. Does the current fragmentation of water management responsibilities present any obstacles to delivering catchment-scale approaches to water management? Are you looking to introduce any changes in this area?

The Committee will be aware that in October, Welsh Government and UK Government jointly commissioned the most extensive independent review of the water sector in England and Wales since privatisation. The Independent Commission, led by Sir Jon Cunliffe, will consider Wales distinct industry and policy landscape and the scope of the review includes the governance structures within water catchment areas. I expect the Commission to present its findings in a report in early summer and once I have considered its findings, I will then outline the action I plan to take.

6. *Is the Welsh Government looking into water-retaining and drought-resistant planting in upland areas, particularly in light of recent wildfires in North Wales? And has the Welsh Government produced an impact assessment as a consequence of these fires?*

Our Climate Adaptation Strategy notes that forestry productivity may be affected by climate-related impacts. As highlighted during evidence session on 27 March, Wales is already being affected by changing climatic conditions, as we have seen with Storms Darragh and Eowyn and with the recent series of wildfires. There are risks posed by more frequent extreme weather events, such as drought, flooding and wildfire. Invasive species and changes in the pattern of outbreaks of pests and diseases also present a serious threat to our woodlands.

Risks to forestry, woodland and soils represent a risk to our plans to achieve net zero greenhouse gas emissions, due to their function as natural carbon stores which sequester carbon from the atmosphere. Adapting our silvicultural methods, as well as improving resilience, may also support increased biodiversity. It is important that the forestry sector plans for these areas of risk and opportunity to ensure sustainability of the sector in the context of climate change, especially given the relatively long-term planning cycles involved.

Our consultation on the priorities and proposals for Wales's first Timber Industrial Strategy was opened on 22 January and closed on 16 April. The second priority explored is "Increasing resilience in our forests" and covers topics such as promoting diversification and adapting silvicultural systems to improve resilience to climate change and pests and disease. The [consultation document](#) was open for responses until 16 April.

7. *When will the Welsh Government publish the Wales Resilience Framework, as well as the Welsh Government response to the National Infrastructure Commission for Wales' flooding report?*

The Welsh Government's response to the National Infrastructure Commission for Wales's Flood Report will be published imminently, and the Wales Resilience Framework will be published in May.

Thank you again for a useful discussion. I look forward to receiving the outcome report from the Committee's Storm Response inquiry in due course.

Yours sincerely,



Huw Irranca-Davies AS/MS

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