

Agenda – Y Pwyllgor Deisebau

Lleoliad:	I gael rhagor o wybodaeth cysylltwch a:
Ystafell Bwyllgora 3 – y Senedd	Gareth Price – Clerc y Pwyllgor
Hybrid	0300 200 6565
Dyddiad: Dydd Llun, 13 Tachwedd	Deisebau@senedd.cymru
2023	
Amser: 14.00	

1 Cyflwyniad, ymddiheuriadau, dirprwyon a datgan buddiannau

2 Sesiwn Tystiolaeth – P-06-1358 Adolygu'r cyllid annigonol ar gyfer ysgolion yng Nghymru

(Tudalennau 1 – 10)

- Dr Martin Price, Cadeirydd Cymdeithas Llywodraethwyr Ysgol Bro Morgannwg
- Laurence Matuszczyk, Cadeirydd Cymdeithas Llywodraethwyr Ysgol Merthyr Tudful
- David Blackwell, Pennaeth Ysgol Uwchradd Catholig St Richard Gwyn, Y Barri a Chadeirydd Fforwm Cyllideb Addysg Bro Morgannwg
- Matthew Gilbert, Pennaeth Ysgol Gynradd Ynys y Barri

3 Deisebau newydd

3.1 P-06-1360 Dylid adeiladu ffordd ymadael syml rhwng yr M48 tua'r gorllewin a'r M4 tua'r dwyrain yn Rhosied

(Tudalennau 11 – 15)



- 3.2 P-06-1364 Argyfwng deintyddiaeth yng Nghymru. Rhaid sicrhau bod gan bob oedolyn a phlentyn fynediad at ddeintydd
(Tudalennau 16 – 23)
- 3.3 P-06-1365 Ail-agor llinellau rheilffordd i gysylltu gogledd a de Cymru
(Tudalennau 24 – 66)
- 3.4 P-06-1366 Adfer y cyllid ar gyfer gwasanaethau Bysiau Cwm Taf 351
(Dinbych-y-pysgod i Bentwyn) a 352 (Dinbych-y-pysgod i Gilgeti)
(Tudalennau 67 – 73)
- 3.5 P-06-1368 Dylai Llywodraeth Cymru gymryd camau i gadw'r Rheoliadau Gwybodaeth Amgylcheddol mewn perthynas â Chymru
(Tudalennau 74 – 99)
- 3.6 P-06-1369 Defnyddiwch enwau Cymraeg yn unig ar gyfer lleoedd yng Nghymru
(Tudalennau 100 – 107)
- 3.7 P-06-1370 Achub y ddarpariaeth mân anafiadau dros nos yn Ysbyty Nevill Hall yn y Fenni
(Tudalennau 108 – 115)
- 3.8 P-06-1373 Dylid atal Llywodraeth Cymru rhag gwastraffu £4 miliwn ar ddatblygiad preifat "Skyline" ar Fynydd Cilfái, Abertawe
(Tudalennau 116 – 126)
- 3.9 P-06-1375 Cynnal etholiad Senedd yn gynnar
(Tudalennau 127 – 129)

4 Y wybodaeth ddiweddaraf am ddeisebau blaenorol

- 4.1 P-06-1356 Cyflwyno mesurau diogelwch cynhwysfawr ar gyffordd 'Mynegbost' yr A477
(Tudalennau 130 – 132)
- 5 Papur i'w nodi – P-06-1326 Dylai'r Senedd graffu ar y sgandal mesuryddion rhagdalu yng Nghymru**
(Tudalennau 133 – 134)

- 6 Cynnig o dan Reol Sefydlog 17.42(ix) i benderfynu gwahardd y cyhoedd o weddill y cyfarfod**

- 7 Trafod y dystiolaeth – P-06-1358 Adolygu'r cyllid annigonol ar gyfer ysgolion yng Nghymru**

Mae cyfyngiadau ar y ddogfen hon

P-06-1358: Adolygu'r cyllid annigonol ar gyfer ysgolion yng Nghymru

Y Pwyllgor Deisebau | 25 Medi 2023
Petitions Committee | 25 September 2023

Cyfeirnod: SR23/6779-2

Rhif y ddeiseb: P-06-1358

Teitl y ddeiseb: Adolygu'r cyllid annigonol ar gyfer ysgolion yng Nghymru

Testun y ddeiseb: Mae gan lawer o ysgolion ddiffyg yn y cyllidebau a osodwyd ganddynt ar gyfer blwyddyn ariannol 2023-24. Yn fwy na hynny, mae'n bosibl y bydd y rhan fwyaf o ysgolion yn cyhoeddi diffyg yn eu cyllidebau ar gyfer 2024-25. Mae'r effeithiau ar blant yn ysgolion Cymru yn ddifrifol – addysgu a dysgu gwaeth, adeiladau gwaeth, pryderon ynghylch diogelwch a gorflinder staff.

Rhagor o fanylion: Paratowyd y ddeiseb hon gan Gadeiryddion Cymdeithasau Llywodraethwyr ledled Cymru.

Mae effeithiau cyllid isel ar blant yn ysgolion Cymru fel a ganlyn:

- Gostyngiad yn ansawdd y dysgu ac addysgu
- Cymarebau oedolion/dysgwyr uwch
- Iechyd a diogelwch – llai o oruchwyliaeth oedolion, er enghraift amser cinio ac egwylion
- Llai o staff cymorth, sy'n golygu bod plant ag anghenion dysgu ychwanegol mewn perygl o beidio â chael yr help sydd ei angen arnynt.
- Llai o oedolion mewn ystafelloedd dosbarth, sy'n rhoi pawb mewn perygl
- Llai o athrawon – naill ai oherwydd staff yn gadael a neb yn cymryd eu lle neu oherwydd dileu swyddi.



- Llai o waith cynnal a chadw ar adeiladau sy'n arwain at bryderon diogelwch
- Mwy o straen ar benaethiaid ac uwch-staff, sy'n arwain at fwy o absenoldeb oherwydd salwch a gorflinder

Ac ar yr un pryd mae ysgolion yn brwydro i roi diwygiadau addysgol ar waith.

Rydym yn annog Llywodraeth Cymru i adolygu ar fyrder lefel y cyllid ar gyfer addysg ar gyfer y flwyddyn ariannol hon a'r flwyddyn ariannol nesaf. Mae ein plant yn haeddu'r addysg orau ac ni ddylent ddioddef oherwydd toriadau ariannol.

1. Crynodeb

- Mae ysgolion yn cael eu cyllidebau gan awdurdodau lleol sy'n defnyddio'r arian a gânt gan Lywodraeth Cymru drwy'r setliad Ilywodraeth leol i ddarparu'r amrywiaeth o wasanaethau y maent yn gyfrifol amdanynt.
- Arian gan yr awdurdod lleol yw'r rhan helaeth o'r cyllid a gaiff ysgolion, er bod Llywodraeth Cymru yn darparu rhywfaint o gyllid uniongyrchol i ysgolion (drwy Consortia Addysg Rhanbarthol) o'i chyllideb addysg ar gyfer gwella ysgolion a chyllid wedi'i dargedu at addysg disgylion difreintiedig.
- Cyfeirir at yr arian y mae awdurdodau lleol wedi bwriadu ei wario ar ysgolion fel gwariant sydd wedi'i gyllidebu. Mae hyn wedi cynyddu 8% yn 2023-24 o'i gymharu â 2022-23. Mae wedi cynyddu 26% ers 2019-20. Mae hyn yn gynnydd 5.3% mewn termau real ers 2019-20 ac yn ostyngiad 1.1% mewn termau real ers 2010-11.
- Mae cronfeydd wrth gefn yng nghyllidebau ysgolion, sef yr arian y mae'r ysgolion eu hunain yn ei ddal ac a gofnodir fel y mae ar un adeg benodol yn y flwyddyn, wedi bod yn hanesyddol uchel dros y ddwy flynedd diwethaf, er bod Llywodraeth Cymru yn dweud bod hyn yn gamarweiniol ac na fydd y sefyllfa hon yn parhau.
- Mae Cymdeithas Llywodraeth Leol Cymru wedi rhybuddio bod ysgolion yn wynebu pwysau chwyddiant a bod pob awdurdod lleol wedi cofnodi gorwariant a bylchau yn eu cyllidebau.

- Yn ôl Llywodraeth Cymru, y sefyllfa ariannol bresennol gyffredinol yw'r anoddaf ers datganoli ac mae Gweinidog y Gymraeg ac Addysg yn dweud nad oes "atebion hawdd" i'r pwysau cyllidebol y mae ysgolion yn eu hwynebu.

2. Sut mae ysgolion yng Nghymru yn cael eu hariannu?

2.1. Cyllid heb ei neilltuo ar gyfer awdurdodau lleol

Daw'r rhan fwyaf o gyllid ysgolion gan awdurdodau lleol, a daw'r rhan fwyaf o'u cyllid hwy o'r setliad llywodraeth leol blynnyddol a bennir gan Lywodraeth Cymru.

Cyllid heb ei neilltuo yw'r setliad llywodraeth leol, felly bydd pob awdurdod lleol yn penderfynu sut i ddyrannu'r adnoddau sydd ar gael iddynt i'r gwasanaethau amrywiol y maent yn eu darparu, gan gynnwys addysg a nhw sy'n penderfynu faint i'w roi i ysgolion o fewn y dyraniad hwnnw.

Mae tri phrif gam i'r broses o bennu cyllidebau ysgolion.

- Yn gyntaf, bydd Llywodraeth Cymru yn rhoi **Grant Cynnal Refeniw** i bob awdurdod lleol. Ynghyd â'i ddyraniad ar dreithi annomestig ailddosbarthedig, mae hyn yn rhan o Cyllid Allanol Cyfun yr awdurdodau lleol. Bydd pob awdurdod lleol yn defnyddio'r cyllid hwn, ynghyd â'r arian y mae'n ei godi drwy'r dreth gyngor, i ariannu'r amrywiaeth o wasanaethau y bydd yn eu darparu, gan gynnwys addysg. Caiff **Grant Cynnal Refeniw** pob awdurdod lleol **ei bennu drwy ddefnyddio fformwla** sy'n seiliedig ar Asesiadau Gwariant Safonol, sef cyfrifiad tybiannol o'r cyllid sydd ei angen ar bob awdurdod lleol i gynnal lefel safonol o wasanaeth. Caiff yr Asesiadau hyn eu rhannu'n Asesiadau Seiliedig ar Ddangosyddion sy'n modelu'r swm tybiannol sydd ei angen ar bob

sector gwasanaeth. 'Gwasanaethau ysgolion' yw un o'r sectorau a ddefnyddir i bennu'r Asesiadau Seiliedig ar Ddangosyddion.¹

- Yn ail, unwaith y byddant wedi penderfynu faint o'u cyllideb gyffredinol ymaent am ei ddyrannu i addysg, mae awdurdodau lleol yn pennu **cyllideb addysg sydd â thair haen**:

- Caiff Cyllideb Addysg yr Awdurdod Lleol ei gwario ar swyddogaethau canolog sy'n ymwneud ag addysg, gan gynnwys ond heb fod yn gyfyngedig i wariant ar ysgolion.
 - Mae'r Cyllideb Ysgolion yn cynnwys gwariant sydd wedi'i anelu'n uniongyrchol at gefnogi ysgolion ond ystyrir ei bod yn fwy effeithiol gweinyddu'r gwariant hwn yn ganolog.
 - Y Cyllideb Ysgolion Unigol yw gweddill y cyllid addysg a ddirprwyir i ysgolion.
- Yn drydydd, mae'r awdurdod lleol yn **pennu'r cyllideb unigol ar gyfer pob ysgol** y mae'n ei chynnal, gan ddosrannu'r Cyllideb hon yn ôl ei fformwla ei hun a bennir yn lleol, o fewn y paramedrau a bennwyd gan Reoliadau Cyllido Ysgolion (Cymru) 2010.

¹ Dywed Llywodraeth Cymru nad yw Asesiadau Gwariant Safonol nac Asesiadau Seiliedig ar Ddangosyddion yn dargedau gwariant ac na ddylid eu trin felly. Maent yn cynrychioli amcangyfrif tybiannol o'r hyn sydd ei angen ar awdurdod lleol i ddarparu lefel safonol o wasanaeth (er eu bod yn dibynnu ar y swm cyffredinol o gyllid a ddarperir gan Lywodraeth Cymru ar gyfer y setliad llywodraeth leol). Maent hefyd yn cynnwys y swm y tybir y gall yr awdurdod lleol ei godi drwy'r dreth gyngor.

2.2. Targedu cyllid sydd wedi'i neilltuo ar gyfer gwella ysgolion a chefnogi addysg disgyblion difreintiedig.

Yn ogystal â'r gyllideb a gaiff pob ysgol gan yr awdurdod lleol, mae Llywodraeth Cymru yn defnyddio nifer o ffrydiau cyllido o'i chyllideb addysg i hybu'r gwaith o weithredu polisiau a blaenorriaethau penodol neu i dargedu cyllid ychwanegol. Caiff y rhain eu rhoi ar ffurf grantiau penodol a ddosberthir drwy'r consortia gwella ysgolion rhanbarthol, fel Grant Gwella Ysgolion y Consortia Rhanbarthol a'r Grant Datblygu Disgyblion (PDG).

Mae'r rhan fwyaf o'r PDG, sy'n ychwanegu at incwm ysgolion ar sail nifer y disgyblion sy'n gymwys i gael prydau ysgol am ddim (eFSM), yn cael ei drosglwyddo yn ei gyfanrwydd i ysgolion. Mae cyfran lai o'r PDG yn cael ei rhoi i'r consortia rhanbarthol i'w dosbarthu i wella addysg Plant sy'n Derbyn Gofal a phlant sydd wedi'u mabwysiadu.

Mae Llywodraeth Cymru yn dyrannu'r Grant Gwella Ysgolion Consortia Rhanbarthol i'r pedwar consortia rhanbarthol, sy'n trosglwyddo rhywfaint o'r arian hwn i ysgolion ac yn ei wario ar fentrau gwella amrywiol. Mae dadansoddiad o'r Grant hwn i'w weld ym mhapur Gweinidog y Gymraeg ac Addysg, at y Pwyllgor Plant, Pobl Ifanc ac Addysg ar gyllideb 2023-24 (gweler Atodiad D).

3. Y sefyllfa ariannu bresennol

3.1. Setliad Llywodraeth Leol 2023-24

Fel yr eglurwyd yn adran 2 uchod, prif ffynhonnell cyllid ysgolion yw Llywodraeth Cymru a hynny drwy'r Cyllid Allanol Cyfun, sy'n gyllid heb ei neilltuo, a gaiff ei ddyrannu i awdurdodau lleol fel rhan o'r setliad Llywodraeth leol.

Roedd Setliad Llywodraeth Leol Derfynol 2023-24 yn gynnydd o 7.9% yn gyffredinol (cynnydd o 6.5% o leiaf i bob awdurdod lleol), o'i gymharu â 2022-23. Awdurdodau lleol sy'n penderfynu ar ba wasanaethau y caiff y cynnydd hwn ei wario.

Gan danlinellu eto mai'r awdurdodau lleol sy'n gyfrifol am ddyrannu cyllid craidd i ysgolion, cyfeiriodd Llywodraeth Cymru at yr arian y mae wedi ei gynnwys yn y Grant Cynnal Refeniw, sydd heb ei neilltuo, o fewn y Setliad Llywodraeth Leol, i awdurdodau lleol ei roi i ysgolion.

Dyweddodd y Gweinidog Cyllid a Llywodraeth Leol yn y Cyfarfod Llawn ar ym mis Rhagfyr 2022:

Mae £227 miliwn ychwanegol yn cael ei ddarparu i lywodraeth leol drwy'r setliad i helpu awdurdodau lleol ddiogelu'r amrywiaeth bwysig ac eang o wasanaethau y maen nhw'n eu darparu, **gan gynnwys ariannu ysgolion yn uniongyrchol.** O ganlyniad i'r penderfyniadau gwariant a wnaed mewn cysylltiad ag addysg yn Lloegr, cafodd Cymru gyllid canlyniadol o £117 miliwn y flwyddyn yn natganiad yr hydref [Tachwedd 2022]. Trwy'r dewisiadau yr ydym ni wedi'u gwneud, mae hwn yn cael ei ddarparu'n llawn i lywodraeth leol. [ein pwyslais ni]

Fodd bynnag, roedd yn rhaid i awdurdodau lleol dalu cost y 5% cychwynnol yn y codiad cyfog i athrawon ar gyfer blwyddyn academaidd 2022/23 o'u hadnoddau eu hunain. Dywedodd Llywodraeth Cymru fod hyn yn cael ei adlewyrchu yn y cynnydd o 7.9% y rhoddodd i awdurdodau lleol ar gyfer 2023-24 a'r cynnydd cynharach o 9.4% ar gyfer 2022-23.

Pan oedd y Pwyllgor Plant, Pobl Ifanc ac Addysg yn craffu ar y gyllideb, dywedodd y Gweinidog y byddai'r codiad cyflog i athrawon yn costio £44 miliwn i awdurdodau lleol rhwng Medi 2022 a Mawrth 2023 a £75m ar gyfer blwyddyn ariannol lawn 2023-24. Gofynnodd y Pwyllgor faint o'r cyllid ychwanegol a roddwyd i awdurdodau lleol i'w wario ar ysgolion fyddai'n weddill ar ôl iddynt weithredu'r codiad cyflog i athrawon. Caiff hyn ei drafod ymhellach yn adroddiad y Pwyllgor Plant, Pobl Ifanc ac Addysg ar Gyllideb Ddrafft 2023-24 (paragraffau 51-54 a pharagraffau 104-105) ac yn ymateb Llywodraeth Cymru (argymhelliaid 5).

[Cytunwyd ar godiad cyflog ychwanegol o 3% ar gyfer 2022/23 ym mis Chwefror 2023. Mae Llywodraeth Cymru wedi darparu cyllid grant i awdurdodau lleol ar gyfer y 3% ychwanegol hwn.]

3.2. Arian o'r gyllideb addysg

Mae Llywodraeth Cymru yn darparu £121 miliwn o PDG i ysgolion yn 2023-24 i ategu'r cyllidebau craidd a gânt gan awdurdodau lleol, yn seiliedig ar nifer y disgylion eFSM sydd ar eu cofrestr (dyrennir £1,150 ar gyfer pob disgyl cymwys).

Mae Llywodraeth Cymru hefyd yn darparu £163 miliwn o gyllid gwella ysgolion drwy'r consortia rhanbarthol.

3.3. Gwariant a gyllidebwyd gan awdurdodau lleol ar gyfer ysgolion

Mae Llywodraeth Cymru yn cyhoeddi data yn flynyddol am gyfanswm y gwariant y mae awdurdodau lleol yn ei gyllidebu ar gyfer ysgolion. Mae hyn yn cynnwys cyllidebau craidd ysgolion, a ddarperir gan awdurdodau lleol, ac sy'n cael ei gyllido drwy'r Grant Cynnal Refeniw, a'r arian grant o gyllideb Addysg Llywodraeth Cymru. Mae Tabl 1 isod yn dangos y data ar gyfer y blynnyddoedd diwethaf.

Tabl 1. Gwariant gros a gyllidebwyd ar gyfer ysgolion

Gwariant gros gyllidebwyd ar gyfer ysgolion £ Biliwn	£ gwariant gros gyllidebwyd ar gyfer ysgolion fesul disgybl	Y ganran wedi ei ddirprwyo i ysgolion
2023-24	3.343	7327
2022-23	3.096	6773
2021-22	2.913	6387
2020-21	2.822	6203
2019-20	2.657	5857
2018-19	2.566	5675
2017-18	2.543	5628
2016-17	2.519	5570
2015-16	2.496	5526
2014-15	2.528	5607
2013-14	2.519	5594
2012-13	2.495	5520
2011-12	2.470	5451
2010-11	2.458	5409

Ffynhonnell: Llywodraeth Cymru, Bwletinau Ystadegol: Gwariant a gyllidebwyd gan awdurdodau lleol ar gyfer ysgolion (rhifynnau sawl blwyddyn)

- Mae cyfanswm y cyllid ar gyfer ysgolion yn 2023-24 8.0% yn uwch nag yr oedd yn 2022-23 (5.3% yn uwch mewn termau real). Mae'r cyllid fesul disgybl 8.2% yn uwch (5.5 % yn uwch mewn termau real).

- Mae cyllid wedi codi 25.8% mewn termau arian parod ers 2019-20 a 9.1% mewn termau real. Mae cynnydd o 25.1% fesul disgybl mewn termau arian parod ac 8.5% mewn termau real.
- Wrth edrych yn ôl dros gyfnod hirach, mae cyllid wedi cynyddu 1.1% mewn termau real (0.7 fesul disgybl) ers 2010-11. Cyn eleni (2023-24), roedd y cyllid wedi gostwng mewn termau real ers 2010-11.

[Cafodd y newidiadau termau real eu cyfrifo drwy ddefnyddio datchwyddydd cynnyrch domestig gros a gyhoeddwyd gan Drysorlys EF ym mis Mehefin 2023.]

3.4. Cronfeydd wrth gefn ysgolion

Mae Llywodraeth Cymru hefyd yn cyhoeddi data blynnyddol ar gronfeydd wrth gefn ysgolion. Caiff ei gofnodi fel ar ddiwedd mis Mawrth bob blwyddyn. Mae Tabl 2 isod yn dangos y data ar gyfer y blynnyddoedd diwethaf:

Tabl 2: Cronfeydd wrth gefn ysgolion

	Cyfanswm	Y Disgybl
Mawrth 2022	£301m	£659
Mawrth 2021	£181m	£393
Mawrth 2020	£32m	£70
Mawrth 2019	£46m	£102
Mawrth 2018	£50m	£111
Mawrth 2017	£46m	£102
Mawrth 2016	£64m	£142
Mawrth 2015	£64m	£141
Mawrth 2014	£60m	£132

Ffynhonnell: Llywodraeth Cymru, Datganiad Ystadegol Cyntaf Cronfeydd wrth gefn ysgolion (rhifynnau sawl blwyddyn)

Mae'r cronfeydd wrth gefn dros y ddwy flynedd diwethaf (fel ar 31 Mawrth) wedi bod yn hanesyddol uchel. Yr esboniad a roddodd Llywodraeth Cymru oedd bod ysgolion, oherwydd y pandemig, wedi cael adnoddau ychwanegol yn gymharol hwyr yn y flwyddyn ariannol ac, oherwydd hynny, rodd y darlun yn gamarweiniol. Dywedodd mai sefyllfa dros dro yw lefel uchel y cronfeydd wrth gefn a gofnodwyd yn ystod y blynnyddoedd diwethaf a hynny oherwydd bod ysgolion wedi cau a bod llai o weithgarwch yn ystod y pandemig.

Trafodir hyn ymhellach yn adroddiad y Pwyllgor Plant, Pobl Ifanc ac Addysg ar Cyllideb Ddrafft 2023-24 (paragraffau 65-67) a pharagraffau 112-114) ac yn ymateb Llywodraeth Cymru

4. Y rhagolygon ariannol sy'n wynebu'r sector cyhoeddus

Mae Llywodraeth Cymru wedi disgrifio'r cylch pennu cyllideb 2022-223 fel "un o'r anoddaf" ers datganoli, gan gyfeirio at y cyfraddau chwyddiant uchaf ers 40 mlynedd, a chynnydd "aruthrol" mewn prisiau ynni, a hynny ar adeg pan mae safonau byw yn gostwng. Dywed y Gweinidog Cyllid a Llywodraeth Leol nad yw setliad cyllido Cymru o San Steffan "yn ddigon i ymdrin â'r holl bwysau eithriadol hyn, heb sôn am ein blaenoriaethau yn 2023-24. Hyd yn oed ar ôl cael £1.2 biliwn ychwanegol dros ddwy flynedd o ganlyniad i Ddatganiad yr hydref Llywodraeth y DU, dywedodd y Gweinidog fod setliad Cymru yn dal yn werth hyd at £3 biliwn yn llai mewn termau real a hyd at £1 biliwn yn llai yn 2023-24.

Yn ei ymateb i ymgyngoriad y Pwyllgor Cyllid cyn Cyllideb Ddrafft 2022-23, rhybuddiodd Cymdeithas Llywodraeth Leol Cymru (CLILC) fod ysgolion yn wynebu pwysau chwyddiant o £177 miliwn a £114 miliwn yn 2023-24 a 2024-25 yn y drefn honno. Dywedodd CLILC hefyd fod pob awdurdod yng Nghymru wedi cofnodi gorwariant yn 2022-23 ac y byddant yn wynebu bylchau yn eu cyllideb yn y blynnyddoedd i ddod. Ar wahân i fisoedd cyntaf y pandemig, meddai, nid yw'r pwysau wedi cynyddu i'r fath raddau nac mor gyflym erioed o'r blaen.

Yn ei lythyr yn ymwneud â'r ddeiseb hon, tanlinelloedd Gweinidog y Gymraeg ac Addysg y cyd-destun hwn: Dywed ei fod yn "cydnabod bod yr argyfwng costau byw yn rhoi ysgolion ac awdurdodau lleol o dan bwysau sylweddol" ond "nad oes atebion hawdd i sut i ddatrys y problemau a wynebir".

Cyhoeddodd y Prif Weinidog ddatganiad ar 9 Awst 2023 yn dilyn cyfarfod o Gabinet Llywodraeth Cymru i drafod pwysau ariannol. Dywedodd mai'r sefyllfa bresennol yw'r "sefyllfa ariannol anoddaf yr ydym wedi'i hwynebu ers datganoli" a:

... roedd ein sefyllfa ariannol, wedi Cyllideb y Gwanwyn y DU ym mis Mawrth, hyd at £900m yn is mewn termau real na phan bennwyd y gyllideb honno gan Lywodraeth y DU ar adeg yr adolygiad o wariant diwethaf yn 2021. (...)

Bydd y Cabinet yn gweithio dros yr haf i liniaru'r pwysau cyllidebol hyn yn seiliedig ar ein hegwyddorion, gan gynnwys diogelu gwasanaethau cyhoeddus rheng flaen, cyn belled â phosibl, a thargedu cymorth tuag at y rheini sydd â'r angen mwyaf.

5. Gwaith craffu blaenorol yn y Senedd

Trafododd Pwyllgor Deisebau'r Bumed Senedd ddeiseb debyg yn 2019, i "Ddiogelu cyllid ysgolion neu gyfaddef bod y gwasanaeth a ddarperir yn gwanhau" P-05-872. Tynnwyd sylw at y ddeiseb hon.

Roedd Pwyllgor Plant, Pobl Ifanc ac Addysg y Bumed Senedd yn cynnal ymchwiliad polisi i gyllid ysgolion ar y pryd. Roedd hwn yn ystyried a oedd y swm cyffredinol o gyllid a oedd ar gael i ysgolion yn ddigonol a'r modd roedd y cyllid hwnnw'n cael ei ddosbarthu. Mewn ymateb, comisiynodd Llywodraeth Cymru adolygiad gan yr economegydd addysg, Luke Sibeta.

Mae'r Pwyllgor Plant, Pobl Ifanc ac Addysg presennol yn parhau i graffu ar lefel y cyllid sydd ar gael i ysgolion, gan gynnwys fel rhan o'i waith o graffu ar y gyllideb flynyddol. Y tro diwethaf iddo wneud hynny oedd ym mis Ionawr 2023.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddu o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.

P-06-1360 Dylid adeiladu ffordd ymadael syml rhwng yr M48 tua'r gorllewin a'r M4 tua'r dwyrain yn Rhosied

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/6916

Rhif y ddeiseb: P-06-1360

Teitl y ddeiseb: Dylid adeiladu ffordd ymadael syml rhwng yr M48 tua'r gorllewin a'r M4 tua'r dwyrain yn Rhosied

Geiriad y ddeiseb: Bob tro mae Pont Hafren (Croesfan yr M48) ar gau i draffig, mae'r ardal sy'n cynnwys Cas-gwent, Cil-y-coed, Magwyr gyda Gwndy a Dwyrain Casnewydd yn llythrennol dod i stop. Yn fras, y rheswm dros hynny yw bod yn rhaid i draffig Cas-gwent sy'n anelu am Loegr naill ai gylchu o amgylch yr isffyrdd heibio Cil-y-coed a thrwy Fagwyr, neu fynd yn syth i lawr yr M48 i gyffordd 23 yr M4, gan droi o amgylch y gylchfan yn eu lluoedd, ac atal traffig Casnewydd a Magwyr rhag llifo allan i gyffordd 23. Mae'n rhaid dirwyn y sefyllfa hon i ben, ac mae modd gwneud hynny.

Ar 13/03/2023 am 07:25 gadewais fy nghyfeiriad yng Ngwndy er mwyn mynd i weithio yn Portishead. Wedi gadael Manor Chase ar y B4245, ymunais â chiw o draffig bron ar unwaith, ac o ganlyniad roedd y daith arferol o tua phedwar/pum munud i gyrraedd ffordd ymuno tua'r dwyrain yr M4 ar gyffordd 23 wedi cymryd union ddwy awr a hanner. Roedd yn rhaid i mi ddyfalbarhau gan fy mod wedi cofrestru ar gwrs hyfforddi gorfodol a oedd yn gofyn am fod yno mewn person. Dyw'r stori hon ddim heb ei thebyg. Yr un yw'r profiad i gannoedd, os nad miloedd o bobl bob tro y mae Pont Hafren ar gau i draffig. Mae'n rhaid i'r gornel gyfan hon o Gymru ddioddef y sefyllfa hon a byddai'n hawdd lleddfu'r mater gyda ffordd ymadael syml a chymharol rad rhwng yr M48 tua'r gorllewin a'r M4 tua'r dwyrain rhwng Rhosied a Gwndy.



Cae yn unig yw'r tir ar hyn o bryd, mae'r dopograffeg yn ffafriol a byddai ffordd ymadael yn atal traffig Cas-gwent rhag cau cylchfan cyffordd 23 yn llwyr, gan osgoi'r oedi hwn.

1. Cefndir

Mae'r M48 a'r M4 yn cyfarfod wrth gyfnewidfa Rhosied – cyffordd 23 yr M4 – gerllaw Magwyr.

Mae pontydd Hafren yr M4 a'r M48 yn gyfrifoldeb Priffyrrd Cenedlaethol, asiantaeth Llywodraeth y DU sy'n gyfrifol am reoli, cynnal a chadw a gwella rhwydwaith ffyrdd strategol Lloegr.

Mae Priffyrrd Cenedlaethol yn dangos bod pont yr M48 yn cau'n amlach o ganlyniad i waith cynnal a chadw, ac i wella diogelwch i swyddogion traffig.

Llywodraeth Cymru yw'r awdurdod priffyrrd ar gyfer yr M4 a'r M48 yng Nghymru, gan gynnwys cyfnewidfa Rhosied.

Yn dilyn adroddiad y Panel Adolygu Ffyrrd a gyhoeddwyd ym mis Chwefror 2023, nododd Llywodraeth Cymru ei hymateb mewn Datganiad Polisi Ffyrrd newydd, yn ogystal â Chynllun Cyflawni Cenedlaethol ar gyfer Trafnidiaeth newydd.

Mae'r datganiad polisi yn nodi dan ba amgylchiadau y bydd Llywodraeth Cymru yn buddsoddi mewn ffyrdd, gan ddatgan y bydd yn gwneud hynny er mwyn:

- cefnogi newid moddol a lleihau allyriadau carbon;
- gwella diogelwch trwy newidiadau ar raddfa fach;
- addasu i effeithiau newid hinsawdd;
- rhoi mynediad a chysylltedd i swyddi a chanolfannau gweithgarwch economaidd mewn ffordd sy'n cefnogi newid moddol.

Mae Trafnidiaeth Cymru yn cefnogi Uned Cyflenwi Burns, i oruchwyllo'r gwaith o weithredu 58 argymhelliaid Comisiwn Trafnidiaeth De-ddwyrain Cymru. Nod y gwaith yw cynnig dewisiadau eraill yn lle siwrneiau ar yr M4 ac annog pobl i ddefnyddio trafnidiaeth gyhoeddus a theithio llesol yn y rhanbarth, gan liniaru tagfeydd ar yr M4 yn ne-ddwyrain Cymru.

2. Camau gan Lywodraeth Cymru

Mae llythyr y Dirprwy Weinidog Newid Hinsawdd at y Cadeirydd ar y ddeiseb hon yn dweud y canlynol:

Ar hyn o bryd nid oes unrhyw gynlluniau i gyflwyno slipffordd yn y lleoliad hwn, ac mae'n annhebygol y byddai cynllun o'r math hwn yn bodloni'r meini prawf ar gyfer cyllid o dan ein profion adeiladu ffyrdd yn y dyfodol a nodir yn ein hymateb i'r Adolygiad Ffyrdd.

Mae'r Dirprwy Weinidog hefyd yn amlinellu'r gwaith sydd wedi dechrau i weithredu argymhellion Comisiwn Trafnidiaeth De-ddwyrain Cymru i liniaru tagfeydd ar yr M4.

3. Camau gan Senedd Cymru

Er bod argymhellion yr Adolygiad Ffyrdd a Chomisiwn Trafnidiaeth De-ddwyrain Cymru wedi'u trafod yn helaeth yn y Senedd, nid yw hynny'n wir am y mater penodol a godwyd gan y ddeiseb.

Fodd bynnag, ar 14 Gorffennaf 2021, [gofynnodd Natasha Ashgar AS i'r Dirprwy Weinidog yn y Cyfarfod Llawn](#) a fyddai'n ymrwymo i fwrw ymlaen â gwaith datblygu ar gyfer "[c]yffordd traffordd ar yr M48, lle roedd tollau pont Hafren yn arfer bod, i leddfu tagfeydd ar yr M4." Roedd y tollau rhwng cyffyrdd 23 a 24 yr M4. Gwrthododd y Dirprwy Weinidog y cynnig hwn.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddu o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1360
Ein cyf/Our ref MA/LW/02014/23

Llywodraeth Cymru
Welsh Government

Jack Sargeant AS
Cadeirydd y Pwyllgor Deisebau

30 Hydref 2023

Annwyl Jack,

Diolch am eich llythyr dyddiedig 11 Medi ynghylch deiseb P-06-1360 Adeiladu slipffordd syml rhwng yr M48 tua'r gorllewin a'r M4 tua'r dwyrain yn Rogiet.

Ar hyn o bryd nid oes unrhyw gynlluniau i gyflwyno slipffordd yn y lleoliad hwn, ac mae'n annhebygol y byddai cynllun o'r math hwn yn bodloni'r meinu prawf ar gyfer cyllid o dan ein profion adeiladu ffyrdd yn y dyfodol a nodir yn ein [hymateb i'r Adolygiad Ffyrrd](#).

Rwyf wedi ei gwneud yn glir iawn y byddwn yn dal i fuddsoddi mewn ffyrdd. Fodd bynnag, rydym yn codi'r safon ar gyfer sefyllfaedd lle mai ffyrdd newydd yw'r ymateb cywir i broblemau trafnidiaeth. Fel y mae'r [Adolygiad Ffyrrd](#) yn ei nodi, mae ffordd y gofynnwyd amdani i leddfu tagfeydd yn aml yn arwain at draffig ychwanegol, sydd mewn amser yn dod â galwadau pellach am lonydd ychwanegol, cyffyrdd ehangach a mwy o ffyrdd. Rydym yn troi mewn cylchoedd, gan allyrru mwy a mwy o garbon wrth inni wneud hynny ac ni fyddwn yn cyrraedd Sero Net oni bai ein bod yn rhoi'r gorau i wneud yr un peth drosodd a throsodd.

Mae ein blaenoriaethau ar gyfer y pum mlynedd nesaf (2022-27) wedi'u nodi yn y [Cynllun Cyflawni Trafnidiaeth Cenedlaethol](#).

Sefydlwyd [Comisiwn Trafnidiaeth De Ddwyrain Cymru](#) (SEWTC) hefyd i ystyried y problemau, y cyfleoedd, yr heriau a'r amcanion ar gyfer mynd i'r afael â thagfeydd yn Ne-ddwyrain Cymru. Yn ei adroddiad Casgliadau Newydd, cadarnhaodd SEWTC mai'r prif achos am dagfeydd ar yr M4, o bell ffordd, yw nifer y cerbydau sy'n defnyddio'r ffordd ar adegau penodol o'r dydd.

Cafodd 58 argymhelliaid y Comisiwn i fynd i'r afael â thagfeydd eu [cymeradwyo](#) gan Lywodraeth Cymru ym mis Ionawr 2021. Mae'r argymhellion yn cyd-fynd yn agos â'n strategaeth drafnidiaeth, [Llwybr Newydd](#). Rhwydweithiau trafnidiaeth integredig, carbon isel ac amlfoddol fydd dyfodol trafnidiaeth Cymru.

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Lee.Waters@llyw.cymru
Correspondence.Lee.Waters@gov.wales

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

Tudalen y pecyn 33

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

Mae'r [Uned Cyflawni Burns](#) sydd â'r dasg o gyflawni argymhellion y Comisiwn yn llunio Adroddiadau Blynnyddol, gan nodi eu cynnydd yn erbyn mesurau tymor byr, canolig a hir.

Fel rhan o'r gwaith hwn, mae Trafnidiaeth Cymru yn [ymgyngori ar eu cynlluniau ar gyfer gorsafoedd newydd](#) rhwng Caerdydd Canolog a Chyffordd Twnnel Hafren, a chynigion gwasanaeth trêr newydd.

Yn gywir,



Lee Waters AS

Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change

Argyfwng deintyddiaeth yng Nghymru

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/6946-1

Rhif y ddeiseb:P-06-1364

Teitl y ddeiseb:Argyfwng deintyddiaeth yng Nghymru. Rhaid sicrhau bod gan bob oedolyn a phlentyn fynediad at ddeintydd.

Geiriad y ddeiseb:Ym mis Hydref 2022, roedd rhestr aros 26 mis i gofrestru gyda deintydd GIG a chael archwiliad yng Nghymru.

Roedd llythyr agored gan Gymdeithas Ddeintyddol Prydain deintyddion y GIG yn beirniad contractau newydd a gyflwynwyd gan Lywodraeth Cymru, ac yn galw am welliannau a buddsoddiadau y mae mawr eu hangen i sicrhau bod pawb yng Nghymru yn gallu cael mynediad at wasanaethau deintyddol.

Roedd yn mynegi pryderon ynghylch llawer o ddeintyddion yn gadael y GIG i fynd i bractis preifat.

<https://www.bbc.co.uk/news/uk-wales-64351984>

Dylai pawb gael mynediad at ofal deintyddol, archwiliadau rheolaidd a thriniaeth amserol.

Yn anffodus, mae fy neintydd wedi gadael y GIG i fynd i bractis preifat. O ganlyniad, rwyf wedi bod yn chwilio am ddeintydd GIG arall ac mae'r un agosaf y gwnes i ei ganfod 79 milltir o fy nghartref, sy'n annerbyniol.



1. Y cefndir

Mae anawsterau ynghylch cael mynediad at ofal deintyddol yn y GIG yng Nghymru wedi cael cryn dipyn o sylw yn ddiweddar, gyda nifer o Aelodau o'r Senedd yn disgrifio'r sefyllfa'n 'argyfwng'.

Mae'r pandemig COVID-19 wedi effeithio'n ddifrifol ar fynediad at wasanaethau deintyddol, gan arwain at ôl-groniad o gleifion sydd angen gofal a thriniaeth ddeintyddol. Fodd bynnag, roedd problemau hirsefydlog o ran mynediad yn bodoli cyn y pandemig.

Yn ystod y ddadl ar ddeintyddiaeth yn y Cyfarfod Llawn ar 24 Mai 2023, cyfeiriodd nifer o Aelodau at ganfyddiadau arolygon a gynhaliwyd ganddynt, gan dynnu sylw at anawsterau ledled Cymru o ran cael gweld deintydd drwy'r GIG, a phrinder y deintyddion sy'n derbyn cleifion GIG newydd. Rhoddwyd sylw i rai o'r materion ynghylch mynediad at ddeintyddiaeth yn ystod y ddadl yn y Cyfarfod Llawn 21 Mehefin 2023 hefyd.

Ymchwiliad y Pwyllgor lechyd a Gofal Cymdeithasol

Cynhaliodd Pwyllgor lechyd a Gofal Cymdeithasol y Senedd ymchwiliad i ddeintyddiaeth a chyhoeddodd ei adroddiad ym mis Chwefror 2023, gydag 16 o argymhellion mewn perthynas â gwasanaethau deintyddiaeth yng Nghymru. Yn ei hymateb i'r adroddiad, gwnaeth Llywodraeth Cymru dderbyn 11 o'r argymhellion, derbyn tri ohonynt yn rhannol, a gwrtod y ddau arall. Cynhaliwyd dadl yn y Cyfarfod Llawn ar adroddiad y Pwyllgor ar 21 Mehefin 2023.

Dangosodd y sesiynau tystiolaeth lafar a'r dystiolaeth ysgrifenedig nad oes darlun clir ynghylch faint o bobl sy'n aros i weld deintydd gyda'r GIG ar hyn o bryd na faint o bobl sydd wedi methu mynd ar restr aros i weld deintydd gyda'r GIG gan nad oes rhestr aros ganolog. Nid oes data yn cael eu cadw'n ganolog ychwaith ar nifer y cleifion sy'n cael eu trin yn breifat. Mae'r sefyllfa yn fwy cymhleth fyth gan fod modd i bobl gofrestru i fod ar fwy nag un rhestr aros.

Galwodd adroddiad y Pwyllgor ar Lywodraeth Cymru i ystyried un rhestr aros ganolog ar gyfer Cymru. Mae swyddogion Llywodraeth Cymru mewn trafodaethau â Gofal lechyd Digidol Cymru i bennu cwmpas cynllun ar gyfer rhestr aros ddeintyddol Cymru gyfan ac mae ymrwymiad i gyflawni'r ateb hwnnw yn y flwyddyn ariannol hon.

Mae adroddiad y Pwyllgor ac Aelodau yn y Senedd hefyd wedi cyfeirio at 'system dair haen' mewn deintyddiaeth yng Nghymru. Un haen yw'r bobl sy'n gallu cael mynediad at ddeintydd GIG, a haen arall yw'r bobl sy'n talu i fynd yn breifat. Y drydedd haen yw'r bobl sy'n methu gweld deintydd drwy'r GIG ac sy'n methu fforddio talu'n breifat.

Cytundebau deintyddol a chyllid deintyddol

Ers mis Ebrill 2022, mae practisau GIG yn gallu dewis bod yn rhan o raglen diwygio contract deintyddiaeth Llywodraeth Cymru, sy'n canolbwytio ar atal ac ar ofal yn seiliedig ar anghenion. Mae hyn yn golygu newid oddi wrth gynnal archwiliadau bob chwe mis ar gyfer pob claf. Y nod yw rhyddhau capasiti i gynnig apwyntiadau i gleifion newydd. Mae Llywodraeth Cymru yn darparu £2 filiwn ychwanegol bob blwyddyn ar gyfer gwella mynediad at wasanaethau deintyddol ledled Cymru.

Fodd bynnag, honnodd Cymdeithas Ddeintyddol Prydain (BDA) ym mis Ionawr 2023 fod contractau GIG newydd a gyhoeddir gan Lywodraeth Cymru sy'n cynnwys gofyniad i weld cleifion newydd yn digwydd ar draul y cleifion sydd eisoes wedi'u cofrestru gyda phractisau. Anfonodd Cymdeithas Ddeintyddol Prydain lythyr agored at Lywodraeth Cymru yn rhybuddio y bydd cytundebau newydd yn gorfodi practisau i adael y GIG, ac mae wedi rhybuddio hefyd y gallai deintyddiaeth y GIG ddiflannu yng Nghymru.

Mae Llywodraeth Cymru wedi dechrau ar y broses a fydd yn arwain at drafodaeth ffurfiol ar contract deintyddol newydd.

Mae adroddiad y Pwyllgor yn galw ar Lywodraeth Cymru i edrych ar a yw'r lefelau cyllid presennol yn ddigonol i fynd i'r afael â'r ôl-groniad o gleifion. Ymatebodd Llywodraeth Cymru drwy ddweud unwaith y bydd rhestr aros ganolog ar waith, bydd yn gallu cadarnhau faint o bobl sy'n aros am ofal deintyddol gyda'r GIG ac asesu'r lefelau ariannu sydd eu hangen.

2. Camau gan Lywodraeth Cymru

Mae gohebiaeth gan y Gweinidog lechyd a Gwasanaethau Cymdeithasol at y Pwyllgor ar 15 Hydref 2023 yn amlygu bod mwyafrif y deintyddion yn ymarferwyr annibynnol, hunangyflogedig sy'n gallu dewis contract i neilltuo cyfran o'u hamser ar gyfer darparu triniaeth GIG ar ran Byrddau lechyd. O ganlyniad, gallent ddarparu gofal GIG yn unig, gweithio y tu allan i'r GIG yn gyfan gwbl neu, fel sy'n

digwydd yn aml, ddarparu cymysgedd o ofal deintyddol gyda'r GIG a gofal deintyddol preifat.

Dywedir bod Llywodraeth Cymru yn gweithio gyda Byrddau lechyd i **fyn*d* i'r afael â bylchau yn y gwasanaethau a ddarperir** drwy eu cynlluniau gweithredol. Mae'r Gweinidog yn cydnabod nad yw mynediad at ddeintyddiaeth fel yr hoffai Llywodraeth Cymru iddo fod ac y bydd "newidiadau sylweddol ac ymarferol yn cymryd amser, a bydd angen buddsoddi cyllid mewn modd sy'n anodd yn yr hinsawdd ariannol bresennol".

O ran **terfynu contractau deintyddol y GIG**, dywed y Gweinidog fod 413 o gontractau deintyddol ar waith ledled Cymru ar ddechrau mis Ebrill 2022, a bod 26 o'r contractau hynny wedi cael eu terfynu am amrywiaeth o resymau megis ymddeoliad, gwerthu'r practis, a phractisau'n dewis symud i ddarpariaeth breifat yn unig. Yn y mwyafrif o achosion lle mae contractau wedi cael eu hamrywio neu eu terfynu, mae Byrddau lechyd eisoes wedi ail-gomisiynu gwasanaethau newydd neu maent wrthi'n gwneud hynny. Mae'r Gweinidog yn nodi bod hyn yn "dangos bod digon o barodrwydd i ymgymryd â chontractau'r GIG". Amlwgir hefyd y ffaith, pan fydd deintydd yn penderfynu lleihau neu derfynu ei ymrwymiad i'r GIG, fod y cyllid ar gyfer y ddarpariaeth a gollir yn aros gyda'r Bwrdd lechyd fel y gall y Bwrdd adfer lefel y gwasanaethau deintyddol a gynigir gan y GIG.

Dywedir bod Llywodraeth Cymru yn gweithio gyda Byrddau lechyd i sicrhau bod mesurau'n cael eu cynnwys yn y broses o adfer gwasanaethau i **sicrhau bod practisau deintyddol yn gweld cleifion newydd**. Mae'r Gweinidog yn nodi bod bron 246,000 o gleifion newydd wedi cael mynediad at ddeintydd GIG ledled Cymru ers mis Ebrill 2022. Nodir bod Llywodraeth Cymru yn bwriadu parhau i fuddsoddi mewn gwasanaethau deintyddol i gynyddu mynediad ar gyfer cleifion newydd, ond bod oedi'n bosibl wrth i apwyntiadau ar gyfer gofal arferol ddod ar gael mewn rhai ardaloedd lleol.

Gan fod y **gweithlu** yn cael ei ystyried rhan allweddol o wella mynediad at ofal deintyddol yn y GIG, dywedir bod Llywodraeth Cymru yn "gweithio i nodi a chreu cyfleoedd arloesol i ehangu sgiliau a gwella llwybrau gyrfa ym maes deintyddiaeth er mwyn sicrhau bod y cyfreithiol i weithio yng Nghymru yn fwy deniadol". Mae Addysg a Gwella lechyd Cymru yn gweithio gyda rhanddeiliaid i ganolbwytio ar **reciriwtio a chadw'r gweithlu deintyddol** yng Nghymru. Cafodd cynllun ei lansio'h ddiweddar i gymhell hyfforddeion deintyddol mewn practisau deintyddol ledled

Cymru wledig, yn hytrach nag ardaloedd trefol mwy poblogaidd. Y nod yw helpu i gynyddu mynediad at ofal y GIG i bobl leol yng nghefn gwlad Cymru.

Mae **cymysgedd sgiliau** (h.y. gwneud defnydd o sgiliau'r tîm deintyddol cyfan) hefyd yn chwarae rhan arwyddocaol yn y ddarpariaeth o ofal deintyddol yn y GIG. Mae therapyddion deintyddol, hylenwyr a thechnegwyr deintyddol clinigol wedi bod â'r gallu i agor a chau cyrsiau triniaeth GIG ers mis Ebrill 2023, sy'n cynyddu capaciti'r gweithlu presennol.

Mae'r Gweinidog yn cynggori y dylai **pobl sy'n ceisio mynediad at wasanaethau deintyddol gyda'r GIG** gysylltu â'u Bwrdd Iechyd i gael y wybodaeth ddiweddaraf am fynediad yn eu hardal leol, gyda'r bwriad o ymuno â rhestr aros practis. Bydd y Bwrdd Iechyd yn gallu darparu manylion am lefel a lleoliad presennol y gwasanaethau deintyddol GIG yn yr ardal. Byddant hefyd yn gallu darparu manylion am y sesiynau mynediad ac argaeledd y driniaeth frys y mae'r Bwrdd Iechyd yn eu darparu i'r trigolion hynny nad ydynt wedi'u cofrestru gyda phractis ar hyn o bryd. Fel mesur dros dro, mae'n bosibl y gellir trefnu i blant gael eu gweld gan y Gwasanaeth Deintyddol Cymunedol, yn enwedig os oes pryderon am iechyd ceg plentyn neu faint o amser sydd wedi mynd heibio ers ei archwiliad deintyddol diwethaf.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddu o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1364
Ein cyf/Our ref EM/02543/23

Llywodraeth Cymru
Welsh Government

Jack Sargeant AS
Cadeirydd – y Pwyllgor Deisebau
Senedd Cymru
Bae Caerdydd
Caerdydd
CF99 1SN

15 Hydref 2023

Annwyl Jack,

Diolch i chi am eich llythyr dyddiedig 22 Medi ar ran y Pwyllgor Deisebau ynglŷn â mynediad at ddeintyddiaeth y GIG i oedolion a phlant.

Rydym yn awyddus i gyrraedd sefyllfa lle mae pawb yng Nghymru sy'n dymuno cael mynediad at ofal deintyddol y GIG yn gallu gwneud hynny. Rydym yn gweithio gyda'r Byrddau Iechyd, sydd â'r cyllidebau perthnasol a'r cyfrifoldeb dros ddarparu gwasanaethau deintyddol y GIG, i roi sylw i fylchau mewn gwasanaethau drwy eu cynlluniau gweithredu.

Mae'r rhan fwyaf o ddeintyddion yn ymarferwyr annibynnol a hunangflogedig sy'n gallu dewis a ydynt am gontractio rhan o'u hamser i ddarparu triniaeth y GIG ar ran Byrddau Iechyd. Gallent ddarparu gofal y GIG yn unig; gweithio yn gyfan gwbl y tu allan i'r GIG; neu, fel sy'n digwydd yn aml, ddarparu cymysgedd o ofal deintyddol y GIG a gofal deintyddol preifat.

Mae bob amser yn siomedig pan fydd deintydd yn penderfynu lleihau ei ymrwymiad i ddarparu gofal y GIG, neu ddod â'r ymrwymiad hwnnw i ben yn gyfan gwbl. Mae'n bwysig pwysleisio bod y cyllid ar gyfer unrhyw ddarpariaeth sydd wedi ei cholli yn parhau ym mediant y Bwrdd Iechyd er mwyn i'r bwrdd allu sicrhau bod gwasanaethau deintyddol y GIG yn dychwelyd yn ôl i'r un lefel.

Dylai unrhyw un sy'n awyddus i gael mynediad at wasanaethau deintyddol y GIG gysylltu â'i Fwrdd Iechyd i gael yr wybodaeth ddiweddaraf ynghylch mynediad yn ei ardal leol, a bydd hynny'n ei helpu i ymuno â rhestr aros practis. Bydd y Bwrdd Iechyd yn gallu rhoi manylion am lefelau presennol a lleoliadau gwasanaethau deintyddol y GIG sydd ar gael yn yr ardal. Bydd hefyd yn gallu rhoi manylion am y sesiynau mynediad a'r driniaeth frys sydd ar gael, a

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:

0300 0604400

Gohebiaeth.Eluned.Morgan@llyw.cymru
Correspondence.Eluned.Morgan@gov.wales

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

Tudalen y pecyn 40

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

ddarperir gan y Bwrdd lechyd ar gyfer preswylwyr sydd heb gael lle mewn practis ar y pryd. Fel mesur dros dro, gallai fod yn bosibl trefnu i blant gael eu gweld gan y Gwasanaeth Deintyddol Cymunedol, yn enwedig os oes unrhyw bryderon am iechyd ceg y plentyn neu hyd yr amser ers ei archwiliad deintyddol diwethaf.

Ym mis Hydref 2004, cyhoeddodd y Sefydliad Cenedlaethol dros Ragoriaeth mewn lechyd a Gofal (NICE) ganllawiau ar gyfer pa mor aml y dylid cynnig archwiliadau deintyddol. Mae'r canllawiau'n nodi'r cyfnod a argymhellir rhwng apwyntiadau archwilio rheolaidd, gan ddweud y dylent gael eu pennu ar gyfer pob claf fel unigolyn a'u teilwra i fodloni ei anghenion penodol ar sail asesiad o lefelau clefyd a'r risg mewn perthynas â chlefyd deintyddol. Bellach nid oes angen i bawb gael apwyntiad i weld y deintydd bob chwe mis, yn bennaf gan fod iechyd y geg yng Nghymru wedi gwella'n ddramatig yn ystod y degawdau diwethaf. Ar gyfer plant, mae'r canllawiau'n argymhell 12 mis fel y cyfnod hiraf rhwng apwyntiadau rheolaidd.

Nid yw'r sefyllfa o ran mynediad at ddeintyddiaeth fel y dymunwn iddi fod. Mae'r problemau gyda mynediad a oedd yn bodoli yn y gorffennol wedi cael eu gwaethyg gan y cymhlethdodau a achoswyd gan y pandemig. Rydym yn gweithio i ddiwygio'r system ddeintyddiaeth gyda'r nod o sicrhau gwelliannau i gleifion a'r proffesiwn. Fodd bynnag, bydd gweithredu newidiadau sylweddol ac ymarferol yn cymryd amser, a bydd angen buddsoddi cyllid mewn modd sy'n anodd yn yr hinsawdd ariannol bresennol.

Mae'r diwygiadau'n golygu bod practisau'n canolbwytio ar atal ac ar ddarparu gofal yn seiliedig ar angen, yn hytrach na chynnal archwiliadau rheolaidd bob chwe mis i bob claf, a hynny gan ein bod yn gwybod ei bod yn bosibl atal pydredd y dannedd a'r clefyd o'u cwmpas i raddau helaeth iawn drwy frwsio'r dannedd yn drylwyr a bwyta llai o siwgr. Wedyn gall y capaciti sy'n cael ei ryddhau gan y newid pwyslais hwn ddod ar gael i ddarparu mynediad i gleifion newydd, ac i'r rheini sydd ag angen gofal parhaus gan dîm deintyddol y GIG, neu ofal brys i ddatrys angen deintyddol penodol heb gael gofal parhaus.

Mae'n ymddangos bod naratif yn cylchredeg bod practisau deintyddol yn dod â'u contractau ar gyfer gofal y GIG i ben, er mwyn iddynt symud at wasanaeth preifat yn unig, gan adael rhai cleifion heb wasanaeth ar ôl symud y cleifion hynny sy'n gallu fforddio talu i gynlluniau deintyddol preifat. Er bod rhai engrifftiau o hynny'n digwydd, nid yw nifer yr engrifftiau'n cyfateb i lefel y sŵn yngylch y mater hwn. Ar ddechrau mis Ebrill 2022, roedd 413 o contractau deintyddol ar waith ar draws Cymru; mae 26 o'r contractau hynny wedi cael eu terfynu am amrywiaeth o resymau megis ymddeoliad, gwerthu'r practis, a phractisau'n dewis symud i ddarpariaeth breifat yn unig. Yn y rhan fwyaf o achosion lle mae contractau wedi cael eu hamrywio neu eu terfynu, mae'r Byrddau lechyd wedi ail-gomisiynu gwasanaethau yn eu lle, neu maent yn y broses o wneud hynny. Mae hyn yn dangos bod digon o barodrwydd i ymgymryd â chontractau'r GIG. Wrth gwrs, mae'n cymryd amser, ac nid oes modd osgoi'r bwlch a fydd yn codi yn y ddarpariaeth tra bod y broses gaffael yn cael ei chynnal.

Fel rhan o'r gwaith o adfer gwasanaethau, rydym yn gweithio gyda'r Byrddau lechyd i gynnwys mesurau ar gyfer sicrhau bod practisau deintyddol yn gweld cleifion newydd. Rwyf wedi ymrwymo i gynyddu mynediad i gleifion newydd fel rhan o'r gwaith o ddiwygio'r ddarpariaeth ddeintyddol, ac ers mis Ebrill 2022, mae bron 246,000 o gleifion newydd ledled Cymru wedi cael mynediad at ddeintydd sy'n darparu gwasanaeth y GIG. At ei gilydd, derbyniodd dros 1 filiwn o bobl ofal deintyddol y GIG drwy'r gwasanaeth deintyddol cyffredinol y llynedd, a darparwyd dros 1.3 filiwn o gyrsiau o driniaeth. Os oes angen triniaeth ddeintyddol frys ar glaf, neu os yw'r claf mewn poen, mae darpariaeth yn ei lle i ddarparu gofal yn gyflym. Byddwn yn parhau i fuddsoddi mewn gwasanaethau deintyddol mewn modd sy'n parhau i gynyddu mynediad i gleifion newydd, ond gallai fod oedi cyn i apwyntiadau ar gyfer gofal rheolaidd ddod ar gael mewn rhai ardaloedd lleol.

Mae'r gweithlu'n rhan allweddol o'r ymdrechion i wella mynediad at ofal deintyddol y GIG, ac rydym yn gweithio i nodi a chreu cyfleoedd arloesol i ehangu sgiliau a gwella llwybrau gyrfa ym maes deintyddiaeth er mwyn sicrhau bod y cyfle i weithio yng Nghymru yn fwy deniadol. Mae Addysg a Gwella Iechyd Cymru yn parhau i ganolbwytio ar weithio gyda rhanddeiliaid i gynnal ffocws ar recriwtio a chadw'r gweithlu deintyddol yng Nghymru. Yn ddiweddar iawn, mae wedi lansio cynllun i gymhell hyfforddeion deintyddol i weithio mewn practisiau deintyddol yn ardaloedd gwledig Cymru, yn hytrach nag yn yr ardaloedd trefol mwy poblogaidd. Bydd hynny'n helpu i wella mynediad at ofal y GIG i bobl yng nghefn gwlad Cymru.

Mae'r cymysgedd o sgiliau hefyd yn gallu chwarae'r ôl bwysig yn y ddarpariaeth o ofal deintyddol y GIG, ac mae'r rhaglen ddiwygio wedi tynnu sylw at fanteision sicrhau bod cydbwysedd o ran sgiliau'r tîm deintyddol er mwyn ei alluogi i ganolbwytio ar atal. O fis Ebrill 2023, gall therapyddion deintyddol, hylenwyr deintyddol a thechnegwyr deintyddol clinigol agor a chau cyrsiau o driniaeth y GIG, sef rhywbeth sy'n cynyddu capasiti ein gweithlu presennol.

Yn gywir,



Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

P-06-1365 Ailagor llinellau rheilffyrdd i gysylltu gogledd a de Cymru

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/6946-2

Rhif y ddeiseb: P-06-1365

Teitl y ddeiseb: Ailagor rheilffyrdd i gysylltu gogledd a de Cymru

Geiriad y ddeiseb:

Mae'r daith rhwng gogledd a de Cymru bob amser yn un hir, yn enwedig wrth ddefnyddio'r rheilffyrdd. Mae teithio ar y trêr rhwng Bangor a Chaerdydd yn golygu bod rhaid i rywun fynd y tu allan i Gymru i allu cyrraed pen y daith.

Mae angen i'r rheilffyrdd gysylltu Cymru yn fewnol. Y cynllun ar gyfer gwneud hyn fyddai ailagor llinellau Bangor - Afon-wen ac Aberystwyth i Gaerfyrddin, ac integreiddio'r rhain â lein y Cambrian, a'r lein o Gaerfyrddin i Gaerdydd.

Dyma'r hyn y mae'r ddeiseb hon yn galw'n benodol amdano:

- Astudiaeth Cwmpasu a Dichonoldeb ar gyfer y lein rhwng Bangor ac Afon-wen



- Ymrwymiad i wario unrhyw arian a geir gan San Steffan ar gyfer y rheilffyrdd ar adfer Ilinellau rheilffyrrdd.
- Datblygu glasbrint o'r llwybr rheilffordd rhwng Bangor a Chaerdydd o ran y llwybr arfaethedig
- Edrych ar lwybrau eraill o fewn Cymru y byddai eu hailagor yn fuddiol ar lefel genedlaethol ac ar lefel leol

Os ydym am ddatblygu seilwaith Cymru, a defnyddio dull gwyrddach o deithio, byddai adfer ac ailagor y rheilffyrdd hyn yn gam i'r cyfeiriad cywir a fyddai hefyd o fudd nid yn unig i bob cymuned ar hyd y rheilffordd, ond i Gymru fel gwlad.

1. Y cefndir

Ar wahân i Linellau Craidd y Cymoedd, a drosglwyddodd i berchnogaeth Llywodraeth Cymru yn 2020, nid yw'r seilwaith rheilffyrdd wedi'i ddatganoli yng Nghymru. Er bod gan Lywodraeth Cymru bwerau i fuddsoddi yn y rheilffyrdd, nid yw Cymru yn cael dyraniad grant bloc.

Cafwyd nifer o ddadleuon yn awgrymu nad yw seilwaith rheilffyrdd Cymru yn cael ei ariannu'n ddigonol - yn fwyaf diweddar mewn perthynas â phenderfyniad Llywodraeth y DU i gategoreiddio prosiect HS2 yn brosiect ar gyfer Lloegr a Chymru. Yn 2021, gwnaeth Pwyllgor Materion Cymreig Tŷ'r Cyffredin gyfres o argymhellion yn dilyn ei 'ymchwiliad i'r seilwaith rheilffyrdd yng Nghymru'. Roedd hyn hefyd yn cynnwys argymhelliaid i gategoreiddio HS2 fel prosiect ar gyfer Lloegr yn unig.

Yn 2019, wrth alw i'r seilwaith rheilffyrdd gael ei ddatganoli'n llawn, cyhoeddodd Llywodraeth Cymru 'Rheilffordd i Gymru', yn cyflwyno'i gweledigaeth ar gyfer y rhwydwaith rheilffyrdd. Rodd hyn yn cynnwys datblygu nifer o goridorau strategol a oedd yn cynnwys cysylltiad rwng y gogledd a'r de. Awgrymodd y gallai hyn gynnwys uwchraddio rheilffyrdd, ailagor rheilffyrdd ac adeiladu rheilffyrdd newydd.

Mewn blog y gyhoeddodd yn 2021, awgrymodd Trafnidiaeth Cymru fod y ffaith nad oes rheilffordd yn cysylltu'r gogledd a'r de heb groesi'r ffin i'w briodoli i ddaearyddiaeth a hanes Cymru. Dywedodd hefyd na fyddai'n ddigon adfer yr

hen reilffyrdd drwy ganolbarth a gorllewin Cymru (fel y mae'r deisebydd yn galw amdano). Awgrymodd:

...the routes would not be suitable for a north-south intercity service, because their meandering nature would mean journey times would be far longer than via the current route. As well as this, the former track beds of these routes were sold off and redeveloped in many places, making rebuilding of the old railway almost impossible.

Mae'r deisebydd yn galw'n benodol am i'r lein rhwng Afonwen a Bangor a'r lein rhwng Aberystwyth a Chaerfyrddin ailagor. Yn ei Gynllun Busnes ar gyfer 2023-24, mae Trafnidiaeth Cymru yn dweud y bydd yn:

...continue to investigate measures that can be implemented to further protect the former rail corridor between Carmarthen and Aberystwyth and Bangor and Afon Wen. We'll work with local authorities and the [Corporate Joint Committees] to have the routes recognised within their Regional Transport Plans.

Y lein rhwng Aberystwyth a Chaerfyrddin

Mae Llywodraeth Cymru wedi ystyried cyn hyn pa mor ymarferol fyddai ailagor y lein rhwng Aberystwyth a Chaerfyrddin.

Yn 2018, cyhoeddodd astudiaeth dichonoldeb yn ystyried costau a buddiannau ailagor y lein. Yr amcangyfrif oedd y byddai'n costio £775 miliwn at ei gilydd ar sail prisiau 2017.

Mewn cyfarfod o bwyllgor craffu Cyngor Sir Ceredigion ym mis Ebrill 2023, awgrymodd yr Athro Stuart Cole ei bod yn dra annhebygol, ar sail yr amcangyfrif o'r gost, y byddai'r rheilffordd yn cael ei datblygu yn ystod y 30-40 mlynedd nesaf.

Y lein rhwng Bangor ac Afonwen

Yn 2020, cyhoeddodd Llywodraeth Cymru fap yn dangos ei huchelgais ar gyfer prif linell Gogledd Cymru. Roedd yn cynnwys ymrwymiadau o ran gwraith, dyheadau tymor byr a chynigion eraill yn amodol ar ddatblygu achos busnes manylach. Roedd hyn yn cynnwys lein rhwng Bangor a Phorthmadog, a oedd ymhliith y 'cynigion ychwanegol.'

Fel y clywsom ar y cyfryngau, cododd hyn obeithion ymgyrchwyr y byddai'r lein rhwng Bangor ac Afonwen yn cael ei hailagor.

Yn 2020, sefydlodd Llywodraeth y DU y 'gronfa adfer eich rheilffordd' i ddarparu cyllid ar gyfer syniadau cychwynnol i ystyried opsiynau i adfer hen gysylltiadau rheilffyrdd coll. Ym mis Mehefin 2022, dangosodd y diweddaraf am y rhaglen fod Llywodraeth Cymru wedi cyflwyno cais yn ymwneud â'r lein rhwng Bangor ac Afonwen, ond afluwyddiannus fu'r cais (gweler Atodiad C).

2. Camau a gymerwyd gan Lywodraeth Cymru

Pan baratowyd y papur hwn, nid oedd ymateb i'r ddeiseb wedi dod i law gan Lywodraeth Cymru. Mae'r camau perthnasol a gymerwyd gan Lywodraeth Cymru wedi'u cynnwys yn yr adran uchod yn rho'i'r cefndir.

3. Camau a gymerwyd gan Senedd Cymru

Mae'r ffaith bod y rhai sy'n mynd yn ôl ac ymlaen rhwng gogledd a de Cymru yn gorfol teithio drwy Loegr wedi'i godi yn aml yn y Senedd.

Ym mis Tachwedd 2020, gofynnodd Llyr Gruffydd AS i Ken Skates AS, Gweinidog yr Economi, Trafnidiaeth a Gogledd Cymru ar y pryd, pa gymorth y gallai Llywodraeth Cymru ei gynnig ar gyfer cynllun i ailagor y lein rhwng Bangor ac Afonwen. Mewn ymateb, cyfeiriodd y Gweinidog ar y pryd at yr astudiaethau amrywiol a oedd yn cael eu cynnal yn ystyried cysylltiadau rhwng gogledd a gorllewin Cymru,

Mae'r syniad o ailagor y lein rhwng Aberystwyth a Chaerfyrddin hefyd wedi'i godi'n aml yn y Senedd. Ym mis Mehefin 2022, gofynnodd Natasha Asghar AS am y wybodaeth ddiweddaraf a chafodd ymateb gan Lee Waters AS, y Dirprwy Weinidog Newid Hinsawdd:

The Aberystwyth to Carmarthen Feasibility Study published in 2018 estimated the cost of reinstatement of the line at £775m. Following the publication of the study, we identified the west coast line, including Aberystwyth to Carmarthen, as a key strategic corridor development in our response to the UK Government's Williams Rail Review. This was part of a clear, comprehensive and conclusive case for full rail devolution and a fair funding settlement.

Yn fwy diweddar, ym mis Hydref 2023, cyflwynodd Deleyth Jewell AS gwestiwn ysgrifenedig yn ymwneud â'r lein rhwng Aberystwyth a Chaerfyrddin. Pan baratowyd y papur hwn, nid oedd ateb wedi dod i law gan y Dirprwy Weinidog.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddu o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.

**P-06-1365 Ail-agor llinellau rheilffordd i gysylltu gogledd a de Cymru,
Gohebiaeth – Deisebydd i'r Pwyllgor, 08.11.23**

At sylw aelodau'r pwyllgor deisebau

Rwy'n falch iawn o weld bod y ddeiseb i 'Ail-agor llinellau rheilffordd i gysylltu gogledd a de Cymru' wedi cyrraedd y pwyllgor deisebau gydag agos i 13,000 o lofnodion. Mae'r ymgyrch yma'n un sy'n bwysig iawn imi, fel rhan o'r ymgyrch mi gerddais ran fwyaf o'r ffordd o Fangor i Gaerdydd, gan ddechrau drwy ddilyn yr hen Iwybr trêñ o Fangor i Afon wen, yna dilyn llinell y Cambrian lawr i Aberystwyth, wedyn cerdded yr hen reilffordd rhwng Aberystwyth a Chaerfyrddin, ac yna cerdded rhan fwyaf o'r ffordd rhwng Caerfyrddin a Chaerdydd (bu'n rhaid imi ddal y trêñ yn Llanelli hyd at Ben-y-bont ar Ogwr gan fod fy nhraed wedi anafu'n ddrwg ar y daith). Gorffennais y daith o flaen y Senedd ar y 27ain o Fedi - cerddais 206 o filltiroedd i gyd dros 10 diwrnod.

Mae'r ymgyrch yma'n allweddol felly at ddyfodol Cymru, yn bennaf i'r nifer o bobl yng Nghymru sy'n gorfol teithio rhwng y gogledd a'r de er mwyn cael gwaith, a hefyd er mwyn cryfhau'r cymunedau gwledig sy'n wasgar ar hyd y gorllewin, a chryfhau'r iaith, gan fyddai'r rheilffordd yn mynd trwy gadarnleoedd y Gymraeg. Yn bennaf, yr hyn rwy'n gobethio gweld yn digwydd yw cael astudiaeth dichonoldeb a sgôp ar y llinell rhwng Afon wen i Fangor, fel cafwyd ar linell Caerfyrddin i Aberystwyth agos i ddegawd yn ôl, a hefyd astudiaeth yn edrych ar y beth fydd effeithiau cael rheilffordd yn cysylltu Cymru'n fewnol o'r gogledd i'r de.

Mae'n bwysig hefyd nodi bod ailagor rheilffordd Bangor - Caernarfon wedi bod yn rhan o strategaeth Llywodraeth Cymru ers dros ugain mlynedd bellach, a bod y dirprwy Weinidog wedi cadarnhau bod achos busnes cryf i'r cynllun yma. Mae'n allweddol rŵan bod astudiaethau yn cael ei wneud ar y rheilffordd rhwng Bangor ac Afon-wen. Gyda'r datblygiadau diweddar gydag HS2 mae'n dod yn glir bod arian yn ddyledus i Gymru fel rhan o fformiwla Barnett, ac er bo'r Gweinidog yn San Steffan yn dadlau bod HS2 dal yn brosiect sy'n dod a budd i Gymru, er bod hi'n glir nad ydi hynny'n wir, mae'n amlwg mai mater o amser bydd hi hyd y bod arian yn mynd i fod yn dod i gefnogi cynllun fel hyn. Gallai hyn felly olygu bod angen dechrau'r astudiaethau cyn gynted ac sy'n bosib er mwyn paratoi at hynny.

Trawslink Cymru sydd wedi bod yn ymgyrchu dros y blynnyddoedd dwythaf er mwyn cael astudiaethau o'r llinellau yma, felly mae gwybodaeth ganddynt hwy wedi cael ei atodi fel rhan o'r llythyr yma. Gwelir astudiaeth achos strategol isod.

I nodi hefyd fel pwynt o wybodaeth, mae deiseb sydd wedi cael ei redeg hefyd gan Traws Link Cymru wedi cyrraedd 18,000 o lofnodion dros y blynnyddoedd, sy'n golygu bod 30,000 wedi arwyddo'r ddau yn gyfangwbl er mwyn cefnogi ailagor y rheilffordd.

Edrychaf ymlaen at glywed y drafodaeth - ac os bod angen i mi gerdded o Fangor i Gaerdydd eto er mwyn amlygwyd y mater yma, byswn yn gwneud hynny ganwaith a mwy eto.

Mae cyfyngiadau ar y ddogfen hon



Traws Link Cymru

West Wales Rail Campaign

Ymgyrch Rheilffordd Gorllewin Cymru

A NEW STRATEGIC RAIL CORRIDOR FOR WEST WALES



September 2020

Front cover: Train leaving Carmarthen station

Contents

1	Background and Context	1
2	The West Wales Rail Corridor Line and Welsh Government Policy	3
2.1	Introduction	3
2.2	Welsh Transport Strategy 2008	3
2.3	Well-Being of Future Generations (Wales) Act 2015	4
3	The New Railway Line	5
3.1	Introduction	5
3.2	Type of Rail Line to be Installed	5
3.3	Rail Construction Standards	6
4	Aberystwyth to Carmarthen Scoping Study	7
5	Aberystwyth to Carmarthen Feasibility Study	8
6	The Social, Economic, Cultural and Strategic Case for Re-opening the Aberystwyth to Carmarthen Railway	8
6.1	Introduction	8
6.2	Population and Passenger Numbers	9
6.3	Demand for Public Transport	10
6.4	Inter- and Intra-regional Connectivity	11
6.5	Transport Poverty	11
6.6	Environmental Benefits	11
6.7	Road Safety and Road Maintenance	11
6.8	Rural Sustainability and Development	12
6.9	Population Structure and Stabilisation	12
6.10	Inward Investment	12
6.11	Health Service Provision	13
6.12	Universities and Colleges	13
6.13	Schools	14
6.14	The Welsh Language	14
6.15	Tourism	14
6.16	Freight	15
6.17	Other Businesses Benefitting from Re-opening of the Line	16
7	The Borders Railway: An Analogue for the Aberystwyth to Carmarthen Railway	16
8	Comments on the Mott MacDonald Feasibility Study	17
8.1	Methodology Used to Calculate BCR	17
8.2	The Chandler/KBS Capital Cost Estimate	18
8.3	Comparison of the Chandler/KBS's Capital Cost Estimate with Other Rail Projects	18
8.4	Consequence of Applying Network Rail Standards	19
8.5	Condition of Existing Track-bed and Associated Slopes	19
8.6	Population Figures Used to Calculate Train Journeys	20
8.7	The Gwili Railway	21
8.8	Freight	22
9	Traws Link Cymru's Proposed Modifications to Figures Used in the Mott MacDonald Feasibility Study	22
9.1	Additional Benefits from Increased Passenger Catchment Area	22
9.2	Revised Capital Cost Estimate	24
10	Conclusion	25
11	Appendices	26
11.1	Population Figures for Enlarged Catchment Areas	26
11.2	Assumptions Used for Revised Capital Cost Estimate	27
12	References and Websites	28

1. Background and Context

On the basis of a range of socio-economic indicators West Wales is one of the most deprived areas of the United Kingdom. This has been recently highlighted in *Ceredigion and Powys Collaboration: A Vision for Growing Mid Wales*, May, 2020, which points to the poor GDP (Gross Domestic Product) and GVA (Gross Value Added) within these two counties; a declining and ageing population; market failure; low pay and rural poverty. Most concerning is the projected economic decline of 3.45% during the period 2018-2040 against a projected growth in the UK economy as a whole of 7.4%. Yet this region, along with the adjacent county of Carmarthenshire, has considerable potential in terms of tourism and agriculture; it has an employment pool that could service a wide range of small and medium-scale industries; it has three university campuses and several linked colleges of further education on seven campuses; it has the National Library of Wales; the Royal Commission for Ancient and Historic Monuments; the headquarters of the S4C television channel; and it has a rich and diverse cultural history.

Unlocking this potential requires considerable inward investment, vision and planning, but a major requirement is a significant improvement in transport network, both within the region itself, as well as outward to the nearby urban centres of South Wales, the English Midlands, and Merseyside and Manchester. Poor transport connectivity and access to markets and services has been recognised as a major infrastructural weakness by previous economic assessments (see, for example, *Framework for Action Plan* produced by the *Growing Mid Wales Partnership*, 2016, and *Rural Wales – Time to Meet the Challenge*, 2017, by Baroness Eluned Morgan). Currently, the road system in Mid- and West Wales in particular is inadequate for the region's needs, and while the existing railway links eastwards from Bangor and Aberystwyth, and east and west from Carmarthen, are both well-used, they do little to improve regional connectivity (Figure 1).



Figure 1. A road/rail map of Wales showing the large gap between Aberystwyth and Carmarthen with no railway connection and no major roads. This means that the whole area is particularly poorly served by public transport. From Welsh Infrastructure Investment Plan for Growth and Jobs, 2012. Welsh Government, Cardiff.

For the past seven years, Traws Link Cymru (hereafter abbreviated to TLC) has been campaigning to re-instate the 90 km-long railway line between Aberystwyth and Carmarthen, which was closed to passengers in 1965 under the programme of Beeching Cuts to the British rail network. It is TLC's contention that the re-opening of this line could be a major driver in the economic and social regeneration of Mid- and West Wales. It would link a number of small towns between Aberystwyth and Carmarthen along a north-south axis (Llanilar, Tregaron, Lampeter, Llanybydder, and Pencader), while providing easier access to the major population centres of South Wales and beyond. However, TLC also envisages that, in due course, the 44 km-long North Wales rail connection between Afon Wen and Bangor would be restored which would complete the rail link between North and South Wales along the western fringe of the country (Figure 2). Quite apart from the considerable economic benefits that this would bring to West and North-west Wales as a whole, a railway line running from Bangor in the north to Carmarthen in the south would be of wider significance as this western 'Rail Corridor' would not only provide an important transport link between industrial South Wales and the rural north, but would also bind the country together to produce a more integrated Wales. As such, a new railway line would have considerable strategic significance.

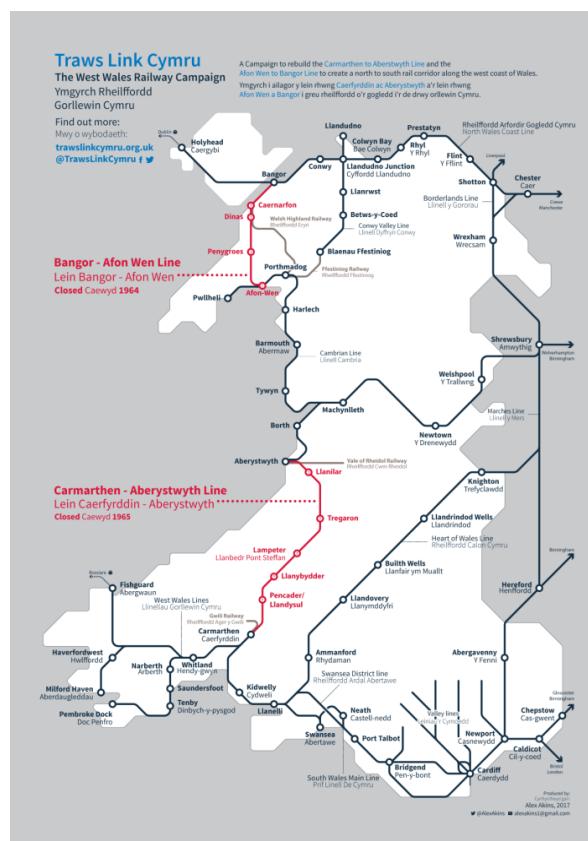


Figure 2. The Traws Link Cymru map showing the proposed new railway lines connecting North and South Wales to create a strategic West Wales Rail Corridor.

In this document we set out the arguments for re-opening these railway lines, initially in the context of recent Welsh Government Policy, and subsequently in terms of the social, economic and other benefits that we see the new railways bringing to West and North-west Wales. Although rebuilding the northern section of the line has always been a long-term ambition of TLC, the focus of the campaign to date has been exclusively on the Aberystwyth to Carmarthen section of the proposed Rail Corridor. Indeed, both a Scoping Study (2015) and a Feasibility Study (2018) have been undertaken to assess the viability of re-opening this particular stretch of line (see sections 4 and 5). Accordingly, much of the detail in the

following pages relates specifically to the Aberystwyth to Carmarthen line and we would envisage that this part of the Rail Corridor would be the first to be constructed.

2. The West Wales Rail Corridor and Welsh Government Policy

2.1 Introduction

The proposed re-opening of the Aberystwyth to Carmarthen railway is fully in line with two key areas of Welsh Government Policy: **The Welsh Transport Strategy, 2008**, and the **Well-being of Future Generations (Wales) Act, 2015**.

2.2 Welsh Transport Strategy, 2008

This document, also titled ‘One Wales: Connecting the Nation’, sets out the Government’s Transport Strategy which focuses on three distinct, but inter-linked, long-term outcomes: **Social, Economic and Environmental**. Under ‘Social’, the strategy identifies improved access to health care; improved access to education, training and lifelong learning; improved access to shopping and leisure facilities; the encouragement of healthy lifestyles; and improving the actual and perceived safety of travel. In the ‘Economic’ category, we find: improved access to employment opportunities; improved connectivity within Wales and internationally; improving the efficient, reliable and sustainable movement of people; improving the efficient, reliable and sustainable movement of freight; and improved access to visitor attractions. Finally, under ‘Environmental’ the following are listed: an increase in the use of more sustainable materials; reduction in the contribution of transport to greenhouse gas emissions; adaption to the impacts of climate change; reduction in the contribution of transport to air pollution and other harmful emissions; reducing the impact of transport on the local environment; reducing the impact of transport on our heritage; and improving the impact of transport on biodiversity.

The re-opening of the railway lines in West and North-west Wales and the creation of a new Rail Corridor would contribute to all of the core elements in the Transport Strategy as set out above. The rail links would clearly enhance connectivity both regionally, and nationally; they would improve international connections, for example to airports in Cardiff, Bristol, Birmingham, and Manchester and to the ferry ports along the Irish Sea coast; they would promote greater social inclusion, offering a viable means of public transport for those in transport poverty; they would provide better access to health care and education, and to shopping and leisure facilities; they would help stabilise the population in rural areas by providing new forms of employment; and they would enhance commuting potential from rural areas to urban centres. In addition, by reducing the numbers of cars on the roads, they would reduce traffic congestion and accidents and therefore provide a safer form of transport. They would also provide a more rapid and efficient transport link between the major centres of population in West and South Wales, and would enhance the tourist attraction of West Wales by improving access to visitor attractions. Above all, by providing a more environmentally-friendly form of transport, they will make a significant contribution to the reduction in emissions of carbon dioxide and other pollutants associated with road vehicles.

In the introduction to the Strategy Document, five key areas where the Welsh Government needs to make substantial progress in the development of a viable transport strategy are listed:

1. reducing greenhouse gas emission;
2. improving public transport and better integration between modes;

3. improving links and access between key settlements and sites across Wales and strategically important all-Wales links;
4. enhancing international connectivity;
5. increasing safety and security.

The re-opening of the Carmarthen to Aberystwyth and Afon Wen to Bangor railway lines meets every one of these core aims of the Welsh Government's Transport Strategy.

2.3 The Well-being of Future Generations (Wales) Act, 2015

The central theme of this Act is the improvement of the social, economic, environmental and cultural well-being of Wales. Its aim is to encourage public bodies to think more about the long-term, work better with people and communities and each other, look to prevent problems, and take a more 'joined-up' approach. The Act notes that Wales faces a number of challenges now and in the future, such as climate change, poverty, health inequalities, jobs and growth, and in order to give future generations a good quality of life, careful thought has to be given as to how decisions made now will impact on them. This Act will ensure that the public sector does this. It is an important piece of legislation that will inform all future decisions-making within the public sector in Wales.

The Act sets out seven well-being goals:

- 1. A prosperous Wales:** An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- 2. A resilient Wales:** A nation which maintains and enhances a bio-diverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- 3. A healthier Wales:** A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- 4. A more equal Wales:** A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- 5. A Wales of cohesive communities:** Attractive, viable, safe and well-connected communities.
- 6. A Wales of vibrant culture and a thriving Welsh language:** A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- 7. A globally responsible Wales:** A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being and the capacity to adapt to change (for example climate change).

As is the case with the aims of the Welsh Transport Strategy discussed above, the re-opening of the Aberystwyth to Carmarthen rail link would make significant contributions to many of the Well-being goals listed above. These include reduction in carbon footprint (goals 1, 2 and 7); an increase in regional prosperity (goals 1 and 4); enhanced connectivity to improve, for example, health care and education provision (goal 3) and intra- and inter-regional linkages (goal 5); and improved transport links that would bring social, cultural (including the Welsh

language), and economic benefits to West Wales (goals 4, 5, 6 and 7). Insofar as all the major public bodies in Wales now have a statutory duty to work towards the seven goals described above, it is encouraging to see that, in very broad measure, the proposed new rail links already fulfil the aspirations of the Well-being of Future Generations (Wales) Act. Indeed, this appears to be acknowledged in the recent policy paper from the Welsh Government, *A Railway for Wales, Meeting the needs of future generations, 2019*, which outlines a programme to meet the needs of future generations in terms of rail transport provision, and which specifically targets new strategic corridor developments, including enhanced north-south connectivity along the western margins of Wales (Figure 3).

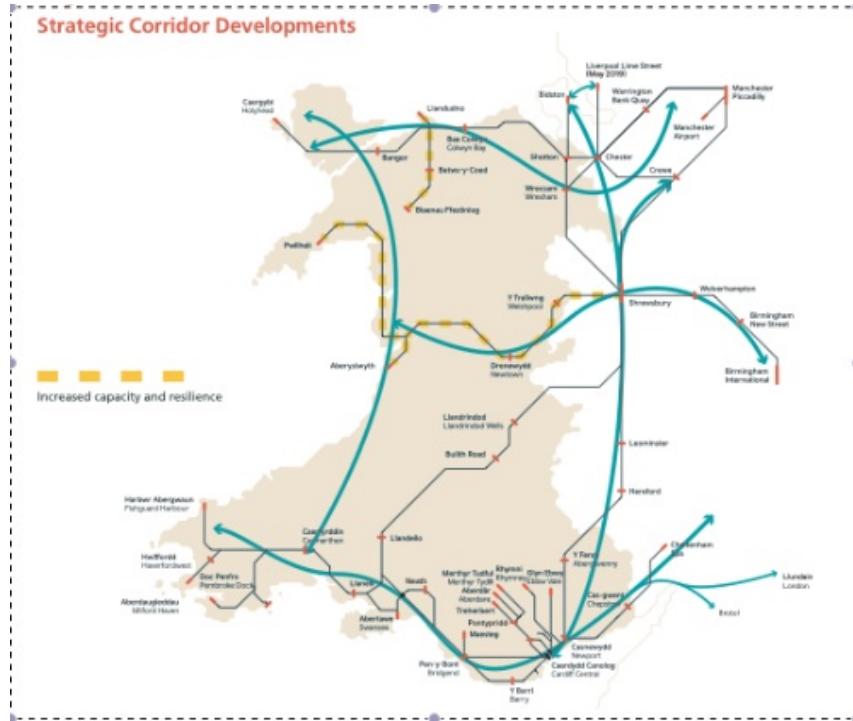


Figure 3. Future strategic rail corridor developments as set out in ‘A Railway for Wales: Meeting the needs of future generations, 2019’. These include a West Wales corridor from Ynys Mon to Swansea, Carmarthen and South Wales which may include upgraded lines as well as re-opened lines.

3. The New Railway Line

3.1 Introduction

TLC’s proposal is to re-install the rail connection between Aberystwyth and Carmarthen, wherever possible along the old alignment. This rail connection ceased passenger operations in 1965. All remaining freight operations finally ceased in 1973, after which the tracks and other infrastructure were removed. Apart from subsequent road and housing developments at both the Aberystwyth and Carmarthen ends of the line, almost the entire track-bed (97%) of the former rail line is still intact. Where deviations from the old track alignment are required, these are covered in Sections 4 and 5 of this document.

3.2 Type of Rail Line to be Installed

There have been proposals that the line could be re-instated as a “light railway”, possibly with the use of tram/trains. Similar proposals have been adopted elsewhere in the UK for disused or under-utilised suburban rail lines adjacent to major cities, and have been incorporated into

“metro” schemes. In some cities these schemes can also incorporate street running to gain access to city centres.

Whereas a light rail system with tram/trains can negotiate steeper gradients and tighter curves than a conventional heavy rail system, this situation does not arise in the case of the Aberystwyth to Carmarthen line. The gradients and curves already exist and were originally designed for a heavy rail line, which carried both passenger and freight trains for over 100 years.

If a light rail system were to be installed for the Aberystwyth to Carmarthen line, there would be some savings in the initial construction costs, as bridges could be designed for a lighter load, less ballast may be required and a lighter gauge of rail line could be used. It might also be argued that with a light rail system “*at grade*” road crossings could be allowed, but it could also be argued that some “*at grade*” crossings should even be allowed for a heavy rail system in a rural setting.

The cost savings if a light rail scheme were adopted would not be significant compared with the total cost of the whole project. Furthermore, any savings in the engineering cost would be more than off-set by having to buy dedicated tram/trains as well as providing a special servicing and stabling depot. In addition, most tram/trains are electrically powered, which if adopted for the Aberystwyth to Carmarthen line would add significantly to the cost.

A huge downside of opting for a light rail system would be the lack of connectivity at both the Aberystwyth and Carmarthen ends of the line. TLC’s proposal is for an integrated rail system with direct rail connections, initially from Aberystwyth and other towns along the line to Swansea and Cardiff, and eventually linking Bangor and Caernarfon directly to South Wales. TLC is also proposing that some freight also be transferred from road to rail. A light rail system would preclude the use of the line for freight.

It is TLC’s firm proposal that the re-installed rail line should be constructed to “heavy rail” standards. TLC considers that a “light rail” system would not be appropriate to the circumstances pertaining in the West Wales corridor.

3.3 Rail Construction Standards

For new rail construction projects Network Rail imposes very strict standards. Amongst these requirements are conditions for the slope angles in cuttings and for embankments. There is also a requirement that there are no “*at grade*” crossings of the rail line, meaning that any crossing must be by way of an over-bridge or under-bridge.

Whilst such strict standards make obvious sense for new projects such as HS2, it is debatable whether these same standards should apply to the re-instatement of a previously operating line in a rural setting.

It is TLC’s opinion that some relaxation should be granted by the Welsh Government to avoid unnecessary excessive expenditure. This relaxation would apply to acceptance of the existing slopes for cuttings and embankments with appropriate remedial measures where necessary, subject to geotechnical examination. It would also possibly apply to some track crossings for farm access and some minor roads, where alternative technology could be considered to ensure safe crossing of the line without the necessity of building expensive bridges.

Had the Aberystwyth to Carmarthen line not been shut down in 1973, Network Rail would have carried on to this day with existing cuttings and embankments, possibly with some localized limited improvement works. Network Rail would have also continued to operate with all the existing level crossings.

By reinstating the railway line to conform with W10 (3.8 m high by 3.3 m wide) or W12 (3.8 m high 3.4 m wide) loading gauge, Hi-cube containers could be carried on standard wagons or, in the case of W12 loading gauge, refrigerated containers. Whilst all new bridges could be constructed to these loading gauges, examination of existing bridges and tunnels would be needed to assess whether they would meet these standards.

In re-instatement the line, provision should be made to ensure that bridges, tunnels and track-bed have sufficient clearance to allow for possible future electrification.

4. Aberystwyth to Carmarthen Railway Scoping Study, 2015

This Study, funded by the Welsh Government (£30,000), was carried out by AECOM. The brief was to provide Technical Advice setting out the issues to be considered under a full Feasibility Study into the re-opening of a heavy rail railway between Aberystwyth and Carmarthen, and a scope, programme and cost for that Study. It noted that over 97% of the approximately 90 km original route remains undeveloped, with the most significant development at the northern (Aberystwyth) end. The core formation, including tunnels, embankments and bridges, generally remain intact. It noted that the original route would not necessarily be the optimum one, although it acknowledged that the topography of the area does not readily lend itself to alternative alignments. However, some divergence from the original route may be necessary to reduce environmental impacts, reduce costs, avoid areas of conservation and sites of scientific interest, and attract more patronage. The topography of the route would largely preclude widening the formation to two tracks and hence a single track line was envisaged.



Figure 4. Aberystwyth station. Built by the Great Western Railway in 1925, it is now a Grade II listed building. On the right is a Transport for Wales train recently arrived via the Cambrian Line from Shrewsbury.

With a number of uncertainties regarding the precise location of the route, it was only possible to give an indicative cost for the rebuilding of the line which could be up to £505 million (2015 prices). Land and consent costs could add a further £250 million bringing the total project costs to around £750 million. It was estimated that a full Feasibility Study could cost in the region of £350,000.

5. Aberystwyth to Carmarthen Feasibility Study, 2018

In 2017, Transport for Wales commissioned the global consultancy company Mott MacDonald to undertake a full Feasibility Study into the re-instatement of the railway line between Aberystwyth and Carmarthen. The Study was funded by the Welsh Government (£300,000) to look into the ‘Case for Change’ in the improvement of strategic connections between Aberystwyth and Carmarthen that had been identified by the *WelTAG Stage 1 ‘Outline Case Report*, November 2016’, and to explore further the opportunities suggested by the previous Route Scoping Study (see section 4).

The Study broadly confirmed the technical feasibility of reinstating a modified route and train service, although a number of challenges were identified. These included crossing part of Cors Caron (an important SSSI, SAC and RAMSAR site); resolution of the flood-risk impacts and potential problems relating to bridge construction on the River Towy in the vicinity of Carmarthen; accommodation of the Gwili Railway Preservation Company; mitigation of extensive flood risks within Flood and Tan15 Development advice zones; property impacts; environment; and consents where the route passes through sites and features protected by statutory designations; and problems relating to ground conditions, residual structures and earthworks.

Subject to satisfactory resolution of these constraints, the Study concluded that the railway could be rebuilt and could provide a regular hourly service between Aberystwyth, Llanilar, Tregaron, Lampeter, Llanybydder, Pencader and Carmarthen, with an end to end journey time of around 85 minutes. With a potential opening year of 2024, initial demand assessments indicated that the re-instated railway could attract up to 370,000 trips in the first year of operation, rising to 425,000 and 489,000 in the assessment years 2027 and 2037 respectively.

A total cost build up of £775 million was envisaged for a single line formation; this included an *optimism bias* uplift of £276 million which is a general risk allowance reflecting HM Treasury/DfT guidance. The Study concluded that while there are no compelling engineering reasons why the railway should not be built, it suggested that low population levels along the line mean that on purely economic grounds the scheme does not present a positive case. Indeed a relatively low BCR of 0.43 was assigned to the project. Hence progression of the scheme would need to be based on wider societal needs and strategic aims, both of which fell outside the remit of the Feasibility Study. It is the contention of TLC that wider societal needs and strategic aims do indeed support the case for reinstating the line, and we explain why this is so in the following section.

6. The Social, Economic, Cultural and Strategic Case for Re-opening the Aberystwyth to Carmarthen Railway

6.1 Introduction

As noted above (section 2.2), the re-opening of the Aberystwyth to Carmarthen rail link is in line with all of the core elements of the *Welsh Government Transport Strategy* of 2008. The importance of good transport networks and connectivity to support economic growth and development in Wales is a key component of policy documents at local, regional and national level and was emphasized as such in the Feasibility Study. These documents include, in addition to the Welsh Government Transport Strategy, the *Network Rail Welsh Route Study*, 2016, *Priorities for the future of Welsh Rail Infrastructure*, 2016, and the *Welsh National*

Transport Finance Plan, 2015. Moreover, the Feasibility Study acknowledged that good public transport connectivity is key to helping rural communities, who may experience deprivation as a result of fewer employment and education opportunities. Economic growth across Ceredigion and Carmarthenshire is therefore dependent on accessibility in terms of the highway network and access to public transport. The re-opening of the Aberystwyth to Carmarthen railway reflects the over-arching policy objectives as set out in these various documents, especially as several highlight the un-sustainability of car use.



Figure 5. The southern terminus of the line at Carmarthen station. On the right is the station at the time of the visit of 60163 Tornado. Steam-hauled excursions frequently terminate at Carmarthen and attract large numbers of visitors to the town.

What was not taken into account in the Feasibility Study, however, was the *Well-being of Future Generations (Wales) Act* (section 2.3). As noted above, this wide-ranging legislation was designed to inform all future decision-making within the public sector in Wales. It was given royal assent on 29 April 2015 and came into effect in April 2016. As such, the aims and objectives that are enshrined in the Act should figure strongly in any assessment of the rationale for re-opening of the Aberystwyth to Carmarthen railway line. Yet Mott MacDonald's Feasibility Study makes no reference to this key piece of legislation. As a consequence, no account was taken of the wider social, cultural, political or strategic context for the line, with the resulting relatively low BCR (0.43) being derived from an algorithm that was based on a narrowly-defined set of economic criteria.

There seems to be some disagreement on the exact dates when the provisions of the Act should apply. It has been claimed that, although the Feasibility Study was published in September 2018, the contract was let before the Act came into effect. However, the provisions of the Act must have been well-known before the terms of reference for the study were agreed and it should have been realized that the Act would apply within the time-scale of the study. Indeed, without addressing the provisions contained in the Act, the overall validity of the Feasibility Study will have been compromised.

In the following paragraphs we examine the wider social, cultural and strategic factors that underpin the case for reopening of the railway. We then look critically at certain aspects of the Feasibility Study itself (see section 8) and propose revisions to some of the cost estimates (see section 9). If these were applied, they would raise the BCR to at least 1.0, which would make the re-instatement of the Aberystwyth to Carmarthen railway line a viable proposition.

6.2 Population and Passenger Numbers

The Feasibility Study took as a basis for the population input into the BCR calculations the 2011 census figures for the settlements along the line. The five towns of Llanilar, Tregaron,

Lampeter, Llanybydder and Pencader have a combined population of around 8000. According to the Feasibility Study, there are a little over 12,000 in Aberystwyth (although the 2011 census shows 18,965) and 14,500 in Carmarthen, giving a combined population of at least 35,000.

However, it is clear that the railway would serve the much wider counties of Ceredigion and Carmarthenshire, whose total populations are around 260,000. If the neighbouring county of Powys, which is linked with Ceredigion in the strategically important Growing Mid Wales initiative (see section 1) is included, a further c. 130,000 potential rail users are added to the passenger pool. Along the entire Western Rail Corridor (Carmarthenshire, Ceredigion and Gwynedd), the population catchment is 384,000. If the population of the district (county) of Swansea (247,000) is included, this increases the total catchment area to around 630,000.

Between Aberystwyth and Carmarthen, there are c. 40,000 students in schools, colleges and universities along the line. There are, in addition, more than 13,000 students on the Trinity Saint David campus in Swansea (see sub-section 6.12), and some 20,000 students at Swansea University who would also benefit from improved rail connectivity in West Wales. Further north, there are over 10,000 university and college students in Bangor. Finally, there is the transient visitor population of business travellers and tourists, many of whom would make use of the line. Data from the Welsh Tourist Board show 2.73 million visitors to Ceredigion in 2018, and 6.39 million to Carmarthenshire. This suggests that the population figures upon which the BCR has been calculated are excessively conservative and that the number of potential rail users is likely to be considerably higher.

6.3 Demand for Public Transport

There is a demonstrable need for public transport in West Wales, as shown by the T1 bus service between Aberystwyth and Carmarthen which, since April 2018, has, carried over 530,000 passengers.



Figure 6. The university in Lampeter (left) and the National Library of Wales, Aberystwyth (right). Opened in 1822 as St David's College, Lampeter is the oldest degree awarding institution in England and Wales outside Oxford and Cambridge. It is now part of the University of Wales, Trinity Saint David. The National Library was founded in 1907 and is the largest library in Wales holding over 6.5 million books and periodicals.

In line with national trends, which indicate an increasing demand for rail transport, both Aberystwyth and Carmarthen stations have shown a marked increase in passenger footfall in recent years. Office of Road and Rail data show that for Aberystwyth, the increase has been 21.65% over the past 15 years (2018/19: 309,000; 2004/5: 254,000), while the figures for Carmarthen show a 30.4% increase (2018/19: 383,386; 2004/5: 294,000) over the same

period. Being on the North Wales mainline, Bangor passenger numbers, are considerably higher; in 2018/19 the footfall was 658,934, with little change from 2013/14 (662,970).

6.4 Inter and Intra-regional Connectivity

The Aberystwyth to Carmarthen railway will re-connect a largely rural area with major centres of population and provide an efficient passenger public transport link between these key regional centres. It will provide significant time savings at peak times when compared with road transport. Park and ride facilities, as at the new Bow Street station on the Cambrian line, and bus feeder services to the new stations will also open up the whole route to a wide catchment area ensuring the benefits are maximised. The Aberystwyth to Carmarthen railway would link with trains to Shrewsbury and Birmingham, westwards to Haverfordwest, Pembroke and Fishguard and south-eastwards to Swansea, Port Talbot and Cardiff, and then on to London. The rail connection to Cardiff and beyond would be further improved by the proposed construction of a new West Wales Parkway station near Felindre; this would provide a direct corridor along the South Wales main line between Carmarthen and Port Talbot, and reduce significantly journey time between west and east Wales (Youle, 2019). These various developments would enable people to travel more easily to Cardiff Airport, Bristol Airport and Birmingham and Manchester airports, and via the new Crossrail hub at Reading to both Heathrow and Gatwick airports. There is also the possibility of a future passenger airport at Pembrey, which would have direct rail access from the Carmarthen to Swansea line.

A further potential benefit would be that congestion into Aberystwyth and Carmarthen will be significantly reduced as the railway will provide a realistic and attractive alternative to the car for commuters, shoppers and students travelling to places of study (see sub-sections 6.12/13).

6.5 Transport Poverty

In Wales, the proportion of households with no cars or vans, is 22.9%, but in Carmarthenshire the proportion without falls to 18.8% and in Ceredigion to 18.39%. Vehicle ownership becomes more of a necessity in many rural areas where there are fewer jobs and poorer public transport provision, but many people struggle to afford a car and have to forgo other necessities in order to run one. This trap of ‘transport poverty’ would be alleviated by a better public transport system and, especially, by a better rail network.

6.6 Environmental Benefits

Research has consistently shown that the carbon footprint from rail is significantly lower than that from road transport. In the UK it is estimated that while transport currently accounts for 26% of all carbon emissions, only 1% of this comes from trains. Indeed, trains are one of lowest emitters of CO₂, releasing 0.046 kg per kilometre each passenger travels, whereas a diesel car is double that at 0.117 kg (Mayers & Bamford, 2020). The re-opening of the Aberystwyth to Carmarthen railway line will therefore offer a more ‘environmentally-friendly’ mode of transport, and will reduce significantly the carbon footprint of transport in West Wales. The re-instated rail link would also ensure that adequate provision is made for future electrification to further reduce carbon emissions in line with Government policy for zero net greenhouse gas emissions by 2050.

6.7 Road Safety and Road Maintenance

The Department of Transport (DoT) has devised an algorithm to value the average cost of reported road accidents, taking into account damage to vehicles and property, insurance

administration costs, police and ambulance costs, the costs of hospital treatment, the direct economic costs of lost output and a quantification of the human costs – pain, grief and suffering to the casualty, relatives and friends. Applying this to road accidents along the route of the Aberystwyth to Carmarthen railway, the full economic costs of road accidents between 2011 and 2015 was £51.3 million (c. £10 million per annum).

While the re-opening of the railway will not eliminate all road accidents and their costs, it might be anticipated that a fast regular train service could be expected to reduce them substantially. Indeed, the experience of the Borders Railway in Scotland (see section 7) is that a re-opened railway can lead to significantly fewer car journeys and, by implication, a reduction in the number of road traffic accidents

A reduction in road traffic should also lead to lower road maintenance costs. Welsh Government figures show that for the two principal arterial roads in West Wales, the A470 and A487, expenditure on safety and resurfacing for the period 2013-2020 was almost £115 million. The re-opening of the rail link between Carmarthen and Aberystwyth, initially, with possible further connection to Bangor via Caernarfon, would divert both passenger and freight traffic away from these roads, thus reducing future maintenance costs.

6.8 Rural Sustainability and Development

The Aberystwyth to Carmarthen railway is the strategic key to unlocking the long-term economic potential of Ceredigion and Carmarthenshire by providing effective access to the labour markets of Aberystwyth and Carmarthen and assisting these two towns to manage their demand for housing by spreading commuter pressure into the hinterland. This will assist the sustainability of the counties by creating the critical mass necessary to maintain the connecting railway services, important institutions (for example Trinity Saint David, University of Wales, Lampeter) and ultimately the local communities.

6.9 Population Structure and Stabilisation

Wales has a higher proportion of people over 65 than England: 18.36% compared to 16.34%. In West Wales the proportion rises to 20.63% in Ceredigion and 20.77% in Carmarthenshire. With an ageing population, public transport becomes even more important.

Wales also has a lower proportion of young adults (18-44): 34.39%, compared to 36.9% in England. This falls to 30.62% in Carmarthenshire, but increases to 36.01% in Ceredigion. The figures suggest that young adults are increasingly leaving the West Wales area to find jobs elsewhere. Wales also has 18.16% of the population aged 15 or under, compared to 18.91% in England. In Ceredigion the figure falls to 14.79%, with Carmarthenshire at 17.96%.

The economic stimulus provided by the new railway would help to reverse the ageing trend of the present population, bringing a new vibrancy to the area. A more efficient transport network provided by the railway will also encourage retention of population in the area. Younger people in particular would be more tempted to remain, which would increase the stability and reduce age imbalance in the regional population.

6.10 Inward Investment

Evidence from the Borders Railway in Scotland (see section 7) suggests that the Aberystwyth to Carmarthen railway line could be a powerful catalyst for inward investment. New businesses could be attracted to Llanilar, Tregaron, Lampeter, Llanybydder and Pencader,

bringing much needed employment to one of the most deprived areas of Wales. The railway will markedly improve the perception of Carmarthenshire and Ceredigion as an area in which to invest.

6.11 Health Service Provision

The line will connect five hospitals: Bronglais (Aberystwyth), Glangwili (Carmarthen), Prince Phillip (Llanelli), Singleton (Swansea), Morriston (Swansea), although there is no reference in the Feasibility Study to hospital provision. Ultimately, the Western Rail Corridor will provide a direct link to Ysbyty Gwynedd in Bangor. The re-opening of the line is strongly supported by the Hywel Dda University Health Board in Ceredigion and Carmarthenshire.

In Ceredigion, the proportion of people with a long-term health problem is 23.2% and in Carmarthenshire is 31.9%. Many such households will be less likely to use private cars, due to infirmity. Improved connectivity between these hospitals by rail would benefit, in particular, the elderly and for those without a car. Even for car owners, the hospitals would be more easily reached without lengthy road trips.

6.12 Universities and Colleges

The fact that a rebuilt line would connect further and higher education institutions along its corridor is an important factor in developing social inclusion, personal development, attainment, and aspiration. Again, given the importance of universities in West Wales (universities provide 20% of employment in Ceredigion and Carmarthenshire), it is surprising that the Feasibility Study is largely silent on students as potential passengers on the line as the re-opened railway will link four university campuses: Aberystwyth, Lampeter, Carmarthen (which now includes the headquarters of the S4C television channel) and Swansea. It will also link further education colleges in Aberystwyth, Carmarthen, Llanelli and Swansea. Ultimately, there will be a direct rail connection between these educational institutions and both the university and further education college in Bangor. In addition, the line will connect Cardiff, Swansea, Carmarthen and Lampeter campuses with the National Library of Wales in Aberystwyth. The new line would be of particular benefit to students at Trinity Saint David, which is based on three campuses (Swansea, Carmarthen and Lampeter). Currently Lampeter is the only university in Wales and England not currently served by a railway line, and the lack of a rail connection has often been cited as one of the reasons for Lampeter's student recruitment problems over recent years.



Figure 7. Two important market towns along the line: Lampeter (left) and Tregaron (right), the latter showing the statue in the town square of the Victorian peace campaigner, Henry Richard.

6.13 Schools

There are two secondary schools in Aberystwyth and two in Carmarthen (one bilingual and one Welsh medium in each case), one in Llandysul near Pencader, one in Lampeter and one in Tregaron. In all, these schools teach more than 6000 students, and there are a further 2700 along the line from Aberystwyth to Bangor. The Tregaron school does not have a sixth form and hence A-level students have to travel either to Lampeter or Aberystwyth. The railway would offer a safe and reliable means of public transport for these students. As with university students, the Feasibility Study makes no mention of school and college students as potential passengers.

6.14 The Welsh Language

TLC has the backing of Cymdeithas yr Iaith Gymraeg (the Welsh Language Society) as the re-establishment of the railway is seen as a way of supporting the language in Ceredigion and Carmarthenshire, both areas having seen an increase between 2008 and 2018 (of 8% and 3% respectively) in people able to speak Welsh. The Welsh Government's aim is for one million Welsh speakers by 2050, and a more stable population within the region would undoubtedly benefit the language by encouraging young Welsh speakers to remain domiciled in the area, while commuting more easily to Aberystwyth, Carmarthen, Swansea and Cardiff for work.

6.15 Tourism

Tourism and recreation is an important part of the Welsh economy, currently generating in excess of £5 billion per year. Recent estimates indicate that revenue from tourism in Ceredigion amounts to around £300 million annually (creating 5700 jobs), and in Carmarthenshire the figures are £441 million and 6176 jobs. The railway would be a further and important boost to the tourist economy of West Wales by bringing more visitors to the area, as has been the case with the Borders Railway in Scotland (see section 7). Indeed, a potential increase in tourist numbers is referred to in the Feasibility Study, although it was noted that in order to quantify the increased numbers, further analysis involving stakeholder consultation is required. Rebuilding of the railway between Aberystwyth and Carmarthen would also provide a substantial encouragement to investment in accommodation and leisure facilities in a very poorly supplied area of outstanding countryside.



Figure 8. Tourist attractions in the Teifi Valley area: Strata Florida, a former Cistercian Abbey near Tregaron, founded in 1164 (left), and the ruins of Newcastle Emlyn Castle which was probably built by the Welsh Lord Mareddud ap Rhys around 1240 (right).

West Wales is popular for a range of outdoor pursuits including hill walking, coastal walking, pony trekking, horse riding, fishing, swimming, coracleing, coasteering, kayaking, surfing, cycling and mountain biking, rock climbing and orienteering. According to Natural Resources Wales, 2015, mountain biking is worth over £23 million to the Welsh economy, while the value of coastal and hill-walking in 2009 was estimated to be £632 million. The re-established railway would give access to the Cardigan Bay Coastal Path which is rated as the second most attractive coastal path in the world. The current Ystwyth Trail would be retained alongside the railway and linked with the Coastal Path. Again, according to Natural Resources Wales, walkers on the Welsh coast spent £84.7 million in 2014, supporting 1000 jobs.

There are numerous National Trust and Cadw properties and other key sites, including Llanerchaeron in the Aeron Valley, Strata Florida Abbey, the large Iron Age hill forts of Pen Dinas near Aberystwyth and Pen-y-Bannau to the north of Tregaron, and Newcastle Emlyn and Aberystwyth Castles. The line also runs alongside the Cors Caron (Tregaron Bog) nature reserve, a SSSI and Ramsar-designated wetland site.

Several preserved full and narrow gauge railways are to be found in West Wales, including the Gwili Railway near Carmarthen and the Vale of Rheidol in Aberystwyth, while further north are the Talyllyn, Ffestiniog and Welsh Highland Railways.



Figure 9. Tourist activity in the Teifi Valley. Cycling on the Ystwyth trail along the old track-bed of the railway line (left); coracles in the river at Cenarth near Newcastle Emlyn (right).

Moreover, the 87 km-long Cambrian Coast Line between Machynlleth and Pwlhelli has itself been described as one of the world's most scenic railways, and has featured in two recent (2019) national TV documentaries by British Broadcaster Channel 5 and by the German Broadcaster SWS. The Cambrian Community Rail Partnership estimates that the line attracted more than 460,000 additional visitors to the region in 2019.

6.16 Freight

A fully engineered heavy railway could also be used for freight transport. This is in line with the Department of Transport's *Rail Freight Strategy* (2016) to move more freight from road to rail. It is envisaged that most of the freight would travel at night, thus avoiding conflicts with daytime and evening passenger services. Potential materials that could be moved by rail include meat products from the abattoir in Llanybydder; milk and cheese from more than 700 dairy producers in Ceredigion and Carmarthenshire; woven wool products from mills that operate close to the line; and domestic waste from the LAS Waste Facility in Lampeter. Food and other domestic products could also be transported by rail, with possible new railway-based retail hubs being developed in West Wales, similar to the Tesco hub at Magor near Cardiff (Wales Route Study, 2016)

An important potential product for rail transport is timber. According to Natural Resources Wales, the Welsh Forestry Sector is worth over £450 million to the economy and employs over 11,000 people in hundreds of small to medium sized rural businesses. It includes forestry logging and related services (£31 million), the manufacture of wood and wood products (£182 million), and pulp, paper and paper products (£201 million). There are two timber businesses along the line and both would welcome the reintroduction of rail transport. In 2005, a six week experiment to supply timber by rail from Aberystwyth to Kronospan Ltd, Chirk, demonstrated the viability of this form of transport. With each train carrying 200 tonnes of timber (equivalent to eight lorry loads), it showed that, over a five-year period, this could remove some 16 million tonne kilometres of timber traffic (4000 lorry loads) from Welsh roads every year.

Another important potential cargo that could be transferred to rail on the re-opened line would be petroleum products from the refinery in Pembrokeshire, or elsewhere in South Wales. The old siding and oil depot are still in existence in Aberystwyth station and could be re-instated. The transport of petroleum products by rail would free up the existing road network from heavy oil tankers on narrow and twisting local roads.

Containers could also be carried on the line, provided the line is constructed to the appropriate loading gauge, reference to which is made in Section 3.3 on page 7.

6.17 Other Businesses Benefitting from Re-opening of the Line

The construction industry in Ceredigion and Carmarthenshire would benefit both during the four years estimated to rebuild the railway, but also from the anticipated expansion in house building, as has occurred in Scotland following the re-opening of the Borders railway (see section 7 below). Businesses in the building supply industry such as Travis Perkins, Jewson and T.L Thomas could see a significant increase in trade. Other specialist suppliers such as Teifi Concrete and several quarries would also see new opportunities to expand. Cambrian Pet Foods Ltd. in Pencader would find new markets open to them and the supply of feeds for farm animals would also be facilitated.

7. The Borders Railway: An Analogue for the Aberystwyth to Carmarthen Railway Line

The 50 km-long Borders Railway between Edinburgh and Tweedbank, which was re-opened in September 2015, is a good analogue for the Aberystwyth to Carmarthen railway line. Its principal effects have been felt in the tourist industry, but there have also been significant economic benefits to the immediate hinterland and to the Borders area as a whole. Passenger numbers for the first year of operation (2015-16) were 1,267,599, almost double the official forecast when the railway was opened, and this figure increased to 1,387,819 in the second year.

The Scottish Tourism Economic Assessment Monitor (STEAM) statistics for the Borders region compared the first half of 2016 to the same period the year before, and these showed that the number of visitor days in hotels/bed & breakfasts had risen by 27%; there was a 20% rise in visitor spend on food and drink; visitor spend on accommodation was up 17%; and the number of days visitors stayed in the Borders increased by almost 11%. Collectively there was an overall increase in visitor spend of 16%, and an estimated 8% increase in employment directly related to tourism.

Data from the *Border Railway Year 2 Evaluation*, 2018, indicated that 15% of users had moved to the region because of the railway, and 52% of those interviewed who had changed their jobs cited the railway as a key factor. Furthermore, it was estimated that around 36,000 car journeys per year were saved because of the railway, while there were 14,000 fewer bus journeys. Of those interviewed during the course of the Transport Scotland survey, 25% stated that they would not have visited the region had it not been for the railway.

The opening of the Borders railway has given a significant boost to the housing market in the region, with the number of house sales increasing by up to 48% in some areas, while 10,000 new homes are set to be built near the rail corridor. In addition, 150 hectares of land adjacent to the railway have been designated for commercial use. At Tweedbank, the southern terminus of the line, a new Central Borders Business Park is being established and plans are in hand for a hotel and retail outlets adjacent to the new station. Indeed, so successful has the Borders Railway project been that funding has now been secured for a Feasibility Study (£10 million from the British and Scottish Governments) to examine the prospects of extending the line southward by 110 km, thereby completing the old Waverley Route through to Carlisle.

In the initial Business Case for the Borders railway, a BCR of 0.50 was assigned to the project, very similar to the figure of 0.43 for the Aberystwyth to Carmarthen line. However, in the final version of the Borders Business Case, there was a significant methodological change with the narrow economic appraisal being replaced by a wider brief that incorporated a broader and socially inclusive methodology. Indeed, three of the four investment objectives within the Business Case were focused on connectivity, accessibility and key social inclusion. Typical attributes that were given a determinable BCR value by utilising this methodology included creating a ‘modal shift from the car to public transport’, and the recognition of increasing levels of social inclusion by making public services more accessible to those who do not have access to a car. When included as sensitivity indices these factors raised the BCR to a viable and healthy 1.3. The experience of the Borders Railway in raising the value of a BCR by stressing connectivity, accessibility and key social inclusion factors as a determinable value in its calculation is a critical dynamic. In this respect the approach taken by the Scottish Government and Transport Scotland stands in sharp contrast to the Mott MacDonald approach for the Feasibility Study on the Aberystwyth to Carmarthen railway line.

8. Comments on the Mott MacDonald Feasibility Study

8.1 Methodology Used to Calculate Benefit/Cost Ratio (BCR)

Because the capital cost estimation was given to another consultant (Chandler/KBS), Mott MacDonald have estimated how much capital the project could afford to achieve a break-even BCR of 1.0. For the recommended hourly train service, the value of benefits used in this calculation is given in Table 34 of the Feasibility Study (page 182), under DS3 line (H) – “Cost Gap allowing for construction inflation”. The figure is £333 million. It is assumed that construction inflation has been added back to the discounted figure in line (G), so that it can be compared with the undiscounted capital cost estimation given by Chandler/KBS.

By dividing the £333 million figure by Chandler’s capital cost estimate of £775 million, a BCR of 0.43 is derived. However, Mott MacDonald’s report gives no explanation as to how the BCR has been calculated, nor does it provide a breakdown of the benefits evaluated to produce the “Cost Gap” figure of £333 million.

8.2 The Chandler/KBS Capital Cost Estimate

Chandler/KBS produced a total cost estimate of £775 million to be used in the Mott MacDonald report. Out of this total figure, only £326 million (direct construction costs plus land & compensation) has been directly estimated from bills of quantities or direct measurement. The remaining 58% of the capital cost estimate has been calculated based on arbitrary percentages or ad-hoc add-ons. Furthermore, it can be seen that, from a direct construction cost of £288 million (which accounts for the visible tangible assets once constructed), there is a huge mark-up of 268% to produce the estimated final project cost.

Apart from costs for design, project management and land purchase/compensation, there seems to be little justification or explanation for these additional costs. A figure of £276 million has been added as “*optimism bias*”. This is required by the Treasury for Network Rail projects. It is based on the historical record of Network Rail in failing to bring in rail infrastructure projects on time and within budget. However, most of these projects were of a far greater complexity than this project. With better design, specification and management of the project during design and construction, this figure seems excessive. Furthermore, under Treasury/DfT guidelines, this “*optimism bias*” could have been reduced from 66% to 18% had a *Quantitative Risk Assessment (QRA)* been carried out. This would have reduced the “*optimism bias*” from £276 million to £90 million, resulting in a reduced total project cost of £589 million, assuming the mean value remained unaltered after QRA.

There are a number of cost items under “*Employer Indirect and Other Project Costs*”, which appear to be payments to Network Rail. As Network Rail is wholly owned by Government, these are not net cash outflows, but internal Government transfers. The same argument can be applied to Chandler’s figure of £28.8 million for “*Overheads and Profit*”.

8.3 Comparison of the Chandler/KBS Capital Cost Estimate with Other Rail Projects

The Chandler/KBS capital estimate works out at a unit rate of £8.6 million per km. The only comparable project in the UK to this project is the Borders Railway in Scotland (section 7). This was completed within budget in 2015 for a cost of £294 million, managed by Network Rail. The route length is 50 km but there are long sections of double track, giving a total track length of 64 km, and there are seven stations (compared with five for this project). This gives a unit rate of £5.9 million per km, which if inflation were added to bring these costs to Mott MacDonald’s base year of 2017, would bring the unit rate to approximately £6.3 million per km. This is a substantial discount (27%) on the Chandler/KBS estimate, and if applied pro-rata to this project, would result in a capital cost estimate of approximately £570 million.

In 2018 the European Commission published a comprehensive study of rail construction costs throughout the EU. The report was entitled “*Assessment of Unit Costs (standard prices) of Rail Projects (Capital Expenditure)*”. Figure 2 on page 11 of that report gives unit cost ranges in millions of euros per kilometre under different types of conventional rail projects.

	Unit Cost (euro mil/km)			Unit Cost (£mil/km)		
	Mean	Max.	Min.	Mean	Max.	Min.
New Lines	8.2	9.5	6.9	7.4	8.6	6.2
Rehabilitation	4.4	7	1.8	4.0	6.3	1.6
Upgrades	6.1	8.7	3.5	5.5	7.9	3.2

Table 1 European Commission Report on Unit Rail Construction Costs

Table 1 summarises these figures, together with those costs converted to £millions per km. The same European Commission report also makes reference to an earlier study of unit rail costs in 2000 by Baumgartner. These give cost estimates of 2 million euros per km with a range of 1-3 million euros per km for “easy topography”. As the Carmarthen route has obviously all been flattened from the original railway construction, this category would apply. With inflation since 2000, this would give a maximum unit cost of £2.7 million per km.

Whilst it could be argued that the capital cost estimate provided by Chandler/KBS may be in line with Treasury guidelines for rail projects undertaken by Network Rail, it is apparent from evidence given above, that this results in estimates significantly above realistic figures in other countries, or even for the Borders Railway in Scotland.

A further current example is the new railway line being constructed in Laos by Chinese construction companies, which is nearing completion, and scheduled to be opened in early 2022. This is a 414 km. single track standard gauge electrified line with a train speed of 160 km per hour, constructed through very demanding topography. Nearly half the total length of the route (47%) has been constructed in tunnels (75 separate tunnels); there are 167 bridges (with 15% of the route on elevated viaducts) and 32 stations. The total cost is US\$6 billion (£4.6 billion at an exchange rate of £1=\$1.30). This equates to a unit cost of £11.1 million per km, which is only 29% higher than Chandler/KBS’s estimate for the Carmarthen-Aberystwyth project, where there is an order of magnitude difference in difficulty and complexity.

8.4 Consequence of Applying Network Rail Standards

Mott MacDonald have assumed that the track-bed profiles must conform with the latest Network Rail standards for new rail projects. They have re-profiled the existing track so that rock slope angles are reduced to 2:1 (63 degrees) and soil slope angles to 1:2 (27 degrees). From Mott Macdonald’s own calculations this will result in 1.2 million cu.m. of additional suitable fill being required to reduce the slope angle of existing embankments. It will also produce 3.8 million cu.m. of cut material, comprising both rock and soil from flattening the angle of all existing cuttings. Some of this excavated cut material may be re-used as fill, depending on relative locations of the fill requirements and sources of the excavated cut material. However, there would still be a large surplus of cut material to be disposed off-site. The cost implications of conforming with these Network Rail standards will be substantial.

Mott MacDonald have also followed the latest Network Rail guidance concerning *at grade* crossings. This means that any crossing of the rail line must be by an under-bridge or over-bridge. Whilst this makes sense where public roads are involved, the substantial additional cost for farm tracks with very limited frequency of use should be queried, when with modern technology it may be possible to use an alternative method to ensure safe crossing at grade.

8.5 Condition of Existing Track-bed and Associated Slopes

The Scoping Study by AECOM indicated that only 4 km out of a total length of 90 km has been lost to development. This would require some diversion of the track from the historical alignment. A whole new alignment and tunnel would be required between Llanbadarn and Llanfarian, at the Aberystwyth end of the line, as well as a new alignment and bridge to join Carmarthen station with Abergwili Junction. There would be minor diversions elsewhere. All new alignments would be constructed to current Network Rail standards. Costs for this work have been included in the Feasibility Study.

The historic problems with the sections of the line adjacent to the Ystwyth River, near Llanilar, and crossing Cors Caron, near Tregaron, have been addressed in the Feasibility Study. Solutions have been proposed and appropriate costs have also been included in the Feasibility Study.



Figure 10. Left; the railway track-bed across part of Cors Caron with the Cambrian Mountains in the background. Right: the south entrance to Pencader Tunnel. At 901m, this is the longest of the three original tunnels along the line and was opened on 1st April 1864

Apart from the short sections referenced in this chapter, the remainder of the track is in a satisfactory condition. Trains operated on this track for over 100 years and it is nearly 50 years since all operations ceased in 1973. The track-bed has been well compacted over time and the associated embankments and cuttings have been well established. The Geotechnical Report, which accompanied the Feasibility Study, did not reveal any significant evidence of slope failure or distress. In the event of minor slope problems along the existing alignment, it would be far cheaper to use appropriate remedial measures (e.g. rock bolting, retaining walls, soil nailing etc.) to locally rectify such problems.

It makes little sense financially to comply with Network Rail current standards for new rail projects, when the existing track profile is adequate for re-instating the rail line. Had the rail line not been shut down in 1973, Network Rail would have carried on to this day with the existing cuttings and embankments, possibly with some localised limited improvement works.

8.6 Population Figures Used to Calculate Train Journeys

The actual population figures used in the Feasibility Study are listed in table 22 on page 159 of the Feasibility Study. With the exception of the population figure given for Aberystwyth, figures for other stations agree with published population figures for those towns. The figure used by Mott MacDonald for Aberystwyth is significantly lower than the published figure. This is confusing; additionally in another part of the report, it states that student population in Aberystwyth is around 10,000 and 2,000 in Lampeter. The published figure of the population for the built-up area of Aberystwyth, which includes Waun Fawr and Penparcau, is 18,965 in the 2011 census, with the estimate for 2018 being 16,248. The actual number of students at Aberystwyth University is currently approximately 8,000.

Mott MacDonald's case for the project being non-viable rests on the low population density along the route. Figure 2 on page 16 of the Feasibility Study shows the weekly forecast journeys for six stations (including Aberystwyth but not Carmarthen) for the year 2024. It compares this with the journeys required to achieve a break-even BCR for a capital cost of £775 million. It also under-lays this graph with the populations of each station.

Mott MacDonald have assumed that train demand falls off almost completely if the station is not within walking distance. Figure 32 on page 139 illustrates a decay curve of demand against distance. Unfortunately, the axes of the graph in the Feasibility Study have not been annotated. However, table 9 on the same page gives figures indicating a demand of between 1% and 29% at a distance greater than 2 km. for a variety of towns, which they have used as a basis for estimating demand over the Carmarthen-Aberystwyth route. These demand figures have been taken from the *Passenger Demand Forecasting Handbook*. The Feasibility Study seems to take no account of demand from the immediate hinterland of each train station, if adequate parking were to be provided or there was a local on-call bus service to link with train departures. This seriously under-estimates the possible demand and is one major reason for the pessimistic conclusion reached in the Feasibility Study.

8.7 The Gwili Railway

A major omission from Mott MacDonald's Feasibility Study is firm proposals, and consequent costs, for how to deal with the Gwili Railway. This is a heritage standard gauge line, which operates on the original Carmarthen-Aberystwyth track-bed between Abergwili Junction and Danycoed via Bronwydd Arms. The operating length of the track is 7 km, although the Gwili Railway has purchased the whole track-bed as far as Llanpumsaint, comprising a total length of 13 km.

The Scoping Study by AECOM did identify the Gwili Railway as a major constraint to progressing the project. AECOM suggested a 3 km diversionary tunnel to by-pass the Gwili Railway, as there is probably insufficient room in the narrow Gwili river valley to accommodate the Gwili line in parallel with the re-instated Carmarthen-Aberystwyth line. Sharing the same track was considered to be technically and commercially very complex and, in all probability, it would not be feasible.

Chapter 3.8 (pages 91-94) of the Feasibility Study does comment on possible alternative options for solving the Gwili Railway problem. The option of a diversionary tunnel, proposed by AECOM, has been discounted on the grounds of cost, although no cost was estimated and it would have been useful to have a comparative cost figure for this option. Mott MacDonald have stated that due to the tunnel length (3 km) and depth below surface (nearly 100 m), a twin-bore tunnel would be required for emergency escape purposes. TLC agrees with this view. Mott MacDonald also agree with AECOM that parallel tracks or a shared track through the Gwili river valley are unlikely to be feasible. Mott MacDonald have concluded that the Gwili Railway Preservation Company should be either financially compensated or otherwise assisted in re-locating the heritage line to another suitable location. However, the Feasibility Study did not investigate any possible alternative locations nor provide any cost figures for such a re-location.

TLC's view is that the most suitable site for re-location of the Gwili Railway would be along the track-bed of the previous line between Carmarthen and Llandeilo. This branches off from the Carmarthen-Aberystwyth line at Abergwili Junction, which is the present southern terminus of the Gwili Railway. TLC considers this option to be preferable to the other possible re-location sites on the closed branch lines to Newcastle Emlyn or to Aberaeron for the following reasons:

- part of the Newcastle Emlyn line is already occupied by the narrow gauge heritage line, Teifi Valley Railway, and unless some agreement could be reached between

- the two heritage railway companies, removal of the Gwili Railway to this line would be complicated;
- the Aberaeron line is quite far removed from the Gwili Railway's present base;
- as the Carmarthenshire County Council have invested funds in the Gwili Railway, it would be politically prudent to keep the railway in Carmarthenshire;
- the southern terminus would remain at the same location as present, Abergwili Junction, and the distance to re-locate Gwili Railway assets to the new site would be relatively short;
- the Gwili Railway could have a direct connection with the existing rail network, which would allow specialist steam excursions to run on the heritage line;
- a joint new station could be built at Abergwili Junction to service both the Gwili Railway and, depending upon the exact location, to facilitate easy access to Glangwili hospital, which is very close-by, for patients/visitors from stations on the Carmarthen-Aberystwyth line.

It is suggested that approximately 13 km of the Carmarthen-Llandeilo track-bed would be purchased and transferred to the Gwili Railway. The project would also finance or undertake itself, as part of the contract for re-instating the Carmarthen-Aberystwyth line, the re-provisioning of all the Gwili Railway's assets to the new alignment.

TLC is aware of current proposals to convert the entire length of the track-bed of the former branch line between Carmarthen and Llandeilo to a cycle track. Cost estimates for this work are indicated at between £5 million and £8 million. This proposal would obviously compromise the ability to transfer the Gwili Railway to this same alignment. However, TLC recommends that the provision of a cycle path should be carried out in tandem with works to re-provision the Gwili Railway, provided there is sufficient width to accommodate both the railway track-bed and the cycle path. If this work were carried out as part of the same contract, it would save a significant amount of money and should satisfy both parties.

8.8 Freight

No reference has been made to the possible future use of the re-instated line to carry freight. In line with the Welsh Government's stated aim of moving freight from the roads onto rail, where possible, and also to reduce greenhouse gases, some investigation should have been carried out to determine possible future revenue from freight business. Bulk transport of petroleum products, timber and possibly milk are obvious targets to look at.

9. Traws Link Cymru's Proposed Modifications to Figures Used in the Mott MacDonald Feasibility Study

9.1 Additional Benefits from Increased Passenger Catchment Area

Analysis of figures from the Borders Railway in Scotland showed that passenger journeys exceeded forecasts by 22% in the first six months of operation and in the second year, there has been a further 9% increase in passenger figures over the first year. In the first six months of operations for stations at the southern end of the line (Tweedbank and Galashiels), the original forecasts grossly under-estimated actual numbers by a factor of 7 (39,546 forecast; 288,511 actual). This was attributed to passengers driving to the station and parking their cars from a wider catchment area, which had not been taken into account in the original feasibility study/business case.

This scenario is very similar to this project and Table 2 shows the additional population that could be considered if an 8-10 km catchment zone were taken into account for each of the stations. The additional towns/villages included in the wider catchment areas for each station are shown in Table 5 in Appendix 11.1.

Station	Population		Additional population within 8-10 km	Total population Within 8-10 km
	Mott report	2018 est.		
Aberystwyth	12,315	16,248	3,405	19,653
Llanilar	1,066	1,075	3,359	4,434
Tregaron	1,183	1,219	2,050	3,269
Lampeter	2,972	3,046	2,835	5,881
Llanybydder	1,596	1,596	2,518	4,114
Pencader	1,066	1,061	4,572	5,633
TOTAL	20,198	24,245	18,739	42,984

Table 2 Additional Population within 8-10 km of Stations

As can be seen from Table 2, by considering an 8-10 km catchment zone for each station, the population is double that used in the Mott MacDonald report. This wider catchment area is considered realistic for a rural area and would involve a car/bus journey of approximately 15 minutes. In figure 2 on page 16 of the Mott MacDonald report, the required weekly journeys to achieve a breakeven BCR with an assumed capital of £775 million are shown for each station. These are also converted into the required population required for each station. This same graphic can be used to estimate the equivalent populations required if a reduced capital expenditure (capex) of £560 million were to be used. These recalculated projections are shown in Table 3.

Station	Population req'd for capex of £560 mil	Population (2018 est.)	% increase pop. req'd for capex £560 mil	Population within 8-10 km	% additional pop. Within 8-10 km
Aberystwyth	19,061	16,248	17	19,653	21
Llanilar	1,613	1,075	50	4,434	312
Tregaron	1,789	1,219	47	3,269	168
Lampeter	4,062	3,046	33	5,881	93
Llanybydder	2,325	1,596	46	4,114	158
Pencader	1,457	1,061	37	5,633	431
TOTAL	30,307	24,245	25	42,984	77

Table 3 Comparison of Population Required for Capex of £560 million with Increase in Population

The figures in the above tables show that to achieve a break-even BCR with a capital expenditure of £560 million, it would require a population increase on Mott MacDonald's own figures of 50%, but if the 2018 estimate of population were used instead, this figure would reduce to 25%. The additional population from an 8-10 km catchment zone is 18,739. Thus, if 32% (6,063) of this increased catchment zone were to use the train that would be sufficient to give a break-even BCR on a reduced capital expenditure of £560 million. As demonstrated with the Borders Railway, this should be easily attainable, provided adequate, free and safe/secure parking facilities were provided at all the new stations

9.2 Revised Capital Cost Estimate

A revised capital estimate has been calculated by TLC taking into account suggested divergences from Chandler/KBS's estimate. This is shown in the following table (Table 4). The assumptions used to produce the figures contained in Table 4 are detailed in Appendix 11.2.

	£ millions
Direct Construction Works	
Railway Control Systems	27.6
Electric Power & Plant	2.8
Permanent Way	57.1
Telecommunication Systems	2.6
Buildings & Property	7.2
Civil Engineering	156.7
Enabling Works	16.1
Direct Costs	270.1
Indirect Costs	
Site Investigation (3%)	8.1
Design (12%)	32.4
Comprehensive Feasibility Study & Business Case	8.0
Removal & Re-instatement of Gwili Railway	12.1
Project Management (8% total minus feasibility study)	29.9
Land Purchase & Compensation	38.2
Other Indirect Costs	12.9
Indirect Costs	141.6
Total Direct & Indirect Costs	411.7
Contingency (35%)	144.1
TOTAL ESTIMATED CAPITAL COST (2017 terms)	555.8
Current Estimate in 2020 Terms (inflation @ 3.5% p.a.)	616.2

Table 4 Revised Capital Cost Estimate

An overall contingency of 35% has been allowed, which is less than the 66% “*optimism bias*” recommended by Treasury. However, TLC consider this level of contingency to be more reasonable for this project, which is significantly less complex than most of Network Rail’s recent projects. It should be noted that for the Border Railways project, the actual working contingency used for construction was fixed at 8%.

The figures given are in comparable time terms to those contained in the Mott MacDonald study. However, to provide a current capital cost estimate for 2020 with assumed inflation rates of 3.5% per annum, this would rise to £616 million.

The revised capital cost estimate compares reasonably well with the actual cost figure for the Borders railway, once allowance has been made for the different route lengths, extra sections of double track and more stations.

10. Conclusions

This document has set out the case for the re-opening of the railway between Aberystwyth and Carmarthen. It is the contention of TLC that there is a compelling argument for reinstating this railway line, because of the economic, social and cultural benefits that it would bring to West Wales. But there is also a wider strategic objective. Not only would the rebuilt railway improve both inter- and intra-regional connectivity but, in due course, it could form the first stage in a new transport network along the western fringes of Wales that would link the north and south of the country without an eastward diversion into England. This western Rail Corridor would connect the industrial areas of South Wales via the Aberystwyth to Carmarthen line, to the rural heartland of Wales, and then northwards via the re-opened link from Afon Wen ultimately to Bangor and North Wales. The strategic imperative of binding Wales together as a nation by schemes such as this, will become even more important if the ramifications of leaving the European Union are to be fully addressed.

It is also important to stress that from an engineering perspective alone, the Feasibility Study concluded that the reopening of the Aberystwyth to Carmarthen line was a viable project, but on purely economic grounds a BCR of only 0.43 could be apportioned to the scheme. However, as we have shown in this document, expanding the catchment areas around each station, providing all new stations with secure parking, and synchronising local bus services to coincide with train timetables, passenger numbers would be significantly increased. This has certainly been the experience of the Borders Railway in Scotland, where passenger usage was significantly under-estimated because no allowance was made for passengers driving or travelling to stations from the immediate surrounding area.

It also appears that Chandler's capital cost estimate has been inflated by a number of ad-hoc add-ons, in addition to unnecessary earthworks to comply with current Network Rail standards for new projects, without any compelling geotechnical evidence to support this extra cost. A massive additional contingency in the form of the *optimism bias* has also been included; this is unreasonable for this project which is significantly less complex than other Network Rail projects where major problems were incurred. TLC's assessment, therefore, is that with an increase in passenger numbers, an enlargement of the population catchment area, and with a revised capital expenditure of around £560 million in 2017 terms or £620 million in 2020 prices (which is 20% less than in the Mott MacDonald Feasibility Study), the project would achieve a break-even BCR of 1.0, or even higher. It is not possible to be more precise with this estimate without further work to take full account of the expanded catchment areas, together with the suggested reduction in capital expenditure.

Whichever cost estimate is accepted, it is nonetheless evident that this will be an expensive project. But it bears comparison with the funds that have been allocated to some road-building schemes elsewhere in Wales, such as the Port Talbot Harbour Way (£107 million for only 4.8 km of carriageway), the Heads of the Valleys A465 upgrade (estimated cost of around £1 billion for 40 km of carriageway), and the projected but now abandoned 'Black Route' around Newport which, had it gone ahead, would have cost in excess of £1 billion. While these are undoubtedly important initiatives, they do little for the people of West Wales and their economic and social well-being. So it is not simply a matter of finance; there is the question of political will. It is TLC's hope and expectation that those whom we elect to represent us will appreciate the enormous benefits that a re-opened railway could bring to this part of Wales, and will do everything possible to bring this project to fruition.

11. Appendices

11.1 Population Figures for Enlarged Catchment Areas

Population statistics for towns or villages within a 8-10 km zone around the stations on the line are shown in Table 5

Towns	2011 census	Estimated in 2018
Aberystwyth		
Llanbadarn	656	662
Penrhyncoch	1316	1298
Bow Street	1572	1445
Sub-total	3544	3405
Llanilar		
Llanrhystud	646	607
Llanfarian	1541	1489
Llangwyryfon	596	583
Lledrod	662	680
Sub-total	3445	3359
Tregaron		
Llanddewi Brefi	640	636
Llangeitho	819	727
Pontrhydfendigaid	712	687
Sub-total	2171	2050
Lampeter		
Ystrad Aeron	596	612
Llanfair Clydogau	634	647
Llangybi	653	640
Cwmann	872	936
Sub-total	2755	2835
Llanybydder		
Capel Dewi	1293	1214
Llanwenog	1364	1304
Sub-total	2657	2518
Pencader		
Llandysul	2732	2641
Penrhiew-lan	521	522
Llanpumsaint	734	716
Llanllwni	638	693
Sub-total	4625	4572
TOTAL	19197	18739

Table 5 Population Figures for Settlements in Vicinities of Stations (Source: www.citypopulation.de)

11.2 Assumptions used for Revised Capital Cost Estimate

The capital cost estimate, which was provided by Chandler/KBS and has been included in Chapter 5, page 132, of the Feasibility Study, has been re-evaluated to change the make-up of the estimate. This revised estimate is shown in Table 4 on page of this report. The assumptions used in this revision are detailed in this appendix.

For the “*Direct Construction Costs*”, Chandler’s figures have been used, with the exception of “*Civil Works*”. Unfortunately, no further breakdown has been given for this cost, which Chandler have estimated at £174.1 million. This “*Civil Works*” figure is assumed to include the following:

- bridges;
- drainage & fencing;
- new tunnel and remedial work for existing tunnels;
- associated road works (including at Carmarthen end);
- surcharging/stabilisation work for Cors Caron;
- flood remedial works adjacent to Ystwyth River;
- new track alignments at Aberystwyth end and at other sites along the route;
- reducing the slope angle for existing cuttings and embankments.

It has been assumed, that by maintaining all existing slopes with some limited remedial works where necessary, a reduction of 10% could be made to Chandler’s figure of £174.1 million. This gives a revised estimate of £156.7 million, equivalent to a saving of £17.4 million. According to Mott’s figures given in their “*Earthworks Schedule*”, the quantities of earth and rock to be removed would be 3.8 million cu.m., with a fill requirement for the embankments of 1.2 million cu.m. This is a total of 5 million cu.m., which is equivalent to a cost of £3.50 per cu.m. with the saving assumed.

A comprehensive feasibility study and final business case would be required, and a very generous allowance of £8 million has been included for this. Site investigation costs, which would include bore holes, rock and soil testing, load testing etc., have been estimated at 3% of the direct construction costs. The percentages used to calculate costs for design and project management are the same as those used in Chandler’s estimate.

The Gwili Railway would have to be moved, and it has been assumed that this could be relocated on the old Abergwili Junction to Llandeilo track-bed. An allowance of £2 million has been made to purchase 13 km of the track-bed (equivalent to their existing ownership), with an allowance of £3.5 million for engineering works on the alignment. A pro-rata allowance of £4.4 million, based on the overall estimate for “Permanent Way” has been made for moving and re-laying the existing 7 km of track. An additional £2.2 million has been allowed for stations and other infrastructure. This gives the total estimated cost of £12.1 million.

An additional allowance of £12.9 million, calculated at 10% of indirect costs, has been included to cover other unforeseen costs during design and construction.

12. References and Websites

A Guide to the Wellbeing of Future Generations Act. 2019.

<https://gov.wales/sites/default/files/publications/2019-06/easy-read-a-guide-to-the-wellbeing-of-future-generations-act.pdf>

Aberystwyth and Ceredigion Population Data: <https://www.aberystwyth.org.uk/more/statistics.html>

AECOM Transportation. 2015. *Scoping study for full feasibility study for re-opening a heavy railway between Aberystwyth and Carmarthen.*

Arcadis. 2016. *Improving Strategic Transport Connections between Aberystwyth and Carmarthen. WelTAG Stage One: Strategic Case Report.*

BBC News (www.bbc.co.uk/news/uk-scotland-south-scotland-36416656)

Borders Railway Year 2 Evaluation. 2018. Transport Scotland.

Borders Railway Tourist Impact Revealed, <https://www.bbc.co.uk/news/uk-scotland-south-scotland-38802457>

Browne, J. 2005. *Rail freight multiple unit trial, Aberystwyth to Chirk, March 2005, Final Report.* Timber Transport Forum. 13th August 2019.

Cambrian News Reporter. *Railway amongst the most scenic in the World.* Cambrian News, 13th August 2019.

Campaign for Borders Rail. 2017. *Summary case for a new cross-border rail link.* Richardson & Son, Hawick.

Census data for Carmarthenshire County Council, 2011

https://www.carmarthenshire.gov.wales/media/2845/carmarthenshire_usual_resident_population.pdf

Ceredigion and Powys Collaboration A Vision for Growing Mid Wales, 2020. Ceredigion County Council, Aberaeron.

Champion, J. 2016. *Rail infrastructure planning in Wales.* National Assembly for Wales, Paper no. 16-042, Cardiff.

Department for Transport. 2013. *Accident and Casualty Costs (RAS60).*

Ernst & Young LLP. 2012. *Borders Railway Final Business Case: Final Version.* Transport for Scotland.

European Commission Assessment of unit costs (standard prices) of rail projects (CAPital Expenditure) – Final report Contract No. 2017CE16BAT002

Ferris, T. 2016. *Lost Lines of Wales – Aberystwyth to Carmarthen.* Graffeg, Llanelli.

Five ways new stations and lines are boosting the economy. 2020. Network Rail.

Forestry Statistics, Forecasts and Services. 2020. Natural Resources Wales (NRW)

Growing Mid Wales Partnership: Framework for Action. 2016. Powys County Council, Llandrindod Wells.

Growing Mid Wales: A Vision for Growing Mid Wales, Strategic Economic Plan and Growth Deal Roadmap. 2020. Powys County Council, Llandrindod Wells.

Holden, J. 2007. *The Manchester and Milford Railway.* 2nd edition. Oakwood Press, Lingfield, Surrey.

<http://www.citypopulation.de>

Iconic Wales Coast Path celebrates its fifth birthday. 2014. Natural Resources Wales,

Mayers, M. & Bamford, D. 2020. *Decarbonising Britain's railways needs urgent action – here's how it could be done.* AirQualityNews.com.

Mitchell, V. & Smith, K. 2011. *Aberystwyth to Carmarthen.* Middleton Press, Midhurst, Sussex.

Morgan, E. 2017. *Rural Wales – Time to meet the Challenge 2025.* Wales Rural Development Forum.

Mott MacDonald. 2018. *Aberystwyth to Carmarthen Rail Reinstatement: Feasibility Study.* Transport for Wales.

National Transport Finance Plan. 2015. Welsh Government.

Network Rail, 2016. *Welsh Route Study,* Network Rail.

Office of Road and Rail 2019. *Estimates of station usage.*

One Wales: Connecting the Nation – The Welsh Transport Strategy, 2008. Welsh Government.

Rail Freight Strategy, September 2016. Department of Transport, London.

Spaven, D. 2017. *The Waverley Route. The Battle for the Borders Railway* (3rd edition), Argyll Publishing, Argyll.

Train Timber Transport Trial. 2005. Forestry Commission.

Tourism visitor figures boost attributed to Borders Railway. 2017. Scottish Borders Council, Kelso.

Transport Scotland, *Borders Railway Year 2 Evaluation.* Scottish Government.

Traws Cymru, T1 Service, <http://www.trawscymru.info/tl/>

UK Census Data, <http://www.ukcensusdata.com/ceredigion-w06000008/population-density-qs102ew#sthash.Nf9i6Q2X.dpbs>

Vientiane-Boten Railway, Laos, <http://www.wikipedia.org>

Wales Infrastructure and Investment Plan for Growth and Jobs. 2012. Welsh Government.

Welsh Assembly Government. *A487 and A470 Maintenance Costs: Freedom of Information Request*, June, 2020.

Welsh Language Results: Annual Population Survey 2001-2018. 2019. Welsh Government.

Welsh Route Study, March 2016. Network Rail.

Youle, R. 2019. *A plan for a £20 million railway station near M4 in Swansea.* WalesOnline, 6th February 2019.

Back cover: Train leaving Aberystwyth station



Traws Link Cymru

West Wales Rail Campaign

Ymgyrch Rheilffordd Gorllewin Cymru

September 2020

P-06-1366 Adfer y cyllid ar gyfer gwasanaethau Bysiau Cwm Taf 351 (Dinbych-y-pysgod i Bentwyn) a 352 (Dinbych-y-pysgod i Gilgeti)

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/6946-3

Rhif y ddeiseb: P-06-1366

Teitl y ddeiseb: Adfer y cyllid ar gyfer gwasanaethau Bysiau Cwm Taf 351 (Dinbych-y-pysgod i Bentwyn) a 352 (Dinbych-y-pysgod i Gilgeti).

Geiriad y ddeiseb: Mae Bysiau Cwm Taf wedi rhedeg y gwasanaethau 351 a 352 ers mis Mehefin 2016. Maent wedi cael eu cefnogi gan gyllid Llywodraeth Cymru i helpu gyda diffygion ariannol. Yn anffodus, mae'r cyllid hwn nawr yn cael ei dynnu yn ôl, sy'n golygu bod y gwasanaethau yn anghynaliadwy yn ariannol. Ar ben hynny, gall bws dau lawr to agored, gan weithredwr bysiau cenedlaethol mawr, weithredu rhwng Dinbych-y-pysgod a Saundersfoot ar sail fasnachol bob dydd rhwng y Pasg a diwedd yr haf, sy'n effeithio'n uniongyrchol ar y busnes teuluol bach lleol.



1. Y cefndir

Er bod gwasanaethau bysiau lleol wedi'u dadreoleiddio, mae'r rhan fwyaf o'r pwerau statudol a'r cyfrifoldebau o ran cynllunio a chaffael gwasanaethau bysiau lleol yn nwylo awdurdodau lleol ar hyn o bryd.

Er bod gweithredwyr bysiau trwyddedig yn rhydd i gofrestru unrhyw wasanaeth y maent yn dymuno ei weithredu ar sail fasnachol, mae gan awdurdodau lleol ddyletswydd o dan adran 63(1) o *Ddeddf Trafnidiaeth 1985* i sicrhau bod gwasanaethau ar gael i fodloni gofynion trafnidiaeth gyhoeddus na fyddent fel arall yn cael eu bodloni drwy'r farchnad fasnachol (h.y. gwasanaethau sy'n angenrheidiol yn gymdeithasol). Mae adran 63(5) yn galluogi awdurdod lleol i ymrwymo i gcontract i dalu cymhorthdal am wasanaethau pe na bai'r gwasanaeth yn cael ei ddarparu o gwbl fel arall, neu'n cael ei ddarparu i safon benodol.

Ariannu bysiau

Mae Llywodraeth Cymru fel arfer wedi darparu cefnogaeth i'r diwydiant bysiau drwy nifer o ffrydiau ariannu, gan gynnwys ei *Chynllun Teithio Rhatach ar Fws* a'r Grant Cynnal Gwasanaethau Bysiau.

Gweinyddir y Grant Cynnal Gwasanaethau Bysiau gan awdurdodau lleol ac fe'i rhennir yn ddau fecanwaith ariannu. Gall gweithredwyr bysiau hawlio cyfraniad tuag at eu costau gweithredu mewnol, a elwir yn Grant Cymorth Cilomedrau Byw, sy'n caniatáu i weithredwyr cymwys hawlio swm am bob cilomedr "byw" (h.y. am ddarparu gwasanaeth bws yn hytrach nac, er enghraifft, am ddychwelyd i ddepo). Mae hyn yn cyfrif am tua dwy ran o dair o'r £25 miliwn a ddyrannwyd i'r Grant Cynnal Gwasanaethau Bysiau yn flynyddol ers 2013-14.

Caiff gweddill y grant ei ddefnyddio gan awdurdodau lleol, i gaffael gwasanaethau sy'n angenrheidiol yn gymdeithasol. Mae awdurdodau lleol hefyd yn gallu defnyddio cyllid o ffynonellau eraill, gan gynnwys eu *Grant Cynnal Refeniw*, ar gyfer gwasanaethau bws.

Y pandemig Covid-19 a chymorth brys

Cafodd y pandemig effaith anferth ar niferoedd y teithwyr - mae Llywodraeth Cymru *yn amcangyfrif* y bu gostyngiad o 95 y cant yn y defnydd o drafnidiaeth gyhoeddus yn nyddiau cynnar y pandemig, o'i gymharu â'r defnydd yn yr un cyfnod y flwyddyn flaenorol.

Felly, darparodd Llywodraeth Cymru gymorth ariannol ychwanegol i'r diwydiant bysiau. I ddechrau, yr enw ar y cyllid brys hwn oedd y Gronfa Caledi Bysiau ac yna daeth i gael ei alw'n Cynllun Brys ar gyfer y Sector Bysiau (BES) o fis Gorffennaf 2020. Arhosodd y Cynllun Brys ar gyfer y Sector Bysiau ar waith ar ryw ffurf neu'i gilydd rhwng Gorffennaf 2020 a Gorffennaf 2023. Fe ddywed papur cyllideb ddrafft Llywodraeth Cymru fis Ionawr 2023 ar gyfer y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith (CCEI) bod dros £150 miliwn wedi'i ddyrannu ar gyfer cefnogaeth frys i fysiau rhwng 2020-21 a 2022-23.

Y Gronfa Bontio ar gyfer Bysiau

Mae'r Cynllun Brys ar gyfer y Sector Bysiau (BES) bellach wedi'i ddisodli gan y Gronfa Bontio ar gyfer Bysiau 2023-24.

I ddechrau, roedd cyllideb ddrafft Llywodraeth Cymru ar gyfer 2023-24 yn cynnwys dyraniad o £28 miliwn ar gyfer 2023-24 ar gyfer y Cynllun Brys ar gyfer y Sector Bysiau (BES) (gweler papur y gyllideb ddrafft uchod). Fodd bynnag, ar 10 Chwefror, nododd Llywodraeth Cymru fod y cyllid hwn yn cael ei dynnu'n ôl yn dilyn cyfnod pontio o dri mis. Mewn dystiolaeth i'r Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith ar 1 Mawrth esboniodd Lee Waters AS, y Dirprwy Weinidog Newid Hinsawdd, fod hyn oherwydd pwysau ehangach o fewn y gyllideb Newid Hinsawdd, yn enwedig ar y rheilffyrdd.

Ar 23 Mai gwnaeth y Dirprwy Weinidog ddatganiad pellach a oedd yn rhoi'r wybodaeth ddiweddaraf am wasanaethau bysiau. Dywedodd eu bod "bron â dod o hyd i ateb a fydd yn ein galluogi i sicrhau bod cyllid ychwanegol ar gael i ddiogelu cymaint o'r rhwydwaith ag y gallwn ni am weddill y flwyddyn ariannol hon". Fodd bynnag, dywedodd mai'r "her" nawr yw dylunio rhwydwaith "a all wasanaethu teithwyr orau yn yr amser sydd ar gael i ni i gynllunio, ac o fewn y cyllid sydd ar gael i ni."

Ym mis Mehefin, fe wnaeth Llywodraeth Cymru gyhoeddi datganiad ar y cyd â llywodraeth leol a gweithredwyr bysiau a oedd yn cyhoeddi £46 miliwn i gefnogi diwedd y Cynllun Brys ar gyfer y Sector Bysiau (BES) ac y byddai y Gronfa Bontio ar gyfer Bysiau newydd yn ei disodli. Roedd y datganiad yn nodi hefyd, "byddwn yn parhau i weithio gyda'n gilydd i ddatblygu model ariannu cynaliadwy tymor hwy sy'n pontio'r bwlch i fasnachfreinio."

Diwygio bysiau

Mae'r cyfeiriad at y symud at fasnachfreinio uchod yn adlewyrchu cynllun Llywodraeth Cymru i gyflwyno Bil Gwasanaethau Bysiau newydd. Yn wahanol i'r Bil blaenorol, a dynnwyd yn ôl yn 2020, a oedd yn cynnwys masnachfreinio fel un o nifer o opsiynau ar gyfer awdurdodau lleol, mae Llywodraeth Cymru yn cynnig disodli'r model bysiau presennol sydd wedi'i ddadreoleiddio â system orfodol o fasnachfreinio ar gyfer Cymru gyfan, gyda Gweinidogion Cymru fel yr awdurdod masnachfreinio. Disgwylir y caiff y Bil ei gyflwyno yng nghyfnod y Senedd hon (h.y. 2023-24).

Ceir rhagor o fanylion am y cynlluniau hyn ym Mhapur Gwyn Llywodraeth Cymru yn 2022, sef Un rhwydwaith, un amserlen, un tocyn: cynllunio bysiau fel gwasanaeth cyhoeddus i Gymru. Ceir rhagor o fanylion am y Papur Gwyn yn yr erthygl hon gan Ymchwily Senedd ym mis Hydref 2022.

Hefyd, cyhoeddodd Llywodraeth Cymru ei dogfen Bws Cymru: cysylltu pobl â lleoedd.

2. Camau gan Lywodraeth Cymru

Yn ei lythyr at y Cadeirydd, dyddiedig 19 Hydref, mae'r Dirprwy Weinidog yn tynnu sylw at y gefnogaeth frys a ddarparwyd i gefnogi gwasanaethau bysiau. Mae'n mynd ymlaen i ddweud y canlynol:

Rwyf wedi gofyn i Trafnidiaeth Cymru weithio'n agos gydag awdurdodau lleol...i nodi a blaenoriaethu llwybrau bysiau ar gyfer cymorth parhaus, a bydd hyn yn cynnwys edrych yn ofalus ar y ddau lwybr hyn.

Mae'r Dirprwy Weinidog yn dweud y bydd y gwaith hwn yn helpu i baratoi cynlluniau manwl ar gyfer gwasanaethau ym mhob rhanbarth o Gymru i gynorthwyo'r pontio i'r system fasnachfraint newydd sydd i'w chyflwyno.

3. Camau gan Senedd Cymru

Mae nifer o gwestiynau ysgrifenedig ar gyllid brys ar gyfer gwasanaethau bws wedi'u cyflwyno.

Cafodd y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith dystiolaeth ar 11 Mai gan awdurdodau lleol Cymru a chynrychiolwyr o'r diwydiant bysiau ar

gynaliadwyedd gwasanaethau bysiau yn dilyn cyhoeddiad y Dirprwy Weinidog (gweler yr adran o'r papur briffio hwn ar y cefndir). Roedd y dystiolaeth hon yn pwysleisio maint yr her o ran ymateb i'r gostyngiadau cyllid, ond roedd hefyd yn tynnu sylw at y ffaith bod trafodaethau'n parhau gyda Llywodraeth Cymru.

Yn dilyn hynny, [ysgrifennodd y Pwyllgor at y Dirprwy Weinidog](#). Yn ei ymateb, mae'r Dirprwy Weinidog yn rhoi rhagor o fanylion am y Gronfa Bontio ar gyfer Bysiau ac mae'n nodi:

Defnyddir y Gronfa Bontio ar gyfer Bysiau yn fecanwaith ychwanegol i gefnogi gwaith y timau rhanbarthol ac i helpu'r diwydiant i symud o gyllid brys i wasanaethau a weithredir yn lleol ar sail tendr o fis Ebrill 2024. Yn y cyfamser, mae fy swyddogion hefyd yn adolygu'r mecanweithiau presennol ar gyfer cyllid grant fel y Grant Cynnal Gwasanaethau Bysiau a ffrydiau cyllid eraill i ddarparu pecyn cymorth mwy sefydlog ac effeithiol ar gyfer y dyfodol.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddu o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1366
Ein cyf/Our ref LW/02315/23

Jack Sargeant AS
Cadeirydd y Pwyllgor Deisebau
Senedd Cymru
Bae Caerdydd
Caerdydd
CF99 1SN

19 Hydref 2023

Annwyl Jack,

Diolch am eich gohebiaeth ar 22 Medi ynglŷn â ‘Deiseb P-06-1366 Adfer y cyllid ar gyfer gwasanaethau Bysiau Cwm Taf 351 (Dinbych-y-pysgod i Bentwyn) a 352 (Dinbych-y-pysgod i Gilgeti’).

Roedd yn ddrwg gennyf glywed am benderfyniad Bysiau Cwm Taf i dynnu'r ddau wasanaeth bws lleol hyn yn ôl, yn enwedig o ystyried yr arian ychwanegol rydym wedi'i ddarparu ers dechrau pandemig Covid i helpu awdurdodau lleol a gweithredwyr i gynnal gwasanaethau bysiau lleol. Mae hyn yn cynnwys fy nyfarniad diweddaraf o £46m a gyhoeddwyd ar 16 Mehefin ([Dirprwy Weinidog yn cadarnhau y bydd y rhan fwyaf o wasanaethau bws yn cael eu diogelu diolch i gronfa £46m | LLYW. CYMRU](#)) hyd at ddiwedd y flwyddyn ariannol hon sy'n cwmpasu'r Cynllun Brys ar gyfer y Sector Bysiau a'r Gronfa Bontio ar gyfer Bysiau sy'n ei ddisodli er mwyn atal canslo gwasanaethau yn gyfan gwbl. Erbyn diwedd y flwyddyn ariannol hon, byddwn wedi gwario dros £200m yn cefnogi'r diwydiant bysiau ers dechrau'r pandemig.

Rwyf wedi gofyn i Trafnidiaeth Cymru weithio'n agos gydag awdurdodau lleol ledled Cymru i nodi a blaenoriaethu llwybrau bysiau ar gyfer cymorth parhaus, a bydd hyn yn cynnwys edrych yn ofalus ar y ddau lwybr hyn.

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Lee.Waters@llyw.cymru
Correspondence.Lee.Waters@gov.wales

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

Tudalen y pecyn 91

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

Bydd y gwaith hwn yn ein helpu i baratoi cynlluniau manwl ar gyfer gwell gwasanaethau bysiau ym mhob rhanbarth i'n helpu i bontio i'r system newydd o fasnachfreinio bysiau yr wyf yn gobeithio ei chyflwyno drwy'r Bil Bysiau newydd ar gyfer Cymru i'r Senedd yn 2024.

Yn gywir



Lee Waters AS/MS
Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change

P-06-1368 Dylai Llywodraeth Cymru gymryd camau i gadw'r Rheoliadau Gwybodaeth Amgylcheddol mewn perthynas â Chymru

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/7092-1

Rhif y ddeiseb: P-06-1368

Teitl y ddeiseb: Dylai Llywodraeth Cymru gymryd camau i gadw'r Rheoliadau Gwybodaeth Amgylcheddol mewn perthynas â Chymru

Geiriad y ddeiseb: Mae Prosiect Amgylcheddol pro bono myfyrwyr Ysgol y Gyfraith a Gwleidyddiaeth, Prifysgol Caerdydd, wedi ystyried Rheoliadau Gwybodaeth Amgylcheddol 2004 a sut y gellid eu gwella yng Nghymru, ac wedi cynhyrchu adroddiad byr.

Fodd bynnag, os bydd y Bil Cyfraith yr UE a Ddargedwir yn cael ei basio, bydd yr holl is-ddeddfwriaeth sy'n deillio o'r UE yn dod i ben ddiwedd 2023, gan gynnwys Rheoliadau 2004.

Byddai'r DU yn torri Confensiwn Aarhus.

Rhaid i Lywodraeth Cymru ddefnyddio'i phwerau i gadw Rheoliadau 2004 i Gymru.

Rhagor o fanylion

Mae pwysigrwydd yr hawliau a roddwyd i'r cyhoedd gan Confensiwn Aarhus (a, thrwy hynny, gan Reoliadau 2004) wedi'u crynhoi'n wych yn achos Fish Legal yn erbyn Comisiynydd Gwybodaeth United Utilities plc Yorkshire Water Services Ltd a'r Ysgrifennydd Gwladol dros yr Amgylchedd, Bwyd a Materion Gwledig [2015] UKUT 52 (AAC), ym mharagraff 57:



"The Aarhus Convention...links environmental rights and human rights. It acknowledges that we owe an obligation to future generations. It establishes that sustainable development can be achieved only through the involvement of all stakeholders. It links government accountability and environmental protection. It focuses on interactions between the public and public authorities in a democratic context and it is forging a new process for public participation in the negotiation and implementation of international agreements...it is also a Convention about government accountability, transparency, and responsiveness..."

1. Cefndir

1.1. Rheoliadau Gwybodaeth Amgylcheddol 2004

Newidiodd y DU gyfraith yr UE yn gyfraith ddomestig, a'i galw'n gyfraith yr UE a ddargedwir, er mwyn lleihau'r tarfu wrth ymadael â'r UE. Roedd cyfraith yr UE a ddargedwir yn golygu bod cyfreithiau cyn Brexit yn parhau i fod ar waith i osgoi bylchau mewn meysydd pwysig fel safonau cynhyrchion, lles anifeiliaid a chyfraith amgylcheddol.

Mae *Rheoliadau Gwybodaeth Amgylcheddol 2004* ('Rheoliadau 2004') yn gyfraith yr UE a ddargedwir. Maent yn rhoi hawl i'r cyhoedd gael mynediad at wybodaeth amgylcheddol a ddelir gan awdurdodau cyhoeddus. O dan Reoliadau 2004:

- mae'n rhaid i awdurdodau cyhoeddus sicrhau bod gwybodaeth amgylcheddol ar gael yn rhagweithiol;
- gall aelodau o'r cyhoedd ofyn am wybodaeth amgylcheddol gan awdurdodau cyhoeddus.

Mae Rheoliadau 2004 yn rhoi ar waith *Cyfarwyddeb 2003/4/CE y Cyngor Ewropeaidd ar yr hawl i'r cyhoedd gael mynediad at wybodaeth amgylcheddol* (Cyfarwyddeb EC) yn y DU. Mae Cyfarwyddeb EC yn deillio o gytundeb rhwngwladol o'r enw '*Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters*', a elwir yn 'Gonfensiwn Aarhus'. Confensiwn Aarhus sy'n rhoi'r hawliau cyhoeddus ar fynediad

at wybodaeth, cyfranogiad y cyhoedd a mynediad at gyfiawnder mewn prosesau gwneud penderfyniadau llywodraethol ar faterion amgylcheddol. Mae'r DU yn rhan o Confensiwn Aarhus.

1.2. Bil Cyfraith yr UE a Ddargedwir (Dirymu a Diwygio) 2023

Cafodd *Deddf Cyfraith yr UE a Ddargedwir (Dirymu a Diwygio) 2023* ('y Ddeddf') ei deddfu ar 29 Mehefin 2023.

Yn ystod hynt y Bil diwygiwyd y dull o ymdrin â chyfraith yr UE a ddargedwir yn sylweddol (ar ôl i'r ddeiseb hon gael ei chyflwyno). Yn lle'r cymal machlud y cyfeiriwyd ato yn y ddeiseb, a fyddai wedi dirymu'r rhan fwyaf o ddeddfwriaeth yr UE a ddargedwir yn awtomatig, rhoddwyd restr o 587 o ddarnau o ddeddfwriaeth yr UE a ddargedwir a fydd yn dod i ben ar ddiwedd 2023.

Y rhestr hon yw Atodlen 1 i'r Ddeddf. Gall Gweinidogion y DU a Gweinidogion Cymru esemtio cyfraith yr UE a ddargedwir a restrir yn Atodlen 1, sydd felly'n ei harbed, ond roedd yn ofynnol iddynt basio rheoliadau i wneud hynny erbyn 31 Hydref 2023. Gwnaeth Llywodraeth y DU esemtio pedwar darn o gyfraith yr UE a ddargedwir o Atodlen 1 cyn y dyddiad cau hwn ond ni wnaeth Llywodraeth Cymru arfer ei phwerau.

Nid yw Rheoliadau 2004 y cyfeirir atynt gan y ddeiseb yn cael eu rhestru yn Atodlen 1, ac felly **nid oes disgwyl iddynt ddod i ben** o ganlyniad i'r Ddeddf.

Er bod Rheoliadau 2004 yn parhau i fod yn berthnasol, maent yn ddarostyngedig i'r newidiadau canlynol a wnaed i gyfraith yr UE a ddargedwir gan y Ddeddf:

- Mae gan Weinidogion y DU a Gweinidogion Cymru bwerau i ddiwygio, diddymu a disodli cyfraith yr UE a ddargedwir a chyfraith a gymathwyd yn haws;
- Gall Llywodraeth y DU a Senedd y DU wneud newidiadau mewn meysydd datganoledig heb gael cydsyniad gan Weinidogion Cymru na'r Senedd, gan osgoi sefydliadau Cymru o bosibl;
- O 1 Ionawr 2024, bydd cyfraith yr UE a ddargedwir yn cael ei hailenwi'n "gyfraith a gymathwyd";
- Mae newidiadau i'r hierarchaeth gyfreithiol ddomestig yn cynnwys diddymu egwyddorion goruchafiaeth ac egwyddorion cyfraith yr UE

ar ôl diwedd 2023. Mae egwyddorion cyfraith yr UE yn cynnwys sicrwydd cyfreithiol, triniaeth gyfartal, cymesuredd, parch at hawliau sylfaenol a'r egwyddor ragofalus.

- Bydd hawliau, pwerau, rhwymedigaethau ac ati sy'n deillio o'r UE yn dod i ben ar 31 Rhagfyr 2023.

Ymrwymodd Llywodraeth y DU i gynnal cydymffurfiad â rhwymedigaethau rhyngwladol yn ystod hynt y Bil drwy Senedd y DU.

2. Camau gan Lywodraeth Cymru

Gwnaeth Llywodraeth Cymru wrthwynebu'r ddeddf o'r dechrau, gan gredu bod cyfraith yr UE a ddargedwir yn gweithio'n dda ac y gellid ei diweddaru yn ôl yr angen. Dywedodd:

... ein barn ni yw bod cyfraith yr UE a ddargedwir (REUL), fel cyfraith yr UE cyn hynny, yn gweithio'n dda. Nid oedd gennym unrhyw fwriad i ddiddymu, dirymu na diwygio cyfraith yr UE a ddargedwir, yn enwedig erbyn dyddiad cau mympwyol.

Gwnaeth Asesydd Interim Diogelu'r Amgylchedd Cymru ysgrifennu adroddiad i Lywodraeth Cymru yn gwneud argymhellion ynghylch Bil Cyfraith yr UE a Ddargedwir (Dirymu a Diwygio). Roedd hyn cyn y gwelliant a newidiodd y dull cymal machlud. Roedd yr adroddiad yn sôn am "bryderon mawr" gan randdeiliaid y gallai deddfwriaeth gael ei rhoi o'r neilltu heb asesiad priodol na gwaith ymgynghori â rhanddeiliaid. Mae'r adroddiad yn nodi y gallai'r diffyg ymgynghori hwn fod yn achos o dorri Confensiwn Aarhus drwy amddifadu'r cyhoedd o'r cyfle i gyfrannu at newidiadau mewn cyfraith amgylcheddol. Yn gyffredinol, cytunodd Lywodraeth Cymru â'r materion a'r pryderon a godwyd, a dywedodd:

... rydym yn llwyr gytuno â'r adroddiad bod angen i Senedd Cymru ymgynghori ac ymgysylltu â rhanddeiliaid ar unrhyw gynigion a ddaw o ganlyniad i'r Bil i wneud newidiadau arwyddocaol i ddeddfwriaeth amgylcheddol.

3. Camau gweithredu Senedd Cymru

Pleidleisiodd y Senedd i **beidio â rhoi cydsyniad** ar gyfer y Ddeddf ddwy waith, ym mis Mawrth a mis Mehefin 2023. Mae pwylgorau'r Senedd eisoes wedi ystyried rheoliadau a wnaed o dan y Ddeddf a byddant yn parhau i fonitro ei weithrediad.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddar o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1368
Ein cyf/Our ref JJ/02668/23

Llywodraeth Cymru
Welsh Government

Jack Sargeant AS
Cadeirydd y Pwyllgor Deisebau
Senedd Cymru
Bae Caerdydd
Caerdydd
CF99 1SN

13 Hydref 2023

Annwyl Jack,

Diolch i chi am eich llythyr ar 26 Medi lle'r ydych yn gofyn am fy safbwytiau ar y materion a godwyd gan ddeiseb P-06-1368 cyn i'r Pwyllgor Deisebau ei ystyried yn ffurfiol gyntaf.

Cafodd Deddf Cyfraith yr UE a Ddargedwir (Dirymu a Diwygio) 2023 ("y Ddeddf") y Cydsyniad Brenhinol ar 29 Mehefin 2023. Mae Atodlen 1 y Ddeddf yn nodi rhestr o is-ddeddfwriaeth a deddfwriaeth uniongyrchol yr UE a ddargedwir sydd i faclud ar ddiwedd 2023. Nid yw Rheoliadau Gwybodaeth Amgylcheddol 2004 wedi'u cynnwys yn y rhestr ac felly nid ydynt i faclud o ganlyniad i basio'r Ddeddf.

Yn gywir,



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

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Julie.James@llyw.cymru
Correspondence.Julie.James@gov.Wales

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

Tudalen y pecyn 97

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

P-06-1368 The Welsh Govt should take steps to save the Environmental Information Regulations in relation to Wales, Correspondence – Petitioner to Committee, 31.07.23

Dear Clerk to the Petitions Committee

I am writing in reference to [The Welsh Govt should take steps to save the Environmental Information Regulations in relation to Wales - Petitions \(senedd.wales\)](#).

I am the named Petitioner, acting for a group of students at Cardiff University's School of Land and Politics.

I need to alert you that, since the Petition was opened, changes to the REUL Bill, now enacted as the Retained EU Law (Revocation and Reform) Act 2023, have, to an extent, taken the 'sting' out of the Bill as it was and the threat it poses to the Environmental Information Regulations 2004.

However, the petition remains a very useful exercise and I would hope the Committee can still consider it.

Particularly, it makes reference to a short report produced by the students, which deals with how the Environmental Information Regulations might be amended to improve them, by and for Wales.

In order to assist the Committee when it comes to consider this petition later this year, I attach that report and would commend the suggestions and proposals therein to the Committee.

Please do not hesitate to contact me if I can assist the Committee at any stage.

Yours faithfully

Guy Linley-Adams
Solicitor
Lecturer in Law



Pro Bono and
Employability

Pro Bono ac
Cyflogadwyedd

Cardiff University
Law Building
Museum Avenue
Cardiff, CF10 3AX
Wales, UK
Tel +44(0)29 2087 6705
www.cardiff.ac.uk/law-politics

Prifysgol Caerdydd
Adeilad y Gyfraith
Rhodfa'r Amgueddfa
Caerdydd, CF10 3AX
Cymru, DU
Tel +44(0)29 2087 6705
www.caerdydd.ac.uk/cy/law-politics

The Environmental Information Regulations 2004

**Report of the Freedom of Information sub-group of the
pro bono Climate and Environment Project of Cardiff
University's School of Law and Politics 2022/2023**

1. Introduction.

The Climate and Environment Project is a pro bono extra-curricular project for law students at the School of Law and Politics at Cardiff University.

The Project is not formally part of the assessment for any degree or professional course and the students volunteering on the Project range from second-year undergraduates to postgraduates to those on solicitor and barrister professional courses.

In 2022 into 2023, the Project sub-group on freedom of information, particularly in the environmental field, examined the Environmental Information Regulations 2004, the rights they underpin, from which European and international law and convention they derive, and how are they administered in the UK.

More particularly, the group considered and discussed how the 2004 Regulations could be improved in Wales.

The members of the FOI sub-group in 2022/23 were:

Amira Shazlin Binti Zulkifli

Ahanaf Taksin Ar-Rafee

Hann Qiang Liew

Asha Thirunavukkarasu

Max Pullen

Beulah Lee

Sarah Curran

Izabela Poniewierska

Maja Wojczak

Kian Nah

Olivia Thomas

Toby Clark

The group was assisted by Guy Linley-Adams, Lecturer in Law at the School of Law and Politics.

2. Background to the Environmental Information Regulations 2004.

The group examined how the Environmental Information Regulations 2004 provide for a right of access for the public to environmental information held by UK public authorities.

The 2004 Regulations came into force on 1st January 2005, under the authority then provided by the European Communities Act 1972, covering England, Wales and Northern Ireland. Scotland has its own Environmental Information Regulations (Scotland) 2004. The Regulations implemented European Council Directive 2003/4/EC on public access to environmental information. That Directive in turn has its origins in the Aarhus Convention.

The 2004 Regulations provide a right of access for the public to environmental information, upon request, subject to a number of exceptions, as well as requiring public bodies to make environmental information available proactively.

The group strongly supported the role the 2004 Regulations play, as part of the UK's implementation of its obligations as a party to the Aarhus Convention, in encouraging transparency from public authorities as part of a process of enabling the public to be informed about the environment and to participate in environmental decision-making from a position of knowledge.

3. The potential effect of the Retained EU Law Bill on the Environmental Information Regulations 2004.

The group was concerned at the potential effect on the 2004 Regulations of the Retained EU Law (Revocation and Reform) Bill ('the REUL Bill'), making its way through Parliament.

It was (and remains) unclear whether the Bill will be enacted in its current form, but what follows must be re-considered in the light of what is finally enacted.

However, as the REUL Bill stands, clause 1 will trigger the sunset of EU-derived subordinate legislation and retained direct EU legislation, unless otherwise saved, on 31st December 2023.

Clause 1 reads:

- (1) *The following are revoked at the end of 2023—*
 - (a) *EU-derived subordinate legislation;*
 - (b) *retained direct EU legislation.*
- (2) *Subsection (1) does not apply to an instrument, or a provision of an instrument, that is specified in regulations made by a relevant national authority.*
- (3) *The revocation of an instrument, or a provision of an instrument, by subsection (1) does not affect an amendment made by the instrument or provision to any other enactment.*
- (4) *In this section “EU-derived subordinate legislation” means any domestic subordinate legislation so far as—*
 - (a) *it was made under section 2(2) of, or paragraph 1A of Schedule 2 to, the European Communities Act 1972, or*
 - (b) *it was made, or operated immediately before IP completion day, for a purpose mentioned in section 2(2)(a) of that Act (implementation of EU obligations etc), and as modified by any enactment.*

The group expressed its general concern that the practical effect of the REUL Bill on the Environmental Information Regulations 2004 is that, unless the 2004 Regulations are later saved pursuant to the provisions clause 1(2), in the case of Wales, by the Welsh Government, the 2004 Regulations would cease to have effect in Wales at the end of 2023.

The group was clear that, quite apart from the wholly negative effect on the right of access to environmental information, that scenario would put the UK in clear breach of the Aarhus Convention.

The group did not consider that the Welsh Government should countenance the Environmental Information Regulations 2004 being allowed to fall as a consequence of the REUL Bill.

Recommendation 1

In the event that the REUL Bill is enacted in a form which would otherwise lead to 2004 Regulations ceasing to have effect in Wales as part of the planned ‘sunset’ of retained EU law, the groups recommends that Welsh Government should act swiftly to save the 2004 Regulations.

The group noted that information rights are not a reserved matter – and so are devolved to Wales.

Given the maturity of Welsh devolution, the group considered it appropriate for the Welsh Government to consider if it should, in addition to amending the 2004 Regulations, as they apply in Wales, per the Scottish model, create and appoint a dedicated Welsh Information Commissioner.

If the REUL Bill is to be enacted and lead to the Environmental Information Regulations 2004 ceasing to have effect within England, it would be incongruous for an Information Commissioner based in England to be hearing complaints from Wales, but not from within England.

Recommendation 2

In the event that the REUL Bill is enacted in a form which will lead to the 2004 Regulations ceasing to have effect in England as part of the planned ‘sunset’ of retained EU law, Wales should consider establishing its own Information Commissioner for Wales.

4. Problems with the Environmental Information Regulations 2004 and possible solutions.

The group considered that, especially if the Welsh Government finds itself required to save the 2004 Regulations shortly, it would be an effective time, almost 20 years since the 2004 Regulations were passed, to consider certain improvements to the 2004 Regulations. This would ensure they work better in practice, to enhance the right of the Welsh public to environmental information held by Welsh public authorities.

Such a progressive approach would be entirely in line with the position Wales has adopted on the environment, not least via the Well-being of Future Generations Act 2015, and the well-being goals for Wales.

Therefore, the group analysed real-world examples of problems that have arisen over the nearly 20 years since the 2004 Regulations came into effect, that the group considers the Welsh Government could now address, in order to make the systems work more effectively as providing timely and wider access to environmental information for the Welsh public.

These are:

- Ensuring public authorities respond (including to refuse) as soon as possible, and do not always default to responding at 20 working days.
- Preventing authorities from ‘resetting the clock’ by asking for clarification, but only at 20 working days
- Reducing time for internal review from 40 working days to 20 working days (as in Scotland)
- Requiring the Commissioner to accept a complaint if there has been no in-time response to an initial request.
- Limiting an applicant’s obligation to requesting an internal review on one occasion only
- Improving proactive publication and public authorities learning from regular requests
- Learning from Commissioner Decisions to avoid using unlawful exceptions for the same type of information.
- Remedyng the inability of public to take the lack of proactive publication to the Commissioner.
- Remedyng public authorities’ ability to raise different exceptions at refusal, at review, at Commissioner’s investigation or at Tribunal.
- Addressing the use of private emails
- When ‘harm’ should be required and not required, when applying exceptions under Regulation 12

4.1 Ensuring public authorities respond (including to refuse) as soon as possible, and do not always default to responding at 20 working days.

The group considered that the effective right granted to the public by the Aarhus Convention would not be delivered without timely access to environmental information.

Even though the provisions of the 2004 Regulations require that a public authority has to respond as soon as possible to a request for environmental information, and no later than 20 working days after a request, there is no metric against which to measure what 'as soon as possible' means.

The group heard that the practical effect has been that there has been nothing to prevent public authorities from routinely, by default, taking the full 20 days to respond. There is a belief, for example in environmental NGOs, that some public authorities may even do this in what might be termed 'bad faith', particularly where the requested information may be considered to be controversial, or the authority concerned might prefer that the information were not released promptly.

The group considered that this problem - of taking 20 working days by default – could be addressed by requiring public authorities to issue an acknowledgment to any request, perhaps within 5 working days, providing, with reasons, an estimate of the time likely to be taken for a substantive response to be given.

This would enable any person requesting information to understand why up to 20 working days may be required to respond and would enable the matter to be raised in any request for internal review (per Regulation 11), or ultimately to be brought to the Commissioner (per Part 5 of the Regulations).

The group considered that this proposal would effectively balance the interests of the public requesting information and the resource demands for the public authorities involved.

Recommendation 3

The group proposes that public authorities should be required to acknowledge requests within 5 working days and, in that acknowledgement, give an estimate of the time that will be taken to respond substantively to the request. This can be achieved by an amendment to Regulation 5, adding a new Regulation 5(1A):

"5(1A) A public authority shall acknowledge the receipt of any request within 5 working days;"

4.2 Preventing authorities from ‘resetting the clock’ by asking for clarification, but only at 20 working days.

The group heard that under the 2004 Regulations, per Regulation 9, public authorities can effectively extend the period within which they must respond to a request by 20 working days, by asking applicants to clarify their request.

The group considered that while asking for such clarification may be entirely reasonable, this provision does potentially allow the ‘reluctant’ public authority to delay responding substantively to a request, by re-setting the 20 working days clock, by asking for clarification, but only after 20 working days have almost elapsed. Such practices dilute the public’s right to receive information in a timely manner.

The group therefore proposed a provision that would require public authorities to ‘triage’ requests received at an early stage, and if necessary, make a request for clarification within 5 working days. This would fit well with the proposed provision (above) under Regulation 5 on acknowledgment of requests.

Recommendation 4

The group proposes that public authorities should be required to seek any clarification that may be required from applicants on the requests made within 5 working days of receipt of a request. This can be achieved by an amendment to Regulation 9(2)(a), so that it reads:

“9(2) Where a public authority decides that an applicant has formulated a request in too general a manner, it shall - (a) ask the applicant no later than 5 working days after the date of receipt of the request to provide more particulars in relation to the request; and”

4.3 Reducing time for internal review from 40 working days to 20 working days (as in Scotland).

In examining the regimes in England and Wales, and in Scotland, the group noted that there is a mismatch between the time allowed for internal review for public authorities in different parts of the UK.

In Scotland, an internal review should only take 20 working days. In England and Wales, the law allows for 40 working days. The relevant UK and Scottish provisions are shown below:

“Representations and reconsideration

11.—(1) Subject to paragraph (2), an applicant may make representations to a public authority in relation to the applicant’s request for environmental information if it appears to the applicant that the authority has failed to comply with a requirement of these Regulations in relation to the request.

*(4) A public authority shall notify the applicant of its decision under paragraph (3) as soon as possible and **no later than 40 working days** after the date of receipt of the representations”.*

“Review by Scottish public authority

16.—(1) Subject to paragraph (2), an applicant may make representations to a Scottish public authority if it appears to the applicant that the authority has not complied with any requirement of these Regulations in relation to the applicant’s request.

*(4) The Scottish public authority shall as soon as possible and **no later than 20 working days** after the date of receipt of the representations notify the applicant of its decision”.*

The group considered that there can be no justification for a longer period to be allowed for in England and Wales, as opposed to Scotland. Welsh public authorities should be no less able to deliver a review in 20 days than their Scottish counterparts.

Recommendation 5

The group proposes a simple amendment to Regulation 11 of the 2004 Regulations (applying to Wales) to allow for a 20 working days maximum period for an internal review.

4.4 Requiring the Commissioner to accept a complaint if there has been no in-time response to an initial request.

The group considered the scenario, under the 2004 Regulations, of a public authority failing to respond at all to a request for information and note that there exists no mechanism to address in a timely manner the situation in which the public authority, to whom a request for information has been made, simply does not respond.

In line with the Regulations, if there is no response, the person requesting information has to request an internal review, before the matter can be taken to the Commissioner.

That is the practical effect of section 50(2)(a) of the Freedom of Information Act 2000, which, per Regulation 18, provides for the enforcement mechanism for the 2004 Regulations, and requires that a complainant to the Commissioner must have “exhausted any complaints procedure which is provided by the public authority in conformity with the code of practice under section 45...”.

In short, a complainant must have asked for an internal review by the public authority of its failure to respond, before the matter can be taken to the Commissioner.

The group noted that what this means in practice is that the ‘reluctant’ public authority can safely sit back and wait for a request for information to run past its 20 working days for the initial response, at which point the person requesting will need to make a request for internal review, which then gives the authority a further 40 working days to address the matter.

In effect, any public authority can therefore safely ignore a request unless an applicant ‘asks twice’, with those requests 20 working days apart.

If a public authority does not wish to provide information (for example, if the requested information is somehow embarrassing, or might be used to ‘fuel’ a legal challenge), it has a total of 60 working days minimum to respond substantively to any request, without fear of any sanction or referral to the Commissioner.

The group considered that such length of delay could be highly detrimental to the value of the requested information to an applicant. Moreover, that such an approach is possible at law undermined the purpose of initial 20 working day time limit for answering requests.

Recommendation 6

The group proposes that an amendment is required to allow an applicant to go directly to the Information Commissioner for a decision to prevent such abuse and uphold the right of access to environmental information in a timely manner, by inserting paragraph 18(1A) into Regulation 18:

18(1A) The enforcement and appeals provisions of the Act shall be read for the purposes of these Regulations such that section 50(2)(a) of the Act does not apply if a public authority fails to respond to a request within the time limits specified in Regulation 5.

4.5 Limiting an applicant's obligation to requesting an internal review on one occasion only.

The group examined a particular matter in relation to the requirement on applicants that they have gone through a public authority's internal review procedure before a matter can then be raised with the Commissioner.

In the case of the Friends of the Earth v DEFRA, Decision Notice IC-102916-C8Q5, 13th June 2022, the Commissioner sought to require Friends of the Earth to request an internal review from DEFRA on a second occasion, having initially complained about a lack of a timely response in a first internal review request. In that matter, Friends of the Earth in fact refused to go to a second internal review and, albeit reluctantly, the Commissioner agreed to deal with the matter by way of a Decision, despite advising Friends of the Earth to go for a second internal review on the substance of the matter.

The group considered that no applicant for information should be required by law or by the Commissioner to go to a second internal review because that would enable the 'reluctant' public authority to add further delay to a process of disclosure of information, undermining the right granted by the Aarhus Convention of timely access to information.

Recommendation 7

The group recommends amending Regulation 18 so as to require the Commissioner to issue a Decision if a complainant has made at least one request for internal review by a public authority.

Insert a new Regulation 18(11):

"For the purposes of these Regulations, section 50 of the Act shall be read as requiring the Commissioner to make a decision as to whether a public authority has dealt with a request in accordance with the requirements of these Regulations where a complainant to the Commissioner has made any representation to a public authority pursuant to Regulation 11. An applicant shall not be required to make more than one representation to a public authority under regulation 11".

4.6 Improving proactive publication and public authorities learning from regular requests.

Access to environmental information is recognised as a right under the Aarhus Convention, but the Convention also requires proactive publication of environmental information, obviating the need for specific requests to be made by the public.

Effective public participation in decision-making processes requires more proactive publication of environmental information. The more information in the public domain, the greater the public engagement, which can also lead to insights and ideas of great value to public authorities. Proactive publication would mean a greater level of access to information and as such would also support open-source research.

The group was generally very supportive of proactive publication.

Proactive publication also reduces pressure on public authorities having to process requests for information.

However, the group considered that experience suggests public authorities do not always learn from previous requests and start proactively publishing information that is regularly requested, or which they have been ordered by the Commissioner to publish.

The group suggested that information of any type or character that has been requested and provided on more than, say, three occasions by the public authority should be considered as a matter of law for future proactively publication.

Recommendation 8

In order to encourage more proactive publication, the group recommends an amendment adding a new subsection to Regulation 4(4)(c) requiring public authorities to ‘learn’ from repeat requests, such that Regulation 4 then reads:

Dissemination of environmental information

4.—(1) Subject to paragraph (3), a public authority shall in respect of environmental information that it holds—

(a)progressively make the information available to the public by electronic means which are easily accessible;

...

(4) The information under paragraph (1) shall include at least—

...

(c) information of any type or character that has been requested and provided on more than three occasions by a public authority or following decisions issued the Commissioner

4.7 Remedyng the inability of public to take the lack of proactive publication to the Commissioner.

The group examined how, under the 2004 Regulations, and the enforcement and appeal provisions provided for under the Freedom of Information Act 2000, an applicant for environmental information cannot take the matter of a lack of proactive publication to the Commissioner.

The enforcement and appeal provisions of the 2004 Regulations are in effect, borrowed from the 2000 Act, by virtue of Regulation 18:

18.—(1) The enforcement and appeals provisions of the Act shall apply for the purposes of these Regulations as they apply for the purposes of the Act but with the modifications specified in this regulation.

Section 50 of the 2004 Act, subsection 1, provides that a person can take a matter to the commissioner when “a request for information” has not been dealt with in accordance with, in this case, the 2004 Regulations.

However, when a person is taking issue with a lack of proactive publication, that would not be considered “a request for information” under section 50 of the Act.

The group considered that a person should be able to complain to the Commissioner and secure a Decision from the Commissioner if there is breach of the duty under the 2004 Regulations on proactive publication.

Recommendation 9

The group recommends an amendment with the effect that a person can complain if there is a breach of duty under the 2004 Regulations on proactive publication, by inserting a new Regulation 18(1)(A):

18(1A) The enforcement and appeals provisions of the Act shall be read for the purposes of these Regulations, such that a request for information as defined in section 50(1) of the Act, shall be taken to include circumstances in which a public authority has, in the opinion of the applicant or complainant, failed to comply with the duty under Regulation 4.

4.8 Learning from Commissioner Decisions to avoid using unlawful exceptions for the same type of information.

The group heard examples of how public authorities do not always appear to learn from previous Decisions from the Commissioner, or from Tribunal or higher Courts as to when, and to what information, they can and cannot apply exceptions provided for by Regulation 12.

These can be decisions made by the Commissioner either against the authority itself, or against other public authorities, in relation to when it is appropriate to apply particular exceptions under regulation 12 and when it is not.

This adds considerably to the time and trouble faced by applicants for information.

It is not resource-efficient for public authorities repeatedly to put applicants to the trouble of complaining to the Commissioner on points that the Commissioner has already addressed in previous Decisions. By repeating the same incorrect application of exceptions to requests, internal review and Commissioner investigations are triggered on points that have been addressed previously.

That can take many months.

Most importantly, the group considered that, in practical effect, reliance on exceptions to withhold information, where public authorities should already understand that such reliance is unlawful, undermines the right of the public to have access to environmental information in a timely manner.

Recommendation 10

The group recommends an amendment adding add a new subsection to Regulation 12 requiring public authorities to ‘learn’ from Decisions, Tribunal or higher Court rulings, by inserting a new Regulation 12(1A):

“A public authority may not refuse to disclose environmental information by applying any exception to disclosure under paragraphs (4) or (5) if the public authority should reasonably be aware from decisions of the Commissioner or judgments of the Tribunal or any higher Court that an exception does not apply to the environmental information requested”.

4.9 Remedying public authorities' ability to raise different exceptions at refusal, at review, at Commissioner's investigation or at Tribunal.

The group examined the effect of the case of *Birkett v DEFRA* [2011] EWCA Civ 1606 which ruled that a public authority could rely upon a different exception or exceptions in proceedings before the Commissioner and/or the Tribunal for refusing to disclose environmental information.

The group considered whether there should be a regulatory or statutory limit on the number of attempts that a public authority can make to invoke the correct exception under Regulation 12.

The group noted, as the Tribunal stated in *Department for Business, Enterprise and Regulatory Reform v ICO and Friends of the Earth* (EA/2007/0072, 29 April 2008), that "it was not the intention of Parliament that public authorities should be able to claim late and/or new exemptions without reasonable justification otherwise there is a risk that the complaint or appeal process could become cumbersome, uncertain and could lead public authorities to take a cavalier attitude towards their obligations. This is a public policy issue which goes to the underlying purpose of FOIA".

The group noted that *Birkett* in effect means that different exceptions be applied (at refusal, at review, at the stage of investigation by the Commissioner and at Tribunal) giving a public authority four attempts to 'get it right'.

This is patently unfair to applicants.

The group proposed an amendment preventing the Commissioner from making a Decision applying exceptions not already raised by the public authority at the initial refusal or internal review stages. Two attempts at 'getting it right'⁵ was considered more reasonable for both the applicant and the public authority to ensure a balance between timely access to information, while ensuring the public authority still has an opportunity to revise its reasons for refusing to disclose information.

Recommendation 11

The group proposes an amendment to Regulation 18:

"18(1A) The enforcement and appeals provisions of the Act shall be read for the purposes of these Regulations such that the Commissioner may not make a Decision applying any exceptions under Regulation 12 that have not been raised reasonably by the public authority as part of its reconsideration under Regulation 11".

4.10 Addressing the use of private emails.

The group noted that use of private emails or other private ‘channels’ of communications has been an issue on a number of occasions recently and there has been increasing use of private email accounts by people working in public authorities for their work-related communications.

There is an increasing concern of the use of private emails by public bodies/authorities to avoid disclosure under freedom of information for work-related purposes.

However, information from private emails would be difficult to locate, which in turn, makes it practically very difficult to disclose.

The group noted the cases of Hillary Clinton, Suella Braverman and Matt Hancock and considered whether adding a new provision to the 2004 Regulations, expressly to include the use of private emails to hold or communicate information relating to the functions of a public authority within the definition of information susceptible to request under the regulations, might work.

Screening private communications may be considered in some circumstances to be too invasive.

However, the group considered that an amendment to the 2004 Regulations could provide that information to be disclosed should include any information that is received, held, stored or communicated through private communications channels, if it related to the functions of a public authority.

Recommendation 12

The group proposes an amendment to Regulation 12(4)(a), so that it reads:

“12(4) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that—

(a) it does not hold that information when an applicant’s request is received and, where there is reason to consider that private communications may contain that information, such search of private communications as can be made lawfully has been made”

4.11 When ‘harm’ should be required and not required, when applying exceptions under Regulation 12.

The group examined and noted that under regulation 12, which deals with the exceptions to the duty to disclose environmental information, the exceptions are divided into two groups per regulation 12(4) and regulation 12(5).

The exceptions provided for in 12(4) are what is known as absolute exceptions, whereas those in 12(5) apply only where the disclosure of the information requested would adversely affect the subject matter of the exception. If there is no harm, the exception cannot be applied.

In other words, Regulation 12(4) exceptions do not require harm to be shown by a public authority seeking to rely on them, whereas Regulation 12(5) exceptions do require harm.

The group considered that there is no logical reason why the exceptions provided for at Regulation 12(4)(d) and (e) should not also require there to be harm before the exception applies. There was nothing that logically means that information that is still in the course of completion (per Regulation 12(4)(d)) or information that is internal communications (Regulation 12(4)(e)) should not be disclosed if the disclosure of that information causes no **harm**.

Recommendation 13

The group therefore recommends that Regulation 12(4) and (5) are amended such that the current regulation 12(4)(d) and (e) appear as regulation 12(5)(h) and (i) respectively.

Defnyddiwch enwau Cymraeg yn unig ar gyfer lleoedd yng Nghymru

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/7092-2

Rhif y ddeiseb: P-06-1369

Teitl y ddeiseb: Defnyddiwch enwau Cymraeg yn unig ar gyfer lleoedd yng Nghymru

Geiriad y ddeiseb: Byddai hyn yn dangos parch tuag at Gymru, fel cenedl sydd â'i hanes a'i diwylliant ei hun; a byddai'n cydnabod rhai o'r ffyrdd y mae Cymru wedi dioddef gorthrwm diwylliannol yn hanesyddol o ran ei hiaith a'i diwylliant.

Yn y lle cyntaf, gallai pobl barhau i ddefnyddio enwau Saesneg yn ôl eu harfer. Fodd bynnag, ym mhob cyd-destun swyddogol, ac yn y cyfryngau llafar ac ysgrifenedig, dylid defnyddio'r enwau Cymraeg gwreiddiol ar gyfer lleoedd yng Nghymru.

Yn dilyn datblygiadau yn ymwneud ag enwau Eryri a Bannau Brycheiniog, rydym o'r farn ei bod yn amser da i ddechrau defnyddio enwau Cymraeg yn unig ar gyfer lleoedd yng Nghymru.



1. Cefndir

Mae enwau pentrefi, trefi a dinasoedd Cymru wedi datblygu dros gyfnod o ddwy fileniwm. Er bod **mwyaf y enwau lleoedd yng Nghymru yn Gymraeg**, mae tarddiad rhai enwau lleoedd yn Saesneg, Ffrangeg, Lladin, Gwyddeleg, Norseg a Brythoneg (gan esblygu i ddod yn Gymraeg fel rydym yn ei hadnabod heddiw).

Mae enghreiffiau o rai **enwau lleoedd Cymraeg yn unig** y gellir eu hadnabod yn cynnwys Aberystwyth, Bangor, Tonypandy, Penarth a Phontypridd. Fodd bynnag, mae sawl enghraifft o ddinasoedd, trefi a phentrefi yng Nghymru sydd ag enw Cymraeg a Saesneg.

Mae gan rai o'r lleoedd hynny sydd ag enwau Cymraeg a Saesneg **sillafu ac ynganiad tebyg iawn** yn y ddwy iaith. Lleoedd fel:

- *Caerffili* - Caerphilly;
- *Caerdydd* - Cardiff;
- *Merthyr Tudful* - Merthyr Tudful;
- *Treorci* - Treorchy.

Mae Dr. Dylan Foster Evans yn ymhelaethu ar esblygiad enwau lleoedd Cymraeg yn yr erthygl fer hon - *Enw da yw'r trysor gorau*. Mae'n nodi bod Caerdydd, er enghraifft, 'yn deillio o'r ffurf ganoloesol Caerdyf (sydd hefyd yn rhoi Cardiff yn y Saesneg)'. Mae'n nodi bod ieithyddion yn credu bod yr enw'n debygol 'wedi ei lunio'n gyntaf yn yr iaith Frythoneg, yn y cyfnod pan oedd y Rhufeiniaid yn byw yng Nghaerdydd tua 2,000 o flynyddoedd yn ôl'.

Mae enghreiffiau o enwau Saesneg fel Flint (Y Fflint), Wrexham (Wrecsam) a Caldicot (Cil-y-coed) sydd wedi'u mabwysiadu gan y Cymry yn hytrach na'r ffordd arall. Yn yr un modd, yr enw gwreiddiol ar Fiwnates oedd yr enw Normanaidd-Ffrangeg - Beaumaris.

Mae gan leoedd eraill yng Nghymru enwau amgen nad ydynt yn gysylltiedig â'i gilydd. Dyma enghreiffiau:

- Newport - Casnewydd (mae'r Gymraeg yn golygu Castell Newydd);
- Swansea (yn deillio o'r Norseg sy'n golygu Ynys Svein) - Abertawe (mae'r Gymraeg yn golygu Aber Afon Tawe);
- Brecon (yn deillio o Deyrnas Gymreig Brycheiniog) - Aberhonddu (daw'r Gymraeg o Afon Honddu);

- Anglesey (yn deillio eto o Norseg - *Ongul*), tra bo'r enw Cymraeg *Môn*, wedi'i gofnodi gyntaf fel Lladin *Mona*.

Mae enghreifftiau o enwau lleoedd Cymraeg wedi'u Seisnigeiddio yn peidio â chael eu derbyn neu eu defnyddio'n raddol, gan gynnwys Caernarvon (Caernarfon), Conway (Conwy), Portmadoc (Porthmadog) a Llanelli (Llanelli).

Mae hefyd lleoedd lle mae anghytundebau parhaus ynghylch p'un a ddylid defnyddio'r sillafu Cymraeg yn gyfan gwbl ai peidio, fel yn **Varteg (Farteg)** sydd wedi cael rhywfaint o gyhoeddusrwydd yn ddiweddar.

2. Y Panel Safoni Enwau Lleoedd

Mae **Comisiynydd y Gymraeg**, corff annibynnol a sefydlwyd gan **Fesur y Gymraeg (Cymru) 2011**, yn gyfrifol am roi cyngor ar y **ffurfiau safonol o enwau lleoedd yng Nghymru**. Mae rhestr o ffurfiau safonol enwau Cymraeg pentrefi, trefi a dinasoedd yng Nghymru **ar gael ar-lein** i unrhyw un sydd am ei defnyddio.

Sefydlodd y Comisiynydd **banel o arbenigwyr** i weithio ar ffurf safonol enwau lleoedd Cymru a gwneud argymhellion arnynt. Mae gwefan y Comisiynydd yn nodi bod y Panel Safoni Enwau Lleoedd yn ystyried 'ystyr, hanes a tharddiad yr enwau lleoedd ynghyd â'r defnydd cyfredol ohonynt wrth lunio'i argymhellion'. Mae'r panel hefyd yn cael ei arwain gan y **Canllawiau Safoni Enwau Lleoedd Cymru**. Mae Adran 9 - *Ffurfa deuol* yn nodi'r cyngor a ganlyn i'r panel ei ystyried:

Dylid anelu at **arfer un ffurf** yn unig pan nad oes **ond llythyren neu ddwy o wahaniaeth rhwng y ffurf Gymraeg a'r ffurf 'Saesneg'**, **gan dueudu at y ffurf Gymraeg**. Dyma hefyd ddymuniad yr Arolwg Ordnans ac Awdurdodau'r Priffydd. Eithr dylid cydnabod amrywiadau sefydlog (Caeriw/Carew, Biwmares/Beaumaris, Y Fflint/Flint, Wrecsam/Wrexham).

3. Camau gweithredu Senedd Cymru

Mae'r Senedd wedi ystyried sawl deiseb yn ystod yr ychydig flynyddoedd diwethaf yn ymwneud ag enwau lleoedd Cymru ac enwau tai Cymru. Yn 2021, cyflwynwyd deiseb a alwodd ar y Senedd a chyrff eraill i **ddechrau cyfeirio at enwau dinasoedd a threfi Cymru yn ôl eu henwau Cymraeg**. Casglodd y ddeiseb 108 o lofnodion. Galwodd y deisebwyr ar gyrrf cyhoeddus i ddechrau defnyddio termau ac enwau lleoedd Cymraeg er mwyn "[c]ynyddu'r defnydd o'r Gymraeg".

Clywodd y Pwyllgor dystiolaeth ynghylch y ddeiseb gan swyddfa Comisiynydd y Gymraeg yn ei gyfarfod ar 7 Mawrth 2022. Un o'r materion a amlygywd yn ystod y sesiwn oedd bod y cyfrifoldeb dros benderfynu ar enwau lleoedd yn nwylo mwy nag un sefydliad. Ar ben hynny, nid oes deddfwriaeth benodol yng Nghymru ar gyfer safoni enwau lleoedd Cymru. Nododd y Dirprwy Gomisiynydd ar y pryd fod:

yna le inni wneud adolygiad o beth ydy sefyllfa Cymru a dod o hyd i atebion sydd yn addas i'n sefyllfa ni. Un o'r pethau dwi'n meddwl sy'n hynod bwysig ydy ein bod ni'n cael yr eglurder yna. Mae'n amlwg i fi yng Nghymru bod yna eithaf tipyn o ddryswch. Rwan, does dim rhaid ichi gael deddfwriaeth i ddatrys dryswch, ond dwi'n meddwl ein bod ni'n methu, yn aml iawn, i gyflawni—. Er bod yna waith caled, dŷn ni'n methu cyflawni cystal ag y buasem ni'n gallu y gwaith o hyrwyddo a gwarchod yr enwau yma, oherwydd ansicrwydd hyd a lled y maes.

Er nad oedd y Dirprwy Gomisiynydd yn galw am greu deddfwriaeth newydd yn y maes hwn, dywedodd y byddai adolygiad o'r mater dan sylw yn amserol.

Yn ystod hanner cyntaf 2020, cyflwynwyd deiseb debyg a oedd yn galw am fynid yn ôl i sillafu enwau lleoedd Cymraeg yn y ffordd Gymraeg. Dyma'r camau penodol y galwodd y deisebwyr amdanynt:

Mae gan Gymru lawer o enwau lleoedd sydd wedi'u Seisnigeiddio'n ddiangen, ac sydd yn aml wedi'u disodli gan ffurfiau Seisnigedig am ddim rheswm da. Rwyf i, a'r rhai sydd wedi llofnodi isod, yn deisebu Cynulliad Cymru i weithredu ac i newid y ffurfiau Seisnigaidd hyn o enwau Cymraeg, drwy Gymru gyfan, ac i adfer eu sillafiadau Cymraeg gwreiddiol.

Trafododd Pwyllgor Deisebau'r Bumed Senedd y ddeiseb ym mis Mehefin 2020. Casglodd y ddeiseb 1,096 o lofnodion.

Yn ystod ail hanner 2020, cafodd deiseb yn galw am ddeddfwriaeth i atal newid enwau Cymraeg tai ei chyflwyno i'r Senedd. Casglodd y ddeiseb hon 18,103 o lofnodion, a chafodd ei thrafod yn y Cyfarfod Llawn ar 20 Ionawr 2020. Yn ystod y ddadl, nododd y Gweinidog lechyd Meddwl, Llesiant a'r Gymraeg blaenorol:

Rhaid imi gyfaddef bod hwn yn fater dwi yn poeni amdano, ond mae yna broblemau ymarferol mae'n rhaid inni edrych ar ynhw...dwi yn hapus i weld a yw hi'n bosibl i ni wneud rhywbeth yn statudol hefyd. Ond, mae'n rhaid i fi ddweud, dwi ddim yn siŵr a yw hi'n bosibl, ond dwi'n fwy na hapus i weld a allwn ni symud ymhellach yn y maes yma.

Yn 2018, cafodd deiseb yn galw ar y Senedd i ddiogelu a hyrwyddo enwau lleoedd Cymru ei gyflwyno. Casglodd 431 o lofnodion a dyma'r camau penodol y galwedd y desebydd amdanyst:

Mae mwy a mwy o enwau lleoedd a thai Cymraeg yn cael eu newid i enwau Saesneg. Mae hyn yn arwain at dranc diwylliant lleol ac un o'r elfennau sy'n gwneud Cymru'n unigryw... Dylid diogelu hen enwau Cymraeg ar leoedd ac adeiladau o dan y gyfraith, a dylai fod yn orfodol i ddatblygiadau newydd gael enwau Cymraeg er mwyn diogelu ein diwylliant a'n hiaith unigryw.

Flwyddyn yn gynharach, enillodd Dai Lloyd AS y bleidlais i gynnig bil Aelod: Datblygu Bil Diogelu Enwau Lleoedd Hanesyddol Cymru. Cynhalwyd dadl yn y Cyfarfod Llawn ar 15 Mawrth 2017.

Nid oedd Llywodraeth Cymru yn cefnogi'r bil, ac ni chafodd ganiatâd i fynd rhagddo.

Fel rhan o'i ymchwiliad yn 2017 i'r Amgylchedd Hanesyddol, bu'r Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu (y Bumed Senedd) yn trafod y Rhestr o Enwau Lleoedd Hanesyddol Cymru. Nododd y dylai Llywodraeth Cymru barhau i fynd ati i adolygu'r mater a bod yn barod i gyflwyno mesur diogelu arall ar gyfer enwau lleoedd hanesyddol os na fydd y rhestr bresennol yn effeithiol.

4. Camau gweithredu Llywodraeth Cymru

Amlinellodd Llywodraeth flaenorol Cymru ei gweithgarwch yn y maes hwn mewn ymateb i'r ddeiseb yn 2018 yn galw ar y Senedd i ddiogelu a hyrwyddo enwau lleoedd Cymru. Nododd, ar ôl pasio Deddf yr Amgylchedd Hanesyddol (Cymru) 2016, fod Llywodraeth Cymru wedi cyflwyno rhestr statudol o enwau lleoedd hanesyddol.

Mae canllawiau statudol yn ei gwneud yn ofynnol i awdurdodau Parciau Cenedlaethol a Cyfoeth Naturiol Cymru ystyried y rhestr pan fo'u swyddogaethau'n cynnwys enwi neu ailenwi lleoedd. Mae hyn yn cynnwys enwi neu ailenwi strydoedd, adeiladau a lleoedd eraill, naill ai'n uniongyrchol neu gan barti arall. Y bwriad yw y bydd y rhestr a'r canllawiau statudol gyda'i gilydd yn arwain at ostyngiad yn nifer y newidiadau ffurfiol i enwau eiddo hanesyddol.

Fodd bynnag, nododd Llywodraeth Cymru:

...nid yw'r mesurau hyn yn mor bell â diogelu enwau lleoedd hanesyddol yn ffurfiol. Rhoddwyd ystyriaeth fanwl i ddiogelu enwau lleoedd hanesyddol yn statudol wrth fynd ati i ddatblygu Deddf 2016.

Mewn ymateb i'r ddeiseb yn galw am fynd yn ôl i sillafu enwau lleoedd Cymraeg yn y ffordd Gymraeg, nododd Gweinidog y Gymraeg ar y pryd:

Comisiynydd y Gymraeg sy'n gyfrifol am roi cyngor i unigolion a sefydliadau am ffurfiau safonol enwau lleoedd yng Nghymru. Mae Rhestr y Comisiynydd o Enwau Lleoedd Safonol Cymru yn adnodd ar-lein defnyddiol, y gellir ei chwilio neu y gellir ei lawrlwytho, i ddod o hyd i enwau safonol pentrefi, trefi a dinasoedd yng Nghymru...

Fodd bynnag, rôl y Comisiynydd yw awgrymu ffurfiau a sillafiadau enwau lleoedd, yn hytrach na'u gorfodi.

Wrth ymateb i'r ddeiseb sy'n galw ar y Senedd a chyrff eraill i ddechrau cyfeirio at enwau dinasoedd a threfi yn ôl eu henwau Cymraeg, nododd Gweinidog y Gymraeg ac Addyssg fod:

Enwau lleoedd Cymraeg ar hyn o bryd yn destun sylw manwl yn y Llywodraeth, a sawl proses ar waith i gasglu dystiolaeth er mwyn llywio datblygiadau polisi yn y maes.

Mae'r Gweinidog yn gorffen ei ymateb wrth gyfeirio at ymrwymiad Llywodraeth Cymru yn ei Raglen Lywodraethu, gan nodi:

Gwyddom fod pobl yn teimlo'n gryf am enwau Cymraeg, boed y rheiny'n enwau tai, yn enwau ar nodweddion daearyddol, neu'n enwau ar drefi a phentrefi. Mae'r maes hwn wedi ei gynnwys yn ein Cytundeb Cydweithio â Phlaid Cymru am ein bod ni fel Llywodraeth am wneud gwahaniaeth gwirioneddol.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddaru o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1369
Ein cyf/Our ref JMEWL/01620/23

Llywodraeth Cymru
Welsh Government

Jack Sargeant AS
Cadeirydd – Y Pwyllgor Deisebau
Senedd Cymru
Bae Caerdydd
Caerdydd
CF99 1SN

16 Hydref 2023

Annwyl Jack,

Diolch am eich llythyr, dyddiedig 26 Medi, yn holi fy marn ynglŷn â'r ddeiseb yn galw am ddefnyddio enwau Cymraeg yn unig ar gyfer lleoedd yng Nghymru.

Mae gwarchod enwau lleoedd Cymraeg yn rhan bwysig o waith Llywodraeth Cymru, wrth gwrs, gyda'n [Rhaglen Lywodraethu 2021 i 2026](#) yn nodi y byddwn yn 'gweithredu i amddiffyn enwau lleoedd Cymraeg' a'r [Cytundeb Cydweithio](#) gyda Phlaid Cymru'n datgan y byddwn yn 'gweithredu i sicrhau bod enwau lleoedd Cymraeg yn yr amgylchedd adeiledig a naturiol yn cael eu diogelu a'u hyrwyddo ar gyfer cenedlaethau'r dyfodol'.

Hyd yn hyn, mae ein ffocws wedi bod ar y cyfoeth o enwau sydd gennym ar gyfer nodweddion daearyddol, daliadau tir, ac eiddo, gan gynnwys ffermydd a thai. Mae llawer o'r rhain yn hanesyddol. Drwy weithio ar y meysydd hyn, daw i'r amlwg mor gymhleth yw'r ffactorau sy'n effeithio ar enwau lleoedd, gydag ystyriaethau gwahanol ynghlwm wrth wahanol fathau o enwau. Mae hyn yr un mor berthnasol i enwau aneddiadau. Mae enwau pentrefi, trefi a dinasoedd Cymru, er enghraifft, wedi datblygu dros gannoedd os nad miloedd o flynyddoedd, ac er bo'r rhan fwyaf o'r enwau ar aneddiadau yng Nghymru â'u tarddiadau yn y Gymraeg, mae nifer ohonynt yn deillio o Saesneg, Ffrangeg, Lladin, Gwyddeleg neu Norseg.

Aiff pethau'n fwy cymhleth pan fod yna enwau gwahanol yn Gymraeg ar gyfer yr un dref neu ddinas. Mae gan bob tref, pentref a dinas ei hanes unigryw ei hun, ac mae'r hanes hwnnw'n perthyn i sut mae ei enw neu enwau wedi gwreiddio, datblygu a newid dros y canrifoedd. Mewn rhai o'r achosion hyn, nid yw'n eglur bob tro beth yw'r enw "gwreiddiol" ar anheddiad penodol.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

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

Gohebiaeth.Jeremy.Miles@llyw.cymru
Correspondence.Jeremy.Miles@gov.wales

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

Tudalen y pecyn 124

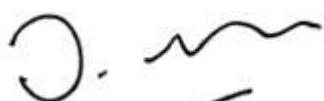
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and responding in Welsh will not lead to a delay in responding.

Mewn gohebiaeth flaenorol atoch ar bwnc tebyg, fe wnes i grybwyl enghraifft Caerdydd – mae'r enw modern Cymraeg *Caerdydd* yn dod o'r ffurf Gymraeg ganoloesol, *Caerdyf*, sydd yn y Saesneg wedi datblygu'n *Cardiff* (*gyda'r 'f' Cymraeg yn cael ei drosi'n 'ff' Saesneg*). Byddai'n anodd pennu, felly, pa un o'i ffurfiau modern sy'n glynus agosaf at y ffurf "wreiddiol" yn yr achos hwn. Ac o hepgor yr enw 'Saesneg' modern, gellid dadlau ein bod hefyd yn dileu cysylltiad â ffurf ganoloesol Gymraeg enw'r ddinas. Yr hyn yr wyf i wedi'i ddysgu wrth ymdrin ag enwau lleoedd yw bod gan bob enw unigol ei hanes unigryw.

Mewn rhai enghreifftiau, lle mae ynganiad enwau Cymraeg a Saesneg ar dref neu ddinas mor debyg i'w gilydd bod dadl gref dros lynnau at un sillafiad, rwy'n credu y gall wneud synnwyr i lynnau wrth y sillafiad Cymraeg. Yn hyn o beth, byddwn yn cefnogi'r egwyddor a hyrwyddir gan Gomisiynydd y Gymraeg, sef y dylem anelu at un ffurf pan fod ond ambell i lythyren o wahaniaeth rhwng y ffurfiau Cymraeg a'r rhai Saesneg. Yn y cyd-destun hwn, mae ein [polisi Seilwaith Ieithyddol y Gymraeg](#) yn nodi'r angen i hyrwyddo a phwysleisio statws enwau lleoedd sydd wedi eu safoni, a chodi ymwybyddiaeth o'r Rhestr o Enwau Lleoedd Safonol Cymru, sy'n cael ei chynnal gan y Comisiynydd. Ond mae'r rhain yn faterion lleol yn aml iawn - rydyn ni wedi gweld yn y gorffennol sut y gall newid dim ond un lythyren mewn enw tref neu bentref, neu ychwanegu cysylltnod er mwyn cysoni orgraff, arwain at anghydweld chwyrn mewn cymunedau lleol. Rwy'n dal i gredu, felly, bod angen canfod ffordd o adlewyrchu'r ystod eang o safbwytiau a goblygiadau sy'n bodoli.

Mae'r ddeiseb yn cyfeirio'n benodol at achosion Parc Cenedlaethol Eryri a Pharc Cenedlaethol Bannau Brycheiniog. Yn y bôn, sefydliadau annibynnol yw'r rhain sydd wedi cynnal ymarferion i geisio barn yn lleol ar y cynigion ar gyfer eu henwi. Er enghraifft, yn ystod y ddwy flynedd cyn ailenwi, cynhaliodd Awdurdod Parc Cenedlaethol Bannau Brycheiniog sgyrsiau gyda gwirfoddolwyr, trigolion lleol, ymwelwyr a busnesau ynglŷn â'i hunaniaeth a'r hyn y mae'n ei olygu i fod yn barc cenedlaethol. Roedd hyn yn cynnwys panel cyfeirio rhanddeiliaid, cynlliad dinasyddion, a phroses ymgynghori ar y brand. Rwyf i o'r farn y byddai angen ymgysylltu trylwyr a sgwrs gyhoeddus agored ar gyfer unrhyw benderfyniad o'r math hwn, am ei fod yn mynd at wraidd democratiaeth leol a sut mae pobl yn gweld eu hunain.

Yn gywir,



Jeremy Miles AS/MS
Gweinidog y Gymraeg ac Addysg
Minister for Education and Welsh Language

Achub y ddarpariaeth mân anafiadau dros nos yn Ysbyty Nevill Hall yn y Fenni

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/7092-3

Rhif y ddeiseb: P-06-1370

Teitl y ddeiseb: Achub y ddarpariaeth mân anafiadau dros nos yn Ysbyty Nevill Hall yn y Fenni

Geiriad y ddeiseb: Mae Bwrdd Iechyd Prifysgol Aneurin Bevan wedi nodi ei fod yn bwriadu cau ei Uned Mân Anafiadau yn Ysbyty Nevill Hall dros nos. Bydd hyn yn golygu mai dim ond un Uned Mân Anafiadau fydd ar agor rhwng 1am a 7am yn ardal gyfan y bwrdd iechyd - yn Ysbyty Brenhinol Gwent yng Nghasnewydd.

Byddai'r newid hwn yn cynyddu amseroedd teithio yn sylweddol i drigolion ym Mlaenau Gwent, Sir Fynwy, Torfaen a rhannau o Gaerffili. Byddai'r newid yn gwneud Ysbyty Brenhinol Gwent ac Ysbyty y Faenor yn fwy prysur fyth.

Mae'r bwrdd iechyd wedi cychwyn ymgynghoriad ar y cynnig: <https://bipab.giq.cymru/amdanom-ni/ymgysylltu/ymgysylltu-ymgynghori-cyhoeddus/cyfleoedd-presennol/ymgysylliad-8-wythnos-ddarparu-gwasanaethau-uned-man-anafiadau/>



1. Y cefndir

Mae Ysbyty Nevill Hall yn y Fenni yn darparu gofal i drigolion Gwent a De Powys, ac ar hyn o bryd yn cynnig gofal 24 awr, saith diwrnod yr wythnos, dan arweiniad nyrs mewn Uned Mân Anafiadau.

Ym mis Medi 2023, cyhoeddodd Bwrdd Iechyd Prifysgol Aneurin Bevan “ymgysylltiad 12 wythnos” ar ddarpariaeth gwasanaethau Uned Mân Anafiadau. Yn ôl dogfen friffo'r bwrdd iechyd mae gwerthusiad diweddar o'r galw am Unedau Mân Anafiadau wedi nodi patrymau gweithgaredd allweddol ar draws safleoedd, ac wedi amlyu anghydbwysedd sylweddol rhwng oriau agor a galw cleifion ar draws yr unedau mân anafiadau. Canfuwyd mai ychydig iawn o gleifion sy'n mynchu Uned Mân Anafiadau Ysbyty Nevill Hall rhwng 1:00am a 7:00am:

Between 1 April 2022 and 31 March 2023, there were 400 attendances to NHH MIU (approximately one patient per night) during these hours. By contrast, there were 1,530 attendances to RGH MIU (approximately four patients per night) during the same hours

Mewn ymateb i'r canfyddiadau hyn, mae'r bwrdd iechyd yn dweud ei fod wedi ystyried nifer o opsiynau ar gyfer darparu gwasanaethau yn y dyfodol, gyda'r nod o sicrhau bod capaciti'n cyfateb i'r galw yn y ffordd orau bosibl, a datblygu'r model mwyaf cadarn a chynaliadwy ar gyfer y dyfodol.

Yr opsiwn a ffefrir gan y bwrdd iechyd yw gwneud yr oriau agor dros dro presennol yn Ysbyty Ystrad Fawr yn barhaol (7:00am i 1:00am, saith diwrnod yr wythnos), a chyflwyno'r un patrwm oriau agor yn Ysbyty Nevill Hall. Pe bai'n cael ei fabwysiadu, byddai darpariaeth gwasanaeth Uned Mân Anafiadau fel a ganlyn:

- Ysbyty Brenhinol Gwent – Ar agor 24 awr, saith diwrnod yr wythnos
- Ysbyty Nevill Hall – Ar agor 18 awr o 7:00am i 1:00am, saith diwrnod yr wythnos
- Ysbyty Ystrad Fawr – Ar agor 18 awr o 7:00am i 1:00am, saith diwrnod yr wythnos
- Ysbyty Aneurin Bevan – Ar agor rhwng 9:00am a 7:00pm o ddydd Llun i ddydd Gwener (ac eithrio gwyliau'r banc)

Mae'r cyfnod ymgysylltu yn para tan 5:00pm ddydd Gwener 1 Rhagfyr 2023. Bydd yr ymatebion yn cael eu coladu mewn adroddiad ymgysylltu a fydd yn cael ei

rannu gyda rhanbarth Llais Gwent (y corff sydd wedi disodli Cynghorau lechyd Cymuned) i nodi a ellir gwneud penderfyniad terfynol, neu a oes angen cymryd camau pellach.

Yn ôl y bwrdd iechyd – yn amodol ar drafodaethau pellach gyda Llais – efallai y bydd yn dymuno cychwyn ar gyfnod o ymgynghori ffurfiol, ac os felly byddai'n gwahodd sylwadau unwaith eto.

2. Camau gan Senedd Cymru

Yn y [Cyfarfod Llawn ar 18 Hydref 2023](#), cododd Peredur Owen Griffiths AS y mater gyda'r Gweinidog lechyd a Gwasanaethau Cymdeithasol ynghylch y newidiadau arfaethedig, a gofynnodd:

O ystyried bod unedau mân anafiadau yn cael eu gweld yn elfen allweddol mewn strategaeth i leddfu'r pwysau ar adrannau damweiniau ac achosion brys, onid yw'n gam yn ôl, ac a fydd hyn yn gwneud Ysbyty Athrofaol y Faenor yn brofiad hyd yn oed yn hirach ac yn fwy rhwystredig i unrhyw un sy'n ymweld â'u hadran damweiniau ac achosion brys ac yn rhoi mwy o bwysau ar y staff sy'n gweithio yno?

Atebodd y Gweinidog fel a ganlyn:

[...] mae'n amlwg yn rhywbeth rwy'n gwybod bod y bwrdd iechyd wedi ei ystyried o ddifrif. Ond y ffaith amdani yw, yn enwedig mewn perthynas ag uned mân anafiadau'r Fenni, ar gyfartaledd, roedd un claf yno dros nos. Nawr, yn y sefyllfaoedd hyn o bwysau ariannol, mae'n anodd iawn cyfiawnhau hynny ar sail gwerth am arian. Ac yn sicr dyna un o'r rhesymau pam eu bod wedi cau'r cyfleuster hwnnw, a symud pobl, ac annog pobl i fynd i ysbyty newydd y Faenor, lle rydym wedi buddsoddi'n sylweddol, a byddwn yn gwneud buddsoddiad ychwanegol sylweddol yn y blynyddoedd i ddod. Rydym wedi rhoi £3.5 miliwn o gyllid cyfalaf ychwanegol tuag at sefydlu canolfan gofal argyfwng yr un diwrnod, er enghraift, yn ysbyty'r Faenor.

3. Ymateb Llywodraeth Cymru

Nododd y Gweinidog lechyd a Gwasanaethau Cymdeithasol yn ei hymateb i'r ddeiseb mai'r bwrdd iechyd sy'n gyfrifol am gynllunio a darparu gwasanaethau gofal iechyd ar ran ei boblogaeth leol.

Dyweddodd y Gweinidog ei bod yn ymwybodol, yn dilyn gwerthusiad diweddar o wasanaethau uned mân anafiadau, fod y bwrdd iechyd wedi nodi anghydbwysedd rhwng oriau agor a galw cleifion ar draws yr unedau, ac:

Er mwyn cydnabod y galw isel gan gleifion dros nos mewn rhai safleoedd (ar gyfartaledd un claf rhwng 1am a 7am yn Ysbyty Nevill Hall), mae'r bwrdd iechyd yn ceisio sicrhau bod yr adnodd staff gwerthfawr hwn yn cael ei ddefnyddio mor effeithiol â phosibl ac y gall timau clinigol gynnal eu sgiliau.

Dyweddodd y Gweinidog y byddai'n annog pawb sydd â diddordeb i gymryd rhan yn y broses ac na fyddai unrhyw benderfyniad yn cael ei wneud gan y bwrdd iechyd tan ar ôl i'r broses ymgysylltiad cyhoeddus ffurfiol ddod i ben ym mis Rhagfyr.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddaru o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1370
Ein cyf/Our ref MA/EM/02621/23

Llywodraeth Cymru
Welsh Government

Jack Sargeant AS
Cadeirydd y Pwyllgor Deisebau
Senedd Cymru
Bae Caerdydd
Caerdydd
CF99 1SN

15 Hydref 2023

Annwyl Jack,

Diolch am eich llythyr dyddiedig 2 Hydref ynghylch Deiseb P-06-1370 Achub y ddarpariaeth mân anafiadau dros nos yn Ysbyty Nevill Hall yn y Fenni.

Fel y gwyddoch, mae'r bwrdd iechyd yn gyfrifol am gynllunio a darparu gwasanaethau gofal iechyd ar ran ei boblogaeth leol. Ryw'n ymwybodol, fodd bynnag, yn dilyn gwerthusiad diweddar o wasanaethau uned mân anafiadau yn ardal y bwrdd iechyd, fod y bwrdd iechyd wedi nodi anghydbwysedd rhwng oriau agor a'r galw gan gleifion ar draws yr unedau. Er mwyn cydnabod y galw isel gan gleifion dros nos mewn rhai safleoedd (ar gyfartaledd un claf rhwng 1am a 7am yn Ysbyty Nevill Hall), mae'r bwrdd iechyd yn ceisio sicrhau bod yr adnodd staff gwerthfawr hwn yn cael ei ddefnyddio mor effeithiol â phosibl ac y gall timau clinigol gynnal eu sgiliau.

Dechreuodd y bwrdd iechyd broses ymgysylltu ffurfiol â'r cyhoedd ar 11 Medi, a fydd yn rhedeg tan 1 Rhagfyr, a byddwn yn annog pob parti â diddordeb i gymryd rhan yn y broses honno. Ceir rhagor o wybodaeth yn:

[Ymgysylltiad 12 wythnos ar Ddarparu Gwasanaethau Uned Mân Anafiadau - Bwrdd Iechyd Prifysgol Aneurin Bevan \(qig.cymru\).](#)

Ni fydd penderfyniad yn cael ei wneud gan y bwrdd iechyd tan ar ôl i'r broses ymgysylltu ffurfiol â'r cyhoedd ddod i ben ym mis Rhagfyr. Pe bai'r cynigion presennol yn cael eu gweithredu, byddai gwasanaethau mân anafiadau yn parhau i gael eu darparu yn Ysbyty Nevill Hall yn y Fenni am 18 awr y dydd, saith diwrnod yr wythnos rhwng 7.00am ac 1.00am, ac yn Ysbyty Aneurin Bevan yng Nglynebw y am 10 awr rhwng 9.00am a 7.00pm o ddydd Llun i ddydd Gwener. Bydd gwasanaethau mân anafiadau yn parhau i gael eu darparu yn Ysbyty Brenhinol Gwent yng Nghasnewydd ar sail 24 awr, ac mae Ysbyty

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

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

Gohebiaeth.Eluned.Morgan@llyw.cymru
Correspondence.Eluned.Morgan@gov.wales

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

Tudalen y pecyn 130

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

Athrofaol y Faenor yn parhau i ddarparu gwasanaethau adran achosion brys 24 awr y dydd, saith diwrnod yr wythnos ar gyfer unrhyw anafiadau neu gyflyrau meddygol mwy sylweddol.

Gobeithio y bydd hyn o gymorth ichi.

Yn gywir,



Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services



Jack Sargeant MS
Chair
Petitions Committee
Senedd Cymru
Cardiff
CF99 1SN

Wednesday 1st November 2023

Dear Jack,

Re: Petition P-06-1370 Save overnight minor injuries provision at Nevill Hall Hospital in Abergavenny.

Thank you for opportunity to share some views on the above petition ahead of your committee's discussions on 13th November.

I proposed this petition together with my ward colleague Cllr Jayne McKenna because we worry about the impact the overnight closure of the minor injuries unit will have on local residents, on existing pressures at The Grange and because of fears this is the thin end of the wedge.

In recent years in Monmouthshire we have seen health services repeatedly cut back and centralised. We've recently lost Accident & Emergency services at Nevill Hall in Abergavenny to be centralised at The Grange, even though the hospital didn't even have planning permission to be an all-access A&E unit.

Last year our ambulance stations in Monmouth and Parkwall near Chepstow were downgraded, while paramedics in Monmouth continue to operate out of a leaking portacabin while the neglected former station continues to deteriorate and decay.

In March, Aneurin Bevan University Health Board announced the temporary cessation of maternity services at Nevill Hall, centralising the service at The Grange. Disappointingly, this has now been made permanent, meaning there is now no maternity provision in our county.

This is on top of the loss of primary healthcare services, including most recently the loss of GP provision in the Glynneath area.

I requested that health board bosses answer questions in a council committee about their plans and it was clear that this closure is being considered not to improve patientcare but as a knee-jerk reaction to the health board's £160million mid-year budget overspend.

*County Councillor Richard John, Leader of the Opposition /Arweinydd yr Wrthblaid
Monmouthshire County Council, County Hall, Usk, Monmouthshire NP15 1GA*

Cyngor Sir Fynwy, Neuadd Sir, Brynbuga, Sir Fynwy NP15 1GA

E-mail/E-bost: richardjohn@monmouthshire.gov.uk

Tel/Ffon 01633 644219

Tudalen y pecyn 132

Under these plans the Royal Gwent In Newport will be the only overnight Minor Injuries Unit in the entire health board area for residents in Monmouthshire, Newport, Torfaen, Blaenau Gwent and Caerphilly. I entirely understand that specialist services should be centralised, but services like minor injuries units, which play an important role in triaging patients and reducing pressure on Accident & Emergency units are vital.

It makes no sense for patients from Abergavenny, other communities in northern Monmouthshire, Blaenau Gwent, southern Powys and elsewhere to travel all the way to the Royal Gwent potentially passing Nevill Hall and the Grange.

One of the arguments the health board is making in favour of the overnight closure is that very few patients attend Nevill Hall MIU overnight but at the same time the health board is saying that the Grange is under pressure because some patients are turning up there when really they should be going to MIU and that the Grange should be for immediately life or limb threatening conditions.

The other point that's been raised is that this decision isn't going to put lives at risk - try telling that to any parent who's taken their child to an MIU in the dead of night with a rash, unsure whether it's hand, foot and mouth or meningitis.

Last week, Monmouthshire County Council passed the following motion with cross party support:

This Council:

Opposes plans set out by Aneurin Bevan University Health Board to end overnight cover at the Minor Injuries Unit at Nevill Hall Hospital in Abergavenny and calls on the administration to work constructively with ABUHB and neighbouring local authorities to ensure that outcome.

I'm grateful for advanced sight of the Minister's comments on the issue, but note that she expresses no view on the proposals, which is disappointing given that health boards account to the Health Minister alone for decisions on service delivery.

Having seen other health services cut back in recent years, we are concerned this latest cut is the thin end of the wedge. We have already received support for our campaign from the public as well as our local MP, constituency and regional Senedd Members, but would very much welcome the support of the Petitions Committee.

Thank you in advance for considering this petition. If you require any further information, please do not hesitate to contact me.

*Yours sincerely,
Richard*

Richard John
Leader of the Opposition
Monmouthshire County Council

*County Councillor Richard John, Leader of the Opposition /Arweinydd yr Wrthblaid
Monmouthshire County Council, County Hall, Usk, Monmouthshire NP15 1GA
Cyngor Sir Fynwy, Neuadd Sir, Brynbuga, Sir Fynwy NP15 1GA
E-mail/E-bost: richardjohn@monmouthshire.gov.uk
Tel/Ffon 01633 644219*

Tudalen y pecyn 133

P-06-1373 Dylid atal Llywodraeth Cymru rhag gwastraffu £4 miliwn ar ddatblygiad preifat “Skyline” ar Fynydd Cilfái, Abertawe.

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/7092-6

Rhif y ddeiseb: P-06-1373

Teitl y ddeiseb: Dylid atal Llywodraeth Cymru rhag gwastraffu £4 miliwn ar ddatblygiad preifat “Skyline” ar Fynydd Cilfái, Abertawe.

Geiriad y ddeiseb:

Mae'r cynlluniau ar gyfer skyline yn cynnwys preifateiddio man cyhoeddus agored ar gyfer prosiect naŵr neb a fydd yn llwyddo ai peidio. Bydd cyfranddalwyr y cwmni preifat hwn yn elwa ar y chwistrelliad mawr hwn o arian, ond mae perygl iddo greu difrod amgylcheddol mawr, a hynny heb unrhyw sicrwydd o lwyddiant y fenter yn yr hirdymor.

Goblygiadau'r cais yw y caiff amwynder natur lleol a ddefnyddir yn helaeth ei golli. Dylid gweithredu mewn modd gwell, sef: Defnyddio cynlluniau presennol i warchod a gwella bioamrywiaeth y rhan wylt hon o Abertawe. Mae grant arian mawr ar gyfer dim budd penodol yn annoeth.

Trodd llygredd gwenwynig a ddeilliodd o orffennol diwydiannol metel trwm Abertawe ein bryniau'n dir diffaith, nes yn 70au'r ganrif ddiwethaf, dechreuodd partneriaeth rhwng ein Cyngor a'r Brifysgol ei drawsnewid yn raddol yn goetir pinwydd, oherwydd dyna'r unig rywogaeth a allai dyfu yno. Dechreuodd y gymuned leol ac ysgolion gyfrannu bryd hynny, ac mae hyn wedi parhau hyd heddiw oherwydd mae grŵp gwirfoddol yn helpu Cyfoeth Naturiol Cymru i ddad-ddofri'r coetir fel bod rhywogaethau a chreaduriaid cynhenid bellach yn ffynnu.

Rydym yn falch bod ein coetir yn cael ei adnabod fel yr enghraift orau o goetir trefol wedi'i adfywio yng Nghymru, ac mae gan bobl leol feddwl y byd ohono fel lle arbennig i fwynhau llond ysgyfaint o awyr iach ar ochr ddwyreiniol y ddinas. Mae



hefyd yn ystafell ddosbarth awyr agored ar gyfer ysgolion lleol. Os oes arian i'w wario, gadewch i ni gael rheolaeth o'r coetir, llwybrau, gwaith cynnal a chadw llwybrau, ceidwaid, hynny yw, pethau nad ydym wedi'u cael ers 25 mlynedd!

1. Y cefndir

Mae'r ddeiseb yn ymwneud â chynigion gan Skyline Enterprises Limited (Skyline) i greu datblygiad hamdden newydd a fydd wedi'i leoli yng Nghyfleuster Parcio a Theithio Glandŵr gan ymestyn hyd at Fynydd Cilfái.

Mae Skyline [yn disgrifio ei hun](#) fel cwmni twristiaeth rhyngwladol sy'n darparu hwyl wirioneddol i gymunedau byd-eang. Gyda'i bencadlys yn Seland Newydd, mae gan Skyline safleoedd yn Queenstown a Rotorua (Seland Newydd), Calgary a Mont Tremblant (Canada), Sentosa (Singapore), Busan a Tongyeong (De Korea) a chyn bo hir, Kuala Lumpur (Malaysia).

Mae'r [cynigion datblygu](#) yn cynnwys sawl elfen gan gynnwys, car cebol gondola o Waith Copr Hafod Morfa, tair reid car llusg, gwifren wib a siglen awyr, llwybrau beicio mynydd newydd, llwybrau cerdded a mannau picnic.

Mewn [erthygl ddiweddar ar Wales Online](#) ynghylch protest a drefnwyd yn erbyn y datblygiad, dywed llefarydd o Skyline y canlynol:

"Our proposals for Kilvey Hill celebrate the hill and its wildlife alongside providing a fun new attraction for the residents of Swansea and its visitors. We recognise the value and importance of the site in ecological terms and, for this reason, instructed Welsh consultancy firm, EDP, back in 2018, to start ecological survey work. That work has continued to date and has informed the preparation of our proposals. Critically, our objective is to enhance the overall biodiversity of the site and to allow for the better management of these in the long term through our involvement.

"If our application is successful, Skyline will be investing circa £34 million into the development of the site and we are already seeking local partners to assist with food and beverage retail at the proposed attraction and in the construction of the scheme. Local planning,

environmental and engineering firms have already been appointed to develop the application proposals.

"Skyline has built recognised world class facilities like this across the globe in New Zealand, Canada and Singapore. We believe Kilvey Hill is an excellent opportunity for our eighth site and we are committed to its sensitive development, as we have been with all our other sites. We held several public consultation events in March this year and community support was very strong. We look forward to further engagement with the people of Swansea as the planning application progresses."

2. Camau gan Lywodraeth Cymru

Daw ymateb Llywodraeth Cymru i'r ddeiseb gan Ddirprwy Weinidog y Celfyddydau, Chwaraeon a Thwristiaeth. Mae'r ymateb yn cadarnhau bod Llywodraeth Cymru wedi cytuno i ddarparu £4 miliwn o gymorth ariannol ar gyfer y fenter gyffredinol gwerth £34 miliwn, y rhagwelir y bydd yn creu "hyd at 100 o swyddi cyfwerth ag amser llawn uniongyrchol". Mae ymateb gan Lywodraeth Cymru i Gais Rhyddid Gwybodaeth, dyddiedig Mehefin 2023, yn nodi bod £1 miliwn o gyfanswm y pecyn cymorth ariannol gwerth £4 miliwn yn ad-daladwy.

Archwiliwyd y buddsoddiad arfaethedig yn Skyline gan Fwrdd Cynghorol Datblygu Diwydiannol Cymru cyn i'r penderfyniad gael ei wneud gan Weinidogion i gefnogi'r prosiect. Mae Bwrdd Cynghorol Datblygu Diwydiannol Cymru yn rhoi cyngor i Weinidog yr Economi ar faterion sy'n ymwneud ag economi Cymru. Rhan ganolog o'rôlei y Bwrdd Cynghorol yw rhoi cyngor ar brosiectau unigol sy'n gofyn am gymorth ariannol o dros £1 miliwn o'r cynlluniau perthnasol o fewn Cronfa Dyfodol yr Economi.

Yn yr ymateb, mae'r Dirprwy Weinidog hefyd yn mynd i'r afael â'r ystyriaethau amgylcheddol sy'n gysylltiedig â'r prosiect:

Gallaf gadarnhau ei bod yn ofynnol i'r awdurdod cynllunio lleol ystyried y cais yn unol â'r polisiau cynllunio cenedlaethol, sy'n cynnwys ystyriaethau amgylcheddol. Mae Skyline wedi cwblhau arolygon topograffig, amgylcheddol ac ecolegol cyn gwneud cais am gyllid.

Mae Llywodraeth Cymru wedi nodi llwybrau clir a fframweithiau polisi ym Mholisi Cynllunio Cymru (PPW) 11 ar gyfer y system gynllunio, er

mwyn ymateb i dueddiadau a chylchoedd amgylcheddol negyddol a sicrhau canlyniadau cynaliadwy gwell. Mae PPW11 yn nodi fframwaith cryf ar gyfer diogelu coed, coetiroedd a gwrychoedd, sy'n ei gwneud yn ofynnol i ddatblygwyr sicrhau bod plannu cydbwyso'n digwydd pan gaiff coetir neu goed eu tynnu fel rhan o gynllun arfaethedig. Mae hyn yn ogystal â'r amddiffyniad a roddir gan Orchmyntion Diogelu Coed a weinyddir gan awdurdodau lleol hefyd.

Mae Skyline wedi ennill gwobr gan Seland Newydd am ei arferion cynaliadwy, sef Gwobr Aur Qualmark.

Bydd adeiladau newydd yn cyrraedd safon ragorol BREEAM lle bo angen. Fel rhag amod unrhyw gymorth, mae'n ofynnol i Skyline gynnal archwiliad annibynnol o'i berfformiad amgylcheddol yn Abertawe, drwy gynllun achredu allanol fel yr Agoriad Gwyrdd neu gynllun cyfwerth.

I grynhoi, nod ein dull buddsoddi ar gyfer prosiect Skyline yw cydbwyso ystyriaethau amgylcheddol ac economaidd y prosiect a sicrhau bod ein cyllid yn gysylltiedig â thargedau clir sy'n cael eu cyflawni.

3. Sylw gan Aelod Lleol o'r Senedd

Mae datblygiad arfaethedig Skyline yn sefyll o fewn etholaeth Dwyrain Abertawe Mike Hedges AS. Dyfynnir ef mewn erthygl ar [wefan Nation Cymru](#) o fis Ebrill eleni yn dweud y canlynol:

“£4 million is an awful lot to pay for 100 jobs – that’s £40,000 per job, which are likely to be low paid and, in the main, seasonal.

“Is it a good use of public money? I would say no.

“If you’ve got that money to invest, I’d much prefer to see it being invested in ITC (information and computer technology) and life science companies who provide high value jobs and will boost the economy.”

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r

Teitl:

papurau briffio hyn yn cael eu diweddaru o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.



Eich cyf/Your ref P-06-1373
Ein cyf/Our ref DB/00706/23

Llywodraeth Cymru
Welsh Government

Jack Sargeant AS
Cadeirydd y Pwyllgor Deisebau
Senedd Cymru
Bae Caerdydd
Caerdydd
CF99 1SN

26 Hydref 2023

Annwyl Jack,

Diolch am eich llythyr, dyddiedig 10 Hydref, ynglŷn â deiseb P-06-1373 sy'n ymwneud â phrosiect Skyline yn Kilvey Hill.

Fi sy'n ymateb gan fod hwn yn brosiect y mae Llywodraeth Cymru yn ei gefnogi sydd yn fy mhortffolio i, sef y Celfyddydau, Chwaraeon a Thwristiaeth.

Mae prosiect Skyline yn Abertawe yn cael ei gynnig gan ddatblygwr preifat o'r enw Skyline Enterprises Limited – cwmni o Seland Newydd sy'n gweithredu ac yn berchen ar saith atyniad presennol yn Seland Newydd, Canada, ac Asia.

Bwriad y prosiect hwn yw creu canolfan Ewropeaidd ac atyniad blaenllaw yn Kilvey Hill, Abertawe. Bydd y prosiect yn creu atyniad 'Skyline'. Mae'r prif weithgareddau yn cynnwys car cebl gondola o safle Gwaith Copr Hafod Morfa, tair reid *luge*, siglen awyr a weiren wib gydag atyniad sy'n cynnig bwyd a diod ar gopa Kilvey Hill.

Gan ystyried pryderon allweddol o destun y ddeiseb, rwyf wedi mynd i'r afael â phob pwynt yn ei dro.

Llwyddiant y prosiect

Wrth wneud penderfyniadau buddsoddi, rydym yn ystyried llawer o ffactorau, ac rydym yn ymdrechu'n gyson i gael y gwerth gorau posibl o bob un o'n buddsoddiadau prosiect.

Mae Bwrdd Cyngorol Cymru ar Ddatblygu Diwydiannol (WIDAB) yn craffu ar y broses o wneud penderfyniadau buddsoddi ac yn adolygu prosiectau a gwneud argymhellion arnynt.

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

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Dawn.Bowden@llyw.cymru
Correspondence.Dawn.Bowden@gov.wales

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

Tudalen y pecyn 139

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

Archwiliodd WIDAB, <https://www.llyw.cymru/bwrdd-cynghorol-cymru-ar-ddatblygu-diwydiannol>, y buddsoddiad arfaethedig ym mhrosiect Skyline cyn i'r penderfyniad Gweinidogol i gefnogi'r prosiect gael ei wneud.

Rhagwelir y bydd y buddsoddiad ym mhrosiect Skyline yn darparu – dros gyfnod y cytunir arno – hyd at 100 o swyddi cyfwerth ag amser llawn ac yn ysgogi buddsoddi sylweddol gan y sector preifat. Yn ogystal, bydd y prosiect yn cael effaith anuniongyrchol ar yr economi drwy waith adeiladu, cyflogau a gwariant ymwelwyr, a'r effaith ar gadwyni cyflenwi.

Cyllid

Gosodir dyfarniadau grant yn erbyn targedau y mae rhaid i brosiect Skyline eu cyflawni, ac fe'u gwneir fusol cam drwy gydol y broses. Mae'r cais i Lywodraeth Cymru yn gofyn am gymorth ariannol o £4 miliwn, sy'n rhan o'r fenter gyffredinol sy'n werth £34 miliwn. Mae'r dyfarniad ariannu hefyd yn ddarostyngedig i gyfres o amodau, gan gynnwys cymeradwyo caniatâd cynllunio a chadarnhau pryniannau tir.

Yr amgylchedd

Gallaf gadarnhau ei bod yn ofynnol i'r awdurdod cynllunio lleol ystyried y cais yn unol â'r polisiau cynllunio cenedlaethol, sy'n cynnwys ystyriaethau amgylcheddol. Mae Skyline wedi cwblhau arolygon topograffig, amgylcheddol ac ecolegol cyn gwneud cais am gyllid.

Mae Llywodraeth Cymru wedi nodi llwybrau clir a fframweithiau polisi ym Mholisi Cynllunio Cymru (PPW) 11 ar gyfer y system gynllunio, er mwyn ymateb i dueddiadau a chylchoedd amgylcheddol negyddol a sicrhau canlyniadau cynaliadwy gwell. Mae PPW11 yn nodi fframwaith cryf ar gyfer diogelu coed, coetiroedd a gwrychoedd, sy'n ei gwneud yn ofynnol i ddatblygwyr sicrhau bod plannu cydbwyso'n digwydd pan gaiff coetir neu goed eu tynnu fel rhan o gynllun arfaethedig. Mae hyn yn ogystal â'r amddiffyniad a roddir gan Orchmylion Diogelu Coed a weinyddir gan awdurdodau lleol hefyd.

Mae Skyline wedi ennill gwobr gan Seland Newydd am ei arferion cynaliadwy, sef Gwobr Aur Qualmark.

Bydd adeiladau newydd yn cyrraedd safon ragorol BREEAM lle bo angen. Fel rhag amod unrhyw gymorth, mae'n ofynnol i Skyline gynnal archwiliad annibynnol o'i berfformiad amgylcheddol yn Abertawe, drwy gynllun achredu allanol fel yr Agoriad Gwyrdd neu gynllun cyfwerth.

I grynhoi, nod ein dull buddsoddi ar gyfer prosiect Skyline yw cydbwyso ystyriaethau amgylcheddol ac economaidd y prosiect a sicrhau bod ein cyllid yn gysylltiedig â thargedau clir sy'n cael eu cyflawni.

Yn gywir,

Dawn Bowden AS/MS

Dirprwy Weinidog y Celfyddydau, Chwaraeon a Thwristiaeth

Deputy Minister for Arts, Sport and Tourism

P-06-1373 Stop Welsh Government Wasting £4million on Skyline private development Kilvey Hill, Swansea, Correspondence – Petitioner to Committee, 08.11.23

Subject: Submission of Petition Report and Survey Findings on the Skyline Development at Kilvey Hill

REF: P-06-1373

For the attention of Members of the Petitions Committee

I, Neil Jones, submitted the petition referred to above on behalf of [Swansea Friends of the Earth](#)(1).

Thank you for offering the extension for this to be read by the committee. There has been extensive community consultation and involvement by volunteers in the absence of Council engagement.

[Swansea Skyline](#) (2) is primarily a complicated large, prominent outdoor and weather-dependent development on Kilvey Hill involving two miles of concrete go-kart track, illuminated until 11 p.m., with sound systems, 24-hour lighting and a licenced bar on the summit. Committee members must not be confused by the name and publicity into thinking it is primarily a zip wire project. It will also include gondolas, a sky swing, service areas, car parks, food truck stands, and luge/skylifts.

Reference: [Figure 1 Korea Luge \(Go Kart track\) Skyline pic](#) and [Figure 2 Vista view of the proposed skyline project site](#)

Recognised designations of Kilvey Hill:

[Site of Importance for Nature Conservation](#)(3) whilst being Wales's largest urban forest with a [Nationally Designated Quiet Area](#)(4), [WOM21 Open Access Area](#)(5). [The Open Spaces Society](#)(6) has condemned the development.

In light of the letter in response to the petition, [231026 Deputy Minister for A,S & T to Chair.pdf](#) We submit our petition report and survey findings regarding the Skyline development at Kilvey Hill. These documents reflect substantial community concerns, supported by data collected by Swansea Friends of the Earth and [Kilvey Community Woodland Volunteers](#)(7). Extensive information on Kilvey Hill and the Skyline project is available here: <https://www.facebook.com/savekilveyhill>(8).

Community Involvement and Concerns:

A rigorous survey of 245 residents conducted by [Kilvey Community Woodland Volunteers](#) revealed deep-seated concerns and anger about the proposed use of public funds for the Skyline project: 90% of participants expressed unease about potential environmental degradation, increased noise, traffic, and loss of green space, all of which could adversely affect personal well-being. In particular, additional comments by 185 participants revealed anger at the lack of community consultation. Results here:

[qual-survey-231107.pdf](#) [quant-survey-231107.pdf](#)

Petition Support and Significance:

The petition, "Stop Welsh Government Wasting £4 million on 'Skyline' private development Kilvey Hill, Swansea," gathered 3,051 signatures, confirming the community's strong connection to Kilvey Hill. A significant portion of support originates from Swansea East and West, communities directly impacted by the development.

[Figure 3 Bar chart of Swansea petition numbers](#). See the [Full petition breakdown report of raw data](#).

Economic Sustainability:

The Skyline Swansea project's claim of creating [100 permanent jobs](#)(9) is challenged by the reality that these are likely to be job hours, not FTEs, and are dependent on achieving a projected visitor count of

450,000 per year. This figure is a massive decrease from an initial over-estimate of 750,000 visitors, which did not meet the company's own benefit-cost ratio (BCR) targets to finance the creation of these jobs, with an individual cost of £125,000 per long-term full-time job hours, Skyline Swansea is now dependent on £12.4 million of public funds and loans. Additional financial backing is presumed to be procured through loans guaranteed by a 125-year lease agreement, which includes public land, with the only security being the limited guarantee of [SKYLINE SWANSEA LIMITED \(Company No. 14320214\)](#)(10), directed by [Geoffrey McDonald](#)(11) and [Nigel Vernon Short](#)(12), who also have ties to adjacent businesses [1](#)(13) [2](#)(14) and the [Swansea City Deal](#).

This financial approach raises concerns about safeguarding of public money and land, especially when considering the opaque nature of the project's financial details and the [Welsh Industrial Development Advisory Board's](#)(15) reliance on non-public [KADA reports](#)(16). These concerns are magnified by recent Welsh tourism data, confirming a decline in business across various sectors, inconsistent with the optimistic projections of the Skyline project.

Welsh Government's "[Tourism Barometer: Summer Wave 2023](#)(17)" indicates a tourism downturn, with only 46% of attractions reporting an uptick in visitors – a figure that conflicts with Skyline's projections. Moreover, top attractions like [Zip World Forest](#)(18), with 223,500 visitors in 2019, and Cardiff Castle, despite its advantageous location in the capital near an international airport, currently do not achieve such high visitor numbers [Cardiff Castle](#)(19) 2021 (372,606). Coupled with Swansea's current hotel capacity constraints, this paints a bleak picture of the project's hoped-for influx of visitors,

Please also see this email  From ben@zenic on On 07_09_2023 11_45 Re_ Subject_ Concerns and ... sent to Mike Hedges and Senned members containing evidence that The Skyline project's financial viability is in question due to concerns about [escalating costs](#)(21), significant [gambling involvement and bypassing government rules](#)(22), problems [paying back subsidies](#)(23) and doubts about meeting visitor projections, raising doubts about its longer-term financial sustainability.

Further, a cause for concern was raised by an article about a recent environmental and community disaster with a Skyline Queenstown development that should raise alarms about care and due diligence within the company. See image [Figure 4: Landslide at Queenstown site](#) and full ([article](#)(24))

The economic viability of the Skyline project is uncertain, demanding a reassessment of its sustainability and a commitment to transparent public investment, especially in the context of recent tourism statistics.

Environment, Well-being and Educational Value:

Kilvey Hill is a special and unusual natural space for mental and physical health, a role supported by Welsh government-funded research. The potential loss or fragmentation of this space could have negative impacts on community health and well-being. Over 60 community groups, mainly volunteer groups, regularly use the hill.

In 2018, the [welfare value](#)(25) for Kilvey was £599,497 on the basis of 147,810 visits. In comparison, Singleton Park is worth £785,666 on the basis of 337,429 visits per year. It shows that the Council risks losing a considerable well-being asset.

The well-being of future generations is a cornerstone of Welsh policy, mandating the preservation of green spaces and the promotion of nature-based well-being practices. Major research over 10 years with 2.3 million adults in Wales ([Geary et al., 2023](#))⁽²⁶⁾ documents the mental health benefits associated with proximity to green spaces, with these effects amplified in socio-economically deprived areas. The Swansea region, particularly the less-affluent East, shows a correlation between green space availability and health outcomes ([Dobbs, 2003](#))⁽²⁷⁾.

Kilvey Hill, as a natural sanctuary, plays a vital role in community health and well-being, offering a place for social interaction and nature-connected activities. Welsh government-funded research ([Simons, 2023](#))⁽²⁸⁾ supports this, revealing the positive impact of time spent on Kilvey Hill in reducing stress and enhancing mental well-being. This space is integral not only for therapeutic and educational purposes but also as a green refuge that sustains the community's social fabric.

With the current user mix of the hill, this project runs the risk of reducing multiple access overall. Swansea's definitive paths map indicates the east side is the most deprived and has few paths and bridleways as defined by [Swansea council](#)⁽²⁹⁾. Recent cuts to bus services in the area due to the withdrawal of funding from the Welsh government compounds this deprivation, [29th October 2023 Service Changes | First Bus](#)⁽³⁰⁾. Lack of public transport will increase the need of the Hill for recreation and health-related activities.

Furthermore, the areas on Kilvey Hill, outside of the proposed lease area, will not be maintained by Skyline, i.e. paths and bike tracks, as stated by Swansea Council in the FIO request, if the Skyline project is awarded a 125-year lease.

The potential loss of space and degradation of Kilvey Hill due to disruptive development will undermine the well-being benefits currently provided. This is in direct contradiction to Welsh government policies that prioritise nature-connectedness and sustainable community health frameworks.

PWW Policy Concerns & Call for Review – Skyline Swansea Project

There are significant policy concerns regarding the Skyline Swansea project, as outlined in the detailed analysis attached [[Attachment Link](#)]. [The Planning Policy Wales \(PPW\)](#)^(PPW) document emphasises the conservation of quiet areas. As the Kilvey Hill area is designated as a national quiet area or is similarly protected due to its tranquillity, the policies outlined in PPW 11 regarding the management of noise and the conservation of quiet spaces are relevant. Page 133 suggests that the policy document provides guidelines to protect such areas from developments that could significantly increase noise levels and disrupt the tranquillity of the area.

The project's projections for visitor numbers and job creation are too ambitious. They don't align with sustainable development duties or the Well-being of Future Generations Act (2015), particularly in terms of economic viability, public investment transparency, and community engagement (PPW, Edition 11, sections 1.11, 1.15, 2.12, 2.28, 2.6, 2.7, 2.8, 1.3, and 1.16). There are also serious issues with the environmental impact, public access, and the project's compatibility with climate change objectives and financial risk assessments.

Request for Re-evaluation:

We request a re-evaluation of the [Welsh Industrial Development Advisory Board's](#)(31) report on the proposed Skyline Development.

We want a better, more collaborative approach to find a sustainable path for Kilvey Hill that respects both community desires, environmental imperatives and the well-being of the community in this area of high deprivation.

We await your response and are ready to provide further information or engage in dialogue as needed.

Yours sincerely,

Neil Jones
Biodiversity Campaigner
Swansea Friends of the Earth


Documents:

- 231026 Deputy Minister for A,S & T to Chair.pdf
- qual-survey-231107.pdf
- quant-survey-231107.pdf
- Petition results Summary_ P-06-1373 Stop Welsh Government Wasting £4million on Skyline private dev...
- From ben@zenic on On 07_09_2023 11_45 Re_ Subject_ Concerns and Queries Regarding the Skyline ...
- Comprehensive Assessment of Potential PWW Failures_ Skyline Swansea Project.pdf
- Figure Images Document.pdf
- planning-policy-wales-edition-11_0.pdf
- A numbered list of references Skyline petition.pdf

Cynnal etholiad Senedd yn gynnar

Y Pwyllgor Deisebau | 13 Tachwedd 2023
Petitions Committee | 13 November 2023

Cyfeirnod: SR23/7092/8

Rhif y ddeiseb: P-06-1375

Teitl y ddeiseb: Cynnal etholiad Senedd yn gynnar

Geiriad y ddeiseb: Ar ôl i Mark Drakeford a'i blaid Lafur barhau i fethu, rydym yn gofyn am etholiad cynnar er mwyn inni gael cyfreith i bleidleisio am blaid lywodraethu newydd yng Nghymru. Ymhllith methiannau Llafur Cymru mae'r ffordd y maent wedi ymdrin â'r pandemig covid, yn rheoli systemau addysg alwedigaethol Cymru a hefyd eu methiant diweddaraf: y terfynau cyflymder 20mya newydd sy'n cael eu cyflwyno yng Nghymru. Mae economi Cymru yn methu ac mae angen newid. Mae'n bryd inni gael arweinydd newydd yn y Senedd.



1. Y cefndir

1.1. Etholiadau cyffredinol arferol

Mae adran 3 o Ddeddf Llywodraeth Cymru 2006 yn darparu ar gyfer cynnal etholiadau cyffredinol ‘arferol’ ar gyfer y Senedd ar y dydd Iau cyntaf ym mis Mai bob pum mlynedd galendr.

Ceir gwaharddiad rhag cynnal etholiad cyffredinol arferol ar yr un diwrnod ag etholiad cyffredinol seneddol y DU, ac felly rhoddir pŵer i Weinidogion Cymru amrywio dyddiad etholiad cyffredinol y Senedd er mwyn osgoi gwrthdar o'r fath.

Mae gan Lywydd y Senedd bŵer o dan hefyd o dan adran 4 o Ddeddf Llywodraeth Cymru i amrywio dyddiad etholiad cyffredinol arferol hyd at fis cyn y dydd Iau cyntaf ym mis Mai, neu fis ar ei ôl.

Byddai Bil Senedd Cymru (Aelodau ac Etholiadau), sy'n destun craffu cyfnod un yn y Senedd ar hyn o bryd, yn lleihau'r amser rhwng etholiadau cyffredinol arferol y Senedd o bum mlynedd i bedair blynedd.

1.2. Etholiadau cyffredinol eithriadol

Fel y nodir yn adran 5 o Ddeddf Llywodraeth Cymru, ceir cynnal etholiadau cyffredinol ‘eithriadol’ ar gyfer y Senedd mewn dwy sefyllfa:

- Os digwydd bod o leiaf dwy ran o dair o gyfanswm yr Aelodau yn pleidleisio o blaid cynnig i ddiddymu'r Senedd; neu
- Os digwydd bod y Senedd yn methu penodi Prif Weinidog o fewn 28 diwrnod ar ôl cynnal etholiad cyffredinol neu y daw swydd Prif Weinidog Cymru yn wag (er enghraift, drwy benderfyniad diffyg hyder yn y Prif Weinidog gan y Senedd neu os yw'r Prif Weinidog yn ymddiswyddo).

Pe bai'r naill sefyllfa neu'r llall yn codi, byddai'n ofynnol i'r Lywydd gynnig diwrnod ar gyfer cynnal etholiad cyffredinol eithriadol.

Os caiff etholiad cyffredinol eithriadol ei gynnal o fewn chwe mis i'r etholiad cyffredinol arferol nesaf sydd wedi'i drefnu, ni fyddai angen cynnal yr etholiad cyffredinol arferol hwnnw. Er enghraift, pe bai etholiad cyffredinol eithriadol yn

Teitl:

cael ei gynnal ar ôl 7 Tachwedd 2025, ni fyddai'r etholiad cyffredinol arferol nesaf ddydd Iau 7 Mai 2026 yn cael ei gynnal.

Gwneir pob ymdrech i sicrhau bod y wybodaeth yn y papur briffio hwn yn gywir adeg ei gyhoeddi. Dylai darllenwyr fod yn ymwybodol nad yw'r papurau briffio hyn yn cael eu diweddu o reidrwydd na'u diwygio fel arall i adlewyrchu newidiadau dilynol.

Eitem 4.1

P-06-1356 Cyflwyno mesurau diogelwch cynhwysfawr ar gyffordd
'Mynegbost' yr A477

Cyflwynwyd y ddeiseb hon gan Elliott Morrison, ar ôl casglu cyfanswm o 10,310 lofnodion.

Geiriad y ddeiseb:

Ar ddydd Sadwrn 13 Mai 2023, collodd Ashley Thomas Rogers ei fywyd yn drychinezus ar gyffordd 'Mynegbost' yr A477 wrth deithio i gyfeiriad Penfro. Ei farwolaeth ef yw'r drydedd farwolaeth ar y rhan honno o'r ffordd mewn 12 mlynedd. Ar ben hynny, mae nifer ddi-rif o ddamweiniau y bu ond y dim iddynt ddigwydd ar y rhan honno a adwaenir yn lleol fel 'man gwael' ar gyfer damweiniau traffig ar y ffordd. Digon yw digon. Mae'r ddeiseb hon yn galw ar Lywodraeth Cymru i wneud y peth iawn a blaenoriaethu bywydau pobl dros bwysau cyllidebu dibwys.

Etholaeth a Rhanbarth y Cynulliad

- Gorllewin Caerfyrddin a Dwyrain Sir Benfro
- Canolbarth a Gorllewin Cymru

P-06-1356 Introduce comprehensive safety measures at the A477 'Fingerpost' junction - Correspondence from Interested Third Party to Committee, 17.10.23

Dear Mr Sargeant

I have been given your email address by Samuel Kurtz as I wrote to him asking if I could forward the video to you that the Motorcycle Action Group representative did for me whilst I have been campaigning for a safer junction after the latest fatality on May 13th. I will forward it under separate cover as I am not terribly confident on a computer. This was simply a video taken once over a few minutes at this tricky, confusing junction. Can I point out that both vehicles that nip across from the left (Pembroke Dock direction) - the Fiat 500 and possibly a Kia/Hyundai type of vehicle both SHOULD HAVE GIVEN Way as it is the right of way for the vehicles pulling out from the A4075 across the Trunk Road carriageway. However this hardly ever happens in the correct manner - it ends up being a free-for all scrabble when the Main Road becomes clear - hence all the accidents and fatalities that have occurred here. I have a business in Pembroke and used to use this junction twice a day. The traffic coming from Pembroke direction backs up as the trunk road is so busy until someone gets impatient and shoots across in front of the traffic on the trunk road - which can be legally driving down that road at 60mph. As you can see from the video sometimes they just pull out straight in front of oncoming vehicles that sometimes have to attempt an emergency stop. This has resulted in so many accidents at the junction - most do not appear to be recorded - as unless the Police are involved there appears to be no database. Also of course 4 fatalities that I know of over the years. 2 fatalities in the past 12 years since the so called improvements!! Just one of the awful injuries was a man having to be air lifted to hospital a few years ago who was unable to walk for 12 months and unable to walk unaided for 5 years. Please note the sort of 'holding pen' in the middle of the road ends up with traffic coming from Pembroke stacked up side by side - sometimes up to 6 vehicles squashed in side by side and squeezed behind each other trying to pull out to join the traffic heading East towards Carew. This holding pen is not a bad thing as before traffic ended up being stuck out in the carriageway however it is not used properly and too many people try to get into it making visibility to pull out to head towards Carew very difficult. I think impatience just takes over as people want to get on their way. Half of the fatalities have been motorcyclists because they are so much more vulnerable when a vehicle pulls out - they do not have the protection of a metal cage around them.

Can I also point out Mr Sargeant that this junction is the only junction used by all the refinery tankers, it is used by many workers at the Power Station and the refinery and also is the only junction used by all the Military traffic and personnel going to Castlemartin Range. Also it will shortly become even busier when the multi million pound Council backed Visitor Centre opens in Pembroke as it is the main junction used by tourists.

I hope this gives you some background information that you will need to make your decision. Incidentally the 10,001 signatures were achieved in 36 days showing the strength of feeling from the local community and visitors.

With kindest regards

Dear Mr Sargeant

Incidentally I meant to mention that I am not affiliated to any Political party - I got involved in all this because 12 years ago when the Nash Fingerpost junction was 'improved- I contacted the Highways and Transport office to say it was still incredibly dangerous and confusing and there would be more fatalities.

Sadly I did not pursue a safer junction then and sadly I was proved correct. Ashley Rogers who lost his life at the Junction on May 13th 2023 was a family friend (our daughters first ever boyfriend) - they weren't together anymore but as a family we have stayed in touch with Ashley and his family. He was due to be married 3 weeks after he was killed and he left behind an 18 month old son.

So my passion for forging ahead with the Petition and all the meetings I have had with the Powers- that- be stems from the fact that I know this junction needs to be made safer - preferably with a roundabout as per Carew and Sageston.

Thank you for your time in reading my emails.

6th July 2023

Centrica plc
Millstream
Maidenhead Road
Windsor
SL4 5GD
www.centrica.com

Jack Sargeant MS
Chair, Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
Wales CF99 1SN

By email: petitions@senedd.wales



Petition P-06-1326 The Senedd should scrutinise the prepayment meter scandal in Wales

Thank you for your letter of 6 June, following on from my appearance at the Committee on 15 May, regarding the conduct of prepayment meter installations through the warrant process. I'm pleased to provide additional information to the Committee in relation to the steps we are taking to bring our debt collection work in-house.

As you know, following our investigation into the conduct of prepayment meter installations, we decided that British Gas would permanently cease all warrant-related work with third party contractors such as Arvato and, as and when PPM warrant installations resume, this work will be carried out in-house. This will give British Gas direct oversight and accountability of the key processes, from recruitment and training to oversight and management of work being undertaken.

While our work to prepare for this change in approach is ongoing, it is being guided by clear and rigorous policies, procedures and controls; including robust recruitment processes and background checks to ensure front line staff have the essential skills and experience appropriate for this sensitive work.

We will build on our existing 'British Gas Policy and Standards on Ability to Pay Relating to Customers in Payment Difficulty' which includes detailed policies and procedures relating to installation of prepayment meters under warrant, including, for example:

- A requirement that British Gas and its customer representatives must deal with each customer on a case-by-case basis in understanding the individual customer's ability to pay, and in reaching agreement as to how the customer will pay for their future energy consumption and any outstanding balance.
- British Gas must ensure that there are adequate processes and systems in place to enable customer representatives to contact customers at the earliest opportunity in order to identify whether a customer is in payment difficulty. This means proactively contacting customers using, as appropriate, a variety of contact methods.

Our approach is also underpinned by our licence requirements as well as voluntary codes of conduct, including the newly introduced Ofgem Code of Practice and the Energy UK Vulnerability Commitment. We have also recently met, and are in ongoing discussion, with the Enforcement Conduct Board.

We are placing a particular emphasis on effective and ongoing training with a focus on recognising and responding to customers with vulnerabilities (both physical and mental) and customers in financial difficulties. The training itself will be undertaken directly through our in-house learning and development teams, creating a highly skilled workforce that will work across this sensitive area.

More widely, as well as bringing our enforcement work in-house, we also introduced parity between the cost of energy for PPM customers and the cost of energy for direct debit customers, i.e. earlier than the date mandated by Ofgem. In addition, we continue to support customers with a £10 million fund to directly support PPM customers who are in debt by providing a non-repayable credit up to £250. This fund has already helped over 50,000 PPM customers this winter. In addition to these commitments, we will work with others in the sector, and beyond, to push for better data sharing in relation to customers who are either physically or financially vulnerable, on an industry-wide basis, drawn from sources such as the Department of Work and Pensions and HM Revenue and Customs, as well as third sector organisations.

I hope that this information is both helpful and reassuring to the Committee; and, please let me know if you would value any further information at this time.

A handwritten signature in blue ink, appearing to read "Yours truly, Chris".

Chris O'Shea
Group Chief Executive