

(LGHRRS - Mining Legacy, Water & Flood)

From: [REDACTED] (LGHRRS - Resource Efficiency and Circular Economy)
Sent: 17 June 2026 15:47
To: [REDACTED] (LGHRRS - Resource Efficiency and Circular Economy)
Subject: FW: SUBJECT: Formal Ministerial Complaint — NRW Regulatory Failure & Conflict of Interest | Aberdare Cemetery Illegal Waste Deposit | SSSI/SAC Compensation Habitat | NRW Ref: CAS-299722-Z9L1 | Exemptions: NRW-WME116908 & NRW-WME116909

*Head of Circular Economy Legislation / Pennaeth Deddfwriaeth Economi Gylchol
Welsh Government / Llywodraeth Cymru*

From: [REDACTED] > On Behalf Of [REDACTED]
Sent: 17 June 2026 15:36
To: [REDACTED] (LGHRRS - Resource Efficiency and Circular Economy) [REDACTED] >
Cc: [REDACTED]

Subject: RE: SUBJECT: Formal Ministerial Complaint — NRW Regulatory Failure & Conflict of Interest | Aberdare Cemetery Illegal Waste Deposit | SSSI/SAC Compensation Habitat | NRW Ref: CAS-299722-Z9L1 | Exemptions: NRW-WME116908 & NRW-WME116909

Dear [REDACTED]

Thank you for sharing this correspondence. I have set out below a consolidated contribution on behalf of Natural Resources Wales (NRW) covering the matters raised and providing responses to the specific questions.

NRW is currently undertaking an active regulatory investigation into the waste activities at this site. While that work is ongoing, there are limits to the level of detail we can share. We will, however, address each point where we are able to and aim to provide as much clarity as possible.

• **Internal review of complaint handling and exemption registrations**

Complaint reference CAS-299722-Z9L1 was considered through NRW's Stage 2 complaints process in line with our [complaints policy](#).

Where a complainant remains dissatisfied, the appropriate next step is referral to the [Public Services Ombudsman for Wales](#), which provides independent oversight of public service complaints.

Waste exemptions are self-registered notifications for low-risk activities that do not require an environmental permit. Exempt activities sit outside the environmental permitting regime and are regulated on a proportionate basis in line with statutory guidance. A U1 exemption is not assessed or approved in advance by NRW.

The exemptions referenced were self-registered via NRW's [online system](#). Responsibility sits with the registrant to ensure the activity complies with the conditions of the exemption. Details of the exemptions can be found here: [Natural Resources Wales \ Exemption Details](#) and [Natural Resources Wales \ Exemption Details](#).

The ongoing investigation is assessing whether the use of a U1 exemption is appropriate in this case, including whether the conditions have been met. As this work is active, we are not able to comment further at this stage.

- **Provision of formal answers**

Responses to the questions are set out below. Where matters relate to ongoing investigative work, our responses are necessarily limited to avoid prejudicing that investigation.

- **Consideration of Section 59 powers**

NRW has a range of enforcement tools and sanctions available, which are applied in line with its Enforcement and Sanctions Policy.

The choice of action in any case depends on the specific circumstances, including the available evidence, the nature of the activity, and the outcomes that regulatory intervention is intended to achieve.

The matters raised form part of an ongoing investigation into activities at the site. While that work continues, it would not be appropriate to comment on specific enforcement options or decisions at this stage.

- **Registration of exemptions NRW-WME116908 and NRW-WME116909**

As noted, waste exemptions are self-registered notifications made via NRW's [online system](#). A U1 exemption is not assessed or approved in advance by NRW.

Both exemptions were registered on 5 January 2026, as reflected in the exemption records referenced above.

NRW first became aware of the reported waste deposit through an email to our enquiries team received on 31 October 2025. This information, including supporting evidence, was assessed in line with our incident management processes. Based on the information provided at that time, the activity was assessed as outside our threshold for recording and response.

Further information received on 17 December 2025 was reviewed against NRW's Wales-wide priorities for waste incidents. Based on the evidence available, the threshold for site attendance was not met. Advice was provided to the party concerned to highlight their duty of care when handling controlled waste.

Additional evidence received in January and February 2026 led to further assessment. This prompted regulatory action and the commencement of a formal investigation in line with our Enforcement and Sanctions Policy.

Separately, a complaint relating to the site was submitted to NRW on 21 January 2026 and was considered under our [complaints policy](#). A Stage 1 response was issued, followed by escalation to Stage 2. The scope of the Stage 2 investigation was confirmed on 6 February 2026, with the final Stage 2 response issued on 6 March 2026.

- **Registration during an active investigation**

Both exemptions were registered on 5 January 2026. The regulatory investigation commenced in February 2026.

As part of the ongoing investigation, NRW is examining the registration of these exemptions. This includes consideration of the activities they were intended to cover, whether those activities meet

the conditions of the exemptions, and the timing of the registrations in relation to the reported waste deposit.

As this work is ongoing, it would not be appropriate to comment further at this stage.

- **Consideration of potential obstruction (Regulation 38(3))**

NRW is aware of the concerns regarding activities undertaken at the site.

Potential offences, including obstruction, are considered on a case-by-case basis and assessed against the available evidence. This includes whether any actions may have affected NRW's ability to carry out its regulatory functions.

These matters form part of an ongoing investigation. It would not be appropriate to comment further at this stage.

- **Habitats Regulations Assessment**

NRW's role is to advise and regulate within defined statutory functions.

A Habitats Regulations Assessment (HRA) is typically the responsibility of the authority authorising or carrying out an activity.

The activity referenced lies outside the boundary of the Tir Mawr a Dderi Hir Site of Special Scientific Interest (SSSI) and is separated from the SSSI by a major road. NRW officers have assessed the potential for impacts on the SSSI and are satisfied that there is no likely impact on the protected site. This conclusion relates specifically to potential effects on its notified features. No evidence of protected species presence has been identified beyond a single record in 2020 in a different part of the cemetery.

On this basis, NRW has not identified a requirement for SSSI consent, nor evidence of an offence under the Wildlife and Countryside Act 1981.

NRW is aware that the site forms part of land identified during the planning process for potential ecological mitigation associated with the A4059/Cynon Gateway scheme. That mitigation strategy is not currently in operation. Delivery of the scheme, including any associated habitat management, remains subject to the local authority acquiring funding and the discharge of the relevant planning conditions.

The planning permission includes pre-commencement conditions requiring details of future habitat management. NRW would be consulted by the Local Planning Authority on those details at the appropriate stage and would consider any updated ecological information at that time.

Sites of Importance for Nature Conservation (SINCs) are non-statutory designations and fall within the responsibility of the local authority.

In relation to the reference to waste being deposited within 165 meters of the Blaen Cynon Special Area of Conservation (SAC), we can confirm that the Blaen Cynon SAC is situated approximately 3.4km (not 165m) from Aberdare cemetery.

- **Notification to the Planning Authority**

Planning conditions fall within the remit of the Local Planning Authority. NRW is not the planning enforcement authority.

NRW acts as a statutory consultee within the planning process. Our role is to provide advice on environmental matters where required, but we do not enforce planning conditions.

NRW is aware that the site forms part of land identified during the planning process for potential ecological mitigation/compensation associated with the A4059/Cynon Gateway scheme. That mitigation strategy is not currently in operation as the relevant planning condition has not been discharged and the scheme has not yet commenced.

Any concerns regarding failure to comply with planning conditions should be directed to the Local Planning Authority, which is responsible for investigating and taking any enforcement action.

- **Validity of the U1 exemption**

This forms part of our ongoing investigation. While this work is ongoing, it would not be appropriate to comment on evidence or potential conclusions.

- **Consistency of U1 exemption with absence of records**

The exemptions referenced were self-registered via NRW's online system.

Waste exemptions are self-registered notifications for low-risk activities that do not require an environmental permit. A U1 exemption is not assessed or approved in advance by NRW.

It is the responsibility of the registrant to ensure that all conditions of the exemption are met.

The ongoing investigation is assessing whether the use of a U1 exemption is appropriate in this case, including whether the conditions have been complied with. This includes consideration of the timing of the registration in relation to the activity, as exemptions cannot be used to retrospectively cover activities that have already taken place. As this work is ongoing, it would not be appropriate to comment further at this stage.

We hope the above provides clarity on NRW's role, the matters raised, and the approach being taken as part of our ongoing work.

Kind regards,

[Redacted]

[Redacted]

Pennaeth Gweithrediadau Canol De Cymru/Head of Operations South Wales Central
Gweithrediadau/Operations

[Redacted]
Fe/Fo / He/Him

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

**Byd natur a phobl
yn ffynnu gyda'n gilydd**

**Nature and people
thriving together**



**cyfoethnaturiol.cymru
naturalresources.wales**

From: [Redacted]

Sent: 10 June 2026 15:56

To: Government Business [Redacted]

Cc: [Redacted]

Subject: FW: SUBJECT: Formal Ministerial Complaint — NRW Regulatory Failure & Conflict of Interest |
Aberdare Cemetery Illegal Waste Deposit | SSSI/SAC Compensation Habitat | NRW Ref: CAS-299722-Z9L1
| Exemptions: NRW-WME116908 & NRW-WME116909

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

Caution: This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Good afternoon

Please find below some correspondence that has been received regarding waste at Aberdare Cemetery.

Please could you provide a contribution to the relevant 4 of 6 matters raised and answer the 8 specific questions. A response by COP 24th June would be appreciated.

(Please note that I have removed some content and attachments to protect personal data).

Many Thanks

Matters for NRW to contribute a response to : (points 4 and 5 have been sent to RCT)

1. **Commission an urgent internal review within NRW** of the handling of complaint reference CAS-299722-Z9L1 and the registration of exemptions NRW-WME116908 and NRW-WME116909, with specific reference to the conflict of interest concern set out above
2. **Require NRW to provide formal written answers** to the eight questions set out in Section 5 of this letter, within 20 working days
3. **Direct NRW to formally consider** whether Section 59 EPA 1990 powers should now be exercised, and to provide a written account of its reasoning
4. **Ensure the public health concern** arising from the exposed contaminated grave soil is addressed by the appropriate authority without delay
5. **Direct the appropriate officials to consider** whether the Section 106/CEMP/LEMP conditions for Planning Reference 210273GREG have been breached and what enforcement action is available
6. **Note that RCTCBC's Internal Review of 25 March 2026** admitted that no records of any kind exist for this activity — and require NRW to confirm whether a U1 exemption can be validly maintained where the operator has admitted on the public record that none of the exemption conditions were ever met

Questions for NRW to answer

1. Who within NRW registered exemption NRW-WME116908, when, and on whose instruction — and was NRW aware at the time of registration that a formal complaint regarding the same site and operator was outstanding?
2. Who within NRW registered exemption NRW-WME116909, when, and on whose instruction — and on the same basis, was NRW aware of the outstanding complaint?

3. If NRW registered either exemption on behalf of RCTCBC, what is NRW's explanation for doing so whilst simultaneously conducting a regulatory investigation into that authority's activities at the same site?
4. What is NRW's formal reasoning for not exercising its Section 59 EPA 1990 powers to require the removal of the illegally deposited waste?
5. Has NRW formally considered whether the burial of the waste pile between January and February 2026, during the active investigation, constitutes obstruction under Regulation 38(3) EPR 2016, and if so, what was its conclusion?
6. Has a Habitats Regulations Assessment been carried out in respect of the deposit of waste on the marsh fritillary SAC compensation habitat, and if not, why not?
7. Has NRW notified the relevant Planning Authority of the apparent breach of the Section 106/CEMP/LEMP conditions securing the marsh fritillary compensation strategy?
8. Does NRW consider the RCTCBC Internal Review response of 25 March 2026 — in which the Council admitted no site plan, EWC codes, quantity limits, timetables, ecology assessments or work records exist — to be consistent with the conditions of a valid U1 exemption? If not, what action does NRW intend to take?

**SUBJECT: Formal Ministerial Complaint — NRW
Regulatory Failure & Conflict of Interest |
Aberdare Cemetery Illegal Waste Deposit |
SSSI/SAC Compensation Habitat | NRW Ref:
CAS-299722-Z9L1 | Exemptions: NRW-
WME116908 & NRW-WME116909**

Dear Cabinet Secretary,

I write to you in your capacity as Cabinet Secretary for Rural Resilience and Sustainability, and as the Minister with portfolio responsibility for Natural Resources Wales, to formally draw your attention to what I respectfully submit is a serious failure of regulatory conduct by NRW in relation to illegal waste deposits at Aberdare Cemetery, Rhondda Cynon Taf — a site forming part of the designated marsh fritillary compensation habitat for the Cynon Gateway North A4059 road scheme, situated within approximately 165 metres of a Site of Special Scientific Interest and a European Protected Special Area of Conservation.

I am copying this letter to my constituency Members of the Senedd — Heledd Fychan MS, Lis McLean MS, and Sara Crowley MS — who have been separately contacted and asked to support a request for Ministerial intervention. I would ask that you treat this as a matter of urgency.

1. BACKGROUND AND CONTEXT

This matter has a substantial history of correspondence with public bodies, including engagement with the previous Senedd administration at the ministerial level. Ministerial responses were received under references HIDCC/00045/26 and HIDCC/00120/26. I raise it again now because the change of administration and portfolio responsibilities has not resolved the substantive issues, because NRW's internal complaints process has now been exhausted, and because evidence has come to light which I consider raises questions that go beyond ordinary regulatory failure and into the conduct of NRW as an independent regulator.

The core facts are these. RCTCBC's Parks Department gave permission for monumental masons to deposit memorial waste — gravestones, core-drilled granite, and workshop debris — at Aberdare Cemetery over a period of at least five years, from 2020 onwards, with no Environmental Permit, no registered waste exemption, and no Waste Transfer Notes for any transfer. Each deposit constituted a criminal offence under Section 33(1)(a) of the Environmental Protection Act 1990 at the moment it was made. The waste was then buried and concealed between January and February 2026, after a formal complaint had been submitted and while NRW's investigation was active. I address that concealment in detail below.

I attach the formal legal reference document "*Aberdare Cemetery Waste Crime Environmental Waste Law Criminal Offences Reference Document*" compiled on 31 May 2026, which sets out the full schedule of criminal offences arising from this matter. I ask that you and your officials read it with care.

A further significant development has occurred since the previous ministerial correspondence. On 25 March 2026, RCTCBC's Director of Legal Services (Andy Wilkins) issued the outcome of an Internal Review of EIR request 25-26/821. In that response, the Council admitted item by item that no site plan exists for the U1 exemption, no EWC codes or quantity limits were set, no timetable for the claimed expansion works exists, no records of quantities of waste deposited exist, no ecology assessments or method statements were undertaken, and all internal correspondence is being withheld under Regulation 12(4)(d) EIR on the grounds that an investigation is ongoing. The Council also confirmed that all work orders were verbal — meaning no written instructions to deposit or use waste at the cemetery were ever issued. These admissions are of the greatest significance and I ask that your officials note them carefully.

2. NRW'S CONDUCT — THREE SERIOUS CONCERNS

2.1 Retrospective Registration of Waste Exemptions 66 Days After Formal Complaint

NRW's public register records that two U1 waste exemptions — NRW-WME116908 and NRW-WME116909 — were registered on 5 January 2026. My formal complaint to NRW was submitted on 31 October 2025. The exemptions were therefore registered 66 days after that complaint was made, and aerial imagery establishes that the waste deposits had been present on site since at least 2020.

The legal position requires no elaboration. A U1 exemption is a prospective authorisation. It permits the future use of waste in construction. It has no retrospective effect whatsoever and cannot legitimise waste that was deposited before the exemption was registered. Criminal liability under Section 33(1)(a) EPA 1990 was incurred at the moment each unauthorised deposit was made — years before any exemption existed. The registration of exemptions 66 days after a formal complaint, purporting to cover five years of prior illegal deposit, does not extinguish completed criminal offences.

I ask, Cabinet Secretary: on what basis did NRW consider the registration of these exemptions to be an appropriate regulatory response in the circumstances? And who within NRW authorised that decision?

2.2 NRW Appears to Have Registered an Exemption on Behalf of the Body It Was Simultaneously Investigating

This is the concern I ask you to treat with the greatest seriousness, as it goes directly to NRW's regulatory independence and integrity.

RCTCBC's own EIR response of 9 January 2026 stated, in terms: *"NRW have confirmed that they have registered this as exempt."* The then Deputy First Minister's letter of 13 February 2026 stated: *"RCTCBC has also registered a U1 exemption"* — the use of the word "also" carries an unmistakable implication: that NRW had already registered one exemption, and RCTCBC subsequently registered the other.

If that is what occurred, then NRW — whilst conducting a regulatory investigation into RCTCBC's waste activities at Aberdare Cemetery — simultaneously registered a waste exemption on behalf of the very body under investigation. This represents a fundamental and irreconcilable conflict of interest between NRW's statutory enforcement function and its conduct in this matter. It raises the question, which I respectfully submit you are obliged to ask, of whether NRW's regulatory response in this case was genuinely independent, genuinely impartial, and lawfully exercised.

I am not in a position to say with certainty that this is what occurred — that is precisely why I am asking you, as the Minister responsible for NRW, to require a full and transparent account from NRW of who registered each exemption, when, on whose instruction, and with what knowledge of the outstanding complaint.

2.3 Failure to Exercise Statutory Enforcement Powers — Section 59 EPA 1990

Section 59 of the Environmental Protection Act 1990 confers on NRW a direct statutory power to serve notice on the occupier of land, or on the person who deposited waste, requiring the removal of illegally deposited waste and the taking of steps to eliminate or reduce the consequences of the deposit. This power exists precisely for circumstances such as these.

NRW has not used it. The waste is now buried under what is estimated to be over 100 tonnes of excavated soil — soil which is itself of a particularly serious character, as I explain in the following section — and the practical opportunity to recover and properly dispose of the waste diminishes with every passing month. I respectfully ask that you require NRW to provide a formal account of why Section 59 powers have not been exercised, and to consider whether the failure to do so is consistent with NRW's statutory duties under the Environment (Wales) Act 2016 and the Environmental Permitting (England and Wales) Regulations 2016.

2.4 NRW's Own Admitted Process Failure

I draw your attention also to the conclusion of NRW's own internal complaints process. In NRW's formal Stage 2 Complaint Outcome (reference CAS-299722-Z9L1, issued 8 March 2026), NRW admitted that fly-tipping reports submitted through their online portal were not being logged or actioned due to a systemic process failure. This admission represents the conclusion of NRW's internal complaints process and the matter is now eligible for referral to the Public Services Ombudsman for Wales (PSOW), which I am actively preparing. I bring it to your attention as it suggests the regulatory failure in this case is not isolated but forms part of a broader systemic problem with NRW's complaint-handling and enforcement processes.

3. THE BURIAL — CONTAMINATED GRAVE SOIL, PUBLIC HEALTH, AND POSSIBLE OBSTRUCTION

I draw your specific attention, Cabinet Secretary, to the circumstances in which the waste came to be buried, as they are both extraordinary and deeply troubling.

The burial occurred between January and February 2026 — after the formal complaint of 31 October 2025 and during the active NRW investigation. The soil used to bury and conceal the masonry waste was not ordinary construction material. It was excavated in the course of emergency culvert repair works beneath the cemetery, works which required the exhumation and reburial of four or more graves to access a collapsed culvert approximately 20 feet below ground. Soil excavated from around exhumed human remains must, by its very nature, be regarded as potentially contaminated material. RCTCBC nonetheless saw fit to use this excavated grave soil to bury and conceal the unlawfully deposited masonry waste beneath it.

The resulting mound of potentially contaminated spoil was then left exposed, unenclosed, and unfenced in a public cemetery, with no barrier, no warning signage, and no protection of any kind for members of the public walking in the immediate vicinity. This raises a serious and unanswered question of public health that I ask you to ensure is addressed without delay.

The timing of the burial, combined with the nature of the material used and the effect of permanently concealing the primary evidence of an ongoing waste crime investigation, raises a further question that I consider NRW is obliged to answer. Under Regulation 38(3) of the Environmental Permitting (England and Wales) Regulations 2016, it is a criminal offence to obstruct an authorised person in the

exercise of enforcement powers. I am not alleging that this offence has been committed — that is a matter for the appropriate authorities to investigate. I am, however, asking whether NRW has formally considered this question, and if so, what conclusion it reached and on what basis.

4. THE ECOLOGICAL AND PLANNING DIMENSION

I ask that you also draw the attention of the relevant officials to the planning and ecological context of this site. The waste dump is on land formally designated as marsh fritillary compensation habitat secured by a Section 106 planning obligation attached to the Cynon Gateway North A4059 planning consent (Reference 210273GREG), requiring management in perpetuity for a minimum of 25 years. NRW itself holds references CAS-127854-V3H0 and CAS-144980-M7J2 in connection with the ecological mitigation strategy for this scheme.

The deposit and burial of over 100 tonnes of waste on this compensation habitat raises the following concerns, which have not been addressed:

- Whether a Habitats Regulations Assessment was carried out before any waste was deposited on land within 165 metres of the Blaen Cynon SAC, as is required under the Conservation of Habitats and Species Regulations 2017
- Whether the activities at the site constitute damage to the SSSI within the meaning of Section 28P of the Wildlife and Countryside Act 1981, for which NRW consent was neither sought nor given
- Whether the Section 106 obligation and the CEMP/LEMP conditions securing the marsh fritillary compensation strategy have been breached, and if so, what enforcement action the Planning Authority intends to take
- Whether the long-term hay-cut management regime required under the ecological mitigation strategy can now be maintained, given the burial of waste across the compensation habitat area

These are matters that fall squarely within your portfolio and within NRW's statutory functions. I ask that they be addressed as a matter of urgency.

5. QUESTIONS REQUIRING MINISTERIAL RESPONSE

I respectfully ask that you provide, or require NRW to provide, formal answers to the following questions:

9. Who within NRW registered exemption NRW-WME116908, when, and on whose instruction — and was NRW aware at the time of registration that a formal complaint regarding the same site and operator was outstanding?

10. Who within NRW registered exemption NRW-WME116909, when, and on whose instruction — and on the same basis, was NRW aware of the outstanding complaint?
11. If NRW registered either exemption on behalf of RCTCBC, what is NRW's explanation for doing so whilst simultaneously conducting a regulatory investigation into that authority's activities at the same site?
12. What is NRW's formal reasoning for not exercising its Section 59 EPA 1990 powers to require the removal of the illegally deposited waste?
13. Has NRW formally considered whether the burial of the waste pile between January and February 2026, during the active investigation, constitutes obstruction under Regulation 38(3) EPR 2016, and if so, what was its conclusion?
14. Has a Habitats Regulations Assessment been carried out in respect of the deposit of waste on the marsh fritillary SAC compensation habitat, and if not, why not?
15. Has NRW notified the relevant Planning Authority of the apparent breach of the Section 106/CEMP/LEMP conditions securing the marsh fritillary compensation strategy?
16. Does NRW consider the RCTCBC Internal Review response of 25 March 2026 — in which the Council admitted no site plan, EWC codes, quantity limits, timetables, ecology assessments or work records exist — to be consistent with the conditions of a valid U1 exemption? If not, what action does NRW intend to take?

6. CONCLUSION AND REQUESTED ACTION

Cabinet Secretary, I am not writing to you as a routine casework matter. I am writing because the documented sequence of events at Aberdare Cemetery — illegal waste deposited for five or more years on ecologically protected land, formal complaint submitted, exemptions registered retrospectively during the investigation, waste then buried under potentially contaminated grave soil and left exposed to the public, enforcement powers not exercised, and the Council's own internal review now admitting that none of the required records ever existed — raises questions about NRW's regulatory conduct that go to the heart of its independence and integrity as Wales's principal environmental regulator.

I respectfully ask that you:

1. **Commission an urgent internal review within NRW** of the handling of complaint reference CAS-299722-Z9L1 and the registration of exemptions NRW-WME116908 and NRW-WME116909, with specific reference to the conflict of interest concern set out above
2. **Require NRW to provide formal written answers** to the eight questions set out in Section 5 of this letter, within 20 working days
3. **Direct NRW to formally consider** whether Section 59 EPA 1990 powers should now be exercised, and to provide a written account of its reasoning
4. **Ensure the public health concern** arising from the exposed contaminated grave soil is addressed by the appropriate authority without delay
5. **Direct the appropriate officials to consider** whether the Section 106/CEMP/LEMP conditions for Planning Reference 210273GREG have been breached and what enforcement action is available
6. **Note that RCTCBC's Internal Review of 25 March 2026** admitted that no records of any kind exist for this activity — and require NRW to confirm whether a U1 exemption can be validly

maintained where the operator has admitted on the public record that none of the exemption conditions were ever met

I am happy to provide your office with access to the full indexed evidence bundle, including photographic evidence, aerial imagery, official correspondence, and regulatory records. I am also available to meet at your convenience.

I look forward to your response.

LIST OF ATTACHMENTS

Photographic and Aerial Evidence

1. 01_Google-Earth_Waste Not being Tipped in Cemetery 2016 - 2026-01-16_12-17-38.jpg
2. 02_Google-Earth_Waste Tipped in 2020 - 2026-01-16_12-13-58.jpg
3. 03_Google-Earth_Waste Tipped in 2021 - 2026-01-16_12-12-25.jpg
4. 04_Google-Earth_Waste Tipped in 2023 - 2026-01-15_14-46-51.jpg
5. 05_Google-Earth_Waste Tipped in 2026 - 2026-01-16_12-08-57.jpg
6. 06_May 2025 photos showing core-drilled granite.jpg
7. 07_May 2025 photos showing core-drilled granite.jpg
8. 08_May 2025 photos showing core-drilled granite.jpg
9. 09_Screenshot of U1 Exemptions_NRW-WME116908 & NRW-WME116909.jpg
10. 10_Potentially Contaminated Soil Used To Hide Masonry.jpg
11. 11_Potentially Contaminated Soil Used To Hide Masonry.jpg
12. 12_Potentially Contaminated Soil Used To Hide Masonry.jpg

Key Legal and Reference Documents

13. Aberdare Cemetery Waste Crime Environmental Waste Law Criminal Offences.pdf

Ministerial Correspondence

14. Deputy First Ministers Letter 19 Jan 2026_HIDCC0004526_Outgoing_0.pdf
15. Deputy First Minister's letter of 13 February 2026_HIDCC0012026_Outgoing_0.pdf

NRW Documents

16. Stage 2 Outcome NRW Complaint Outcome__CAS-299722-Z9L1 - Response.pdf

RCTCBC EIR Documents

17. EIR request_25-26_821 – Aberdare Cemetery_ waste import_tipping, permissions and records (from 1 Jan 2020).pdf
18. Internal_Review_request__EIR_25-26_821__Aberdare_Cemetery_waste_expansion_.pdf with all attachments (4)

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein

[hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. -----

On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.