

INTERNAL MEMORANDUM

To: Hugh Towns
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1 (addendum)
Date of previous memo: 02/04/2025
Date: 17/04/2026

SUBJECT: P/25/0037 | Variation of conditions 4 (Duration of Restoration), 6 (Approved Plans) and 50 (Restoration Strategy) of planning permission APP/U6925/A/10/2129921 involving a revision to the restoration scheme. | Ffos Y Fran Land Reclamation Scheme East Of A4060 Slip Road Merthyr Tydfil CF48 4AE

NEW ECOLOGICAL DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Biodiversity Statement. Ffos-y-Fran Final Restoration Strategy *prepared by Richards, Moorehead + Laing Ltd on behalf of MERTHYR (SOUTH WALES) LTD. 3274/11. 3274/11. Rev 2. Dated: 24/02/2026.*
2. Letter Response to NRW. Ffos-y-Fran Final Restoration Strategy *prepared by Richards, Moorehead + Laing Ltd on behalf of MERTHYR (SOUTH WALES) LTD. Dated: 12/03/2026.*

COMMENTS – in response to the above documents [as an addendum to comments from memo #1 (02/04/2025)]

Document 1

Document 1 compares the original agreed restoration plan (2015) to the alternative restoration plan (2025) and argues that the 2025 plan would produce a larger Net Benefit to Biodiversity and cause less disruption to species of principle importance (including European Protection Species) and create more habitats of principle importance over a bigger area. Based on the information and statistics provided within the document, and taking them at face value, this would appear to be the case.

NB a Net Benefit for Biodiversity (NBB) in comparison with baseline conditions (if confirmed as those existing when the operations of coal extraction ceased at the end of Nov 2023) could be achieved regardless of which restoration proposal [original agreed (2015) or alternative (2025)] is implemented.

The above comments are related purely to ecological benefit and not to environmental or safety concerns, or indeed the cost of restoration.

Document 2

Document 2 also includes reference to baseline conditions, and the comments suggest that the baseline conditions timeframe has not yet been agreed upon.

Document 2 confirms that a draft GCN Conservation Plan has now been prepared and is available for review. This will be reviewed and commented on when received by the LPA ecologist.