

Our Ref: CAS-304955-Q2Q9

Your Ref: P/25/0037

Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
CF48 4TQ

Date: 23 April 2026

Dear Sir/Madam,

Proposal: 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.

Location: Ffos Y Fran, Merthyr Tydfil.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 02 April 2026.

We continue to have **concerns** with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding **land contamination and pollution prevention**. If this information is not provided, we would object to this planning application. Further details are provided below.

We also advise that based on the information submitted to date, conditions regarding **land contamination, pollution prevention** and **European protected species** should be attached to any planning permission granted. Without the inclusion of these conditions we would object to this planning application.

Land Contamination and Pollution Prevention

Further to our previous response, we have reviewed the following documents:

- Letter Response to NRW Comments by Richards Moorehead & Laing Ltd, dated 12th March 2026.
- Geotechnical Stability Report by James Associates, dated March 2026, Revision 01.
- Biodiversity Statement by Richards Moorehead & Laing Ltd, dated February 2026.

Geotechnical Engineering

Within our original response (ref: CAS-275294-H0Z5, dated 17th April 2025), we advised that a stability risk assessment should be provided as part of the restoration plan to consider potential impacts of the proposed restoration works and finished profile to the short and long term stability of Trecatti Landfill.

We are now in receipt of the Geotechnical Stability Report referenced above and provide the following comments:

Whilst we welcome the report, we do not consider it provides sufficient evidence to demonstrate that the restoration proposal would not pose an unacceptable risk to the long-term stability and integrity of the Trecatti Landfill. The report states that long-term ground stability was considered in the development of the restoration design, however no supporting geotechnical analysis for that design is referenced.

The submission includes outputs from slope stability modelling (of what appear to be current rather than restoration tip profiles), however these are presented without confirmation of the input parameters or assumptions, nor sufficient evidence that they are appropriate in the long term.

Surface and Ground Water Monitoring

We note from the letter response by Richards Moorehead & Laing Ltd, dated 12th March 2026, that two borehole locations have been suggested; one on site (BH5824) and an additional borehole off site (BH5826). It is noted that no monitoring has taken place since coaling ceased in 2023 and these two sites have historically been monitored for groundwater levels.

It is proposed to monitor these two sites fortnightly until the end of 2026 and potentially quarterly or 6 monthly thereafter. We would request that groundwater monitoring is undertaken fortnightly until all remediation works are completed and then monthly to quarterly for the aftercare period thereafter.

Overall, we consider there is currently insufficient detail with regards to water monitoring. We therefore consider that the following condition should be attached to any planning permission granted:

Condition: Water Quality and Quantity Monitoring Plan

No development shall commence until a water quality and quantity monitoring plan for the protection of water quality and quantity in the watercourses and groundwaters beneath the site has been submitted to and approved in writing by the Local Planning Authority. The water quality and quantity monitoring plan shall include:

- Details of the monitoring methods e.g. location, frequency and determinants for water quality sampling.
- Timescales for works.
- Timescales for submission of monitoring and interpretative reports to the local planning authority during construction.
- Details of triggers for specific action and any necessary contingency actions.

The water quality and quantity monitoring plan shall be carried out in accordance with the approved details during the site preparation and construction phases of the development.

Justification: A construction water quality and quantity monitoring plan should be submitted to ensure necessary monitoring measures are approved prior to commencement of development or phase of development and implemented to manage any potential adverse impacts of construction on water quality and quantity in waterbodies, watercourses and groundwater.

Timescales

As raised in our previous response (ref: CAS-275294-H0Z5, dated 17th April 2025), we note that the aftercare and monitoring periods are limited to 5 years in duration. We advise that for a scheme such as this, after care and monitoring periods should be extended to between 15 and 30 years to realise the potential improvements.

Biodiversity and European Protected Species (EPS)

We have reviewed the following additional information:

- Biodiversity Statement by Richards Moorehead & Laing Ltd, dated February 2026.
- Technical Note: Note on storage shed suitability for roosting bats by Dr Adam Lynch dated 10.01.2026.

We have no comments on the submitted Biodiversity Statement with regards to EPS. We therefore refer your authority back to our previous response and requested conditions with regards to EPS (ref: CAS-286263-P6X2, dated 7th October 2025).

We note from the submitted Biodiversity Statement that reseedling is proposed. Whilst we recognise the importance of reseedling to prevent siltation and pollution issues, we also note the importance of natural regeneration of native plants and habitats to offer the best outcome for biodiversity. We note that this is a matter for the local authority to consider and provide this advice as guidance to the developer to enhance biodiversity measures.

We note the submitted technical note with regards to suitability for roosting bats within the buildings on-site, which has concluded negligible roost suitability. We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

Other matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Eleanor Sullivan

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.