

Ein cyf/Our ref: CAS-305340-S4C7  
Eich cyf/Your ref: P/26/0072

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

Dyddiad/Date: 27 April 2026

Annwyl Mr Cross/Dear Mr Cross

**Bwriad/Proposal: Discharge of conditions 7 (Restoration Details) and 8 (Final Restoration Plan) of planning permission P/92/0464.**

**Lleoliad/Location: Trecatti Landfill Site, Fochriw Road, Pant-y-Waun.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 8 April 2026.

We have **concerns** with the application as submitted. We do not recommend your Authority discharges conditions 7 (Restoration Details) and 8 (Final Restoration Plan) of permission P/92/0464 for the following reasons.

We have reviewed the following information submitted in support of the application:

- Drawing: Trecatti Landfill Site, Location Plan – Restoration, prepared by Biffa, dated 16.02.26.
- Drawing: Treacatti Landfill Site, Landscape Restoration Plan, Drawing No: TL LR-01, prepared by Biffa, dated 26.03.26.
- Trecatti Landfill, Landscape Restoration Supporting Statement, SLR Project No.: 406.065292.00001, Revision:1, prepared by SLR, dated 25 March 2026.

We note the proposal is to establish grassland over the capped landfill across approximately 35ha by using existing site soils and importing additional soil if necessary. The seed mix proposed however is wholly unsuitable for providing any biodiversity benefit or diversity in the resulting grassland. Three types of Perennial Rye Grass make up the bulk of the seed mix, which would lead to a sward devoid of ecological interest and only of benefit to agriculture. Given that the proposal is to cut once annually after the grassland has been established to emulate a hay cutting regime, it would seem sensible to establish

a grassland type that is inherently more diverse, as it would do just as well, if not better under a hay cutting regime than the heavily agriculturally-biased mix being proposed.

Low nutrient soils should be used. Subsoil could potentially be used to achieve this or only a very thin topsoil layer used. Any soils used, whether re-used from on site or imported from elsewhere should be free from any contaminants and invasive non-native species in particular. A more appropriate seed mix should be used, such as a meadow grass mix. Meadow grass mixes 'EG1 General Purpose Meadow Grass Mix' or 'EG4 Meadow Grass Mixture for Clay Soils' from Emorsgate Seeds would be more appropriate as they do not contain the agricultural Rye Grass varieties that are currently being proposed.

Using generic 'wildflower' mixes should be avoided as they will contain inappropriate flower species for the site. The site could also be sown at a lower rate than currently proposed to allow some gaps in the turf, which would mean local species could recruit into the habitat naturally over time. To incorporate more diversity at the time the site is seeded, a small quantity of local wildflower seeds, sourced from for example from Wyndrush Wild, which is based in Pembrokeshire, could be mixed with the meadow grass mix.

In addition to offering greater ecological benefit, using a more appropriate and less agriculturally-biased seed mix would offer a lower maintenance solution in future. It is also likely to establish more quickly and persist better in the longer term on the restoration site.

#### Further advice

The site operator should ensure that there is appropriate mitigation during the earth works and whilst waiting for the vegetation to establish. This is required to ensure that there is no runoff of soil into the surrounding watercourses from the restoration area or from any access roads/tracks or storage areas.

The operator should follow current best practice guidance GPP5: Works and maintenance in or near water, found on Netregs [gpp-5-works-and-maintenance-in-or-near-water.pdf](#). As a regulated site, it should have a pollution incident response plan. This should either be revised to include these works, or a new plan created for these works, and shared with the appointed contractor.

### **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 on the above, please do not hesitate to contact us.

Yn gywir/Yours faithfully,

**Andrew Hurst**

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.