



Merthyr Tydfil Heritage Trust

Ffos y Fran restoration – call any new plans to involve communities

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Llyr Gruffydd MS Chair and Members of the
Climate Change, Environment, and Infrastructure Committee
Senedd Cymru
SeneddClimate@senedd.wales

Wednesday, 22 May 2024

Dear Llyr Gruffydd MS Chair and Members of the Climate Change, Environment, and Infrastructure Committee,

Merthyr Tydfil Heritage Trust last month raised its concerns about the “total failure” of the Ffos y Fran Land Reclamation scheme – the final phase of the East Merthyr Land Reclamation Scheme.

We appreciate the efforts of the Climate Change Committee to hold statutory public sector bodies to account for what seems to be pitiful neglect in the oversight of the final stages of opencast coal mining across the vast East Merthyr site.

Your last meeting (9 May 2024) heard that the Ffos y Fran operator Merthyr South Wales Ltd (MSW Ltd) had written in with a claim that they had reached a formal agreement with Merthyr Tydfil County Borough Council to commence an interim restoration programme of works on site commencing this month.

Yet the local authority has said nothing about this in public – perhaps its delegation meeting with you today can clarify what this “formal agreement” says and who signed it off.

We will again be observing your proceedings with interest. Our ambition is to persuade statutory authorities and agencies to accept responsibility for delivering the aims of the Ffos y Fran restoration. and the whole 34 years of three phases of the East Merthyr Land Reclamation Scheme (stage 1 Incline Top, stage 2 Goat Mill Road and finally stage 3 Ffos y Fran).

At the outset in 1990 local people in East Merthyr and Dowlais were given pledges by their local authorities. Yes, there would be noise and nuisance in the short term but after 20 years – 30 at most - the old coal and slag tips stretching from Penydarren near Merthyr Tydfil town centre right up to the top of the overlooking hills would be re-purposed to provide communities with much needed breathing space and an environment that encouraged the revival of biodiversity.



Merthyr Tydfil Heritage Trust

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Back in the 1990s stages 1 and 2 delivered – in particular at Incline Top. Nature did indeed make a comeback. A new link highway was laid, a housing estate was built and a new park, woodlands and playing fields were provided. Restoration after two years of opencast mining was carried out over a five year term. A key to this success was initial positive public consultation and then close liaison with local residents.

This is in complete contrast with our experience over the last decade with the local authority and the operator at Ffos y Fran. Now in the spring of 2024 we see public bodies and agencies dissembling and prevaricating. Typical of this is Merthyr Tydfil CBC's latest letter to Friends of the Earth concluding, "the Council is taking a cautious approach to ensure the most appropriate outcome for the restoration of the site can be achieved in the public interest, mindful of the limited powers it has available."

To many this may sound not as caution but as a signal of retreat.

We would like to provide a more detailed submission to you following today's evidence session – even though it's at a late stage in your investigation.

As the Heritage Trust explained in our previous letter of 23 April 2024 we expect any new revised and/or replacement aftercare scheme for Ffos y Fran to include all the main objectives of the Replacement Strategy (2007).

That is to say the promises made to provide:

- safe public access across the East Merthyr historic landscape with a new network of trails and footpaths
- sustainable wildlife habitats and biodiverse environmental sites
- protection and restoration of surviving heritage features – including the old railway track bed from Cwmbargoed to Dowlais and
- the return of most of the site for traditional commoners' use.

The escrow account of £15 million (interestingly the sum originally promised for restoration in the first Ffos y Fran scheme some 25 years ago) should not be thrown away on unnecessary spoil moving for cosmetic landscaping.

MSL Ltd now say they have appointed Richards, Moorehead and Laing (RML) as consultants to prepare a revised restoration strategy. RML should be carrying out baseline habitat and biodiversity surveys – and the results should be shared with the local community and the wider public. As an example, the nesting season is in full swing. Many are likely to be surprised at the numbers and variety of birds across East Merthyr officially recorded 20 years ago. So, what is the picture today?



Merthyr Tydfil Heritage Trust

Ffos y Fran restoration – call any new plans to involve communities

3

The Heritage Trust has two suggestions to make from ‘left of field’.

First, that part of the Ffos y Fran site could be put forward as an alternative site for Dwr Cymru’s proposed water treatment works involve an underground reservoir and destruction of green, open countryside at Pontsarn less than a mile away.

Second, that the Ffos y Fran final operational site with its new 20 metre deep ‘body of water’ and the rock and coal seam cliff that looms over it be checked for potential as a ‘pumped hydro’ energy storage scheme.

May we now ask again that the committee politely calls for the Welsh Government to intervene to make sure Merthyr Tydfil County Borough Council has the best possible support and advice. And has it immediately.

You have heard evidence to the effect that neither the Carmarthenshire County Council opencast advisory team nor the Coal Authority have been commissioned to provide advice. They haven’t been near Ffos y Fran for months – possibly years.

The Central Valleys Landscape Partnership co-ordinated by Natural Resources Wales has brought together a Colliery Spoils Working Group that includes expertise from academic and scientific bodies across South East Wales. We understand that members of the group would be happy to be consulted on Ffos y Fran.

Generations of local people in East Merthyr and Dowlais have been let down by schemes that have ruined the environment and contributed to chronic ill health across the community. Prior to the East Merthyr Land Reclamation there was the Royal Arms / Trecatti coal opencast mining operation. Restoration there led to the Trecatti landfill site and that brought years of complaints and court action.

Any revision of the Ffos y Fran restoration plan now must not fail the present and future generations of our town.

Kind regards,

Rob Thomson

Projects Officer

Merthyr Tydfil Heritage Trust

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3