

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 3
Date of previous memo: 30/01/2026
Date: 21/08/2026

SUBJECT: P/25/0299 | Erection of replacement dwelling with associated works | 40 Mount Pleasant Heolgerrig Merthyr Tydfil CF48 1RY

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION (new or updated documents highlighted in bold)

1. **40 Mount Pleasant, Heolgerrig, Merthyr Tydfil. Ecological Assessment Report *prepared by* BE Ecological Ltd. Issue: 1VB. Dated: 06/08/2026.**
2. Land at 40 Mount Pleasant, Heolgerrig, Merthyr Tydfil. Green Infrastructure Statement. *Prepared on behalf of* Mr J. Slocombe. – UPDATED VERSION – JUNE 2026.
3. **Land at 40 Mount Pleasant, Heolgerrig, Merthyr Tydfil. Drawing Title: Proposed Site Plan, Drawing Number: P04, Revision E *prepared by* Andrews Architecture. Dated: 06/08/2026.**
4. Land at 40 Mount Pleasant, Heolgerrig, Merthyr Tydfil. Drawing Title: Proposed Elevations, Revision A *prepared by* Andrews Architecture. Dated: October 2024.
5. 40 Mount Pleasant, Heolgerrig, Merthyr Tydfil. Bat Method Statement *prepared by* BE Ecological Ltd. Dated 08/01/26.
6. **Land at 40 Mount Pleasant, Heolgerrig, Merthyr Tydfil. Drawing Title: Proposed Site Sections, Drawing Number: P08, Revision E *prepared by* Andrews Architecture. Dated: 06/08/2026.**

COMMENTS – Document 1 (Ecological Assessment report)

- Recommendations in the Ecological Assessment Report (Document 1):
 - New native wildflower planting area: Emorsgate EM2 (Standard General Purpose Meadow Mixture)
Management included, but limited – only up to year 5? This is meant to be long term, so at least 25 years in this context.

This is shown on the proposed site plan (Document 3)
 - All lawned areas: Emorsgate EL1 (Flowering Lawn Mixture)

No management included for this within the Ecological Assessment Report (Document 1)

A lawned area is **not** shown on the proposed site plan (Document 3)
 - Lighting plan / Dark buffer zone

Required – as per previous comments (see later for more detail)
 - Vivara Pro Build-in Woodstone® Bat Tube recommended *for the southern or eastern elevation or those elevations facing retained boundary vegetation.*

This *is* included on the Proposed Elevations Plan (Document 4) on the southern elevation. This is acceptable

- Method Statement – dormouse, GCN, Amphibians

Provided in the Appendix of the Ecological Assessment report (Document 1).

- Hedgehog – Gaps in fencing

Gaps for hedgehogs are not shown on the proposed site plan (Document 3)

- Mario Dual Chamber Sparrow Terrace to *be integrated into northern or western elevation of each house*. [typo? - there is only one proposed dwelling]

This is included on the Proposed Elevations Plan (Document 4) on the northern elevation. This is acceptable

- Invertebrates: enhancement measures will include native species planting to support a wide range of pollinators and other invertebrates

No details or reference to this in any submitted document including Document 1.

COMMENTS – Documents 2 + 3 (GIS + Proposed Site Plan drawing)

- The information presented within Documents 1 and 2 is *still* not consistent with the information in Document 1. All documents must contain consistent information. Please amend accordingly.
- Issues with the GIS (Document 2)
 - The GIS is high level and lacks detail. A detailed GIS is required along with a detailed long-term management plan prior to determination for a Full application. Without this, a definitive judgement regarding Net Benefit for Biodiversity (NBB) cannot be made. See later in this memo for more detail.
- Issues with the Proposed Site plan (Document 3)
 - The eastern hedge is marked as being retained ‘if possible’. Whether or not habitat is to be removed must be known, otherwise mitigation, compensation, enhancement and measures to achieve NBB cannot be set out. The key to the plan then also refers to replacing/upgrading this hedge with the ecologist to confirm exact species. There is no reference to this in the Ecological Assessment report (Document 1).
 - A proposed southern boundary hedge is included, with the key stating that it is to be planted as per the GIS (Document 2). This is alluded to in the GIS (Document 2), but is not referred to in the Ecological Assessment report

COMMENTS – Documents 4 (Proposed Elevations drawing)

- The Proposed Elevations drawing (Document 4) is acceptable.

COMMENTS – General

The following must also be submitted:

- GREEN INFRASTRUCTURE STATEMENT
 - A detailed Green Infrastructure Statement (GIS) proportionate to the scale and nature of the development proposed must be submitted to and approved in writing by the local planning authority. The GIS must include, but not be limited to:
 - A description of how green infrastructure has been incorporated into planning proposals;

- A demonstration of how the step-wise approach (the means of demonstrating the steps taken towards securing a Net Benefit for Biodiversity) has been applied;
- The highlighting and description of up-to date baseline data considered and up-to-date ecological surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.
- Consideration of ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.

○ LANDSCAPE/HABITAT, ESTABLISHMENT, MANAGEMENT, MAINTENANCE + MONITORING SCHEME

A proportionate, but long-term Landscape/Habitat, Management, Maintenance + Monitoring Scheme must be submitted to and approved in writing by the local planning authority. The scheme must include, but not be limited to, the following:

- Details (including a plan/drawing) of the onsite *retained* landscaping/habitat/green infrastructure and the onsite *new* landscaping/habitat/green infrastructure.
- A planting plan - NB all species will be native and of local (if not Welsh) provenance.
- The immediate and long-term establishment, maintenance and management measures for all [retained and new] onsite landscaping/habitat/green infrastructure. **NB to assist with this – long term management plans for wildflower grassland and hedgerows are supplied later in this document.**
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure (both retained and new).
- Details of the funding mechanisms to meet the maintenance, management and monitoring objectives and details of the responsible person(s). NB the funding mechanism must anticipate and take account of costs rising over time.
- How a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.

○ LIGHTING SCHEME

An internal and external Lighting Scheme must be submitted to and approved in writing by the local planning authority. This will include, but not be limited to:

- Details of colour temperature and models of lighting used.
- A demonstration of dark zones at the boundaries and across/through the site. Any known roosts and wildlife boxes must not be illuminated (for example bat, bird, invertebrate) and there must be dark routes to allow barrier-free access to the boxes. The Lighting Scheme must conform to the latest guidance (see below) and any updates to these documents or further guidance regarding lighting that may be published subsequently.
 - Guidance Note GN08/23 Bats and Artificial Lighting At Night. Bat Conservation Trust and The Institute of Lighting Professionals 2023 - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
 - Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

- COMPLIANCE

Evidence that ecological measures have been installed, created, implemented etc will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.

LONG-TERM MANAGEMENT PLANS (can be submitted as part of the Landscape/Habitat, Establishment, Management, Maintenance + Monitoring Scheme)

Grassland and Wildflower Areas

Establishment Phase (Years 0–2)

1. Seed Selection

- Use only native species seeds of local (if not Welsh provenance) will be used to maintain regional genetic diversity and support native wildlife.
- See Appendix II for a list of producers:

2. Ground Preparation

- Ground with low fertility and without perennial weeds will be used.
- Any weeds that are present will be removed from the area using repeated cultivation.
- The surface vegetation will be buried and the soil raked and then rolled or treaded to produce a firm surface.

3. Sowing

- Seed will be sown by hand in autumn or spring.
- The seed quantity will be split into two or more parts to avoid running out and ensure an even distribution.
- The seed will be rolled or treaded in to give good soil to seed contact.

4. First Year Management

- After sowing there will be a flush of annual weeds arising from the soil seed bank. This may look unsightly but will provide shelter for the sown seedlings and a resource for invertebrates. The weeds will be cut, removed and composted in early August.
- The young wildflower area will then be kept short by mowing until March of the following year.
- Any remaining perennial weeds such as docks will be dug out.

5. Management once established (2-25 years)

- In the second and subsequent years the area will be managed using traditional meadow management methods.
- The wildflower area will not be cut from spring through to early August to give the sown species an opportunity to flower and go to seed.
- In early August the area will be cut to a height of approximately 50mm and the cuttings left to dry and shed seed for up to a week. The cuttings will then be removed from the site to prevent nutrient build-up.
- The re-growth *can* then be mowed before winter (optional) to a height of approximately 50mm and again in spring if needed (again, optional). Cuttings will be removed to prevent nutrient build up.
- Introduce Yellow Rattle in the Autumn to reduce grass dominance and promote wildflower diversity.
- Rotate some uncut areas to create structural diversity.

6. Monitoring

- Track species emergence and adjust management accordingly.
- Introduce additional species via plug planting or green hay if needed.

Tips for Success

- Patience is key: Meadows take years to mature and stabilize.
- Avoid over-management: Let natural processes shape the community.
- Engage with local experts: Wildlife Trusts and Natural Resources Wales offer guidance and support.
- Seasonal Management Calendar (once established)

Hedgerows

1. Establishment Phase (Years 0–2)

- Site Preparation:
 - A 1.5m-wide strip of vegetation will be cleared.
- Planting
 - The hedge will be planted from November to March

- 2-year-old transplants (whips) will be used
- Whips will be planted in a staggered double row, 40cm apart, with 4–8 plants per metre
- Native woody species only will be used (at least 5 species if possible in equal amounts). For example, hawthorn, blackthorn, hazel, dog rose, field maple, etc. A mix of species will produce resources for wildlife throughout the growing season. For example, early blossoming blackthorn to hawthorn and late flowering ivy.

- Protection

- A fence will be introduced (at a minimum distance of 1.2m from the hedge) where necessary to prevent livestock damage.
- Guards will initially be used, but will be removed when the hedge is established

2. Years 3–10: Establishment & Early Growth

- The hedge will be lightly trimmed every 2–3 years to encourage bushy growth
- Over-trimming will be avoided as this can cause sparse lower growth
- The hedge will be monitored for gaps and these will be filled in with replacement planting as and when required

3. Years 11–20: Maturity & Habitat Enhancement

- Sections can be laid every 10–15 years to rejuvenate growth
- The adjacent margins will be managed for biodiversity

4. Years 21–25: Rejuvenation & Legacy

- Older hedgerow sections will be coppiced to restart growth cycle
 - Any declining plants will be replaced
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