

# INTERNAL MEMORANDUM

**To:** David Cross  
**From:** Matt Davies (Ecologist)  
**Ext:** 5278  
**Memo number:** 2  
**Date of previous memo:** 02/09/2025  
**Date:** 17/11/2025

**SUBJECT: P/25/0223 | Residential development compromising 47 homes, landscaping, informal open space and associated engineering works | Land Adjacent To Hillcrest And Mitchell Crescent Penydarren Merthyr Tydfil CF47 9JF**

## DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Hayden Terrace, Merthyr Tydfil. Preliminary Ecological Assessment report, Version V1.0, *prepared by Ecological Services Ltd. Dated: June 2024.*
2. Hillcrest, Merthyr Tydfil. Ecological Impact Assessment report, **Version V3.0**, *prepared by Ecological Services Ltd. Dated: November 2025.*
3. Hayden Terrace, Merthyr Tydfil. Reptile Survey Report, Version V1.0, *prepared by Ecological Services Ltd. Dated: 18<sup>th</sup> May 2022.*
4. Hillcrest/Hadyn Terrace, Merthyr Tydfil. Tree Survey, *prepared by Treescene (Arboricultural Consultants). Dated: 30<sup>th</sup> September 2024.*
5. Hillcrest/Hadyn Terrace, Merthyr Tydfil. Tree Constraints Plan, *prepared by Treescene (Arboricultural Consultants). Date received: 18/08/2025.*
6. Proposed Residential Development, Hillcrest. Green Infrastructure Statement *prepared by TDA on behalf of Merthyr Housing Association. Dated: May 2025 (Updated November 2025).*
7. Proposed Residential Development, Hillcrest. Landscape Specification & Management Plan *prepared by TDA on behalf of Merthyr Housing Association. May 2025 (Updated November 2025).*
8. Hillcrest. Outline Soft Landscape Proposals. Drawing number: **TDA.3019.02(A)** *prepared by TDA on behalf of Merthyr Housing Association. Dated: November 2025.*

## REQUIREMENT - *Landscape/Habitat, Establishment, Management, Maintenance + Monitoring Scheme amendments*

For Documents 7 and 8 - See table below for remaining elements required.

| Element                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Included or further information needed                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Replacement tree planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Where a woodland or a shelterbelt area is lost as part of a proposed scheme, the compensation planting must be at a scale, design and species mix reflective of that area lost. In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers. Further details to be found in PPW12. NB replacement tree planting must be in the right place and not at the expense of other valuable and/or priority and protected habitats. | Please include number of trees to be removed and number of trees to be introduced – to demonstrate minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. |

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|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| A planting plan - NB <i>all</i> species will be native and of local (if not Welsh) provenance. | Required.                                                                                                       |
| Bio-Retention Areas                                                                            | Pages 19 and 20 (Document 7) - change species references to those shown in Document 8. i.e., to native species. |

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#### REQUIREMENT – *Lighting Scheme*

A detailed Lighting Scheme is required. This will include, but not be limited to:

- The results of an onsite ambient light level survey for use as a baseline.
- Both lux horizontal and lux vertical illuminance contour plans down to a lux level of 0.2 covering the site and the wider landholding. This will be required for the ambient light level survey and the proposed post-development lighting set-up.
- Cross referencing with other relevant ecological documents, including but not limited to the long-term Landscape/Habitat Establishment, Management, Maintenance + Monitoring scheme and the enhancement plan.
- Details of colour temperature and model of lighting used.
- Details of lighting to be used both during construction and operation. The lighting shall be installed and retained as approved during construction and operation.
- A Central Management System (CMS) should be used to produce light only when and where needed.
- An environmental lighting impact assessment against conservation requirements for nocturnal and crepuscular species including details of when the lighting will be in operation (restrictions will be required).

The above survey and plans must be undertaken and produced by a competent lighting professional in collaboration with the commissioned ecologist. The lighting plan must demonstrate dark zones at the boundaries and across/through the site. Known roosts and proposed 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 and access to foraging and commuting routes. 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>

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#### REQUIREMENT – *Precautionary Working Method Statement (PWMS)*

Detailed Precautionary Working Method Statements for the following are required: reptiles, amphibians, nesting birds, badger, hedgehog, invertebrates, priority and protected habitats.

NB much of this information is included within Document 2. Additional information is required to cover all the above for approval in writing by the local planning authority.

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#### REQUIREMENT – *Ecological Enhancement Plan*

Full details of all biodiversity/ecological enhancements will be required for approval in writing by the local planning authority. This must include the following:

- Integrated bird boxes
- Integrated bat boxes
- Reptile hibernacula
- Invertebrate boxes (must be made of woodcrete, for example, rather than timber)
- Gaps in boundaries passage of hedgehogs and other species

All enhancements must be clearly marked on architect plans, drawings and elevations. The plans must be used to inform details of the Lighting Scheme, ensuring that proposed wildlife boxes are not illuminated (for example bat, bird, invertebrate) and there must be dark routes to allow barrier-free access to the boxes and access to foraging and commuting routes.

Again, most of this information is included within Document 2, but this must be expanded to include all the above. Separate marked-up architect plans, drawings and elevations will be required.

A specific point regarding the proposed reptile hibernacula (Document 2, page 27 + Appendix 4, page 32). A word of caution about using brash and deadwood/logs. While this creates excellent habitat in the short term, it decomposes (relatively) quickly. Ideally a good mix of both rocky and woody materials, but favouring rocky material should be used, for longevity. Oversizing hibernacula would also be a good idea too - a fresh hibernacula created 500mm high, will quickly settle and decompose resulting in something much lower. I would suggest that the hibernacula are created 1500-2000mm high when freshly constructed, in the hope that they won't then collapse to less than half their original size. In addition, I would suggest they are constructed in a similar way to the 'windrows' seen in forestry, a large bank (Running east-west, for maximum sunlight).

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#### REQUIREMENT – *Construction Environmental Management Plan - Biodiversity (CEMP-B)*

A Construction Environmental Management Plan - Biodiversity (CEMP-B) is required for approval in writing by the local planning authority. The CEMP-B will include, but not be limited to the following:

- A risk assessment of potentially damaging construction-type activities
- Identification of "biodiversity protection zones", "root protection zones" and areas where invasive species have been identified.
- Reference to details for implementation of method statements required to achieve specific biodiversity outcomes, and particularly mitigation measures. Including, but not limited to the long-term Landscape/Habitat Establishment, Management, Maintenance + Monitoring scheme.
- Identification of practical measures, both physical measures and sensitive working practices to avoid impacts during development, for protecting biodiversity through the control or regulation of construction-type activities.
- The location and timing of sensitive works to avoid harm to biodiversity features.
- The times during construction or development implementation when particular specialists need to be present on site to oversee works.
- Responsible persons and lines of communication.
- Funding
- Defining and communicating the role and responsibilities on site of an ecological clerk of works (ECoW), or appointed ecologist(s) responsible for managing biodiversity issues on site, and times and activities during construction or development implementation when they need to be present to oversee works.
- Use of exclusion fences, protective barriers and warning signs.

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#### REQUIREMENT – *Invasive Non-Native Species (INNS) Methodology / Strategy*

An Invasive Non-Native Species (INNS) Methodology / Strategy (to include a long-term (in perpetuity) biosecurity risk assessment and management plan for the site and the wider landholding) is required for approval in writing by the local planning authority.

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#### REQUIREMENT – *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.