

INTERNAL MEMORANDUM

To	David Cross
From	Matt Davies
Memo #	2
Date	01/09/2026
Previous memo date	13/08/2026
Application:	P/26/0178 Discharge of conditions 12 (Ecological Enhancements) and 17 (Affordable Housing) of planning permission P/25/0223 relating to a residential development. Land Adjacent To Hillcrest And Mitchell Crescent Penydarren Merthyr Tydfil

Condition #12 of P/25/0223

Prior to construction works commencing on site details of the proposed biodiversity/ecological enhancements shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the following:

- *updated elevations to illustrate the location of the integrated bird and bat boxes;*
- *details of the proposed reptile hibernacula;*
- *details of invertebrate boxes (must be made of a woodcrete rather than timber);*
- *details for the provision of gaps in boundaries for passage of hedgehogs and other species; and*
- *a timescale for its implementation.*

The enhancements must be clearly mark on the relevant plans, drawings and elevations and used to inform the lighting scheme for the development and ensure wildlife boxes are not illuminated. The development shall be carried out in accordance with the approved details.

Reason - *To protect the natural environment and important habitats in accordance with Policies EnW1 and EnW2 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.*

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

Doc #	Details
1	Hillcrest. Detailed Soft Landscape Proposals. Drawing number: TDA 3019.02(A) <i>prepared by</i> TDA <i>on behalf of</i> Merthyr Housing Association. Dated November 2025.
2	Hillcrest. Type G 385P (House Type): 4134-PEN-ZZ-ZZ-DR-A-2500 S4, Rev P5 <i>prepared by</i> Pentan Architects. Dated: 21.03.25 [Plots 5 + 7 (x1 sparrow), 6 + 8 (x1 swift) – each plot also has x1 bat]
3	Hillcrest. Type E 2B4P (House Type) End Type: 4134-PEN-ZZ-ZZ-DR-A-2300 S4, Rev P5 <i>prepared by</i> Pentan Architects. Dated: 21.03.25 [Plots 23, 30, 42, 27, 26, 37 (2x bat for each)]
4	Hillcrest. Type D 2B3P (Assisted Bungalow): 4134-PEN-ZZ-00-DR-A-2200 S4, Rev P5 <i>prepared by</i> Pentan Architects. Dated: 21.03.25 [Plot 31 (x1 sparrow + 2x bat)]
5	Hillcrest. Type F 2B3P (Mews House Type) End Type: 4134-PEN-ZZ-ZZ-DR-A-2410 S4, Rev P4 <i>prepared by</i> Pentan Architects. Dated: 21.03.25 [Plot 36 (x1 swift + x1 bat)]
6	Hillcrest. Type F 2B3P (Mews House Type) Mid Type: 4134-PEN-ZZ-ZZ-DR-A-2400 S4, Rev P4 <i>prepared by</i> Pentan Architects. Dated: 21.03.25 [Plots 32 (x1 swift) + 34 (x1 sparrow)]
7	Hillcrest. Type C 1B2P Walkup Flats Floor Plans and Elevations: 4134-PEN-ZZ-ZZ-DR-A-2100 S4, Rev P4 <i>prepared by</i> Pentan Architects. Dated: 21.03.25 [Plots 13-22 + 43-47 (x2 sparrow and x1 swift for each row)]

8	Hillcrest. Type E 2B4P (House Type) Mid Type: 4134-PEN-ZZ-ZZ-DR-A-2310 S4, Rev P4 <i>prepared by Pentan Architects</i> . Dated: 21.03.25 [Plots 28, 41 (x1 sparrow), 24, 39 (x1 swift)]
9	Hillcrest. Type A + B 1B2P (LGF Flat) & Type B 2B4P (UGF House Type): 4134-PEN-ZZ-ZZ-DR-A-2000 S4, Rev P5 <i>prepared by Pentan Architects</i> . Dated: 21.03.25 [Plot 1/9 (x1 sparrow, x1 bat); Plot 2/10 (x1 swift, x1 bat); Plot 3/11 (x1 sparrow, x1 bat); Plot 4/12 (x1 swift)]
10	Boundary Type 05 Detail: 4134-PEN-ZZ-ZZ-DR-A-9600 S3, Rev P <i>prepared by Pentan Architects</i> . Dated: 24.07.26
11	Covering Letter, <i>written by</i> LRM Planning Limited. Reference:21.173. Dated 07/08/2026.

COMMENTS + REQUIREMENTS

Doc #	Comments
1	The details of the bat and bird boxes do not seem to tally with those shown Documents 2-9? For example – Plots 23, 30, 42, 27, 26, 37 on Document 1 show x2 bat boxes, but also x1 bird box (either sparrow or swift). The bat boxes are shown on Document 3, but the bird boxes are not. Another example – Plot 31 shows a sparrow terrace box and no bat boxes on Document 1, but Document 4 shows a sparrow terrace box and x2 bat boxes? Can Document 1 be fully checked against the elevation drawings (Documents 2-9) with amendments made where necessary to ensure there is consistency?
2	The bird boxes (sparrow terrace and swift) appear to be integrated into the northeastern elevation and the bat boxes into the southwestern elevation. If this is correct, this is fine.
3	Bat boxes can face any direction, so these are fine.
4	The sparrow terrace box appears to be shown integrated into the southeastern elevation. If this is correct, this is fine. The bat boxes appear to be shown integrated into the lower gable end, facing northeast. These should, instead, be integrated within the higher gable end on the same orientation.
5	The swift box appears to be shown integrated into the southeastern elevation. If this is correct, this is fine.
6	Both the swift box and the sparrow box appear to be shown integrated into the southeastern elevation. If this is correct, this is fine.
7	Plots 13-22. The swift box and the sparrow terrace boxes appear to be shown integrated into the northwestern elevation. If this is correct, they must be moved to a more north facing or east facing elevation. Plots 43-47. The swift box and the sparrow terrace boxes appear to be shown integrated into the southeastern elevation. If this is correct, this is fine.
8	Plot 24 – the swift box appears to be shown integrated into the rear elevation, facing southeast. If this is correct, this is fine. Plot 28 – the sparrow terrace box appears to be shown integrated into the rear elevation, facing northeast. If this is correct, this is fine. Plots 39 (swift) and 41 (sparrow terrace) – both boxes appear to be shown integrated into the rear elevation, facing southeast. If this is correct, this is fine.

9	Plots 1/9, 2/10, 3/11 and 4/12 – the bat boxes appear on the elevations facing roughly west and the bird boxes on elevations facing roughly east. If this is correct, this is fine.
10	Continuous gap shown between bottom wire of the fence and the ground of 150mm. The gap is acceptable. Question: are all the boundaries onsite to be post and wire fences or are there other boundary types?
11	Page 3 refers to 15 bee bricks and gaps along boundaries for hedgehogs and other species. These need to be marked on Document 1. Timescale for implementation (page 3) states that the development is currently anticipated to be completed in August 2028. It needs to specifically state that this will include all biodiversity/ecological enhancements dealt with under this condition.
General	All swift boxes - what is their height from the ground? – this needs to be at least 5m. The positions of the hibernacula are shown (Document 1), but there is no other detail, for example, regarding construction methodology, orientation – see footnote for comments prior to determination¹ NB as the positions of the wildlife boxes must dovetail with the lighting scheme². It would make sense to delay discharge of the enhancement condition until the application for discharge of the lighting condition is submitted. There may need to be changes to the positions of the integrated wildlife boxes to more easily facilitate appropriate lighting, where required.

¹ “A specific point regarding the proposed reptile hibernacula. 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).”

² the 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.

