

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1
Date of previous memo: -
Date: 02/09/2025

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. Hayden Terrace, Merthyr Tydfil. Ecological Impact Assessment report, Version V2.0, *prepared by* Ecological Services Ltd. Dated: June 2025.
3. Hayden Terrace, Merthyr Tydfil. Reptile Survey Report, Version V1.0, *prepared by* Ecological Services Ltd. Dated: 18th May 2022.
4. Hillcrest/Hadyn Terrace, Merthyr Tydfil. Tree Survey, *prepared by* Treescene (Arboricultural Consultants). Dated: 30th 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.
7. Proposed Residential Development, Hillcrest. Landscape Specification & Management Plan *prepared by* TDA *on behalf of* Merthyr Housing Association. Dated: May 2025.
8. Hillcrest. Outline Soft Landscape Proposals. Drawing number: TDA.3019.01(F) *prepared by* TDA *on behalf of* Merthyr Housing Association. Dated: August 2025.

REQUIREMENT - *Green Infrastructure Statement (GIS) amendments*

The GIS must include certain elements. This is relevant to Document 6 in the list above. See table below.

Element	Included or further information needed
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 - NBB) has been applied;	The step wise approach has been referred to, but more detail is required. Please refer to PPW12, pages 149-151, section 6.4.15. As one example of the further detail not yet provided: Avoid: planning authorities need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.
The highlighting and description of up-to date baseline data considered and up-to-date surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.	Please ensure all relevant documents are highlighted, described and cross referenced.

Consideration of ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.	This is required. A comparison of each element between the current and the proposed habitat would be useful.
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REQUIREMENT - *Landscape/Habitat, Establishment, Management, Maintenance + Monitoring Scheme amendments*

This must include certain elements. This is relevant to Documents 7 and 8 in the above list (and also Documents 4 and 5). See table below.

Element	Included or further information needed
Details (including a plan/drawing) of retained landscaping/habitat/green infrastructure both on construction site and in the wider landholding	[Document 8 does not show the existing trees within the retained habitat]
Details including a plan/drawing) of new landscaping/habitat/green infrastructure both on the construction site and in the wider landholding	✓
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.	[Details from the GIS – 6 no. individual trees to be removed along with 6 no. tree groups. The codes for all the trees and tree groups earmarked for removal are not specified. Please can these be added in?
A planting plan - NB <i>all</i> species will be native and of local (if not Welsh) provenance.	Documents 7 and 8 include ornamental/non-native/cultivars/nativars and some species that can be invasive in the UK, e.g., <i>Prunus laurocerasus</i>, <i>Lonicera pileate</i>, <i>Alnus cordata</i>. Amendments are therefore required. Native species must be used. The retained grassland area should be supplemented/overseeded with a seed mix including appropriate species for the soil and grassland type and including hemiparasitic plants (e.g., yellow rattle) to reduce the cover of more vigorous resident grasses. This should be undertaken and monitored over several years with the aim of increasing biodiversity. Amenity grass areas will be seeded with a species mix that would respond well to regular mowing. The following are examples of seed mix that can be used: ○ EL1 Flowering Lawn Mixture - Emorsgate Seeds ○ Heritage Flowering Lawn 80% Grass Seed Wildflower Mix - 80% Grass Seed Mixes John Chambers ○ Low flowering lawn seed mix - Wild Flower Lawns and Meadows (or equivalent)

The immediate and long-term (in perpetuity) establishment, maintenance and management measures for all [retained and new] onsite landscaping/habitat/green infrastructure and landscaping/habitat/green infrastructure within the wider landholding.	Page 13 of Document 7 – “Native hedgerows to be cut once annually, outside of the bird nesting season, to maintain a height of 1.8 metres.” Hedges should not be cut annually (as flower buds often form on second-year growth). Hedges must be managed on a two- or three-year rotation – as stated in Document 2, page 26. Please amend. Grassland management and creation of hibernacula, to create more suitable habitat for reptiles must be undertaken ‘prior to implementation of the RMS’ to ensure there is capacity for the numbers of animals encouraged into a smaller area. This must be specified. Use of pesticides and herbicides is not acceptable. All such references must be removed and alternative management techniques included. Page 13 of Document 7 includes a brief management prescription for ‘Wildflower Areas’. Document 8 includes areas to be seeded with x3 different seed mixes – Emorsgate EM1, EM8 and EH1. Additionally, EL1 will be used for Amenity Grass areas. The Emorsgate site includes specific management instructions for each of these mixes (including instructions for Ground Preparation, Sowing, First Year Management and Management Once Established). These management instructions for each seed mix should be included in Document 7.
Timing, phasing and duration of construction activities and conservation measures.	This has not been included and is required.
Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures and landscaping/habitat/green infrastructure within the wider landholding (both retained and new).	Document 7 does not include post-development monitoring information, which is required. Monitoring of the retained grassland habitat to assess the impact of the overseeding must be included. Monitoring of wildlife boxes must be included.
Cross referencing with other relevant ecological documents, including but not limited to the Green Infrastructure Statement, the Lighting Scheme, the drainage scheme etc.	Required.
Details of the funding mechanisms to meet the maintenance, management and monitoring objectives. NB the funding mechanism must anticipate and take account of costs rising over time.	This information is required.
Details of the responsible person(s) / management company	Document 7, page 10 – <i>“Following the implementation of the landscape proposals, the management of landscape areas at the site will be undertaken by a suitably qualified contractor to be appointed by the site operator. The contractor will be expected to make site visits, spread throughout the year to suit the season.”</i> Further details are required if available.
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.	This needs to be explored and explained within Document 7.
Details of review periods and reporting of long-term (in perpetuity) landscaping/habitat/green infrastructure management objectives.	Required.

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>

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.

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).

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.

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.

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.