

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 29/08/2024
Date: 20/09/2024

SUBJECT: P/24/0191 | Construction of new synthetic pitch and erection of associated fences, barriers and storage container. Erection of flood lighting around new synthetic pitch and existing running track. | Afon Taf High School Yew Street Troedyrhiw Merthyr Tydfil CF48 4ED

SITE, HABITAT AND POSSIBLE IMPACTS

The running track, and proposed position of the 3G sports pitch, is adjacent to the wooded river, also a SINC (Afon Taf). There are also nearby Ancient Semi Natural Woodland and Restored Ancient Woodland sites, along with other valuable habitat.

Therefore, there are likely to be impacts, for example, due to:

- o Artificial Light At Night (ALAN) – impacts on bats as well as other species (e.g., otter, invertebrates, birds), and
- o Removal of grassland habitat.

RELEVANT DOCUMENTS RELATED TO ECOLOGY

1. Afon Taf High School, Merthyr Tydfil. Preliminary Ecological Appraisal Report Update by Wildwood Ecology Ltd. Document Ref: WWE24118 PEA Update. Dated 28/06/2024.
2. Afon Taf High School, Merthyr Tydfil. Green Infrastructure Statement by Wildwood Ecology Ltd. Document Ref: WWE24118 GIS Rev A. Dated 02/08/2024.
3. Afon Taf. Proposed floodlighting. Project No. 7497. Drawing No. HLS7497. By Halliday Lighting. Dated 27/02/2024.
4. Afon Taf High School, Merthyr Tydfil. Preliminary Ecological Appraisal Report Update by Wildwood Ecology Ltd. Document Ref: WWE22004 PEA_DRAFT. Dated 16/03/2022.

Latest documents submitted:

5. ***Afon Taf High School, Merthyr Tydfil, CF48 4ED. Ecological Impacts Assessment Report prepared by Wildwood Ecology Ltd. Document Ref: WWE24118 EcIA Rev A. Dated 12/09/2024.***
6. ***Afon Taf High School, Merthyr Tydfil, CF48 4ED. Green Infrastructure Statement prepared by Wildwood Ecology Ltd. Document Ref: WWE24118 GIS. Dated 12/09/2024.***
7. ***Afon Taf High School. Football / Rugby pitch & Athletics Track Lighting Design prepared by Ark Lighting. Dated 19/09/2024.***

COMMENTS

Document 5

Page 5, Table 2 – how do the habitats described here relate to the habitat plan in Appendix II? The table uses the UK Habitat Classification system, but the survey methods outlined in Appendix I and the plan in Appendix II relate to Phase 1 habitats survey system? The approach must be consistent.

This was an issue previously flagged up, which has not been rectified.

Page 5. Para 2.11 – “There were 12 trees identified with PRF’s, however a full assessment could not be undertaken due to access limitations.”

There is a discrepancy between this statement and the habitat plan legend in Appendix II, which only has target notes for x9 trees with PRFs.

Document 5 (Page 5, para 2.12) confirms that the trees to the west of the proposed MUGA (and to the south of the target noted trees referred to above) have not been assessed for bat features.

Document 6

Page 14, Table 2 still includes aspirational measures. These have been highlighted in yellow within the document. Is there a reason for this? Was the intention to remove the highlighted paragraphs?

Document 7

- o As previously required (memo #1 – 29/08/2024) the lighting plan must conform to the latest guidelines (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>). This will include, but not be limited to:
 - o The contours (and/or coloured numbers) for 0.2, 0.5, 1, 5, and 10 lux must be clearly shown, as well as appropriate contours for values above these. **[These have been added to the new document.]**
 - o A colour temperature of 2700K or lower (currently Document 3 features luminaires of 4000K). **[This has been amended. All luminaires now have a colour temperature of 2700K.]**
 - o The boundary habitat and river corridor must remain either:
 - illuminated to levels no greater than onsite baseline ambient levels **[a baseline ambient level light survey has not been undertaken]**; or
 - dark – in line with the criteria/definition as set out in the lighting guidelines (at or below 0.2lux on the horizontal plane and at or below 0.4lux on the vertical plane). **[This has not been achieved]**
- o The West Dark Zone (page 7) and East Dark Zone (page 8) do not meet the criteria for darkness as set out above. The lux levels in these zones reach as high as 10lux. This is not acceptable. Further amendments to the lighting scheme will be necessary.
- o The guidelines also refer to the following:
 - o Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - See ILP GN01 (<https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>)
 - o Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt

Have these criteria also been considered?

- o Restrictions on when the light is in use must please clearly set out.

REQUIREMENTS

General

- o Amendments to Documents 5-7, as set out above.

Further survey work

- o It is clear from the updated lighting scheme (Document 7) that there are likely to be impacts from lighting on foraging, commuting and roosting bats (Document 1, Appendix II target notes at least x9 trees with suitability for roosting bats) as well as other protected species. Further survey work is therefore required. **NB if darkness as defined within the ILP/BCT guidelines can be achieved – this further bat survey work will not be required.**

Planning conditions

- o No development shall take place (including ground works, vegetation clearance) until a Construction Environmental Management Plan - Biodiversity (CEMP-B) has been submitted to and approved in writing by the local planning authority.
- o No development shall take place (including ground works, vegetation clearance) until a detailed long-term Landscaping, Habitat & Ecology Scheme (LHES) has been submitted to and approved in writing by the local planning authority. The LHES must include, but not be limited to, the following:
 - o Details of retained landscaping/habitat/green infrastructure
 - o Details of new landscaping/habitat/green infrastructure
 - o A planting plan
 - o Long term (at least 25 years) maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new)
 - o Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc
 - o Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures
 - o Details of the funding mechanisms to meet the maintenance, management and monitoring objectives.
 - o Details of the responsible person
- o No development shall take place (including ground works, vegetation clearance) until an Invasive Non-Native Species (INNS) management plan has been submitted to and approved in writing by the local planning authority.