

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 5

Date of previous memo: 04/11/2021

Date: 28/02/2022

SUBJECT: P/21/0170 | Demolition of Industrial Buildings and Erection of 14 Dwellings and 6 Apartments (Outline) | Bryntaf Garage 105 Bryntaf Aberfan Merthyr Tydfil CF48 4PJ

Documents (previous (1+2), new (3) and amended (4-7) submitted in support of the above application:

1. Preliminary Ecological Appraisal. Bryntaf Garage. Sylvan Ecology (for JT Planning). Document number J M050- PEA Report-V1.1. Issue date 15/10/21.
2. Protected Species Report. Bryntaf Garage. Sylvan Ecology (for JT Planning). Document number M050- Eco Report-V1.1. Issue date 15/10/21.
3. Ecological lighting statement. Date received 21/12/21.
4. Amended – Proposed Site Plan Drawing number A100. Proposed 3D Views. Lighting Schematic. Date received 21/12/21.
5. Amended – Drawing numbers A202 Rev B and A201 Rev D. Date received 21/12/21.
6. Amended – Drawing numbers A204 Rev B and A203 Rev D. Date received 21/12/21.
7. Amended – Drawing numbers A202 Rev A and A201. Date received 21/12/21.

Comments (previous in black, new in green):

Document #1

Enhancements are now marked on the indicative plans within the ecological reports. All relevant final plans/drawings for the scheme will need to be marked up with the enhancement measures when full planning is applied for.

Document #2: *Bats*

An 'indicative' lighting schematic has been added to the report.

There will be a planning condition for a site lighting scheme requiring written approval prior to commencement of construction. If the scheme can demonstrate dark flight lines for commuting and foraging bats across the scheme as well as dark routes to and from the integrated bat boxes without horizontal and vertical illuminance plans, then these will not be required.

The lighting plan must provide the specifications for the luminaires proposed to be used. In addition, it must take into account, not only, external lighting, but internal

lighting, light spill from the nearby street lights or residential security lights and light spill from roof lights.

Specifically regarding internal lighting, a reduction of windows including skylights, internal luminaire placement and perhaps blackout blinds might all contribute to an acceptable lighting plan. Other measures that can be used include glazing treatments – see below for excerpt from: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

‘Glazing should be restricted or redesigned wherever the ecologist and lighting professional determine there is a likely significant effect upon key bat habitat and features. Where windows and glass facades etc cannot be avoided, low transmission glazing treatments may be a suitable option in achieving reduced illuminance targets.

Products available include retrofit window films and factory-tinted glazing. ‘Smart glass’, which can be set to automatically obscure on a timer during the hours of darkness, and automatic blinds can also be used *but their longevity depends on regular maintenance and successful routine operation by the occupant, and should not be solely relied upon.*’

Any proposed onsite lighting (external and internal) will conform to: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

NB the landscape scheme can also contribute to limiting light spill.

The following guidelines need to be cited within the ecological reports:

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Document #3

No details regarding the author of this document. Please provide.

The language used is ambiguous, e.g., ‘*The following will be considered when choosing luminaires.*’ This needs to be a requirement rather than just a consideration.

It is unclear what is meant by the final point (‘Any external lighting’). Please can this be clarified?

Document #4

The principle of fencing and hedge planting is good, however, a range of native species will be used to provide a more biodiverse feature. More details will be required in a Landscape Plan.

Olev Torch – online data sheet (https://www.olevlight.com/wp-content/uploads/2019/04/TORCH_Datasheet.pdf) specifies 3000K. Also, the data sheet has no info regarding wavelength. Can a luminaire be sourced with a colour temperature of $\leq 2700\text{K}$ and with motion sensors?

Documents #5-#7

Automatic blinds have been proposed for roof lights and recessed windows. Who will be responsible for the regular maintenance and successful routine operation of these blinds?

Previous comments regarding lighting stated ‘*If the scheme can demonstrate dark flight lines for commuting and foraging bats across the scheme as well as dark routes to and*

from the integrated bat boxes without horizontal and vertical illuminance plans, then these will not be required.'

These latest documents do not demonstrate exactly where dark flight lines are proposed to be across the scheme and dark routes to and from the integrated bat boxes. If this cannot be adequately demonstrated then horizontal and vertical illuminance plans will be required.

Other issues

There are opportunities for enhancement of the site in terms of landscaping. A Landscape Management Plan (**still required**) would be required to demonstrate this. Native species of local provenance will be used and the plan should cover at least 5 years post-construction.

NB appropriate planting may mitigate some of the detrimental effects of ALAN on the site, including offsite light sources (e.g., nearby street lighting and residential security lighting).

The following is proposed:

'Hawthorn hedging or similar to foot of the cliff to absorb potential falling debris from the cliff edge above and keep residents away.' See Drawing Number A100, dated 2020-04-10.

This seems insufficient in my view, with no details regarding the width of the hedging and with the hedging seemingly within the gardens of each property, separated by fencing of each garden. This would leave residents free to remove the hedging if they so wished. A wider buffer would be better here, fenced off from the gardens and with a wider range of native species (of local provenance).

In addition, the shading created by the cliff-face will have a bearing on the species used in these areas.

Document #4

As previously referred to, the principle of fencing and hedge planting is good; however, a range of native species will be used to provide a more biodiverse feature. More details will be required in a Landscape Management Plan.

Question: how wide is the fenced-off buffer proposed to be?