

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 23/08/2022
Date: 08/12/2022

SUBJECT: P/22/0192 | Provision of 29 camping pods, changing village, vehicle workshop, children's play area and associated access, drainage and landscape infrastructure | Gethin Woodland Centre A470 Pentrebach To Rhydycar Northbound Abercanaid Merthyr Tydfil CF48 1YZ

This planning application concerns Phase 3 of the development. The following are documents submitted in support of the application:

1. Ecological Impact Assessment Report. Land at Bike Park Wales, Merthyr Tydfil. Wildwood Ecology Ltd. Document Ref: WWE22067 ECIA REV B. Dated 25/11/2022

Bats

Autumn 'top-up' bat transects (x2) were+- undertaken in 2022. The results of these surveys must be displayed in the same way as the results from the 2018 survey work as shown in Figures 4, 5 & 6 (pages 18 & 19).

The positions of the automated/static bat detectors for the 2022 survey are displayed in Figure 2 (page 3). Where were the static detectors positioned for the 2018 surveys? – a similar plan to Figure 2 would be useful.

Other requirements:

- A site lighting plan (including horizontal and vertical illuminance plans) must be produced. This must show the dark corridors and areas informed by the previous 2018 survey work and the 2022 autumn 'top-up' surveys. These dark areas would need to strictly conform to the criteria as set out in the following guidelines:
<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
- So, for dark corridors and areas, illuminance would need to be <0.2 lux on the horizontal plane and <0.4 lux on the vertical plane. Particularly important given the presence of lesser horseshoe bat.
- Luminaires must also fully conform to the guidelines (for example, amongst other things they would need to have a colour temperature of <2700K and a peak wavelength of >550nm).
- The use of red light could perhaps be considered.

- Any and all measures to limit lighting only to 'where' it is required must be employed (e.g., perhaps bollard-style lighting, directional lighting, the use of baffles or hoods etc).
- In addition, lighting must only be used 'when' it is required – there will need to be restrictions regarding when lighting will be operational (e.g., avoiding lights being left on all through the night).
- The lighting plan should be developed with input from the ecologist to ensure the best outcome for bats and other species affected by Artificial Light At Night (ALAN).
- In addition, all works will be undertaken in daylight hours only with no external lighting used.
- The lighting plan is preferably required prior to planning determination.
- When the lighting plan is produced, the it can then be referenced and discussed within the EclA document.
- More detail of the results of the automated/static detector survey required, for example, a table showing bat passes, species and times for each detector on each night. This must include the 2018 and the 2022 survey results. This can be placed in an appendix and referred to within the body of the EclA report.

Birds

x3 'top-up' bird surveys undertaken in September and October 2022 plus nightjar survey combined with the first bat transect in September 2022.

Requirements:

- For the bird survey results, a visual representation is required. For example, showing the transect route plus species abundance and species richness plots for each survey visit.

PRA

3.36 (page 23) – *'Both young oaks marked in green have been assessed as having low suitability to support roosting bats due to the presence of ivy cover on their stems, and therefore ecological supervision will be required during to felling.'*

Requirement:

- It may be that the ivy is covering features with suitability for bats. Removal of the ivy would allow the status of the trees in terms of suitability to either be confirmed (as low) or adjusted if necessary. This would be required as a first step if the trees are to be impacted by the development. Please can the report be amended to reflect this?

Biodiversity compensation and enhancement

Requirements:

- An assessment of habitat to be lost and how this will be compensated for. A quantitative measure detailing the areas to be lost and compensated for is needed. A qualitative measure may also be relevant if, for example, the compensation habitat is of a smaller area than the habitat lost, but is proposed to be of a higher quality in terms of biodiversity.
- Much more in terms of enhancement is required. Currently, the enhancement is limited to a single habitat pile.
- All measures must be fully specified and stated within Document 1 and also marked on all relevant drawings, plans and elevations.

Reptile Mitigation Strategy

Question:

Are there routes through the woodland/scrub to the east of the receptor area to allow reptiles access to the grassland areas to the south east? Can the connectivity please be shown on a plan?

Other

Requirement:

Management of habitat in receptor site will be undertaken for at least 10 years. Please can the report be amended to reflect this and align with the 10 year Landscape Maintenance Programme Document?