

Guildford Environmental Forum Response to Planning Application to discharge

Condition 4 The Landscape and Ecological Management Plan

Guildford Environmental Forum has made comments all through the planning process about the incompatibility of the Urn Field proposals in particular the proposed flood lighting on the wildlife and the wider natural environment of Merrow Down which is a Site of Nature Conservation Importance (SNCI).

The Landscape and Ecological Management Plan prepared by Greengage to discharge condition 4 is the first document submitted by the applicant which responds to the fundamental issues raised previously by a range of consultees on these issues. These fundamental issues create unreconcilable conflicts and we believe that the planning application is undeliverable in its current form because of the legal protection of bat roosts and the associated habitat. Therefore, we request that all work on the pre-commencement applications is paused until the issues are resolved.

The rest of the note addresses the points in more detail around this primary issue of the lighting impact on the protected species and the woodland to the north of the site and also includes the northern part of the site itself.

Commentary from Surrey Wildlife Trust as part of the planning application responses date 4/3/2021

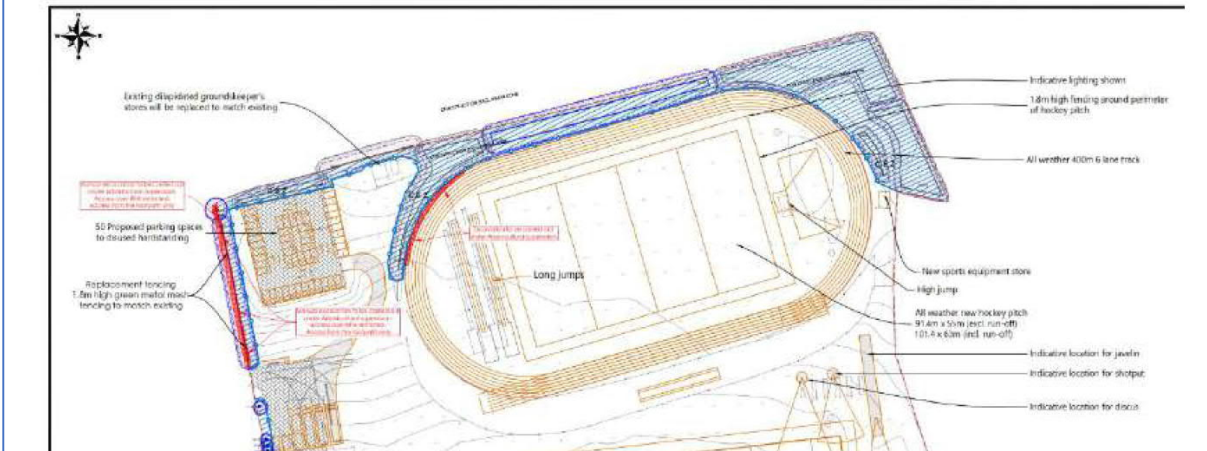
"As a result of tree felling, the proposed development will be placed closer to the woodland edge. Woodland offers optimal habitat for bats which are known to be using this woodland edge for foraging and commuting. As nocturnal animals, bats are sensitive to any increase in artificial lighting of their roosting and foraging places and commuting routes.

Paragraph 180 of the National Planning Policy Framework states that planning policies and decisions should "limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation".

The applicant should ensure that the proposed development will result in no net increase in external artificial lighting at the woodland edge and other foraging commuting corridors across the site, in order to comply with above referenced legislation and the recommendations of the Bat Conservation Trusts' document entitled "Bats and Lighting in the UK – Bats and The Built Environment Series". In particular I draw the applicant's attention to the need to ensure that light levels of 1 lux or below is necessary at the woodland edge. We advise that compliance with this best practice guidance is secured through a Sensitive Lighting Management Plan submitted to the Council for approval prior to commencement of development."

Figure 4.1 from 'The Landscape and Ecological Management Plan' clearly shows the location of the protected woodland shaded in blue on the plan below. This shows the woodland to be retained extends into the site as far as the edge of the proposed running track.

Figure 4.1 Tree protection plan with areas proposed for removal in red



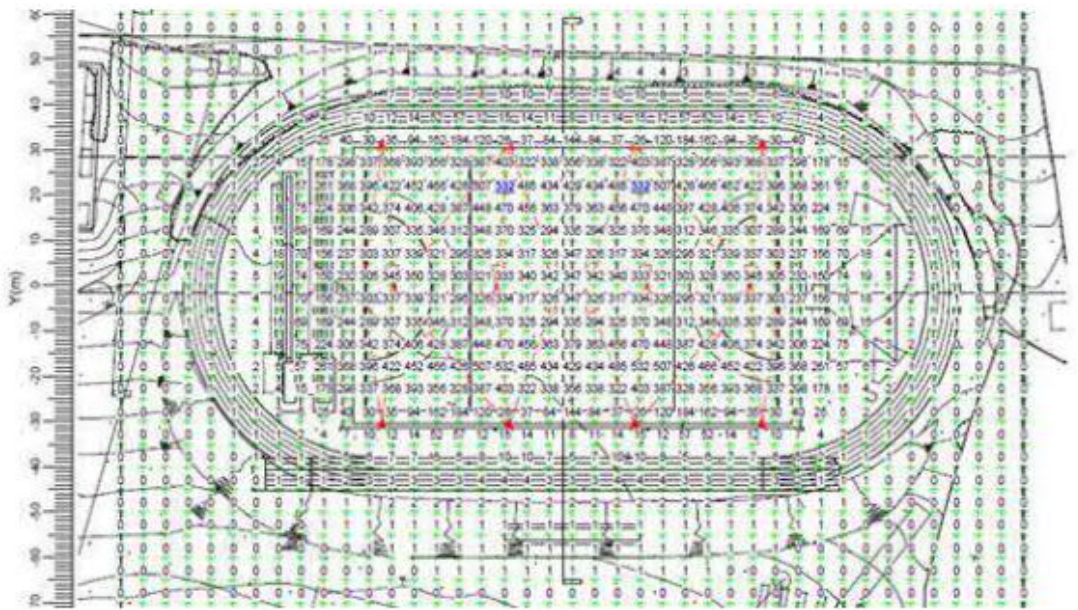
Section 4.3 of this report reconfirms the presence of bats activity and the likely roosting activities within the woodland and states 'Therefore, to mitigate impacts on roosting, foraging and commuting bats a sensitive lighting strategy should be implemented in line with the guidance provided by the ILP and BCT.'" We have copied the text below from the report.

During operation

The activity survey results re-confirmed that the woodland edge provides a foraging and commuting resource for bats. Additionally, there is likely bats roosting off-site within the woodland. Therefore, to mitigate impacts on roosting, foraging and commuting bats a sensitive lighting strategy should be implemented in line with guidance provided by the ILP and BCT. Greengage liaised with the lighting engineer to develop the following key considerations of the sensitive lighting strategy.

Sports England and Sports Hockey recommend minimum of 350 lux for competitions⁴. To meet these requirements and ensure light spill onto the woodland edge, directional lighting will be used with louvres to reduce light spill. Projected light spill is detailed in the Figure 5.1 below.

Figure 4.3 Image from the lighting report detailing Lux spill upon the woodland edge

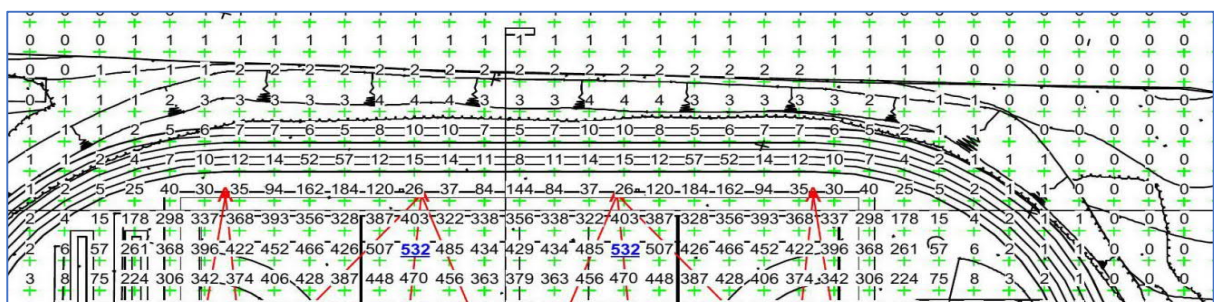


This figure demonstrates the level of light spill is approximately 1 lux onto the woodland edge which is equivalent to twilight⁵.

BCT and ILP⁶ guidance recommends use of luminaires with warm-white LED lighting ideally <2,700 Kelvin. However, this is not achievable due to the requirements set out by Sports England which state a minimum of 4,000K. Therefore, proposals will avoid impacts to bats during the active season (April to October) by not using floodlights during this period. For the remainder of the year the lighting strategy will seek to minimise the light spill on to the woodland to no more than 1 lux and the lights will be curfewed to 20:00. This reduces the impact on bats foraging and commuting during occasional warmer winter evenings.

Throughout this process we have identified the technical flaws with the lighting analysis which still remain. The analysis submitted to date are designed to define the lux levels on the playing surface and not the impact on the surrounding environment. These calculations only look at pitch levels, not only do they ignore the wider impact on the trees but there is also no assessment or calculations for the light reflecting off the pitch surface.

Even using these lighting levels and the information submitted, the LEMP has incorrectly identified the edge of the woodland as the edge of the site. We have provided a zoomed section of the figure below (from the LEMP) which identifies that the lighting proposal shows a figure of between 4 and 10 lux at the woodland edge and not 1 as claimed by the LEMP.



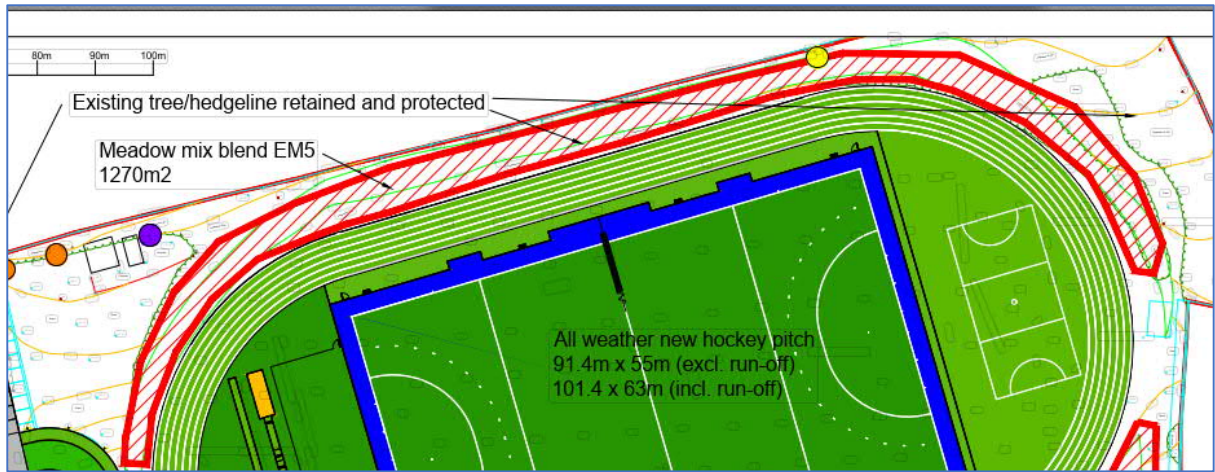
The report has clearly prioritised the needs of lighting design for hockey over the impact on the protected species; the mitigation is inappropriate at every level:

- The proposed light is bright white light and not the compliant warm light white
- The proposed lighting level is 4000 Kelvin and not the compliant 2700 Kelvin
- The Lux levels at the woodland edge are between 4 -10 times the light level the design is seeking to achieve
- The design does not comply with Surrey Wildlife Trust 's requirement for no net increase in artificial lighting at the woodland edge
- Whilst no lighting is proposed between April and October, we know bat movements within the Borough that bats are active outside these months and this is increasing as the climate warms.
- The report identifies for the first time that bat roosts are likely in the woodland but then does nothing to address the impact because it incorrectly identifies the woodland edge and therefore the lighting levels. Therefore, the report needs to be updated to reflect the predicted case and address the impact on these roosts of the above non-compliant lighting design. As the roosts are protected in law as set out in Appendix B of the LEMP report, therefore this evidence is needed before any works can start.
- The report identifies that the light spill should be limited to 1 lux to protect that dormice, which again the lighting fails to do.

Therefore, the conclusion drawn from the report are not correct and there is an unresolved conflict between the proposed lighting and Landscape and Ecological Management Plan. The scheme is not compliant with NPPF para 180, the IPL and BCT guidance and the requirements of Surrey Wildlife Trust and the application to discharge the condition 4 should not be granted.

Two last points on wider integration

1. The surface water design highlights that Pesticides/Glyphosate will be used on the Astro turf areas and the LEMP does not explain how the conflict with using these chemicals and the damage they do to the natural environment on the boundary to a Site of Nature Conservation Importance.
2. the scheme talks about enhancement of the habitats and providing wildflower meadows of 3700m² of additional habitat. We would question the actual deliverability of this enhancement and request that the council carefully check these locations and would question if the design team have been to site. An example of this is 1270 m² of enhancement is located on a steep north facing slope within the retained woodland, therefore it is unsure how this will become a wildflower meadow (see extract of plan below).



On Behalf of Guildford Environmental Forum