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Cyfeillion y Ddaear

Planning Case Officer, Mrs. Y. J. Prichard
Vale of Glamorgan Council

16 October 2016

Northcliffe Lodge development: App No. 2015/01449/FUL

Inadequate consideration of the landscape and conservation values of the mature woodland that would be lost by the Northcliffe Lodge development

1. We point out that this site is Lowland mixed deciduous woodland, a priority habitat under the Biodiversity Action Plan and in the Section 7 list under the Environment Act. While this List is under review, the NRW accepts this site would be covered. There is no recognition of this status in the either the Council's ecologist Comments, nor in the applicants' reports.

2. The June 2015 Treescene survey did not consider the landscape and conservation values of trees that would be lost by the development, nor coulds it be used to judge these. Under the British Standards 5837:2012, regard has to be given to:

2 Mainly landscape values and *3 Mainly cultural values, including conservation.*

The Treescene report lists and assesses trees and tree-groups only on *1* arboricultural grounds.

3. Some of the Treescene assessments of limited lifetime are clearly contestably low estimates:

17m Corsican Pine T13 Notable specimen of variable form…. Evidence of slight thinning and die-back in upper crown which is normal for a specimen of this age. Category B 20-40yrs

7m Yew T18 Tree of reasonable form with evidence of slight thinning of crown 20-40yrs

17m Pine T51 Tree of good form with extensive die-back and thinning throughout crown. Category C 10-20yrs

17m group of Ash and Sycamore G58 Trees generally of reasonable form but some specimens exhibit signs of mild die-back. Category C 20-40yrs

4. As the Treescene report did not follow the British Standards in terms of assessing *landscape values and cultural values, including conservation* and its appraisals being apparently biased to short lifetimes, this report could not be reliably used to justify the TPO Order no.11. We therefore ask the Council to disclose other evidence that they used to determine the small fraction of the trees given TPO protection in this Order.

5. The visually important setting (from the sea and from much of Cardiff Bay) of the wooded headland is recognised as important in Council planning documents (including the Penarth Conservation Area SPG). However, the applicants present no relevant pictures or photo-montages from various locations, just an artist's sketch from a position unknown or imagined, while the issue is unmentioned in officer reports and Memos. In view of the council's duty to consider the landscape impacts of the development, would you refer this issue to the officer responsible for landscape issues?

In Summary: We

- Seek further information underpinning the reduced TPO order on the on-site trees, as apparently ignoring landscape issues
- Ask that the officer responsible for biodiversity comment regarding the site's status as priority habitat under the Biodiversity Action Plan and in the Section 7 list under the Environment Act.
- Ask for the officer responsible for landscape to comment on impact on the wooded headland, as setting for Penarth and particular setting for the listed buildings (Custom House, Marine Buildings, St Augustine's Church).