

Vale of Glamorgan Council
Civic Offices
Holton Road
Barry
CF63 4RU

3rd March 2017

Dear Mr Howell,

Planning application: 2016/01160/OUT

Proposal: Proposed tourist (Tree Tent) accommodation development on land adjacent to Woodside Hamlet, including access from Mill Lane, with associated parking, wash up and toilet facilities | Woodside Hamlet, Ham Manor, Llantwit Major

As the UK's leading woodland conservation charity, the Woodland Trust (Coed Cadw) aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have over 500,000 members and supporters.

Ancient Woodland (land that has been continually wooded since at least AD1600) is one of the UK's richest habitats, supporting at least 256 species. Ancient woods form a unique link to the primeval wildwood habitat that covered lowland Britain following the last ice age. Ancient woodland sites are irreplaceable – the interactions between plants, animals, soils, climate and people are unique and have developed over hundreds of years. These ecosystems cannot be re-created and with only 2% of the land area in the UK covered by ancient woodland we cannot afford to lose any more.

The Woodland Trust **objects** to this planning application on the basis of damage, loss and deterioration to Ham Wood (grid ref: SS972680), an area of ancient woodland designated on Natural Resources Wales' Ancient Woodland Inventory as Restored Ancient Woodland Site (RAWS).

Planning policy

The Welsh Assembly has recognised that areas of ancient woodland are declining and becoming increasingly fragmented and emphasises the importance of conserving ancient woodland and its value as a biodiversity resource through the publication of Planning Policy Wales (2014). The following paragraphs highlight ancient woodland's importance:

Paragraph 5.2.9: "Trees, woodlands and hedgerows are of great importance, both as wildlife habitats and in terms of their contribution to landscape character and beauty. They also play a role in tackling climate change by trapping carbon and can provide a sustainable energy source. Local planning authorities should seek to protect trees, groups

of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality. Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage.”

Paragraph 5.2.10: “Local planning authorities should, as appropriate, make full use of their powers to protect and plant trees to maintain and improve the appearance of the countryside and built up areas.”

Paragraph 5.5.15: “In the case of a site recorded on the inventory of ancient woodland (1) produced by the former Countryside Council for Wales, authorities should consult with the Natural Resources Wales before authorising potentially damaging operations.”

Within Vale of Glamorgan Council’s Local Development Plan ‘Policy MD 10 - Promoting Biodiversity’ states the following:

“New residential, commercial and community development will be required, where possible, to positively contribute to biodiversity interests within the Vale of Glamorgan by:

1. Maintaining and enhancing existing important biodiversity features such as woodland, trees, hedgerows, wetland, watercourses, ponds, green lanes, geological features and habitats;

Where proposals have a negative impact on sites shown to be important for biodiversity, developers will need to demonstrate that the development could not be located elsewhere.”

Ham Wood as both a RAWs and Site of Importance for Nature Conservation (SINC) clearly falls under the category of a site that is important for biodiversity, meaning that the developer should be required to find an alternative site – away from ancient woodland – for the siting of their development.

Impacts on ancient woodland

The proposed development in this area will constitute loss and damage to ancient woodland. Ancient woodland is irreplaceable and cannot be recreated. The highly valuable and important ancient woodland, as well as the associated wildlife populations, will be heavily impacted by the development and as such it would be highly significant if this habitat was subjected to this harmful development. Any loss and fragmentation of ancient woodland would have a deleterious effect on the wider environment and network of habitats, whether ancient or non-ancient, or woodland, hedgerow or wetland.

The Woodland Trust is particularly concerned about the following impacts:

- Direct destruction of ancient woodland for the construction of the proposed development and infrastructure;
- Fragmentation and degradation of the surrounding wooded environment as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats;

- Intensification of the recreational activity of humans and their pets cause disturbance to the habitats of breeding birds, vegetation damage, litter, and fire damage;
- Large amounts of disturbance occurring from development, during both construction and operational phases, particularly noise and light;
- Pollution occurring from adjacent infrastructure, i.e. dust produced during the construction of the facility buildings;
- There will inevitably be safety issues in respect of trees adjoining public areas, tents and buildings, which will be threatening to the longer-term retention of such trees, thereby likely resulting in a reduction of the woodland canopy;
- There can be changes to the hydrology altering ground water and surface water quantities. Also the introduction of water run offs from urban development will result in changes to the characteristics and quality of the surface water as a result of pollution/contamination etc.
- Any effect of development can impact cumulatively on ancient woodland – this is much more damaging than individual effects.

Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts would occur as a result of development within the woodland to make way for the construction of this proposal.

As well as the tents and buildings being located within the ancient woodland the car park will also result in considerable take of the ancient woodland. This change of use to a parking area should be considered as loss of ancient woodland. The soil will inevitably be affected by compaction and hydrological changes that ultimately change its composition, making it no longer viable for ground flora or understorey habitat to thrive and grow in this area.

Considering the breadth of wildlife identified as using the ancient woodland site, and the various habitats within, on a regular basis – otters, bats, numerous bird species – it is apparent that the woodland has a strong diversity that would be sensitive to any disturbance. As such the local faunal populations will likely be affected by noise and light pollution generated from the proposed tents and facility buildings during both the construction and operational phases. The loss and fragmentation of the woodland habitat will be an inevitable consequence of the development, and likely cause much stress to local populations, with potential impacts to wildlife in the wider environment of the area.

Noise associated with recreational/leisure developments will be elevated and likely remain constant over time. The increased noise levels will likely limit the distributions of animal species that are intolerant of noise and negatively affect their reproductive success near to woodland edges^{1 2}. This may be beneficial at some sites if, as a result, deer pressure is reduced but bird diversity has been found to be lower in noisier sites³.

¹ Fernandez-Juricic, E. (2001) Avian spatial segregation at edges and interiors of urban parks in Madrid, Spain. *Biodiversity and Conservation*, 10, pp. 1303-1316

² Warren, P. S., Katti, M., Ermann, M. & Brazel, A. (2006) Urban bioacoustics: it's not just noise. *Animal Behaviour*, 71, pp. 491-502

Light pollution from development will likely occur during both construction and operational phases and may be generated from temporary lighting, vehicle lights, torches and facility lighting. It typically includes chronic or periodically increased illumination, unexpected changes in illumination and direct glare⁴. Artificial illumination reduces the visibility of the moon and the stars⁵, affects species orientation differentially and may serve to attract or repulse particular species. This affects foraging, reproduction, communication, and other behaviour, consequently disrupting natural interactions between species⁶. Light pollution near to ancient woodland is, therefore, likely to substantially affect the behaviour of species active during dawn and dusk, and twilight/nocturnal species, such as moths, bats, and certain species of birds, resulting in the decline of some species^{7 8}.

The development as a whole will result in fragmentation due to the corridors of noise and disturbance that it will create in the woodland environment, including the necessary paths between tents and facilities. The construction of tents within the treetops will also likely result in the disruption of the habitat features bats would follow. The impact of fragmentation will likely be exacerbated by artificial lighting in the reception areas and cabin facility buildings and deter bats.

Overall, the development proposal is likely to result in the loss of ancient woodland understorey and ground level habitat and the severance of faunal commuting routes and foraging areas. The level of disturbance will be unacceptable for an area that is home to sensitive and fauna and flora. The development will result in significant negative impacts on local wildlife populations, and as a result puts the development in direct contravention of local and national policies that aim to conserve and enhance biodiversity. The Trust believes that any proposed mitigation of these impacts would not be sufficient.

Conclusion

The proposed development impacts upon Ham Wood, an area of restored ancient woodland. Ancient woodland is irreplaceable and its loss cannot be mitigated for. Evidently any such development within this area would cause lasting, significant damage and impact heavily upon the integrity of the entire woodland site. The Trust believes that

³ Stone, E. (2000) Separating the noise from the noise: A finding in support of the "Niche Hypothesis" that birds are influenced by human-induced noise in natural habitats. *Anthrozoos*, 13, pp. 225-231

⁴ Longcore, T. & Rich, C. (2004) Ecological light pollution. *Frontiers in Ecology and the Environment*, 2, pp.191-198

⁵ Elvidge, C. D., Imhoff, M. L., Baugh, K. E., Hobson, V. R., Nelson, I., Safran, J., Dietz, J. B. & Tuttle, B. T. (2001) Night-time lights of the world: 1994-1995. *ISPRS Journal of Photogrammetry and Remote Sensing*, 56, pp. 81-99

⁶ Longcore, T. & Rich, C. (2004) Ecological light pollution. *Frontiers in Ecology and the Environment*, 2, pp. 191-198

⁷ Arlettaz, R., Godat, S. & Meyer, H. (1999) Competition for food by expanding pipistrelle bat populations (*Pipistrellus pipistrellus*) might contribute to the decline of lesser horseshoe bats (*Rhinolophus hipposideros*). *Biological Conservation*, 93, pp. 5-60

⁸ Conrad, K. F., Warren, M. S., Fox, R., Parsons, M. S. & Woiwood, I. P. (2005) Rapid declines of common, widespread British moths provide evidence of an insect biodiversity crisis. *Biological Conservation*, 132, pp. 279-291

any development that adversely impacts and results in the loss of ancient woodland is highly inappropriate.

The Woodland Trust **objects** to this application as it will result in loss and damage to ancient woodland. In this case it is clear that the proposed development will be considerably impactful on Ham Wood and its associated wildlife. The siting of the development within ancient woodland means that there are no mitigation measures that would prevent ancient woodland from being adversely impacted.

As such, the development proposed as part of this planning application falls in direct contravention of a number of national and local planning policies and should therefore be refused planning permission.

We hope you find our comments to be of use to you. If you are concerned about any of the comments raised by the Woodland Trust then please do not hesitate to get in contact with us.

Yours sincerely,

Jack Taylor
Campaigner – Ancient Woodland