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Vale of Glamorgan Council
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9th May 2024

Dear Mr Robert Lanksheare

Application: 2024/00211/OUT
Proposal: Outline planning application for proposed redevelopment of the CAVC Weycock Cross campus for up to 16 dwellings (use class C3), including demolition, public open space, sustainable urban drainage system, landscaping and associated infrastructure and engineering works. All matters reserved except for means of strategic access.

Objection – loss and deterioration of ancient woodland

As the UK's leading woodland conservation charity, Coed Cadw (The Woodland Trust) 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. The Woodland Trust owns and cares for over 100 sites covering more than 2,800 hectares across Wales and we have 500,000 members and supporters across the whole of the UK.

The Trust also campaigns, with the support of local communities, to prevent any further destruction of ancient woods and veteran trees. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of a planning application.

Woodland Trust Position
The Woodland Trust **objects** to this application on the basis of loss and deterioration of Coedydd y Barri Woodlands (grid ref: ST 09354 69040), designated as Ancient Semi Natural Woodland on Natural Resources Wales' Ancient Woodland Inventory (AWI). Much of the woodland is also designated as SSSI.

Ancient Woodland
Natural Resources Wales' Ancient Woodland Inventory[1] places woodland into one of four categories:

- **Ancient Semi-Natural Woodland** (ASNW) – broadleaf woodlands comprising mainly native tree and shrub species which are believed to have been in existence for over 400 years

[1] https://naturalresources.wales/guidance-and-advice/environmental-topics/woodland-management/woodlands-and-the-environment/ancient-woodland-inventory/?lang=en

- **Plantation on Ancient Woodland Sites** (PAWS) – sites which are believed to have been continuously wooded for over 400 years and currently have a canopy cover of more than 50 percent non-native conifer tree species
- **Restored Ancient Woodland Sites** (RAWS) – woodlands which are predominately broadleaf now and are believed to have been continually wooded for over 400 years. These woodlands will have gone through a phase when canopy cover was more than 50% non-native conifer tree species and now have a canopy cover of more than 50 percent broadleaf.
- **Ancient Woodland Site of Unknown Category** (AWSU) – woodlands which may be ASNW, RAWS or PAWS. These areas are predominantly in transition and existing tree cover is described as 'shrubs', 'young trees', 'felled' or 'ground prepared for planting'

Ancient woodlands ecosystems, and the soils on which they have developed, are of special importance because of their long history of ecological and cultural continuity. This contributes to ancient woodland being one of the most diverse terrestrial habitats in the UK. By definition, ancient woods are irreplaceable and cannot be replaced by new planting. Therefore, the loss of ancient woodland represents a permanent loss of biodiversity.

All ancient woodlands come within the definition of priority woodland habitats listed in Section 7 of the Environment Act (Wales). The Environment Act places a duty on public authorities to seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales and take all reasonable steps to maintain and enhance those species and habitats as listed in Section 7.

Policy

The Welsh Government recognises 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 edition 12 (2024).

Planning Policy Wales edition 12, issued 7th February 2024, strengthens previous policy on ancient woodland and ancient and veteran trees. Paragraph 6.4.43 states *"Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless* ***very exceptionally*** *there are significant and clearly defined public benefits; this protection* ***must*** *prevent potentially damaging operations and their unnecessary loss. In the case of a site recorded on the Ancient Woodland Inventory, authorities should consider the advice of NRW. Planning authorities should also have regard to the Ancient Tree Inventory, work to improve its completeness and use it to ensure the protection of trees and woodland and identify opportunities for more planting as part of the Green Infrastructure Assessment, particularly in terms of canopy cover."*

Impact on ancient woodland

The development site includes, and is adjacent to, parts of Coedydd y Barri Woodlands ASNW and SSSI. The proposed residential area to the north includes extending the currently developed area into the ancient woodland, in addition to extensive re-development immediately adjacent to the ancient woodland boundary. The proposals for access into the site include widening the existing access road, installation of a pavement, and works to the adjacent canopy. These issues are set out in more detail below.

Direct loss of ancient woodland – northern development area

The proposals would result in the direct loss of ancient woodland to make way for the residential properties. Parameter Plan 2 shows that "*rear gardens and other soil landscaping features*" would be

developed within the ancient woodland. A buffer zone of 3 metres is proposed between the gardens and the retained ancient woodland.

Direct loss of ancient woodland – access route

Parameter Plan 2 states that development that "may" take place along the existing access road includes "*landscaping, cycleways, footpaths, lighting, roads/ junctions, infrastructure above/below ground, SuDs and fencing*". The proposals include widening of the access road and construction of a pavement, resulting in the direct loss of ancient woodland and SSSI habitat. There will also be a requirement for canopy works – the extent to which the canopy works would have been necessary in the context of the existing access provision is unclear.

Indirect impacts on ancient woodland

We note that parts of the location site adjacent to the ancient woodland are currently developed, with buildings and hardstanding extending up to the ancient woodland boundary. Where re-development takes place in close proximity to ancient woodland there is potential for encroachment on the rooting systems of ancient woodland boundary trees in addition to indirect impacts such as noise, dust and light pollution, and increased disturbance to wildlife.

In summary, we are particularly concerned about the following impacts on the ancient woodland:-

- Direct loss of ancient woodland to facilitate the proposed development.
- Encroachment on the root systems and rooting environments of trees within the ancient woodland.
- Damage to ancient woodland soils, ground flora, fungi and understorey.
- Noise, light and dust pollution arising during construction and occupation.
- Intensification of human activity resulting in increased disturbance to breeding birds and other sensitive fauna, vegetation damage, predation and disturbance from domestic pets, trampling, litter or fire damage.
- Long-term future requirements for managing the woodland canopy where it overhangs the development, for reasons of safety or shading.
- Where gardens abut woodland, it can result in the dumping of garden waste into the woodland. It can also create additional pressure to prune or fell boundary trees because of leaf fall or interference with TV reception.
- Development can provide a source of non-native and/or invasive plant species and aids their colonisation of the woodland.
- Any effect of development can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

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

Whilst we note that the tree felling proposed within the ancient woodland is necessary for health and safety reasons, the siting of gardens and infrastructure within the ancient woodland will result in the loss of ancient woodland soils and ground flora, and loss of available habitat. Ancient woodland soils are highly important environments that have evolved over hundreds of years. They support complex relationships between species above and below ground and are sensitive to disturbance. Development within the boundary of the ancient woodland will have a detrimental impact on these soil communities.

When land use is further intensified such as in this situation, woodland plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use.

We note that the Planning Statement proposes "*sensitive long-term management of retained woodland habitat*". Whilst the Woodland Trust is generally supportive of sensitive ancient woodland management, this should be undertaken for the purposes of improving biodiversity, and not as a trade-off or compensation for loss or deterioration of the woodland habitat resulting from an approved planning application.

Mitigation

Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts.

Natural Resources Wales has also published standing advice Natural Resources Wales / Advice to planning authorities considering proposals affecting ancient woodland which outlines the potential impacts of development on ancient woodland, and also provides recommendations for their protection. We would refer the Council to this guidance for further information on how to ensure ancient woodland is appropriately protected from the impacts of development.

It is not possible to mitigate the loss of ancient woodland. Therefore, those elements of the proposal that will result in such loss, including the siting of gardens within ancient woodland and the widening of the access road, should not be taken forward.

Ideally this development would allow for a stand off zone of **at least 15 metres** to mitigate indirect impacts from the development. The existing built structures would need to be carefully removed and the area restored to provide a buffer to the ancient woodland boundary. In accordance with the standing advice, development should avoid including gardens in stand-off or protection zones.

If demolition and rebuilding is to proceed within existing footprints the applicant should ensure that the proposed works will not result in any detrimental impact on the surrounding ancient woodland in line with PPW12. It is important to implement appropriate mitigation measures in accordance with the standing advice to alleviate adverse impacts during construction and occupation. Care should be taken to avoid root systems by using appropriate methods, such as air spade or hand-dig, to determine the location of key roots and ensure their protection during implementation of the plans. HERAS fencing, fitted with acoustic and dust screening measures, should be positioned to provide as large a buffer as possible to minimise adverse impacts during construction. The applicant should also demonstrate that appropriate mitigation is in place to minimise light pollution during occupation.

Conclusion

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Woodland Trust **objects** to this application on the basis of loss and deterioration of ancient woodland. We will maintain this objection until the applicant is able to re-design the proposals and demonstrate that suitable mitigations have been implemented that will ensure the avoidance of loss and deterioration of ancient woodland in line with Planning Policy Wales edition 12.

If you would like clarification on any of the points raised please contact us via campaigning@woodlandtrust.org.uk

Kind regards

Cathy Johannesen
Woods Under Threat team