

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

26th May 2022

Dear Mr Rowlands,

Application: 2019/00871/OUT

Proposal: Hybrid application comprising an outline application for the demolition of existing buildings and erection of 44.75ha Class B1/B2/B8 Business Park, car parking, landscaping, drainage infrastructure, ecological mitigation and ancillary works (all matters reserved aside from access) within Area A and ... | Land at Model Farm, Port Road, Rhoose

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.

Impact to ancient woodland

The Woodland Trust would like to lodge a **holding objection** to planning application 2019/00871/OUT on the basis of potential deterioration and detrimental impact to an area of Ancient Semi Natural Woodland (grid ref: ST077673) designated on Natural Resources Wales' Ancient Woodland Inventory (AWI)¹. The Ancient Woodland Inventory 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
- **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'

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

Elusen gofrestredig Rhif 294344. Cwmni di-elw a gyfyngir o dan warant. Cofrestrwyd yn Lloegr Rhif 1982873.

Swyddfa Gofrestredig: Kempton Way, Grantham, Lincolnshire NG31 6LL. Mae logo Coed Cadw (the Woodland Trust) yn nod masnachu cofrestredig.

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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.

Planning 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 version 11 (2021) (PPW 11).

In PPW 11, paragraph 6.4.26 states *“Ancient woodland and semi-natural woodlands and individual ancient, veteran and heritage trees are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees and woodlands should be afforded protection from development which would result in their loss or deterioration unless there are significant and clearly defined public benefits; this protection should 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.”*

We would like to note that in a letter to local authorities and national park authorities across Wales (dated 7 July 2020), Julie James MS, Minister for Climate Change, stated the following in respect of planning and post Covid-19 recovery: *“It is my strongly held view that we must not sacrifice the principles of sustainable development and place making in the pursuit of economic recovery at any cost.”* We consider this a clear commitment from Welsh Government towards ensuring that future development in a post Covid-19 world respects and protects natural assets, such as ancient woods and trees.

The Council should also have regard for **Policies SP10 (Built and Natural Environment), MG21 (Sites of Importance for Nature Conservation, Regionally Important Geological and Geomorphological Sites and Priority Habitats and Species)** and **MD9 (Promoting Biodiversity)** of the **Vale of Glamorgan Local Development Plan 2011-2026** with respect to the protection of the natural environment.

Impacts to ancient woodland

We are particularly concerned about the following impacts to the ancient woodland from the close proximity of a large-scale commercial development:

- Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.

- Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
- Any effect of development can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

When land use is changed to a more intensive use such as in this situation 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.

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. Potential mitigation approaches for the protection of ancient woodland can help ensure that development meets policy requirement and guidance. Such mitigation may include, but is not limited to, the following:

- Adhering to BS 5837:2012 to provide adequate tree and root protection.
- Measures to control noise, dust and other forms of water and airborne pollution.
- Sympathetic design and use of appropriate lighting to avoid light pollution.
- Producing and funding an access management plan for the woodland, and/or providing alternative natural greenspace to reduce additional visitor pressure.
- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.
- Introduction of sympathetic management for neglected woodlands or trees.
- Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.

This development should allow for a buffer zone of **at least 30 metres** to avoid root damage and to allow for the effect of pollution from the development. The council should ensure that it is satisfied the width of the proposed buffer is adequate to protect the adjacent ancient woodland. The buffer should be part-planted before construction commences on site. HERAS fencing fitted with acoustic and dust screening measures should also be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles, and to limit the effects of other indirect impacts.

In addition, Natural Resources Wales has recently published standing advice² which outlines the potential impacts of development on ancient woodland, and also provides recommendations for their protection. We would like to refer the Council to this guidance for further information on how to ensure ancient woodland is appropriately protected from the impacts of development.

Veteran trees

Veteran trees can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are

² [Natural Resources Wales / Advice to planning authorities considering proposals affecting ancient woodland](#)

irreplaceable habitats. A veteran tree may not be very old, but it has decay features, such as branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value.

Trees are susceptible to change caused by construction/development activity. As outlined in 'BS5837:2012 - *Trees in relation to design, demolition and construction*' (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

While BS5837 guidelines state that trees should have a root protection area (RPA) of 12 times the stem diameter (capped at 15m), this guidance does recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. The applicant should ensure that any trees displaying veteran characteristics within or adjacent to the site are retained and afforded a suitable root protection area of 15 times the trunk diameter or 5 metres beyond the crown of the tree, whichever is greater. This view is supported by the Ancient Tree Forum.

Conclusion

The Trust wishes to lodge a **holding objection** to this planning application unless the applicant is able to provide the ancient woodland on-site with a larger buffer zone to ensure appropriate protection from the impacts of the development.

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

Yours sincerely,

Nicole Hillier
Campaigner – Woods Under Threat
Woods Under Threat Team