



# COED CADW WOODLAND TRUST

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Our Ref: Model Farm CAS-02641-G8G7M5

10 December 2024

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To Whom It May Concern,

The inquiry into the above application has recently been brought to our attention by local residents due to concerns over impacts on trees and woods within the development area.

#### **Background to the Trust**

The Woodland Trust is the UK's largest woodland conservation charity. Our vision is a UK rich in native woods and trees, for people and wildlife. We stand up for trees and woods across the UK, campaigning to stop the irreversible destruction of ancient woodland and unnecessary loss of trees from our cities. We plant woods and trees to combat climate change and create a haven for nature and people. We mobilise communities, landowners and volunteers to get trees in the ground, and aim to plant a tree for every person in the UK. Restoration is also key to our work. Ancient woods have rich, irreplaceable ecosystems. But they've been damaged by non-native planting and invasive species. We work to restore them to their former glory.

#### **Ancient woodlands**

Ancient woods and trees represent a living cultural heritage. They are also our richest wildlife habitat and are highly valued by people, making a significant contribution to well-being and yet ancient woods cover less than 3% of land in the UK. Ancient trees and ancient woodland are vulnerable to damage from development. Their significance is national or global rather than simply 'local'. The Woodland Trust believes there should be no further loss of or significant damage to ancient woodland and that permission for development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees and including ancient wood pasture and parkland) should be refused, unless there are wholly exceptional reasons. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss.

#### **Protection of high nature value trees and woodland features**

According to the Ancient Woodland Inventory for Wales 2021, the red-line area for the development includes part of a block of ancient semi-natural woodland at 51.398498 -3.327665. While not mapped by the inventory, OS County Series mapping from the late 1800s also shows areas of established woodland along Whitesands Brook and a number of hedgerow trees are shown, suggesting that these features are long-established and as such may be of conservation value.

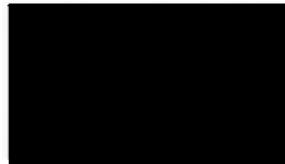
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The minimum recommended buffer between development activity around such features would be 15m, although this represents a minimum exclusion zone necessary to prevent direct damage. Around ancient woodlands, a larger protection zone of 50m would be desirable to buffer woodlands from wider environmental impacts, such as dust from construction traffic or pollutants e.g. point-source nitrogen pollution from vehicles (and to avoid the need for future safety interventions where mature woodland is adjacent to publicly used spaces). We would expect to see specific provision for an appropriate fixed minimum buffer and robust protection measures around all ancient woodlands within a development site.

We note plans for planting of broadleaved trees to buffer and extend these areas of existing woodland. We would encourage the use of natural regeneration immediately adjacent to ancient woodlands and for any necessary planting in proximity to ancient and high nature conservation value woodlands, the selection of local provenance, site-native trees which are UK & Ireland Sourced & Grown-certified, to reduce biosecurity risk.

Yours sincerely,



Kylie Jones Mattock  
Interim Director - Wales