

Orders Branch
Transport
Welsh Government
Cathays Park
Cardiff
CF10 3NQ



30th September 2019

Dear Sir/Madam,

Reference: qA1316457 – A40: Llanddewi Velfrey to Penblewin scheme

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. The Woodland Trust owns and cares for over 100 sites covering more than 2,500 hectares across Wales and we have 500,000 members and supporters across the whole of the UK.

The Ancient Woodland Inventory¹ 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 broadleaves 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'

Loss of ancient woodland

The Woodland Trust **objects** to the proposed scheme on the basis of damage and loss to two areas of ancient woodland which are both recorded as Restored Ancient woodland Sites (RAWS) on the Ancient Woodland Inventory (AWI).

National Planning Policy

The Welsh Government 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 version 10 (2018) (PPW 10).

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

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.”

Impacts to ancient woodland

The Woodland Trust is concerned about the following impacts:

- Direct loss to Ffynnon Wood (grid reference: SN138168) and an unnamed woodland (at grid reference: SN150171) from the creation of a new trunk road.
- Fragmentation as a result of the destruction of adjacent semi-natural habitats;
- Where the wood edge overhangs the road network, branches and even whole trees could be indiscriminately lopped/felled, causing reduction of the woodland canopy.
- There can be changes to the hydrology altering ground water and surface water quantities.
- Temporary works resulting from the proposals may cause long term damage to habitats.

Furthermore, the Trust is concerned that for the remaining woodland, there will be additional impacts of increased noise and light pollution from traffic, as well as dust pollution during construction of the proposal. The woodlands will also be subjected to increased nitrogen oxide emissions from vehicles, which can change the character of woodland vegetation (in terms of species composition) through altering nutrient conditions².

Mitigation

In order to protect ancient woodland from the impacts of the scheme, a buffer zone of **at least 30 metres** should be implemented to avoid root damage and to allow for the effect of pollution from the scheme. The buffer should be planted before construction commences on site. A fence should also be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles etc.

Conclusion

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Woodland Trust **objects** to this proposal due to the direct loss of this irreplaceable habitat.

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

Yours faithfully,

Nicole Hillier
Campaigner – Ancient Woodland

² Sheate, W. R. & Taylor, R. M. (1990) The effect of motorway development on adjacent woodland. Journal of Environmental Management, 31, pp. 261-267