Cardiff Civic Society response to second consultation on Natural Environment and the Historic Environment

Overall, we do not think the revised policies on the Natural Environment accurately reflect Planning Policy Wales 12. We therefore object to them.

We support the revised policy on the Historic Environment, subject to one addition.

Please see our amendments to the policies in orange font. Other comments are in blue font

1) Policies SP3 and SP4

Have policies SP3 and SP4 been amended to ensure the step-wise approach influences master planning and design at the outset?

2) New Policy SPxx: Step-wise Approach, Green Infrastructure and Net Benefit for Biodiversity

Cardiff faces a climate and nature emergency. Planning Policy Wales requires development to maintain and enhance biodiversity, promote ecosystem resilience and secure a Net Benefit for Biodiversity. Protecting, restoring and enhancing biodiversity and green infrastructure is fundamental to creating healthy, resilient and sustainable places.

All development proposals must comply with the relevant sections of Planning Policy Wales and any successor statutory guidance.

Development proposals must maintain and enhance biodiversity, promote ecosystem resilience and deliver a net benefit for biodiversity in line with the DECCA principles of Diversity, Extent, Condition, Connectivity and Adaptability.

Development proposals must demonstrate, through a Green Infrastructure Statement, proportionate to the scale and nature of the development, how biodiversity, ecosystem resilience and green infrastructure have informed site selection, layout, design, construction and long-term management by using the step-wise approach, as follows -

~~Development must apply the Step wise approach to biodiversity by:~~

1. Avoiding sites which have an adverse impact on biodiversity, ecological features and green infrastructure. Applicants must demonstrate which sites they have considered and why they have been discounted.
2. Minimising impacts that cannot be avoided. Where impacts are demonstrated to be unavoidable, harm must be minimised ~~through on site mitigation design measures.~~
3 Mitigating and restoring biodiversity features, where avoidance and minimisation is unavoidable on site ~~where ever possible.~~
4 Providing Compensation measures on-site~~only~~ where ~~significant~~ ~~residual~~ adverse impacts remain after ~~avoidance, minimisation and~~ mitigation/restoration.
5. Providing off-site compensation as a last resort. This must be of a significant magnitude to fully compensate for any loss. (from PPW)
6. Provide biodiversity enhancement measures in all cases.
7. The provision of a long-term management plan that covers all steps outlined above.

~~Cardiff faces a climate and nature emergency. Planning Policy Wales requires development to maintain and enhance biodiversity, promote ecosystem resilience and secure a Net Benefit for Biodiversity. Protecting, restoring and enhancing biodiversity and green infrastructure is fundamental to creating healthy, resilient and sustainable places.~~ (Moved to the beginning of the policy)

~~Biodiversity and green infrastructure considerations must be integrated into development proposals from the earliest stages of site selection and design to ensure that nature recovery, ecosystem resilience and climate adaptation are embedded throughout the planning process~~ (This repeats an earlier paragraph)

The Step-wise Approach provides ~~the framework~~ a sequential approach through which to secure a net benefit for biodiversity and the resilience of ecosystems ~~from~~ for all development. This means that each step must be thoroughly surmounted before the applicant can proceed to the next step. Applicants cannot jump to the end of the step-wise approach without dealing with the preceding steps. For example, an applicant cannot propose development on a site without considering first whether other sites would avoid biodiversity harm. Doing so will render the application defective and it will be refused.

The Step-wise Approach requires development proposals to first avoid sites which impact on biodiversity and green infrastructure before then considering whether adverse effects can be minimised. If they can't, then the applicant must consider whether mitigation/restoration is achievable. If not, then the applicant must provide ~~or~~ biodiversity compensation. Compensation ~~should~~ can only be considered where adverse impacts cannot reasonably be avoided, minimised or mitigated~~and may occur on or offsite~~. Compensation must firstly be provided on-site and if this is not possible, then off-site compensation must be secured. The final stages of the Step-wise Approach of enhancement and long-term management are essential to achieving a Net Benefit for Biodiversity and ensuring that ecological gains are sustained over time.

If the Green Infrastructure Statement does not adequately demonstrate that the step-wise approach has been followed, planning permission will be refused.

~~Applicants must demonstrate how ecological constraints and opportunities have influenced site layout, design and delivery. Green Infrastructure Statements provide the principal mechanism for demonstrating compliance with this policy and should be proportionate to the scale and complexity of development. Development must contribute positively to ecosystem resilience through consideration of DECCA principles of Diversity, Extent, Condition, Connectivity and Adaptability, which provide a recognised framework for maintaining resilient ecosystems.~~ (This basically repeats an earlier paragraph)

Applicants must avoid undertaking pre-emptive site clearance prior to ecological assessment and preparation of a Green Infrastructure Statement. ~~The Council will apply a precautionary approach when assessing biodiversity value in these instances and opportunities for delivering a net benefit for biodiversity and the resilience of ecosystem where habitat removal has occurred before adequate ecological assessment.~~ Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point. (This is what PPW says)

Further guidance on the preparation of Green Infrastructure Statements and application of the Step-wise Approach is provided in Supplementary Planning Guidance (SPG) and Technical Guidance Notes (TGNs).

3) Revised Policy SP21: Ecological Resilience and Nature Networks

Maintaining and enhancing ecological resilience is fundamental to addressing biodiversity loss, climate change and the long-term health of ecosystems. Resilient ecosystems support species recovery, ecosystem services and wider community well-being. Ecological networks and green infrastructure opportunities must be considered from the earliest stages of site design retaining existing ecological connections but also strengthen them where possible.

Development proposals must protect, maintain and enhance ecological resilience and nature networks, in line with the DECCA principles of

~~provide a framework for demonstrating the resilience of ecosystems having regard to their;~~
diversity,
extent,
condition,
connectivity and
adaptability ~~and should be considered alongside green infrastructure planning and biodiversity enhancement measures.~~

Development will only be permitted where it can be demonstrated in the Green Infrastructure Statement that:

• The diversity, extent, condition, connectivity and adaptability of ecosystems will be maintained and enhanced;
• Existing ecological networks, habitats, green infrastructure assets and ecological corridors and stepping stones have been protected and incorporated into the design of the development;
• Connectivity between habitats and species populations is maintained and enhanced and habitat fragmentation, loss of ecosystem function and the isolation of species populations are avoided;
• Appropriate buffers, corridors, stepping stones and other green infrastructure measures shall be provided where necessary to maintain and enhance ecological resilience; and
• Opportunities to strengthen ecological connectivity on and off site, habitat restoration and long-term ecological management have been maximised.

~~Maintaining and enhancing ecological resilience is fundamental to addressing biodiversity loss, climate change and the long-term health of ecosystems. Resilient ecosystems support species recovery, ecosystem services and wider community well-being. Ecological networks and green infrastructure opportunities must be considered from the earliest stages of site design retaining existing ecological connections but also strengthen them where possible.~~ (Moved to beginning of policy)

~~The DECCA principles provide a framework for demonstrating the resilience of ecosystems having regard to their; diversity, extent, condition, connectivity and adaptability and should be considered alongside green infrastructure planning and biodiversity enhancement measures.~~ (Moved further up)

Development should avoid habitat fragmentation recognising that ecological networks operate across administrative and site boundaries and maximise opportunities for habitat restoration, creation and improved ecological connectivity both within and beyond the development site.

Nature networks provide important ecological connections between designated sites, habitats and species populations, enabling wildlife to move, adapt and recover in response to climate change and other environmental pressures. Development should protect existing ecological connections and maximise opportunities for habitat restoration and improved connectivity at both the site and landscape scales. Habitats, watercourses, trees, hedgerows, grasslands and other green infrastructure assets all contribute to wider ecological connectivity.

Further guidance relating to ecological networks, corridor design, habitat buffering and ecological resilience is provided in supporting SPG and TGNs.

4) Revised BG1: Recreational Pressure on the Severn Estuary and Cardiff Beech Woods

The Severn Estuary SAC, SPA and Ramsar Site and the Cardiff Beech Woods SAC are internationally important nature conservation sites protected under habitat legislation. Evidence prepared to inform the Plan and Habitats Regulations Assessment identifies recreational pressure as a source of significant effect on these designated sites that requires mitigation to address it.

Increased population growth, housing development and tourism can lead to more visitors using sensitive habitats and designated nature conservation sites. Increased recreational activities such as walking, dog walking, cycling, horse riding and informal recreation can cause direct and indirect impacts on protected habitats and species/qualifying species which can lead to habitat degradation, disturbance and loss of ecological function.

Development proposals that would result in an increase in visitor pressure on Cardiff Beech Woods SAC and the Severn Estuary SAC, SPA, Ramsar or functionally linked land associated with those sites, will only be permitted where it can be demonstrated that no adverse impacts on the integrity of the sites will occur or where appropriate strategic mitigation measures are secured in accordance with the Council's approved mitigation strategy and supporting guidance.

Development or policies in land use plans for which there is no alternative solution and which must be carried out for imperative reasons of over-riding public interest may be authorised notwithstanding a negative assessment of the implications, subject to notifying Welsh Ministers. Any necessary compensatory measures to protect the overall coherence of the network of SACs and SPAs must be secured. (from PPW. The issue is compensation as well as mitigation.)

~~The Severn Estuary SAC, SPA and Ramsar Site and the Cardiff Beech Woods SAC are internationally important nature conservation sites protected under habitat legislation. Evidence prepared to inform the Plan and Habitats Regulations Assessment identifies recreational pressure as a source of significant effect on these designated sites that requires mitigation to address it.~~ (Moved to the top)

~~Increased population growth, housing development and tourism can lead to more visitors using sensitive habitats and designated nature conservation sites. Increased recreational activities such as walking, dog walking, cycling, horse riding and informal recreation can cause direct and indirect impacts on protected habitats and species/qualifying species which can lead to habitat degradation, disturbance and loss of ecological function.~~ (Moved further up)

A Recreation Mitigation Strategy has been prepared to meet Habitats Regulations Assessment requirements when permitting residential and tourism development for both the Severn Estuary Site and the Cardiff Beech Woods to address the recreational impacts of ~~new housing and~~ (new housing cannot be proposed on these sites) increased tourism ~~development~~ on the sites. The Cardiff and the Vale of Glamorgan Joint Severn Estuary Recreation Mitigation Strategy identifies a 12.6km mitigation catchment to be applied within which development is considered likely to increase visitor pressure on the Severn Estuary and the Cardiff Beech Woods identifies a 6km mitigation catchment to be applied within which development is considered likely to increase visitor pressure on the Cardiff Beech Woods.

The Recreation Mitigation Strategies consists of two elements

• Strategic Access Management and Monitoring (SAMM) consisting of measures related to managing recreation pressure on and around the Severn Estuary and the Cardiff Beech Woods
• Green Infrastructure and Suitable Alternative Green Space (SANGs) to reduce recreation pressure on and around the Severn Estuary and the Cardiff Beech Woods

Where necessary, development will be required to contribute to strategic recreation mitigation measures, including visitor management, access management, habitat protection and enhancement, the provision of alternative recreational opportunities, monitoring, and other measures necessary to maintain the integrity of protected sites and support ecological resilience. Biodiversity compensation may also be required.

Further detail on mitigation requirements, contribution mechanisms and compensation will be provided through supplementary planning guidance.

Has NRW been consulted about the Recreation Mitigation Strategy?

PPW says - Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW's representations.

5) BG2: Designated Sites

This policy needs to reflect PPW.

Development proposals must protect, maintain and enhance biodiversity, ecosystem resilience and the integrity of designated nature conservation and geological sites, including their supporting habitats, ecological functions and wider ecological network connections.

All designated sites must be able to continue to protect the biodiversity and features for which they were designated and contribute to the resilience of ecosystems at the appropriate scale. This ability should not be compromised by inappropriate development or other activity (from PPW)

Statutorily designated sites

Development must be avoided on statutorily designated sites – i.e. Special Area of Conservation, Special Protection Area, Ramsar sites, Site of Special Scientific Interest and National Nature Reserve. This is a matter of principle to ensure that these sites can continue to fulfil their role at the heart of resilient ecological networks.

With regard to SSSIs, the only instances where development will be considered are :-

- Development which is necessary for the management of the SSSI, and is the sole reason for the development proposal. This is limited to activities needed to meet its conservation objectives, including restoration and nature recovery, as well as site management, infrastructure, national flood management, and other necessary nature based solutions, or

- Desirable interventions relating to public access, active travel and educational projects, or

- Minor alterations or extensions to existing houses and buildings on existing employment sites

The proposed development must not be likely to damage a SSSI and there must be broad and clear agreement for mitigation and enhancement as part of a development plan. Otherwise the development cannot be be proposed. (from PPW)

In wholly exceptional circumstances and only where development is considered to be appropriate and is not likely to damage a SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development plan should development be proposed. This means that development will be considered unacceptable in the absence of an agreed position in a development plan which indicates that it is acceptable in terms of its effect on the notified features of a SSSI. (from PPW)

The applicant must clearly demonstrate their claim that their development proposal constitutes a wholly exceptional circumstance.

There is also a presumption against development not within a SSSI but likely to damage a SSSI. In such cases, proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are clearly understood and development should be refused where there are adverse impacts on the features for which a site has been designated (from PPW)

Before authorising development outside of a SSSI but likely to damage any of the notified features of a SSSI, the Council is required to give notice of the proposed operations to NRW, and must take its advice into account in deciding whether to grant planning permission and in attaching planning conditions. Where the local planning authority is minded to grant planning permission against the advice of NRW, it must notify Welsh

Ministers. For the purposes of landuse planning, proposed SSSIs will be treated in the same way as notified SSSIs (from PPW).

~~Internationally and nationally designated sites represent the most important areas for biodiversity and geodiversity conservation. These designations include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs)~~

~~Development likely to damage the special features of an SSSI would not be permitted. Particular weight will be given to the protection of SSSIs and development that is not necessary for the management of the site should only be permitted in wholly exceptional circumstances. Applicants must demonstrate that the need for and benefits of the proposal clearly outweigh the national importance of the site and that all reasonable measures have been taken to avoid, minimise and mitigate adverse effects. Zone of Influence/nature recovery zones impacts on ecological connectivity, ecosystem resilience and the role of SSSIs within wider nature networks will also be taken into account, as will indirect impacts such as recreational pressure, hydrological changes, pollution, fragmentation and cumulative effects.~~

~~•~~ Development affecting an European designated site will only be permitted where it can be demonstrated, alone and/or in combination with other plans or projects, that there will be no adverse effect on the integrity of the site. (I don't understand this sentence)

~~Development affecting a nationally designated site, including a Site of Special Scientific Interest (SSSI) will may only be permitted, on a case by case basis, for the management of the site, and for other small-scale proposals that are necessary to secure its role as a living landscape. There is a presumption against all other forms of development in a SSSI as a matter of principle. In wholly exceptional circumstances and only where development •is considered to be appropriate and is not likely to damage a SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development plan should development be proposed. (from PPW)~~

~~where it can be demonstrated that the special features, ecological value and functionality of the site will be maintained. Development that is not necessary for the management of the site should will only be permitted in wholly exceptional circumstances. Where wholly exceptional circumstances are considered met, applicants will demonstrate that the need for and benefits of the proposal clearly outweigh the national importance of the site and that all reasonable measures have been taken following the Step-wise Approach for biodiversity.~~

Non-statutorily designated sites

Locally designated sites form an important component of Cardiff's ecological network and contribute significantly to biodiversity conservation, ecological resilience and community access to nature.

~~•~~ Development affecting ~~locally~~ non-statutorily designated sites, ~~including~~ such as Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves and Regionally Important Geological Sites (RIGS) do not have a statutory process for their protection. Such designations do not preclude appropriate developments, where there are no adverse impacts on the features for which a site is designated and on wider ecosystem resilience. Where harm is unavoidable it should be minimised by mitigation measures and offset as

far as possible by compensation measures designed to ensure there is no reduction in the overall conservation value of the area or feature, and a net benefit for biodiversity secured. (from PPW)

Where sites are not designated, but meet the criteria for designation, they will be treated as though they are designated (from PPW)

The step-wise approach must be followed and demonstrated in the Green Infrastructure Statement for all development proposals affecting non-statutorily designated sites..

~~must avoid significant adverse effects on their biodiversity, geodiversity and ecological value. Development proposals must demonstrate application of the Step-wise Approach to maintain and enhance biodiversity and promote ecosystem resilience.~~

~~Internationally and nationally designated sites represent the most important areas for biodiversity and geodiversity conservation. These designations include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs)~~ (Moved to section – Statutorily designated sites)

~~Development likely to damage the special features of an SSSI would not be permitted. Particular weight will be given to the protection of SSSIs and development that is not necessary for the management of the site should only be permitted in wholly exceptional circumstances. Applicants must demonstrate that the need for and benefits of the proposal clearly outweigh the national importance of the site and that all reasonable measures have been taken to avoid, minimise and mitigate adverse effects. Zone of Influence/nature recovery zones impacts on ecological connectivity, ecosystem resilience and the role of SSSIs within wider nature networks will also be taken into account, as will indirect impacts such as recreational pressure, hydrological changes, pollution, fragmentation and cumulative effects.~~

The protection of all designated sites contributes significantly to the Council's duties under the Environment (Wales) Act 2016 and supports the objectives of Nature Recovery in Cardiff.

~~Locally designated sites form an important component of Cardiff's ecological network and contribute significantly to biodiversity conservation, ecological resilience and community access to nature.~~

~~Such sites include Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs), and Regionally Important Geological Sites (RIGS).~~

~~Although local designations do not have the same statutory protection as national or international sites, they represent areas of significant ecological or geological value and are material considerations in planning decisions.~~
~~Development proposals should seek to avoid impacts on locally designated sites and where impacts cannot be avoided, demonstrate that appropriate~~ minimisation~~, mitigation and~~ compensation along with ~~enhancement measures~~ in all cases ~~have been incorporated.~~

The Council will seek opportunities to strengthen local ecological networks through habitat restoration, enhancement and improved ecological connectivity.

Further guidance on designated site assessment and mitigation requirements is contained within supporting SPG and TGNs.

6) Policy BG3: Protected Habitats, Species and Habitats and Species of Principal Importance

Development proposals affecting protected habitats, protected species, including ~~or~~ Species of Principal Importance (PPW, para 6.4.35), or other habitats and species of recognised local ecological value will only be permitted where it can be demonstrated that:

• There will be no unacceptable loss, deterioration, fragmentation or disturbance of protected habitats, habitats containing protected species, Habitats or Species of Principal Importance, irreplaceable habitats, species or ecological features that contribute to nature networks and ecosystem resilience.
• The ~~favourable~~ conservation status of species and the ecological integrity of supporting habitats will be maintained.
• Development resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient and veteran trees (are there others in Cardiff? e.g. the trees policy mentions hedgerows. This policy needs to state what irreplaceable habitats exist in Cardiff), will only be permitted in wholly exceptional circumstances and where consistent with national planning policy. (This whole point is important and merits more explanation)
• Direct, indirect and cumulative adverse effects have been avoided through site selection, layout and design.
• the stepwise approach has been applied by seeking to avoid impact, minimising, mitigation/restoring and, where necessary, compensating, enhancement and long term management..
• A Net Benefit for Biodiversity is achieved for each.

Cardiff contains a diverse range of protected species, habitats and Habitats and Species of Principal Importance, that together with other ecological features contribute to biodiversity, ecological connectivity, ecosystem resilience and the wider Nature Recovery Network. These include internationally, nationally and locally important habitats, legally protected species, Habitats and Species of Principal Importance and wildlife corridors that facilitate the movement of species across the landscape and those species which are of local value through geographical extent or population size. Protecting, restoring and enhancing these assets is essential to addressing the Nature Emergency, supporting climate resilience and delivering the well-being objectives of the Council.

Development can adversely affect habitats and species directly, indirectly or cumulatively and proposals must therefore be informed by appropriate ecological evidence proportionate to the nature, scale and location of development. Ecological assessments should consider not only individual habitats and species but also habitat condition, ecological function, connectivity and the role of sites within wider Nature Networks and resilient ecological networks.

Applicants will be required to demonstrate that the Step-wise Approach has been applied, giving priority to avoiding sites which will adversely ~~adverse effects~~ affect biodiversity before considering minimisation, mitigation, compensation, along with enhancement and long term management measures. Protected species or habitats, Habitats and Species of Principal Importance (section 7 list), the Cardiff Nature Recovery Action Plan and those of

local value should be considered at the earliest stages of project development to maximise opportunities for avoidance and minimise the need for mitigation or compensation.

(N.B The Welsh Govt's Chief Planner said this in his letter 0f 01/04/2026 accompanying the updated s.7 species and habitats list -

When considering opportunities for NBB in respect of the new bird species on the list it will be important to also secure suitable provision for nesting, which could include installation of measures such as swift bricks as part of the fabric of new buildings.)

In assessing proposals, particular regard will be given to maintaining and strengthening ecological connectivity, supporting Nature Recovery Networks and enhancing ecosystem resilience. Opportunities for habitat creation, restoration, enhancement and long-term management must be incorporated into development proposals to secure biodiversity benefits that support species recovery and ecological resilience.

The ~~Council's~~ Cardiff Nature Recovery Action Plan, Biodiversity and Resilience of Ecosystems Duty reporting and associated technical guidance (what is this guidance?) provide additional information on species and habitat priorities within Cardiff and these documents must be considered in the Green Infrastructure Statement.

7) Policy BG5 Trees, Woodlands and Hedgerows

Development proposals should protect and enhance a sustainable urban forest. Permanent removal of and/or significant harm to trees, woodlands and hedgerows will not be permitted unless it is clearly shown that this will achieve significant and clearly defined public benefits and losses are compensated in accordance with National Planning Policy.

7.375 Trees, woodlands and hedgerows offer multiple benefits, including: -

• Visual amenity.
• Defining a sense of place.
• As important cultural heritage or natural heritage monuments.
• Providing places for relaxation and recreation.
• Supporting biodiversity.
• Improving health and wellbeing
• Intercepting and storing pollutants.
• Intercepting and storing water.
• Carbon sequestration.
Accretion of soil and soil organic matter.
• Protecting against soil erosion.
• Microclimatic amelioration.
• Mitigating the predicted impacts of climate change.

7.376 A sustainable urban forest will contain a diverse but balanced age range and species mix of trees, though large, long-lived trees will be favoured for protection and planting due to the increased benefits they offer in mitigating the predicted impacts of climate change. The selection of appropriate species for planting will be dependent on the local context – for example, in semi-natural contexts, locally native trees are likely to take precedence, whereas in highly urbanised contexts, non-native trees better adapted to

climatic extremes may be more appropriate. A sustainable urban forest is key to the ambition to achieve 25% canopy cover by 2030.

7.377 To help determine if removal of and/or significant harm to trees, woodlands or hedgerows within or bounding a site will achieve significant and clearly defined public benefits, applicants must assess them in accordance with the current British Standard 5837, the Hedgerows Regulations 1997 and as part of wider Green Infrastructure Assessment Statement in accordance with Planning Policy Wales Chapter 6. The assessments statements must inform rather than be informed by design. The Cardiff Council Green Infrastructure Supplementary Planning Guidance (Trees and Development Technical Guidance Note) provides further guidance on determining if removal of and/or significant harm to trees, woodlands or hedgerows within or bounding a site will achieve significant and clearly defined public amenity benefits.

7.378 To prevent damage to trees, woodlands and hedgerows during development, schemes of protection will be required, in accordance with the current British Standard 5837. Veteran trees, ancient trees and ancient woodland require special protection measures to ensure that they are buffered against changes to the environment that may be detrimental to their health and/or their capacity to provide a habitat for other organisms.

7.379 Trees are the largest and longest living organisms in Cardiff. When considering developments that may affect them, regard will be given to potential short and long-term impacts. Where the loss of trees, woodland or hedgerows is unavoidable, compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value including biodiversity, landscape value and carbon capture) will be required. Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost, and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Where a woodland or a shelterbelt area is lost as part of a proposed scheme, the compensation planting must be at a scale, design and species mix reflective of that area lost. In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers. The planting position for each replacement tree shall be fit to support its establishment and health and ensure its unconstrained long-term growth to optimise the environmental and ecological benefits it affords.

7.380 Although younger trees are more easily replaced, the Council will seek to ensure (how – through planning conditions? This needs to be made clear) that sufficient young trees survive to maturity, having regard to the number of developments that may occur during their natural lifespan. Proposals that create spaces for larger tree species to grow to maturity will be favoured over proposals for scattered smaller trees

7.381 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 must 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.

8) The Historic Environment: Policy HE1

Overall, we consider that this revised policy is acceptable.

However, we think that para 3 needs strengthening. A sentence needs to be included to say that the application must fully demonstrate that all these factors have been thoroughly considered.

With this addition, we support the revisions to this policy.

Cardiff Civic Society
6th November 2026