

Arboricultural Impact Assessment Addendum

Response to Comments

Land at
Lower Berse Farm
Ruthin Road
Wrexham

This Arboricultural Impact Assessment has been prepared in accordance with the protocols, standards and procedures set out in BS 5837: 2012 'Trees in relation to design, demolition and construction'.

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Introduction

- 1.1 This addendum has been prepared to address comments made by Wrexham Council and the Woodland Trust in respect of the impact of the development on trees, veteran trees and semi-natural ancient woodland on the site.
- 1.2 This addendum supports the original Arboricultural Impact Assessment ref: AIA/RRW/08/21 and should be read in conjunction with this document.
- 1.3 The Wrexham Council Tree Officer comments are in respect of the loss of Category A trees T25, T26, T84, T144 & T146, the potential impact to the area of Ancient Semi-Natural Woodland W4, the severance of the linear group of trees along the bridleway and the general proximity of trees to the proposed dwellings and structures and how this may impact the trees in the future. These comments can be read in full on the Wrexham Council website.
- 1.4 The WT comments are in respect of trees T24, T28, T44, T172 and the area of Ancient Semi-Natural Woodland W4 and can be read in full on the Wrexham Council website, but essentially the comments raise concern about the impact on these trees from development because of encroachment into the Root Protection Areas or veteran tree buffer zone (see section 6.7 of AIA/RRW/08/21).

Response to Comments

Loss of category A trees

- 2.1 Having reviewed the site layout I think it would be possible to retain up to four of the five trees identified for removal through minor amendments, which would include the alteration of the route of the spine road to allow for the retention of T25, amendments to the junction onto Bersham Road to preserve T84 and amendments to the car park layout to allow for the retention of T144 and T146.

Impact on Bridleway Arboricultural Feature

- 2.2 The development of the site requires that spine roads link the north and south sections, and these routes cross the bridleway at two points creating gaps in the linear feature of around 25 metres at each. These gaps are relatively small, the overall length of the group is 1130 metres, and are unlikely to significantly detract from the character or functionality of the feature in arboricultural terms. However, to limit the visual and ecological impact to a minimum, options to reduce the overall width of the crossings, such as a reduction in the size of the carriageway and alterations to the route of the cycle path can be considered. Further mitigation would include additional tree planting along the routes of the spine roads and enrichment planting of the bridleway feature, helping to compensate for the impact of future tree loss through ash dieback and natural tree loss. The location of the Public Open Space and footpath is unlikely to have any significant detrimental impact on the bridleway feature.

Veteran Trees

- 2.3 The WT comments are in respect of trees T24, T28, T44, T172 and the area of Ancient Semi-Natural Woodland W4 and can be read in full on the Wrexham Council website, but essentially the comments raise concern about the impact on these trees from development because of encroachment into the Root Protection Areas or veteran tree buffer zone. (see section 6.7 of AIA/RRW/08/21)
- 2.4 At the time of the original tree survey a search was made of the ancient tree inventory <https://ati.woodlandtrust.org.uk/> held by the Woodland Trust. This showed no entries for any trees on the site, however subsequently, two trees have been added to the inventory, which are identified as T24 and T44 in the AIA. Both these specimens are categorised as notable trees, not veteran trees, and therefore the additional protection recommended for veteran trees is not applicable in this case. As the trees have now been assessed by a veteran tree assessor their conclusions on the status of the trees supersede those in the original report.
- 2.5 T24 – has now been assessed by a veteran tree assessor and identified as a notable tree. This requires an RPA to be provided following BS5837: 2012 guidance, which in this case is a 15m radius. Under the indicative masterplan site layout T24 is located within an area of open space with no significant development or infrastructure closer than 23 metres from the tree. There are off-road cycle paths and footpaths that traverse the RPA, but these will either be constructed using a no-dig method, a well-established and accepted method of constructing hard surfaces within RPAs or re-directed outside the RPA. This can be dealt with as part of the reserved matters application and can be conditional to planning permission being granted.
- 2.6 T28 – it is not clear as to whether this tree has been assessed, it is not recorded on the ATI. It is therefore considered to be a veteran tree. There is no incursion into the BS5837: 2012 derived RPA of T28, however, this is a very minor incursion into the veteran tree buffer zone, affecting around 90m² (>6%) of the buffer zone. With consideration to the health and condition of the tree, the relatively minor incursion into the periphery of the buffer zone and the fact that the current agricultural land use in the area adjacent to the tree, where the effects of ploughing, rolling, cropping etc would limit root development in this direction, it is considered that this level of incursion would have negligible affect on the health and condition of T28. Furthermore, the change in land use away from farming to a natural buffer zone, as is proposed for the land immediately to the north and south of T28, would significantly improve its root zone and long-term prospects.
- 2.7 T44 – as a notable tree requires an RPA be provided following BS5837: 2012 guidance, this has been done and, under the indicative masterplan layout, there is no incursion into the RPA.

- 2.8 T172 – is noted as having some veteran characteristics but is not considered a veteran tree. There is no incursion into the RPA of T172.

Ancient Woodland

- 2.9 The WT and WTO comments are in respect of W4 and can be read in full on the Wrexham Council website, but essentially raise concerns about the impact of the development on the ancient woodland from increased use, pollution, increased light levels, damage to trees, pressure to remove trees and invasive species and seeks a 50-metre buffer zone, the WTO comments seek a 15-metre buffer. The WT comments for a 50m buffer zone are in accordance with advice in their published guidance 'Planning for Ancient Woodland' and would be appropriate in some situations, however the standing advice provided by the Natural England and the Forestry Commission advises that a minimum of a 15m buffer zone should be provided, and Natural Resources Wales states that '*The BS 5837 Tree Survey, PEA and/or EcIA assessments should be used to inform the stand-off or protection zone for each individual woodland and veteran and ancient trees. Some zones may only require a root protection area to prevent negative impacts on individual trees or groups of trees, and others are likely to extend further.*'
- 2.10 From an arboricultural perspective a buffer zone of between 15m and 20m is adequate to protect the woodland to ensure that both the root zone and the crown and branches of the trees are not damaged by construction and that there is sufficient separation between the woodland edge and any new dwellings to ensure that concerns about proximity are minimised.
- 2.11 Under the current indicative masterplan layout, there is some minor encroachment into the buffer zone by the development parcels, however, this would not significantly affect the functioning of the woodland.
- 2.12 Additional protection can be provided for the woodland during the construction phase to prevent pollution from dust, light, chemical and pollutant runoffs and to maintain the woodland hydrology.
- 2.13 It is possible to restrict access to the woodland to reduce human and animal activity, however, no-damaging recreation within the woodland, could be seen as a positive benefit that would help connect people with the area and consequently engage them in positive protection and conservation of the resource.
- 2.14 It should also be recognised that the development of the area provides many benefits for the woodland. The creation of a woodland edge natural buffer zone will be a significant improvement on the current agricultural land use and there is the opportunity to bring the woodland into management as part of the wider development.

Juxtaposition between Trees and Proposed Dwellings

- 2.15 At this stage the application is in outline form and the position of the proposed buildings and structures has not been confirmed, other than in an indication of the general development parcels and road layout. It is not possible to properly assess in detail the relationship between the trees and dwellings or consider any proximity or encroachment issues, however, the site planning is based on a tree constraints plan which will guide the layout and all issues of encroachment and proximity will be fully considered at this stage. It is the intention to provide a final site layout that is fully compatible with BS 5837:2012 guidance.

Conclusion

- 3.1 Having reviewed the Wrexham Council Tree Officer and Woodland Trust comments, it is considered that the issues raised have either been fully addressed in the Arboricultural Impact Assessment, supported by this addendum or that they can be fully addressed through amendments to the masterplan or at the detailed site layout stage of the project and that the important trees and woodland across the site can be fully protected and will not be compromised by the proposed development.
- 3.2 The landscaping and biodiversity enhancement measures that are part of the development of this land will have a positive impact on the existing trees and woodland, providing them with natural and undisturbed buffer zones and securing their long-term retention as part of the natural capital of the site. The proposal also allows for new tree planting that will provide the future urban forest and will represent a positive enhancement of the natural environment in this area.

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