

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

10th March 2021

Dear Sir/Madam,

Application: P/2021/0077

Proposal: Erection Of An Organic Free Range Egg Production Unit And All Associated Works | Cae Mor Farm, Llwyn Mawr, Pontfadog, Llangollen, LL20 7BE

Objection – detrimental impact to ancient woodland

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.

Natural Resources' Wales' 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 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'

Ancient woodland 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.

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

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

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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.

The Woodland Trust **objects** to the above planning application on the basis of potential deterioration to a number of woodlands designated on the Ancient Woodland Inventory (AWI).

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 10 (2018) (PPW 10).

We would like to note that in a letter to local authorities and national park authorities across Wales (dated 7 July 2020), Julie James AM, Minister for Housing and Local Government, 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.

In PPW 10, 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 from nitrogen air pollution

Nitrogen pollution is one of the most significant and immediate threats to ancient woodlands and other semi-natural ecosystems in the UK. Levels of atmospheric ammonia and nitrogen deposition are negatively affecting habitats where important biodiversity has developed through historically low atmospheric levels of reactive nitrogen, resulting in a deterioration of their ecological integrity. This is leading to direct loss of species, but there is also a growing evidence-base revealing wider impacts on ecosystem functioning and resilience. This includes loss of soil fungi that trees depend upon (ectomycorrhizae), resulting in increased susceptibility to stress from climate and tree diseases.

There are a significant number of ancient woodlands within 5km of the development site. The ammonia report submitted to support this application details the process contribution to the critical levels and loads for three areas of ancient woodland within proximity to the development. The process contributions to these woodlands are as follows:

- Ancient woodland at grid reference: SJ2286235843 – the predicted ammonia concentration process contribution is 15.1% and predicted nitrogen deposition is 35%
- Ancient woodland at grid reference: SJ2309435754 - the predicted ammonia concentration process contribution is 6.9% and predicted nitrogen deposition is 16%

- Ancient woodland at grid reference: SJ2347836380 - the predicted ammonia concentration process contribution is 3.25% and predicted nitrogen deposition is 7.6%.

It should be noted that the upper critical level of 3 NH₃ µg m³ has been used to calculate the process contributions of ammonia concentration for this development, and therefore when assessed solely against the lower critical level of 1 NH₃ µg m³ the process contribution is likely to be higher than stated above.

The background ammonia concentration and background nitrogen deposition² for these woodlands respectively are:

- Ancient woodland at grid reference: SJ2286235843 – 1.88 NH₃ µg m³ and 30.66 kg N/ha/yr.
- Ancient woodland at grid reference: SJ2309435754 – 0.63 NH₃ µg m³ and 14.7 kg N/ha/yr.
- Ancient woodland at grid reference: SJ2347836380 – 1.06 NH₃ µg m³ and 20.44 kg N/ha/yr.

This shows that the critical load for nitrogen deposition and the critical level for ammonia concentration are already in exceedance for two of the ancient woodland sites affected. Further significant increases in the levels of ammonia and nitrogen will lead to continued deterioration of ancient woodland habitat, and its ecological integrity.

Mitigation

The Woodland Trust believe that an application must be able to demonstrate that any resulting increase in the levels of ammonia and nitrogen deposition will be insignificant (<1% of the critical level and load) at all ancient woodland sites within 5km of the development.

In this situation, the development may need to be amended to include further control measures or other proposals in order to attempt to reduce the process contribution to <1%. These amendments and proposed measures would need to be clearly stated and supported by further modelling to demonstrate the subsequent reductions in emissions and deposition.

Conclusion

The Trust **objects** to this planning application unless the applicant can adequately demonstrate that the proposed development will not result in detrimental impact to the ancient woodlands in the surrounding area from ammonia pollution.

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

²<http://www.apis.ac.uk/search-location>