

Wrexham County Borough Council  
The Guildhall  
Wrexham  
LL11 1AY

29<sup>th</sup> October 2020

Dear Sir/Madam,

**Application: P/2020/0562**

**Proposal: Demolition of the existing poor standard detached single story dwelling and replacement with a detached one and a half story dormer style attached dwelling. | 2A Llwyn Y Cil, Chirk, Wrexham, LL14 5AB**

**Holding objection – Potential deterioration of ancient woodland adjacent to Snowdrop Cottage**

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. These aims can be achieved through the restoration and improvement of woodland biodiversity and increased awareness and understanding of the importance of woodland. The Woodland Trust owns and cares for over 100 sites covering more than 2,500 hectares across Wales and has 500,000 members and supporters throughout the UK.

The Woodland Trust will maintain a holding objection to this application on the basis of potential damage and deterioration to an area of ancient woodland to the south and west of 'Snowdrop Cottage' (grid ref: SJ28043786). This wood is designated as a Restored Ancient Woodland Site (RAWS) on Natural Resources Wales' Ancient Woodland Inventory (AWI).

**Ancient Woodland**

The Ancient Woodland Inventory<sup>1</sup> 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 broadleaved now and are believed to have been continuously 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'.

<sup>1</sup> <https://naturalresources.wales/evidence-and-data/research-and-reports/ancient-woodland-inventory/?lang=en>

Ancient woodlands 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.

### **Planning Policy**

The Welsh Government has recognized that areas of ancient woodland are declining and becoming increasingly fragmented and emphasizes 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).

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**

This application is for the demolition of the existing bungalow and the construction of a new dwelling. We are concerned about the potential following impacts to the ancient woodland:

- Increased disturbance to woodland wildlife from light and dust pollution during the construction phase.
- Where the wood edge overhangs new elements on the development site, branches and trees may be indiscriminately lopped/felled causing reduction of the woodland canopy.
- Hydrological changes altering ground water and surface water quality and quantity. Run off, drainage issues and dust loaded rainwater drift from the development will result in changes to the characteristics and quality of adjacent woodland’s water sources from pollution, contamination etc.
- The introduction of hard-standing areas creates new run-offs for surface water. This may allow pollutants/contaminants from construction processes (i.e. spilt fuel oils and other toxic materials) to impact on the ancient woodland or result in hydrological changes to the woodland.

We note that the ecological report within the application mentions the presence of bats. Bats can be threatened from development work that might negatively their roosting, commuting and foraging activity through disturbance, destruction of habitat, and also habitat loss/severance. Almost all European bat species utilise woodland at some stages in their life cycle. We therefore recommend that comments are sought from the Bat Conservation Trust with regards to this application, if the council have not already done so.

It also appears that the ancient woodland to the south of the proposed development has experienced some level of removal and disturbance previously, however it is important that if this area of woodland is still designated as ancient on NRW’s AWI then it should be treated as such.

### **Mitigation**

Where development is in close proximity to ancient woodland, potential mitigation measures should be considered to protect the ancient woodland and ensure that the development meets policy requirements and guidance. Such mitigation may include, but is not limited to, the following:

- Adhering to BS 5837:2012 to provide adequate tree and root protection.
- Improving the condition of the woodland.
- Measures to control noise, dust and other forms of water and airborne pollution, i.e. fencing fitted with acoustic and dust screening measures.
- Sympathetic design and use of appropriate lighting to avoid light pollution.
- Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.
- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.

This development should allow for a buffer zone of at least 15 metres between the adjacent ancient woodland and any new form of built development in order to avoid root damage and to prevent impacts of pollution from the construction. The buffer should be planted before construction commences on site. The council should ensure that it is satisfied the width of the proposed buffer is adequate to protect the adjacent ancient woodland. The buffer should be planted before construction commences on site. HERAS fencing fitted with acoustic and dust screening measures should also be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles, and to limit the effects of other indirect impacts.

### **Conclusion**

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Woodland Trust will **maintain a holding objection** until it is made clear that the application in question will be incorporating suitable mitigation measures to protect the nearby ancient woodland.

If you would like clarification of any of the points raised please contact us via [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)

Yours sincerely,  
The Campaigning Team