

Wrexham County Borough Council
16, Lord Street
Wrexham
LL11 1LG

1st October 2020

Dear Sir/Madam,

Application: P/2020/0471

Proposal: Plant room extension, services building, sprinkler tanks and pump house.

Objection – Impact to Black Erlas Wood – Restored 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 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.

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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Registered office: Kempton Way, Grantham, Lincolnshire, NG31 6LL. The Woodland Trust logo is a registered trademark.

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.

Damage to ancient woodland

The Woodland Trust **objects** to planning application **P/2020/0471** on the basis of damage to Black Erlas wood (grid ref: SJ3777450036), a restored Ancient woodland Site designated as such 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

This application is for the extension of the plant room, services building, sprinkler tanks and pump house with a road running adjacent to the ancient woodland. Building in this location will likely result in damage to the root protection areas of the trees forming the boundary of the ancient woodland. The Woodland Trust is concerned about the following impacts to the ancient woodland

- Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
- Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
- Development can provide a source of non-native and/or invasive plant species and aids their colonisation of the woodland;

- Any effect of development can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

When land use is changed to a more intensive use such as in this situation plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use.

Furthermore, the Woodland Trust is highly concerned that an arboricultural survey has not been completed for this site, and requests until such time as a report is submitted the application is refused or delayed due to lack of information.

Mitigation

Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts.

Potential mitigation approaches for the protection of ancient woodland can help ensure that development meets policy requirement 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.
- Non-invasive root investigation for ancient trees and protection beyond the limit of the usual investigative tools.
- Measures to control noise, dust and other forms of water and airborne pollution
- 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 20 metres** to avoid root damage and to allow for the effect of pollution from the development. 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

The Woodland Trust will **maintain a holding objection** to this planning application until it is clear that the applicant has provided a 20 metre buffer zone between the development and the adjacent ancient woodland.

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,

Victoria Willetts
Volunteer Co-ordinator – Campaigning