

Wrexham County Borough Council  
Planning Service  
16 Lord Street  
Wrexham  
LL11 1LG

10<sup>th</sup> October 2019

Dear Mr Forster,

**Application: P/2019/0676**

**Proposal: Construction of New Milking Parlour, Slurry Storage Lagoon And Silage Pad**

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 2,500 hectares across Wales and we have 500,000 members and supporters across the whole of the UK.

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 broadleaves 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'

**Damage to ancient woodland**

The Woodland Trust **objects** to planning application P/2019/0676 on the basis of damage to an area of ancient semi-natural woodland (grid ref: SJ4518038335), designated as such on the Ancient Woodland Inventory (AWI).

**Policy**

The Welsh Government has recognised that areas of ancient woodland are declining and becoming increasingly fragmented and emphasises the importance of conserving ancient woodland and its

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

Elusen gofrestredig Rhif 294344. Cwmni di-elw a gyfyngir o dan warant. Cofrestrwyd yn Lloegr Rhif 1982873.

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.

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**

The Woodland Trust is concerned about the following impacts to the ancient woodland:

- Damaging or destroying the roots of the trees which form the boundary of the ancient woodland.
- Noise, light and dust pollution occurring from the adjacent development, during the construction phases.
- Where the wood edge overhangs newly constructed areas trees can become a threat to the structures or a safety issue and can be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
- Application P/2019/0676 proposes to build a milking parlour as well as slurry storage and silage pads. The proposed slurry storage may cause changes to the nutrient balance of the area due to potential run off. If a pollution event were to occur, it would result in significant damage to the ancient woodland.
- Changes in the hydrology from the development will particularly affect the ground around the trees, or affect the water table and drainage of the woodland or individual trees.

### **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. In the UK, rates of atmospheric nitrogen deposition have increased substantially leading to eutrophication and acidification of ancient woodland habitats. Accumulations of extra nutrients, as well as reduction in soil pH, are negatively affecting habitats whose important biodiversity developed in direct response to low atmospheric levels of reactive nitrogen. This is leading to direct loss of species, but there is also a growing evidence-base which is revealing wider impacts on ecosystem functioning and resilience such as the loss of the soil fungi that trees rely on, resulting in more susceptibility to stress from climate and trees diseases (such as acute oak decline).

The proposed development includes the construction of a slurry lagoon, which is likely to result in increased ammonia emissions and nitrogen deposition within the surrounding ancient woodland. As the applicants have not provided detailed modelling for the adjacent and surrounding ancient woodlands, it is difficult to determine the potential impact of the proposed development.

### **Mitigation**

This development should allow for a buffer zone of **at least 30 metres** to avoid root damage and to allow for the effect of pollution from the construction of the structures. A fence should also be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles etc.

With regards to potential ammonia pollution, 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.

### **Conclusion**

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Woodland Trust **objects** to this planning application unless the applicant is able to provide the adjacent ancient woodland with an appropriate buffer of 30m. In addition, the applicant should demonstrate through atmospheric modelling of dispersal and deposition that any resulting increase to the levels of ammonia and nitrogen deposition will be insignificant (<1% of the critical level or load) at all ancient woodland sites.

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