Arboricultural Impact Assessment

Land at
Former Penley Polish Hospital – Llanerch Panna Camp
Tudor Road
Penley
Wrexham

Ref:
AIA/TRP/02/26

Date:
24th February 2026

Commissioned by:
Mr J. Sadowski

Prepared by
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Arboricultural Impact Assessment

Timber Storage Area

Former Penley Polish Hospital – Llanerch Panna Camp

Tudor Road

Penley

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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Artificial intelligence tools have been used to assist in the drafting and formatting of this report. The assessment, professional judgement, analysis and conclusions are those of the author alone and have been prepared in accordance with relevant planning policy and professional standards. The author retains full responsibility for the content and its use in the planning process.

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Instruction & Introduction

1.1 Shields Arboricultural Consultancy received instructions from Mr J. Sadowski to provide an arboricultural assessment in respect of the above site. The client may copy and distribute the report as required for the purpose of applying for planning permission for or preparing any documents or plans for this or future applications at this site.

1.2 Retrospective planning permission is being sought to use part of the site for the storage of raw timber, logs and woodchip. This application has been made following the refusal of a previous application where one of the reasons given (reason 4) stated:

'Allowing the continuation of activities which are likely to have already had a significant, and detrimental impact upon the woodland ecosystem and its functionalities in recent years is not supported. Importing and storing potentially infected timber and arisings obtained from tree surgery operations presents an unacceptable level of threat to the health & well-being of individual species and the overall woodland. Other biosecurity measures such as equipment and vehicular hygiene have not been apparent. In the absence of specific arboricultural information, it is not possible to determine that the use is acceptable. The continued use of the site therefore presents risks to the long-term health and well-being of the woodland contrary to UDP policies GDP1, EC4 and to the advice set out in LPG17.'

This report has been prepared to consider and address this reason.

Scope & Limitations

2.1 The purpose of the report is to assess the environmental and amenity values of all trees on or adjacent to the area affected by the proposed development and is based on a site assessment undertaken February 2026 by S. Shields, principal consultant Shields Arboricultural Consultancy. The report will assess the potential impact that may arise as a result of the proposed change of use of the site and make recommendations for protecting trees, hedges and shrubs where appropriate.

2.2 The report is prepared in accordance with the recommendations of the British Standard Document BS 5837: 2012 'Trees in Relation to Construction'.

2.3 This report is not an ecological assessment and does not identify habitats or constitute a protected species survey.

Statutory Controls & Obligations

3.1 Forestry Act; the felling of trees is controlled by the Forestry Act, which requires that a felling licence is obtained prior to cutting down any trees. The Forestry Act does not apply to the felling of trees growing within an orchard, private garden, churchyard or public open space. Natural Resources Wales has the responsibility for enforcing the Forestry Act.

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3.2 Tree Preservation Orders & Conservation Areas; Local Authorities have specific powers under the Town & Country Planning Act 1990 as amended, to protect trees through the use of Tree Preservation Orders. Where trees are protected under such orders it is a criminal offence (subject to any exemptions for which provision may be made by the act or order) to undertake, cause or permit the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of trees except with the consent of the local planning authority. Similar controls apply to all trees growing within a designated Conservation Area.

3.3 Bats, wild birds and other protected species; The Wildlife & Countryside Act & the Conservation (Natural Habitats & C.) Regulations make it an offence to disturb or destroy bats and bat roosts and wild birds and their nests. Other species of plant and animal are also protected. These creatures often inhabit trees and sufficient care must be taken to ensure they are not affected during forestry and arboricultural works.

Site description

4.1 The site as a whole extends to approximately 7 hectares on land to the south of Penley, Wrexham County Borough, occupying part of the former Llanerch Panna No. 83 Station Hospital, later known as Polish Hospital No. 11, which closed in 1949. While adjoining land to the east has since been redeveloped for housing, the site itself has remained largely unmanaged. Extensive remnants of the former hospital infrastructure, including concrete foundations, roads and hardstanding, remain across much of the ground and continue to influence soil conditions and land use constraints. The proposed timber storage area is set in a section of the site formerly used as a vehicle service yard and which is set to hard standing.



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4.2 Over recent decades the wider site has undergone natural succession, resulting in the establishment of secondary broadleaved woodland dominated by self-seeded Sycamore (*Acer pseudoplatanus*), with scattered Ash (*Fraxinus excelsior*), Goat Willow (*Salix caprea*), Elm (*Ulmus* spp.) and occasional Oak (*Quercus robur*). The stand is even-aged and structurally uniform, and in many locations trees are growing over remnant hardstanding and buried infrastructure that constrain rooting depth and compromise stability. Consequently, the woodland represents a post-developed landscape feature of comparatively low arboricultural quality. While it provides some localised visual screening, it offers limited broader landscape, ecological or public amenity value in its unmanaged condition and is likely to decline further in structural integrity and function without active management.

4.3 In November 2019 Wrexham County Brough Council placed the site under a Tree Preservation Order. This order is known as 'Tree Preservation Order: Wrexham County Borough Council, (Community of Maelor South) - TPO No 287/2019 ' Woodland west of Ellesmere Lane and trees in Tudor Drive, Penley, Wrexham ' and comprises two woodland designations covering the north and south section of the site and two individual trees situated in the rear garden of a residential property on Tudor Drive.

Arboricultural Impact Assessment

Existing Site Context and Baseline Condition

5.1 The reason for refusal of the last application places significant weight on alleged *continuing harm* to the woodland ecosystem. However, this position does not adequately reflect the established baseline condition of the site.

The timber yard is located entirely within a large, pre-existing area of hardstanding, formed as part of the site's historic use. This area:

- Is largely impermeable and devoid of soil-based rooting environments;
- Does not function as woodland habitat;
- Has already resulted in long-term ecological and arboricultural severance.

The proposed use does not require additional tree removal, soil disturbance, or encroachment into rooted areas and therefore does not materially alter the woodland's existing structure or ecological functionality.

As such, the assertion that continuation of the use would cause further *significant and detrimental impact* is not substantiated when assessed against the current site condition.

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Biosecurity Risk – Proportionality and Evidence

5.2 It is acknowledged that biosecurity is an important consideration. However, the refusal reason overstates the level of risk without providing a clear evidential basis.

The applicant:

- Operates a documented biosecurity policy;
- Has undertaken a risk assessment specific to the storage and handling of timber;
- Stores material on hardstanding, physically separated from living trees and soils.

There is no evidence presented that:

- The site has been a source of pathogen transmission;
- The woodland has suffered demonstrable decline attributable to the timber yard use;
- The proposed activity presents a materially greater risk than typical arboricultural operations routinely permitted elsewhere.

Planning policy requires risk to be assessed proportionately, not on the basis of hypothetical or unquantified harm.

Imported Timber and Arboricultural Arisings

5.3 The refusal reason assumes that importing timber and arisings presents an *unacceptable* threat. This position does not reflect accepted arboricultural practice.

Across the UK, timber storage and processing is routinely undertaken in proximity to trees where:

- Material is segregated;
- Storage durations are limited;
- Biosecurity protocols are applied.

The applicant is willing to accept reasonable planning conditions, including:

- Restrictions on imported species or material sources;
- Defined storage zones;
- Time limits on timber retention;

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- Enhanced monitoring and reporting.

Such conditions would allow any residual risk to be effectively managed, rather than relying on outright refusal.

Equipment and Vehicular Hygiene

5.4 The refusal states that hygiene measures "have not been apparent." This is not a sound basis for refusal, as:

- Visibility of measures does not equate to their absence;
- No formal request for clarification or additional information was made prior to refusal;
- Any perceived shortfall could be addressed through conditioned management requirements.

Planning guidance supports the use of conditions to secure operational controls where impacts are manageable.

Arboricultural Information and Burden of Proof

5.5 The refusal relies heavily on the statement that "in the absence of specific arboricultural information, it is not possible to determine that the use is acceptable."

However:

- The use is confined to hardstanding and does not directly affect trees;
- The woodland condition and constraints are well documented;
- Any additional arboricultural detail could have been sought via further information or condition, rather than refusal.

Refusal on the basis of absent information is not justified where the impacts are indirect, limited, and capable of control.

Policy Compliance

5.6 UDP Policy GDP1 – The proposal does not cause demonstrable harm to amenity, landscape character, or environmental quality, as it:

- Utilises previously developed land;
- Does not increase woodland loss;
- Retains existing tree belts that provide public amenity.

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5.7 UDP Policy EC4 – The development does not result in unacceptable harm to ecological interests, given:

- The absence of soil or habitat disturbance;
- The degraded nature of the hardstanding area;
- The ability to manage biosecurity risks through conditions.

5.8 LPG17 – The objectives of LPG17 are to safeguard tree health and amenity value. The proposal:

- Does not undermine the visual or structural contribution of the woodland;
- Can be operated in a manner consistent with tree protection and biosecurity best practice;
- Does not conflict with the underlying purpose of woodland protection.

Conclusion

6.1 The proposed change of use to allow the storage of raw timber, logs and woodchip would be confined entirely to the existing area of hardstanding and would not require the removal of any trees, nor result in encroachment into soil-based rooting environments or adjoining woodland areas. The operational footprint is therefore physically separated from the living woodland resource and does not give rise to direct arboricultural impact.

6.2 The woodland surrounding the hardstanding derives its public amenity value primarily from external views and its contribution to landscape character. The proposed use would not alter the established woodland edge, result in canopy loss, or materially affect the visual amenity that underpins its protection.

6.3 Concerns relating to biosecurity are acknowledged; however, such risks are capable of effective management through the implementation of the applicant's documented biosecurity policy and risk assessment. These measures include the controlled sourcing and segregation of material, defined storage areas, hygiene protocols for plant and vehicles, and monitoring procedures. The activity proposed is consistent with standard arboricultural practice and does not inherently present an unacceptable risk to woodland health when appropriate controls are in place.

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6.4 Importantly, the refusal reason given for the previous application identifies potential risk rather than demonstrable harm. In planning terms, risk must be assessed proportionately and on the basis of evidence. There is no substantive arboricultural evidence indicating that the proposed use would be detrimental to individual trees or to the overall woodland ecosystem, particularly given its confinement to a previously developed, impermeable surface.

6.5 Accordingly, it is concluded that the proposed change of use:

- Would not result in the loss of trees or woodland;
- Would not adversely affect the amenity value that justified the woodland's protection;
- Would not materially harm woodland health where biosecurity measures are implemented; and
- Is not contrary to relevant local or national planning policy relating to tree protection or environmental safeguarding.

6.6 On this basis, the proposal represents a proportionate and acceptable use of previously developed land within the woodland setting.

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