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Mansel Jones
Forest Resource Planner
National Forest Planning Team
Natural Resources Wales

11th November 2016

Dear Mansel

Habitats Regulations Assessment of the Brecon Beacons South Forest Resource Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Brecon Beacons South Forest Resource Plan (FRP). Our comments are made in the context of our role under the Conservation of Habitats and Species Regulations 2010 (as amended), and as advisers to the Welsh Government on matters relevant to the natural heritage of Wales and its coastal waters.

Please note that these comments relate only to the HRA aspect of the FRP, and the proposals therein. They do not relate to the appropriateness of any other aspects of the FRP or the proposals it contains.

Please also note that all of SAT's formal responses are published on the Natural Resources Wales external website.

In summary, we agree with the conclusion that the FRP is not likely to have a significant effect on European sites when considered alone or in-combination with other plans and projects, and that appropriate assessment is not required in this instance.

We provide our comments below:-

1. Our overarching comment is that we welcome and support the Forest Resource Planning process, together with your commitment to HRA.
2. We welcome the discussion that has taken place between ourselves, forest planners, the local Natural Resource Management (NRM) Team and national technical specialists. These discussions have helped to identify and resolve HRA issues. It is our view that this is an excellent example of integrated and solution-focussed working.

3. As a result of these discussions, amendments have been made to the FRP and the HRA which have enabled potential significant impacts on the Coedydd Nedd a Mellte SAC to be avoided. In particular, we note that the proposed coupe boundaries have been amended in line with advice from the Bryologist and Senior Habitat Surveyor, excluding certain areas from felling operations, in order to protect adjacent bryophyte hotspots, an integral component of the woodland communities for which the SAC is designated.
4. In addition, we welcome the discovery of three rare liverwort species not previously recorded in the SAC, during the course of the survey work carried out to inform the FRP.
5. We also note the commitment in the FRP to adherence to best practice guidelines as set out in *NRW Forest Management Practice Quick Guide, Environmental Risks Associated with Standard Forest Management and Best Forest Practice Applied to Standard Forest Management*.

In conclusion, we accept that the agreed amendments, together with the best practice mitigation offered as part of the plan, and the information provided to inform the HRA, is proportionate to the level of risk presented to European sites by this plan. We therefore agree that it can be safely concluded that **this FRP is not likely to have a significant effect on any European sites when considered alone or in-combination with other plans and projects.**

We hope that you find these comments useful, but if you would like to discuss any of these points further please do not hesitate to contact us via the Strategic Assessment mailbox at strategic.assessment@cyfoethnaturiolcymru.gov.uk

Yours sincerely



Howard Davies
Head of Corporate Planning