



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref:
Eich cyf/Your ref:

Welsh Government Building
Rhodfa Padarn
Llanbadarn Fawr
ABERYSTWYTH
Ceredigion SY23 3UR

Ebost/Email:

strategic.assessment@cyfoethnaturiolcymru.gov.uk

Ffôn/Phone: 0300 065 4687

Martin Williams
Area Forester (planning)
Technical Support Team (Forestry)
Natural Resources Wales

31st July 2017

Dear Martin

Habitats Regulations Assessment of the Pengwern Forest Design Plan amendment

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Pengwern Forest Design Plan (FDP) amendment. Our comments are made in the context of our role under the Conservation of Habitats and Species Regulations 2010 (as amended).

Note that these comments relate only to the HRA aspect of the FDP, and only in relation to activities proposed in the area covered by the amendment. They do not relate to the appropriateness of any other aspects of the FDP or the proposals it contains.

Please note that this response will be published on the Natural Resources Wales external website.

In summary, we agree that the whole of the FDP amendment is directly connected with or necessary to the management of Coedydd Derw a Safleoedd Ystlumod Meirion SAC for the purposes of conserving the habitats or species for which the SAC is designated, and therefore agree that HRA is not required in relation to this SAC. In addition, we agree with the conclusion that the FDP amendment is not likely to have a significant effect on any other 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 your commitment to HRA. In addition, 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.

2. We note the amendment lies within the Coedydd Derw a Safleoedd Ystlumod Meirion SAC, and is to clearfell a 3.8 ha block of conifers, and restore to native, upland broadleaf.
3. We welcome the consultation that has taken place between forest planners and Natural Resources Wales technical specialists in lower plants and bats, together with the local NRM Team. In particular, we note the site visit that took place by Sam Bosanquet, Natural Resources Wales Non-vascular Plant Ecologist, and his subsequent report *A visit to Coed Pengwern (Meirionnydd Oakwoods) to assess potential impacts of conifer removal on bryophytes and lichens 2017*. We note that in relation to the southern block of larch by the Afon Teigl, which has a liverwort-rich ground layer, foresters with experience of restoring liverwort-rich PAWS will be consulted during the PAWs restoration.
4. We note that the coupe lies 4 km upstream from the Pen Llyn a`r Sarnau / Llyn Peninsula and the Sarnau SAC.
5. We note the commitment to full adherence of the Forests and Water UK Forestry Standard Guidelines, 5th Edition, 2011, and commitment to production of bespoke Water Management Plans at coupe level prior to felling taking place. In addition, we note the commitment to best practice guidelines regarding otters.
6. We also note the commitment 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*.

We note that should forestry related incidents occur, either here or elsewhere, incident reviews or investigations may identify actions or recommendations. Where these incidents could have implications for potential future impacts on European sites, either locally or nationally, these actions or recommendations may need to be implemented as appropriate in order for future FRP HRAs to safely conclude that specific operations included within these FRPs are not likely to have significant effects on European sites in the future.

In conclusion, we agree that the whole of the FDP amendment is directly connected with or necessary to the management of Coedydd Derw a Safleoedd Ystlumod

Meirion SAC for the purposes of conserving the habitats or species for which the SAC is designated, and therefore agree that HRA is not required in relation to this SAC. In addition, we agree with the conclusion that the FDP amendment is not likely to have a significant effect on any other European sites when considered alone or in-combination with other plans and projects, and that appropriate assessment is not required in this instance.

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 Roger Matthews via the Strategic Assessment mailbox at strategic.assessment@cyfoethnaturiolcymru.gov.uk

Yours sincerely



Mark Hughes
Performance Manager
Acting Head of Governance and Planning