

Our Ref:
Your Ref:

Rob Llewellyn-Smith
River Restoration Officer
Natural Resources Wales

15 March 2021

Dear Rob

Habitats Regulations Assessment of the LIFE Dee River Project

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the LIFE Dee River Project, both for in-river channel works, and for fencing and tree planting. Our comments are made in the context of our role as the Appropriate Nature Conservation Body (ANCB) under the Conservation of Habitats and Species Regulations 2017 (as amended).

Please note that these comments relate only to the HRA aspect of the LIFE Dee River Project, and the proposals therein. They do not relate to the appropriateness of any other aspects of the project or the proposals it includes.

In summary, we agree with the conclusion that both in-river channel works and fencing and tree planting, that form part of the LIFE Dee River Project, will have no adverse effects on the integrity of National Site Network (NSN) sites when considered alone or in-combination with other plans or projects.

We provide our comments below:-

1. We welcome your commitment to HRA, and the discussions that have taken place between the project officers and the local Environment Teams.
2. We note that much of the work included in the project is directly connected with or necessary for the management the National Site Network (NSN) site, and in pursuance of the site's conservation objectives, and does therefore not require consideration through HRA. However, we note that there is a possibility that works could affect the downstream Llyn Tegid Ramsar site and its features, and that there is a conceivable negative impact on some features of the River Dee and Bala Lake SAC and Llyn Tegid Ramsar site which is not accounted for through the site's conservation objectives, both of which have therefore been considered in this HRA.
3. We agree that the avoidance and mitigation measures set out in the appropriate assessment will avoid adverse effects. Whilst this is set out at a broad, non-site specific level, we note the commitment that all of the works will have a high level of oversight by Natural Resources Wales staff, which will include daily visits at the start of each working day and usually being present for much or all of the work so as to supervise activities, ensure that avoidance and mitigation measures are followed, and therefore any adverse effects will be avoided.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Roger Matthews', with a stylized flourish at the end.

Roger Matthews
Lead Specialist Advisor, Strategic Assessment

Tel:

Direct e-mail: strategic.assessment@cyfoethnaturiolcymru.gov.uk

Address:

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English