

Martin Williams
Area Forester Coed y Brenin / Bala

19 March 2021

Dear Martin

Habitats Regulations Assessment of proposed amendment to the Rhydymain Forest Design Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) on proposed amendments to the Rhydymain Forest Design Plan (FDP). Our comments are made in the context of our role as the Appropriate Nature Conservation Body under the Conservation of Habitats and Species Regulations 2017 (as amended).

Please 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 amendments. They do not relate to the appropriateness of any other aspects of the FDP or the proposals it contains.

In summary, we agree with the conclusion that the amendments to the FDP are not likely to have significant effects on National Site Network sites when considered alone or in-combination with other plans or projects, and it is our advice that an appropriate assessment will not be required in this instance.

We provide our comments below:-

1. We note that the amendment is for the thinning of Coupe 21078.
2. We note that watercourses leaving the coupe flow in to the Pen Llyn a Sarnau SAC at the head of the Mawddach estuary at a distance of 12km downstream.
3. We note the commitment that all works included in this plan will adhere to the standard and best forest practice set out in '*A description of Standard Forest Management, its risks to Natura 2000 Sites and the appropriate mitigation used to prevent associated significant impacts*' document and '*Environmental Risks Associated With Standard Forest Management*' spreadsheet.

In particular, we note the commitment to:

- '*Forests and Water, The UK Forestry Standard, Fourth edition, 2017*', section 6.7; and
- the production of bespoke Water Management Plans at a coupe level prior to any forestry works taking place.

4. With regard to otters, we note the commitment to follow Natural Resources Wales' *European Protected Species (EPS) Forest Management Toolkit and Guidelines* and *Woodland Management in the presence of otters: Guidance for compliance with the Habitats Regulations, in particular Table 2*.
5. We note that the site is 2.5km from the boundary of the Migneint-Arenig-Duallt SPA, and we further note the commitment to following best practice as described in the HRA to avoid disturbance to Merlin nest sites, and that there are no records of merlin nesting in this wood.
6. We note that the site is 1.3km from parts of the Meirionydd Oakwoods and Bat sites SAC, (and that there are no Lesser Horseshoe bat roosts in this nearest site although there is a roost 0.8km away). We further note that advice from the Specialist Adviser: Terrestrial Habitats and Species confirmed the thinning is not disruptive and will not reduce the foraging resource for the Lesser Horseshoe Bat population.

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 Anne MacDonald 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 long, sweeping underline.

Roger Matthews

Lead Specialist Adviser, Strategic Assessment