

Andrew Hood
Senior Officer Forest Planning
Natural Resources Wales

24th March 2021

Dear Andrew

Habitats Regulations Assessment of the Crychan Forest Resource Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Crychan Forest Resource Plan (FRP). 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 FRP, 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 the FRP is not likely to have significant effects on National Site Network (NSN) sites when considered alone or in-combination with other plans or projects.

We provide our detailed comments below:-

1. We welcome and support the Forest Resource Planning process, together with your commitment to HRA. We also welcome the constructive discussions that have taken place between the Forest Planners and the local Environment Teams.
2. 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;
- *Managing forest operations to protect the water environment, Practice Guide, 2019*;
- *Managing Forests in Acid Sensitive Water Catchments* practice guide; and
- the production of bespoke Water Management Plans at a coupe level prior to any forestry works taking place, as set out in the [Land Management Manual](#), Section 3.7.

3. We further note the specific plan objectives and design principles which help to prevent and reduce runoff impacts in the long run, which include:
 - Smaller felling coupes reducing effects of peak water flows;
 - Increase in native woodland cover, PAWs restoration and broadleaved riparian corridors/buffers alongside watercourses;
 - A move away from clearfell systems to more Continuous Cover Forestry (CFF) and Low Impact Silviculture (LISS) in the longer term.
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 also note and welcome the in-combination assessment in relation to residual sediment load run-off, which includes consideration of the Water Framework Directive (WFD) waterbody classification data.

We hope that you find these comments useful. If you require any further information or clarification please do not hesitate to contact me via the Strategic Assessment mailbox at strategic.assessment@cyfoethnaturiolcymru.gov.uk

Yours sincerely



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