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26th March 2021

Dear Alan

Habitats Regulations Assessment of the Mynydd Ddu and Llanthony Forest Resource Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) on the Mynydd Ddu and Llanthony Forest Resource Plan (FRP). 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 FRP, and the proposals therein. They do not relate to the appropriateness of any other aspects of the FRP or the proposals it contains.

In summary, we agree with the conclusion that the FRP is not likely to have significant 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 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 Team.
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.

With particular regard to potential impacts on water quality, we note the commitments to:

- ['Forests and Water, The UK Forestry Standard'](#), Fourth edition, 2017, section 6.
- ['Managing forest operations to protect the Water Environment'](#), Practice Guide, 2019.

- The approval of an appropriate bespoke [Water Management Plans](#) at a coupe level prior to forestry works taking place ([WMP for Harvesting Operations Guidance Doc](#)).

3. We further note the specific plan objectives and design principles:

- The significant expansion of robust riparian woodland corridors alongside the main watercourse and gullies, and the clear mapping of a required 10 metre riparian buffer (NBL or Successional Woodland) along every watercourse visible on OS 10K maps.
- A move away from clearfel systems to more Continuous Cover Forestry over 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. With regard to Lesser Horseshoe Bats, we note the commitment to following best practice guidance and management procedures as detailed in the following documents:

- [European Protected Species Forest Management Toolkit 2019](#)
- ['Bat Roosts and Tree Felling on the Welsh Government Estate Completed Under Programme of Works Licence'](#)
- ['European Protected Species Coupe Toolbox Guidance'](#)
- ['EPS compliance auditing on WGWE'](#)

6. We further note the commitment to maintaining arboreal connectivity between Foxwood (MU 21) and a key (non NSN site) bat roost further to the north, near Llanthony as being important for maintaining the size and range of the local lesser horseshoe bat population, and the specific relevant plan objective and design principles as listed in the HRA form:

- The FRP proposes to restore the full extent of Llanthony back to native woodland.
- Of the 153ha of managed land within Llanthony woodland 79% (121ha) is designated as low impact silviculture (LISS), minimum intervention, or natural reserve under the current proposal, avoiding potential disruption of arboreal connectivity.
- Clearfell operations (totalling 30ha over the life of the plan) are limited to the removal larch crops and remnant conifer crops that cannot be thinned, with all of these felled areas to be restocked with native broadleaves. Once restored to native woodland, all of Llanthony will fall under some form of low impact silviculture, ensuring arboreal connectivity and foraging habitats are secured and/or improved in perpetuity.

- At the northern end of Llanthony wood, the extensive application of LISS, wide age class range of existing crops, areas of natural reserve and limited remaining area of larch clearfell should ensure that at least some key flight lines between the unnotified Lesser Horseshoe Bat roost near Llanthony Woodlands and Foxwood are always maintained.

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 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 long horizontal flourish extending to the right.

Roger Matthews

Lead Specialist Adviser, Strategic Assessment