

Richard Phipps
Forest Resource Planner

6 May 2021

Dear Richard

Habitats Regulations Assessment of the Brecon Beacons East Forest Resource Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) on the Brecon Beacons East 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 a significant effect or an adverse effect on the integrity of National Site Network 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, the local Environment Team and specialist advisers.
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. With regard to otters, we note the commitment to follow Natural Resources Wales' *European Protected Species (EPS) Forest Management Toolkit 2019 Version v10.1* and *Woodland Management in the presence of otters: Guidance for compliance with the Habitats Regulations*, in particular *Table 2*.
4. With regard to Lesser Horseshoe Bats, we note the commitment to follow Natural Resources Wales' *European Protected Species (EPS) Forest Management Toolkit 2019 Version v10.1*. We further note the bespoke mitigation measures which are detailed in the Appropriate Assessment, to maintain connectivity between roosts, hibernacula and foraging areas. We welcome the close working between yourself and Sam Dyer (Specialist Adviser: Terrestrial Habitats and Species) to understand the potential impacts on Lesser Horseshoe Bats and to develop these mitigation measures.

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, sweeping underline.

Roger Matthews

Lead Specialist Adviser, Strategic Assessment