

Alan Varker
Forest Resource Planner
Natural Resources Wales

7th May 2021

Dear Alan

Habitats Regulations Assessment of Dyfnant Forest Resource Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of Dyfnant 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 and the local Environment Team, as well as the Strategic Assessment Team.
2. We agree that potential impacts on the Berwyn and South Clwyd Mountains SAC and the Berwyn SPA require consideration at the HRA screening stage. We also agree that the issue of potential conifer regeneration originating from Dyfnant Forest block on the blanket bog and dry heath interest features of the Berwyn and South Clwyd Mountains SAC requires consideration through Appropriate Assessment, and note that conifer regeneration originating from Dyfnant Forest has been an issue around this forest in the past.
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.

4. We note and welcome the inclusion of measures in the FRP aimed at preventing and reducing conifers within Dyfant Forest from seeding on to the Berwyn and South Clwyd Mountains SAC. In particular, we welcome the inclusion of significant buffer areas, both open and broadleaved, along the margin of the SAC. We recognise that these are also likely to benefit other biodiversity interests, including SPA and SSSI features.
5. We also note and support the inclusion of a set of conditions within the FRP that require NRW to take action to remove conifer regeneration should an assessment of the SAC unit conclude that conifer regeneration is causing a performance indicator failure, and thereby contributing towards preventing the overall achievement of favourable condition of the SAC as a whole. We note that the commitment to these conditions enables the HRA to conclude no adverse effects on site integrity in relation to potential impacts from conifer regeneration, and that they are legally binding on NRW.

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 tail.

Roger Matthews

Lead Specialist Adviser, Strategic Assessment