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Ein cyf/Our ref:  
Eich cyf/Your ref:

Welsh Government Building  
Rhodfa Padarn  
Llanbadarn Fawr  
ABERYSTWYTH  
Ceredigion SY23 3UR

Ebost/Email:

[strategic.assessment@cyfoethnaturiolcymru.gov.uk](mailto:strategic.assessment@cyfoethnaturiolcymru.gov.uk)

Ffôn/Phone: 0300 065 4687

Martin Williams  
Area Forester (planning)  
Technical Support Team (Forestry)  
Natural Resources Wales

31<sup>st</sup> July 2017

Dear Martin

### **Habitats Regulations Assessment of the Cord y Brenin coupe 20493 Forest Design Plan amendment**

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Coed y Brenin coupe 20493 Forest Design Plan (FDP) amendment. Our comments are made in the context of our role under the Conservation of Habitats and Species Regulations 2010 (as amended).

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

Please note that this response will be published on the Natural Resources Wales external website.

**In summary, we agree with the conclusion that the FRP is not likely to have a significant effect on European sites when considered alone or in-combination with other plans and projects, and that appropriate assessment is not required in this instance.**

We provide our comments below:-

1. Our overarching comment is that we welcome and support your commitment to HRA. In addition, we welcome the discussion that has taken place between ourselves, forest planners, the local Natural Resource Management (NRM) Team and national technical specialists. These discussions have helped to identify and resolve HRA issues.

2. We note the amendment is to change the management of a 6.6 ha block of conifers from Low Impact Silvicultural Systems (LISS) to clearfell, which will be replanted with broadleaf, which together with any conifer regeneration will be left to create a mixed woodland.
3. We note that the coupe lies close to the Afon Eden Eden – Cors Goch Trawsfynydd SAC, being separated by a ca 50m buffer of predominantly broadleaved trees along most of its length from the Afon Eden.
4. We note the commitment to full adherence of Forests and Water UK Forestry Standard Guidelines, 5<sup>th</sup> Edition, 2011, and commitment to production of bespoke Water Management Plans at coupe level prior to felling taking place.
5. We note the commitment to best practice guidelines regarding otters. We also note the information provided in relation to lesser horseshoe bats, including the location of local roost sites, and the consultation that took place with the Natural Resources Wales local bat specialist.
6. We also note the commitment to adherence to best practice guidelines as set out in *NRW Forest Management Practice Quick Guide, Environmental Risks Associated with Standard Forest Management* and *Best Forest Practice Applied to Standard Forest Management*.

We note that should forestry related incidents occur, either here or elsewhere, incident reviews or investigations may identify actions or recommendations. Where these incidents could have implications for potential future impacts on European sites, either locally or nationally, these actions or recommendations may need to be implemented as appropriate in order for future FRP HRAs to safely conclude that specific operations included within these FRPs are not likely to have significant effects on European sites in the future.

**In conclusion, we agree with the conclusion that the FRP is not likely to have a significant effect on European sites when considered alone or in-combination with other plans and projects, and that appropriate assessment is not required in this instance.**

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 Roger Matthews via the Strategic Assessment mailbox at [strategic.assessment@cyfoethnaturiolcymru.gov.uk](mailto:strategic.assessment@cyfoethnaturiolcymru.gov.uk)

Yours sincerely



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**Mark Hughes**  
**Performance Manager**  
**Acting Head of Governance and Planning**