

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

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

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Martin Williams Area Forester (planning) Coed y Brenin Natural Resources Wales

6th November 2016

Dear Martin

Habitats Regulations Assessment of the Coed y Brenin Forest Design Plan amendment

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Coed y Brenin 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), and as advisers to the Welsh Government on matters relevant to the natural heritage of Wales and its coastal waters.

Please note that these comments relate only to the HRA aspect of the FDP, and the amendment of the proposals therein. They do not relate to the appropriateness of any other aspects of the FDP or the proposals it contains.

Please also note that all of SAT's formal responses are published on the Natural Resources Wales external website.

In summary, we agree with the conclusion that the amendment to the FDP 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.
- 2. We note that the FDP amendment changes the management of a 4.9 ha block of conifers from LISS to clearfell, due to windblow. This will then be replanted with conifer with a broad-leaved buffer.
- **3.** We note the mitigation included aimed at preventing sediment loaded run-off entering watercourses, namely strict adherence to the *Forest and Water, UK Forestry Standard Guidelines, 5th edition, 2011*, and the production of a bespoke Water Management Plan at the coupe level prior to clearfelling taking place.

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4. In addition, we note that when the coupe is subsequently replanted with conifers, a broadleaved buffer will be planted around its edge, which will be retained during subsequent felling operations.

In conclusion, we accept that the best practice mitigation offered as part of the plan amendment, and the information provided to inform the HRA, is proportionate to the level of risk presented to European sites by this plan amendment. We therefore agree that it can be safely concluded that this FDP amendment is not likely to have a significant effect on any European sites when considered alone or in-combination with other plans and projects.

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

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Roger Matthews Senior Environmental Assessment Adviser