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Alan Hunt
Forest Resource Planner
National Forest Planning Team
Natural Resources Wales

31st August 2016

Dear Alan

Habitats Regulations Assessment of the Bwlchgwaller Hafod Forest Resource Plan

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

Please also note that this response, and all of SAT's formal responses, 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 the Forest Resource Planning process, together with your commitment to HRA.
2. We welcome the liaison that has taken place between forest planners and relevant local protected area staff specifically in relation to the HRA *prior* to the formal HRA consultation with SAT. We believe that these discussions have helped to identify and resolve issues at an early stage, and thereby enabled the consultation with SAT to be quicker and more efficient. In future consultations, where this liaison identifies contentious issues, we would encourage further discussion between the two parties to try and resolve these issues prior to formally consulting SAT.

Where these discussions identify issues which, whilst not within the scope of the HRA, are however relevant in the wider context, we recommend continued close and productive ongoing working between relevant teams, post sign-off of the plan, in the interests of realising fully integrated sustainable management of natural resources at a local level, particularly in relation to subsequent lower tier forestry plans.

3. We accept that the correct impact pathways between the FRP area and European sites have been identified, and we agree that the correct European site interest features have been considered as part of this HRA screening exercise.
4. We note the commitment in the FRP 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*.

In conclusion, we accept that the best practice mitigation offered as part of the plan, and the information provided to inform the HRA, is proportionate to the level of risk presented to European sites by this plan. We therefore agree that it can be safely concluded that **this FRP 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



Roger Matthews
Senior Environmental Assessment Adviser