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Rhys Jenkins
Conservation and Heritage Manager
Natural Resources Wales

10th October 2016

Dear Rhys

Habitats Regulations Assessment of the Lake Vyrnwy Forest Design Plan amendment

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Lake Vyrnwy 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 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 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 clearfelling of this area, and its subsequent management as a riparian area favouring broadleaved trees is already in the existing approved FDP – the only change proposed is to bring the felling date forward, and this is therefore the only aspect that requires consideration by this HRA.
3. We 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*.

4. We also note the commitment to the best practice set out in '*Dyda J, Symes N & Lamacraft D (2009) Woodland management for birds: a guide to managing woodland for priority birds in Wales. The RSPB, Sandy and Forestry Commission Wales, Aberystwyth*' to avoid damage or disturbance to breeding red kite and merlin.

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



Roger Matthews
Senior Environmental Assessment Adviser