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Caroline Riches
Senior Officer Forest Operations
Natural Resources Wales

26th November 2019

Dear Caroline,

Habitats Regulations Assessment of the Gower and Penllergaer Forest Resource Plan

Thank you for consulting the Strategic Assessment Team (SAT) on the Habitats Regulations Assessment (HRA) of the Gower and Penllergaer Forest Resource Plan (FRP). Our comments are made in the context of our role as the Appropriate Nature Conservation Body (ANCB) under the Conservation of Habitats and Species Regulations 2017.

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 will not have adverse effects on the integrity of European 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. In addition, we welcome the dialogue that has taken place between yourself and the local Environment Team.
2. We agree that potential impacts on the Gower Ashwoods SAC and the Gower Commons SAC require consideration at the screening stage. We note that the woodland within the SAC will be managed as a natural reserve. This means that it will not be subject to woodland management such as thinning, clear-felling and the construction of access tracks.

3. We agree that there may be likely significant effects from the provision of *suitable species replacements to ensure the maintenance of Ash's position should the decline of Ash infected with Chalara fraxinea create significant areas of open space, and health and safety tree felling as required, on the Tilio-Acerion forests of slopes, screes and ravines feature of Gower Ashwoods SAC*, which therefore requires consideration through appropriate assessment.
4. We agree that it is possible to undertake these activities at project level without adverse effects on site integrity, through the use of mitigation measures including those listed in the HRA. However, we note and support the commitment that project level HRA must be undertaken before any species replacement or health and safety tree felling works are undertaken within the SAC, and that the FRP does not support these works if adverse effects on site integrity cannot be ruled out.
5. We welcome and support the commitment to continue to control invasive non-native species (INNS), including rhododendron and cherry laurel, in particular to ensure that these species do not spread on to the adjacent Gower Commons SAC.

We hope that you find these comments useful. 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
Lead Specialist Advisor, Strategic Assessment