

Summary of responses to the Alwen FRP consultation (Dec 2022):

We received 3 responses via the consultation hub and a further 3 emails from environmental organisations

The following Issues/comments were raised (**In bold**) with NRW's replies below each issue raised:

The forest drains into the Alwen Reservoir 'a vital source of drinking water' and the River Dee Special Area of Conservation downstream. The forest could play an important role in managing and storing water. Broadleaf buffers along watercourses expanded as large as possible or up to 50m would be beneficial.

The new plan allows for expansion of broadleaf buffers which are 50m width as a minimum rather than a maximum figure. These will be implemented over time, as and when the old crops are felled and new crops are planted. Many areas with second rotation crops already have wide riparian buffers and these are shown on the maps. All operations including restocking will adhere to the UKFS water guidelines and as the Dee is an important SAC. The plan is subject to a Habitat Regulation Assessment as well to ensure water quality standards.

The reservoir already acts as a storage for water, but with new areas proposed for deep peat restoration which will include drainage blocking and rewetting of the habitats in the plan, the natural storage of water of the land surrounding the reservoir will be enhanced.

Maps are not clear where deep peat restoration and where successional woodland is going to happen. The majority of area identified on these maps is identified by NRW as deep peat according to NRW's Lle "unified peat layer". As such, there should be prioritisation towards peatland restoration. A small amount of peat restoration seems to lack ambition and leadership to other landowners.

Would be good if we could work on a strategic plan that covers common objectives of all landowners and Government. For instance, a great objective would be reconnecting / bridging sections of Mynydd Hiraethog SSSI, rather than developing island habitats of deep peat where it appears convenient to do so. That would require cooperation with Dwr Cymru, and also a change towards an acceptance to restore peat bog / heather moorland on some areas that are currently considered a greater priority as tree cover.

All areas of deep peat restoration are shown as open habitat on the maps. There are already many existing open areas of heathland and deep peat. The figure of 90 hectares relates to new areas of open habitat and deep peat restoration or areas that are not to be replanted with spruce crops and may develop as successional woodland. The areas were chosen for restoration after a deep peat survey was carried out by independent contractors for the National Peat Action Program (NPAP) team and suitability for restoration was assessed. Not all areas shown on GIS layers (unified peat layer) are suitable for restoration and are balanced with the need for woodland cover in Wales.

The NPAP team are already in the planning stage of restoring/ rewetting a large area of the Mynydd Hiraethog SSSI which will be connected together with areas of new deep peat restoration on the Welsh Government Woodland Estate (Forest Resource Plan area)

More Low Impact Silvicultural Systems/ Continuous Cover Forestry. More ambition, please and diversify the forests more.

Low Impact Silvicultural Systems (LISS)/ Continuous Cover Forestry (CCF) is being utilised in the well managed crops on the better soils nearest the reservoir. The poorer, less well managed crops on poorer soils are only suitable for clear felling at these altitudes. There are many young crops currently with unassigned management which when thinned on time may become suitable for LISS/CCF in the future. Also newly planted crops in the next rotation may also be suitable. The forest will diversify with more natives over time especially around water courses and areas of open habitat. The age class structure will also develop further in the second rotation or current CCF areas.

Aspects of the forest resource plan will benefit the overall biodiversity of the site, however, specific mentions of priority avian fauna and their consideration within the forestry plan are missing.

The main Alwen FRP objectives document goes into more detail than the summary provided for the consultation and mentions specific avian species including Black Grouse, Hen Harrier, Merlin and Curlew.

Bird species will benefit from several of the objectives already identified in the forest resource plan. However, any changes in management within Alwen Forest could materially affect the assemblage of upland breeding birds. Furthermore, the Alwen Forest site as identified in the forestry resource plan supports populations of several priority species, including Black Grouse, Hen Harrier, Merlin and Curlew. More can be done within the fringe of the forest and on the open land to ensure the continued survival of these species within and around Alwen Forest. Simple management practices added to the plan with these species in mind will make a significant difference to the biodiversity of the site and the surrounding area, thus improving the long-term sustainable management of the forest and surrounding area.

The long-term vision map highlights areas adjacent to the Mynydd Hiraethog SSSI and the Hafod Elwy Moor NNR that are planned as open ground, for peatland restoration, areas that will be left for successional woodland and as planted broadleaf buffer areas in support of Black Grouse and other objectives within and outside of the forest.

Within the setting of the wider landscape, the forest itself offers a wide range of habitats that have the potential to support a wide range of species. There are also aspects of the FRP that are planned with Black Grouse in mind or will indirectly benefit Black Grouse conservation.

Areas of broadleaf woodland along the boundary of the forest was a point raised during the internal consultation for the FRP. Following discussion, there are now additional areas of native broadleaf woodland highlighted within the maps. Specifically, there are areas of native broadleaf woodland bordering the Hafod Elwy NNR in the northern part of the forest and adjacent to the Mynydd Hiraethog SSSI in the South Alwen Forest.

The extent of the broadleaf woodland identified on the maps needs to consider NRW policy requirement to maintain a productive forest area as well as a habitat requirement for Black Grouse and as such extends a minimum of 50m from the forest boundary. In addition, it should be recognised,

that the forest type “Upland Wales Higher Exposure’ (which is predominately conifer) does allow for a proportion of native/broadleaf (non-conifer) planting where objectives can identify it as a requirement at the time of replanting. Consideration will be made toward having some detail in the objectives in support of wider areas of broadleaf woodland being established at the time of restocking.

Hen Harrier, Merlin and Curlew are also referenced within the main objectives document as a priority species for conservation and the procedure taken ahead of operations would consider the impact on habitat and any known locations. There are also areas of open land within the plan which are identified both on the Long-term Vision and Forest Types and Restocking maps. The management of the larger open areas form part of the plan for peatland restoration within the Alwen FRP and can be identified within the main objectives document. Peatland restoration areas will be managed by the National Peatland Action Programme (NPAP) who are currently drawing up a management plan for these areas.

A number of specific issues were raised around best practice around harvesting operations within the forest with specific reference to Schedule 1 and protected birds.

The main objectives document makes reference to the procedures that are followed regarding protected species when Forest operations that are being planned. This would include procedures to follow ahead of felling and on objectives to consider ahead of replanting. All of our operations go through a consultation process prior to being signed off and before operations can start. For harvesting this would include ecological surveys to identify nesting sites, protected species and areas of suitable habitat within forest coupes and the identification of impact zones for nest sites outside of coupes. These go on to inform timing constraints placed on coupes and will also form some of the decision making for future replanting.

It is good to see that the resource plan recognises the need to diversify tree species to counter the current range of risks and to promote future bio-diversity that will help to benefit all flora and fauna in the forest.

However, the proposed plan does not go anywhere near far enough in clearly identifying and providing conservation areas for red squirrels. The natural reserves are very small and unconnected to each other. The areas allocated as natural reserve status probably represent a tiny portion of the forest. The current resource plan for red squirrel conservation (in terms of habitat) is too generalised and does not adequately outline how or where prime red squirrel habitat will be conserved and protected going forward.

At a minimum, there should be incremental increases over the life of the resource plan to achieve at least 25% of the forest for red squirrel protection and conservation. This would mean converting areas identified under standard forest management to red squirrel natural reserves and managed accordingly. These might take the shape of a number of principal sites which are inter-connected by protected forest corridors. The publicly available resource plan should clearly map the natural reserves for red squirrels.

There is a requirement under UKWAS guidelines for Natural Reserves to cover a Minimum of 1% of plantation within a Woodland management Unit (WMU) and 5% of semi natural woodland area within a WMU. In this instance the WMU is all areas of WGWE managed in the NRW North East area, so includes Clocaenog and the blocks around Ruthin and Llangollen. Within the Alwen Forest, approximately 2.6% of the Forest block is assigned to Natural Reserve, with further areas identified

as successional woodland, minimum intervention broadleaf woodland, Lower Impact Silvicultural Systems (LISS) and large areas of young crop with unassigned management.

The management of the forest within the standard forest management areas will include management without clear-felling i.e. Low Impact Silvicultural Systems (LISS), clear-fell and areas of young crops, currently with unassigned management objectives (Areas of unassigned management may be reviewed as LISS, clear-fell or Natural Reserves in future FRP reviews). Where appropriate the principals outlined in 'Red Squirrel Conservation in Clocaenog Forest: Review and Recommendations 2021-2025' will be applied to areas of standard forest management and broadleaf woodland.