

Newborough Forest Resource Plan Engagement Summary and Response - November 2022

NRW received a total of 43 responses to the consultation, 16 from NGO's and 27 from the general public:

29 responses on Citizen space

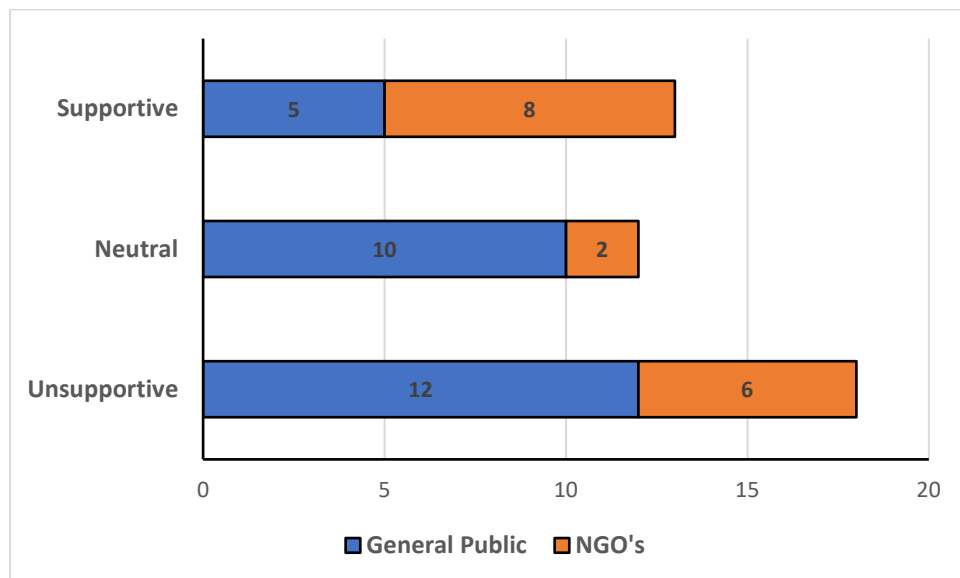
11 responses by email

3 responses by letter

Overall there were approximately 30-35 Visitors that left their details at the 2 drop-in events held in November 2022

General Analysis of the consultation responses:

The majority of the responses, 25 out of 43 (58%) were either neutral or supportive of the plan:



18 out of 43 (42%) responses were unsupportive of the plan of which:

6 (14%) responses wanted fewer, or no trees removed (5 general public/1 NGO)

10 (23%) responses wanted more, or all the trees removed (5 general public/5 NGO's)

2 (5%) responses were not happy with habitat destruction through recent operations (2 general public)

Generally a greater proportion of NGO's (10 out of 16) were supportive/ neutral rather than unsupportive about the plans, and a greater proportion of the general public were unsupportive /neutral (22 out of 27) rather than supportive about the plans.

A significant number of responses, mainly by the general public, raised recreation and traffic issues. (Please see all responses in sections below).

In general, people who responded and were more supportive of the plans, wrote less than people who were less supportive as they tended to highlight more issues/problems with the plans. Hence, the section on unsupportive comments is much longer than supportive comments. (Please see all responses in sections below).

At the Drop-in sessions, the majority of people left positive comments under the banners of: I like.... I wish....I wonder....

Outcomes of the Consultation

Overall NRW is happy and welcomes that the majority of responders were either neutral or in support of the proposals. It feels that the original draft proposals went a long way in achieving the right balance between Dune Habitats, Forest and People.

However, as a result of the extensive consultation from both external Stakeholders /Public and internal NRW specialist advisors including the 'Statutory Assessment Team', a number of changes have occurred to the plans since November 2022.

The following changes have been carried out due to the Habitats Regulation Assessment (HRA). These include:

- A commitment to the timings of frontal dune felling with allowance for adaptive management in future FRP's.
- Increased broadleaf (Dune Woodland) around Shore Dock catchments in Cerrig Duon and Fryddiau.
- Increased open space along the Shore Dock corridors (including open space created by 'Sands of Life' works), but with indicative pinch points in the canopy for woodland connectivity for red squirrels.
- Resulting changes to thinning and forest operations maps.
- A number of conditions that allow for adaptive management in future FRP's.
- Detailed delivery to be documented by a 'Conservation Management Plan' .

In addition, other "non HRA" changes have been carried due to the extensive consultation:

- Additional open space added to match previous 'Sands of Life' works.
- Changes in felling plan due to new Llyn Parc Mawr Community Woodland agreement
- Retention of 2 forest research plots in core pine areas
- Clear fell reduction on boundary for adjoining residents
- Broadleaf buffering for Bee populations along Parnassus Slack edge
- A number of minor changes made to the objectives for clarity and completeness.

Below are lists of consultation comments, grouped into topics, with NRW's responses added in **RED** where appropriate.

Positive Comments supporting the plan and its objectives:

I do like the concept of protecting the existing woodland with more robust, hardy mixed woodland near the coastline as this area has been devastated in recent years.

I've always liked the work carried out by NRW and think the ethos and commitment behind the work is to be commended.

I like that the plan is a long-term project.

I like that it is sympathetic to change and will indeed probably change as other outside factors will guide its course.

I think this plan is sympathetic to the local biodiversity and will indeed adapt to changes brought about by weather and climate change. I like it also works with the needs of the general public who also use the area as a recreational site. I think the plan is comprehensive and will adapt to the challenges that time and tide will bring.

Like that there seems to be a good effort to make a variety of different habitat emphases.

Increasing the amount of deadwood – positive step for increasing biodiversity. There has obviously been a lack of dead wood present in the area because on my last visit there we virtually no bracket fungus or other saprotrophic fungi or birch polypore. Most of the fungi observed were mycorrhizal and associated with the coniferous trees. As you state, you will be encouraging more native woodland to flourish, which will hopefully bring about a more balanced proportion of fungal species. More native dead wood will also increase the number and variety of invertebrates which feed on this and then feed into the ecosystem as a whole.

Fresh water management sounds good.

Continue to protect monuments and historical features – good.

Acknowledgement that SAC Habitats should be encouraged.

Appears to be a good strategic plan taking into consideration all the stakeholders.

I welcome the proposal to control invasive non-native species. However, given the vague references to replanting with exotic tree species it is far from clear that further problems are not being created.

The North Wales Wildlife Trust generally supports the plans for Newborough Forest. This includes the restoration of dune habitat, maintenance of SAC/SSSI features; provision for the important species the site supports, including Red Squirrel; increasing deadwood and INNS control. We are supportive of the plans to diversify the composition and structure of the woodland and the gradual increase of broadleaved woodland as well as the intention to increase the area of woodland habitat and to allow natural processes to dominate.

I like the wildlife corridors /area of afforested deep peat that we intend to restore to peat /broadleaf woodland and new areas of native trees to create nature corridors & removal of conifers. Planting and development of canopies to encourage red squirrels.

I also like timber management plans.

Thank you. I love the plans.

As a local resident I appreciate that the area has been preserved for wildlife, whilst also providing the country with a natural resource, which is timber. The timber has not been wholesale harvested on a vast scale but is sympathetically worked so that the wildlife can adapt to the changes.

It's all very well done. Good to see some effort being put into managing the area.

The plan is a good compromise between a lot of competing issues. We like the dune restoration, creation of woodland glades and the creation of coastal broadleaf woodland.

Support the management of the forest and the objectives however it should be managed sensitively and not create an eyesore with mass felling, looking like 'scorched earth' as has happened in some parts of Scotland.

I like that the plan includes felling of non-native species and conifers, to encourage the return of native flora and fauna.

Supportive of the intention to restore and maintain dune habitat by managing appropriate woodlands.

The increase in the amount of dead wood to increase biodiversity and manage INNS is supported.

The aim of protecting historical monuments and features is welcomed given the historical/cultural significance of the area.

Support the proposed increase in indigenous tree species, and the willingness to continue cooperating with the Llyn Parc Mawr community woodland group.

We feel the proposals are generally good with some positive changes...

Felling coups within the main forest. I agree with NRW that felling coups should be kept small to minimize negative impacts.

Newborough forest produces some high-quality timber that importantly enters the UK supply chain. The growing and supply of commercial timber should be continued to support the working forest element of Newborough.

Newborough warren. NRW is doing an excellent job of managing this special area. The grazing intensity seems to have struck the right balance in terms of sward height. This shows the rich and important flora across the site. The dune ecosystem appears to be in good condition.

I like the plan to restore canopy connectivity and to improve structural diversity.

I would like to say that I support the new plans in Newborough: to establish a more natural Dune Woodland near the coast, and more space for sand dune habitats by the sea. Newborough is a very special site for rare bryophytes, and the special species that have been recorded there are all in the dune habitats. Scientific research shows that bryophyte spores, at times, remain viable in the soil for many years. So it is possible that these dune habitats will regenerate unexpected species. It will be interesting to see what species will develop after the establishment of these dune woodlands.

From the point of view of the bryological interest any plan to decrease the conifer cover and move towards a more 'natural' sand dune habitat is to be welcomed and should be the long-term aim. We would strongly support any plan where this was the main objective.

That's one of the best suggestions - this should be the first bullet point - especially for conifer forest admirers. Is this really going to happen? *In relation to - Look for opportunities to create new woodland around the current forest and to compensate potential long-term losses due to sand dune habitat restoration.*

Neutral Comments about the plan and its objectives:

The eco system that is there now has been there for 70 years and in that time has developed into a mixed environment of different wildlife. There is the warren and now there is the forest. I feel that we should not go backwards but try to save both.

The plans are very carefully looking after the vegetation of course, but there is very little planning shown for the people visiting this site including the local population of Newborough.

Newborough is an estuarine sedimentary geosystem - a very restricted feature in which sediment transport processes interact with biotic components to create distinctive landscapes characterised by a succession of vegetation types on sand of maritime origin. The typical pattern of vegetation on such dunes passes from foreshore, strand line, embryo dunes, shifting dunes, dune slacks, fixed dunes and eventually to dune heath or dune woodland with distance from the shore. This is also an incredibly valuable resource for its varied biodiversity due to the contrasting micro-habitats and stressed conditions therein. Newborough is perhaps the most valuable protected areas in Wales, with 32 recognised SSSI features putting it above the whole of the vast 20,000ha Eryri SAC with 27 notified features.

Happy with this in principle, but more need to be cut.

Marginal. In relation to - The woodland ecosystem will continue to provide habitats for numerous bird species, mammals such as bats and owls, as well as invertebrates and a diverse range of associated flora. AND - Increase the quantity of deadwood in the forest, which supports a diverse biota within the forest ecosystem.

By all means, as long as it does not modify the true nature of the site. In relation to - Continue to provide the extensive access and recreation provision to a unique forest landscape and coastal destination which is economically important as well as delivering well-being benefits for the visitors and communities of Newborough, Anglesey and North-West Wales.

By all means, as long as it does not modify the true nature of the site. In relation to - Manage the forest accordingly to help provide open and least restrictive access and an interactive and fulfilling visitor experience whilst minimising the impacts of visitor numbers on the biology, heritage and landscape of the site.

Stating the obvious as long as it respects the main natural features of the site. In relation to - Work co-productively with communities and stakeholders and delivery partners to help develop and deliver a sustainable long-term 'People Plan' for future site use, local economy, access and recreation for the forest and surrounding area.

Issues Raised which challenge or are unsupportive of the plan and its objectives:

Losing Forest/Clear felling

The plans are very difficult to follow but from what I heard at the meeting the environmentalists would like it to go back to warren getting rid of the forest.

I am not happy with the plans that appear to allow the forest to decline - the area was originally Dune Slacks, but although the forest was established a relatively short time ago (approx. 70years), we now have an established environment alongside the remaining dunes and the warren. The trees, plants and wildlife of the forest have developed their own ecology and compliment the area, both from a conservation point of view and an aesthetic point of view. Your plans allow for the perimeter of the forest to be populated with native species - it is still unclear if these are to be "planted" trees or whether shrubs and trees will be allowed to establish naturally.

The central area of forest is a mixture of pine, conifer, native species etc. You are thinning this to leave established trees. There is no plan to replant new trees to maintain this area of the forest in the long term. Essentially the thinning and course of time will return the area to the dune slacks you'd prefer, but I believe this will adversely affect the area from a tourism and residential point of view. I do not believe we should go backwards... with more and more areas of deforestation in the world, it feels important to maintain and preserve this small area of woodland and allow it to thrive.

Tourism is one of the main sources of employment in the area. Visitors come here for the diversity and variety of different landscapes this area offers - the warren, the dunes, the beach, the forest, the coastal paths etc. Without the forest, tourism and employment for Newborough and the immediate area would suffer. To be told at the consultation that conservation is your priority, not tourism and the local economy was a surprise. Yes, conservation is important, but not at the expense of everything else - even NRW would see a reduction in their income if tourism in the area fell and that would in turn hamper efforts for conservation.

Along the Cefni estuary & in the SE corner of the forest you have significant sections of the forest euphemistically labelled as 'adaptive management' areas They are in fact clearfell areas. It should also be noted that the description will have misled many who will not realize the implications of the designation.

There is no sound ecological rationale for removing forest in these areas. Along the Cefni estuary the existing mobile dunes of the foredune zone, embryonic & mobile dunes, are in a good ecological state AND have no need of a hinterland of various fixed dune habitats to continue to thrive. The plan harks back to CCW nonsense of creating all dune habitat types around every boundary of the forest and in doing so pushing the forest back from the foredunes and beach disconnecting it from the sea, beach & seascapes.

Anglesey, Wales and the UK are not short of extensive coastal dunes with the whole sequence of mobile foredune to fixed dune habitats; on the island at Newborough, in the Warren; a very large area at Aberffraw, and from Cable Bay (Porth Tre Castell) to Rhosneigr. Elsewhere in Wales and the UK there are very expensive sections of coast with all the dune habitats present. The UK is not short of dune habitat. What we are short of is coastal forest with a close link to the upper shore & beaches. The plan will disconnect the forest from the sea and beach and significantly degrade the enjoyment

& health and well-being of those who wish to enjoy both forest and sea with its everchanging seascapes.

Additional harm will involve the burial & destruction of the footpath running behind the foredune ridge, and forest trees newly exposed by the felling will suffer windfall because they have grown sheltered by the existing trees that the plan aims to remove. The new forest boundary will not be weather adapted and is likely to suffer considerable damage in severe weather events.

Likewise the planned felling in the SE corner of the forest between the main carpark and Warren. There is no sound ecological or climate change rationale for felling in either area designated as 'adaptive management'.

Timber and forestry are way down the summary list of objectives: they should be at or near the top for the forest area - it doesn't mean the other objectives are compromised, it just shows that the "forest" is a forest first and foremost (and will hopefully remain so).

The plan should be reviewed and the object of shunting the forest back from the foredune zone removed. It is not based on a sound ecological rationale and is unnecessary but would cause great harm to the health and well-being benefits of the forest being closely linked to the upper shore.

Overall loss of woodland / forest / tree-covered area - we don't have enough trees on Anglesey anyway. We don't produce enough timber in Wales.

No felling of this important woodland should take place to create further dune habitat unless and until the nature and extent of the proposed felling is properly defined and then consulted on and definitely no more felling exposing rock formations to the detriment of the red squirrel habitat. Large areas of pine were stripped from these rock formations and in doing so removed key red squirrel habitat and fragmenting the forest, the result of felling is devastating for our endangered indigenous red squirrels with large tracts of land throughout now being inhospitable areas. It actually looked more natural with the trees growing as they were around and on the rocks.

Some felling around the outer edge of the forest has already taken place under the umbrella of Sands of Life without any further consultation regarding this work which had been shelved for years, just waiting in the shadows for the right time to re-appear.

There has never been proof that the forest has had a detrimental effect on the water table and therefore can't be having an adverse effect on the dunes, and as measurements are still being taken and have been for very many years, if that had been the case the findings would have been published a long time ago as should have happened under Countryside Council for Wales. There are many who would like to have the sand dune habitat as the prime pride of place and that further removal of conifers might be necessary to allow the dune system to change over time, but this particular forest is of prime importance for many habitats and the species that inhabit it and should be protected from encroachment from people who deem it to be less important than the already extensive dune system.

Nowhere does the plan emphasize that the forest is first and foremost, that a key feature to maintain is the intimate link between the forest, beach and foredunes, providing shelter of the trees for walkers whilst having beautiful views of the sea, beach and distant mountains and Bodorgan Estate with the Maltraeth estuary in the foreground. To be able to smell and hear the sea from a forest is a feature that cannot be over emphasized.

At the beginning I put 'Nowhere does the plan emphasize that the forest is first and foremost and it is obvious to me that it's dunes first, clearing forest when deemed necessary for dune health.

Newborough forest is small and to keep chopping bits down for dune habitat makes it more difficult to have a thriving squirrel population. NRW need to keep a record of squirrel numbers and a record of trees planted to support an increasing population. Visitors love to see Red squirrels and many other creatures. Once again, I must emphasize that it is of paramount importance to retain connectivity between forest and beach, because the forest's link with the sea is rare and needs to be cherished.

There should definitely be NO MORE felling of woodland to create dune habitat at all, unless and until the precise nature and importantly the extent of the felling is properly defined and then consulted on.

NO MORE felling to expose rock formations at the expense of any red squirrel habitat.

NRW Response

The maps show the proposed Long-term Vision for Newborough Forest and the forest management needed to help achieve the Vision, which includes some areas of clear felling. Long term, the core forest structure, which has developed over the last 70 years and will continue to be managed to maintain the forest ecosystem that supports a range of protected species including Red Squirrels. In addition, the forest will also continue to support timber production and provide a unique coastal habitat and location for local people and visitors to enjoy. However, it is shown and acknowledged by the plan, that there will be a gradual reduction of closed canopy woodland cover in the long-term to improve the condition of sand dune habitats along the coast. This amounts to a reduction forest cover of 60Ha from 670Ha to 610Ha over the next 30 years, and in the shorter term a reduction of 10Ha in the next 10 years. This is absolutely necessary and a legal requirement to meet the conservation objectives set out in the SAC core management plan. Without this change NRW would not be able to obtain approval of a plan, that did not meet its statutory and legal duty in the management of the nationally protected Special Area of Conservation (SAC) and its conservation features. These include the open dune system along the coastal frontage, dune slack vegetation in the Warren and Shore Dock. Furthermore, a Habitat Regulation Assessment has confirmed that these changes are necessary to meet the objectives of protecting the conservation features on this SAC.

Originally, the draft plans for the consultation included 'Adaptive Management' in the forested areas by the shore to allow for felling, as and when was required, in order to have the least impact on the crops behind, whilst restoring the dune system. No felling was proposed for the next 10 years and the crop behind was to be thinned and slowly transformed to native Dune Woodland. However, this proposal has now had to change after the Habitat Regulation Assessment. A commitment to continued removal of trees along the shore to meet the SAC conservation objectives was necessary and the areas shown 'as Adaptive Management' have been amended to actual fell years. 10.7 Ha of shorefront forest will be felled in the next 10 years for the purpose of meeting the conservation objectives, and a further 10.9 Ha are due to be felled the following 10 years and then 7.5 Ha the following 10 years. These have been sequenced in order to minimise the impact on the forest behind, where thinning will help develop the native Dune Woodland through regeneration and underplanting where necessary. Restocking of conifers and broadleaves will continue in the core forest behind. This will be a slow long-term transformation along the shorefront taking up to 30 years to achieve.

Lack of Open Sand Dune Habitat SAC protection

In relation to the Newborough Forest Resource plan I have rarely seen such an incoherent plan. The plan is NOT fit for purpose. There is a failure to structure the plan in a meaningful way. Even worse, however, is the failure to include and address key issues which could leave it open to legal challenge:

Firstly there is no mention that the site is a site of special scientific interest for the coastal processes related to the sand dunes. In this context it is a very important site, even more so in the context of climate change and this is a key consideration.

Newborough has only been artificially forested since the 1950's where it was planted into one of the largest and most important dune habitats in the UK, despite protestations. To preserve this man-made landscape, which has done much more harm than good, to the biodiversity of the area under the simple guise of it benefiting red squirrels and the recreational activities of humans seems rather unjustified. Humans will enjoy coastal activities whatever the surrounding habitat is, and as for the red squirrels, yes, they are protected and scarce, but they are hardly the only organism in this area which is, and yet they are one of the only ones that requires pine habitat to thrive. It would seem that the squirrels are being used as a cute and fluffy excuse to maintain a habitat which does not actually benefit the majority of the wildlife in the area. This can also be applied to your objective to find new areas of woodland to plant due to dune restoration. This area was dune habitat until humans decided to change it for their benefit only. Restoring the dune should be of paramount importance. There seems to be a very strong bias in these objectives towards forestation, even in the opening passage where the area is referred to as Newborough forest, with the dunes and warren only being mentioned as an aside.

Whilst I understand that what was done cannot be undone, and that Newborough has been forested for over half a century, the bias towards woodland, and in particular, plantation is still a very prevalent theme throughout this entire document.

Dislike the continued acceptance that Newborough should still be dominated by arboreal plant communities. In so doing NRW is ignoring its international responsibility to conserve a SAC naturally engineered by coastal processes. It is questionable whether Newborough would support any significant woodland areas if left to nature and certainly not coniferous woodland. There needs to be a much greater acceptance of this natural outcome of ecological processes and much greater emphasis on the encouragement and management of open habitats. Closed canopy priorities are an entirely human construct when it comes to exposed coastal communities and, in this case, seem only to exist to ensure greater timber output and higher populations of Red Squirrel which are clearly introduced on this site and have no historic precedent. The raven roost, while interesting is not unique, and is in any case a temporary phenomenon in time and place given the highly organised social structure of this species and its present success and expanding population. Open ground conditions would not compromise populations of Great-crested Newt or Medicinal Leech. The advantages of more extensive open ground dynamic plant communities cannot be over-emphasised and would benefit a vast suite of pioneer species of plant and animal for which Newborough was once well known.

The forest resource plan is being done in isolation from the wider land unit. That is a fundamental flaw in the approach taken. It is starting from the assumption that this area is, and should remain, a forest. It is not. It is a plantation imposed on an underlying dynamic geological system. Whether some or all of it remains that way should be open to question. The commitment to "Maintain

woodland/forest cover as far as possible whilst meeting other objectives namely around SAC/SSSI interest features” fails to recognise that these objectives are contradictory. Some contraction of plantation cover on the dunes is necessary to meet the SAC / SSSI conservation objectives.

The UK Biodiversity Action Plan called for the restoration of dune from afforestation - something that is being undertaken elsewhere at Culbin, Ainsdale, Whitford, Harlech and elsewhere in Europe. In contrast, this plan appears to be doing the opposite; proposing the reforestation of some areas that have been cleared.

I don't like:

- that the long-term vision has a high percentage of conifers,
- insufficient open areas,
- plan does not meet the ecological requirements of the designated habitats and species.
- plan does not consider climate change adequately.

NRW's first responsibility is to protect the dunes, which are of international importance and a rare habitat. The Corsican (alien) pine trees have been planted there in the 50s for commercial reasons (and because of the mistaken belief at the time that the dunes had to be stabilized). They have changed the indigenous nature of the dune vegetation by encouraging the spread of other alien plants that do not particularly belong to that habitat. The dunes are naturally dynamic and when left alone, change from a calcareous soil to an acid soil over time with heather and woody shrubs developing naturally in the end, with the calcareous nature being renewed from the sea adding to the diverse patchwork of ecological communities. The people of Newborough have lived in harmony with this patchwork over centuries.

The plan to maintain the forest, even by planting indigenous trees, is completely contrary to the integrity of the dune and places 'urban' amenity priorities ahead of ecological ones. Such places are treasures and an amenity in their own right. Treasure them for what they are, not as some place of fiction that ignores and destroys their true history.

The plan gives too much priority to developing woodland on the best sand dune site in Wales. Dune habitats need to be prioritised. The site has been an open dune for centuries and NRW should recognize this.

“Maintaining the status quo” so to speak, as proposed on your plans for Newborough is not acceptable these days unfortunately, and this is why:

1. The dune area of Newborough, including the island of Llanddwyn, are sites of European and international importance and have been designated and protected because of the dune features which are under significant threat not only in Wales, and Britain but throughout Europe.
2. The area has been designated as a European SAC. This legislation protects the habitat and its wealth of rare species from damage and harmful management. NRW's proposed plans are contrary to every element of the SAC's core management plan. NRW has a duty to improve and expand the quality of those features where evidence or a strong suggestion of harm is present. Allowing trees to continue along our banks is harmful to the SAC and NRW allows this to continue in the future contrary to its statutory duties to protect and safeguard the features.
3. Trees, woodland or forest are not features of the SAC and cause considerable damage to the site.

However the prospective plan encourages natural regeneration on the site, rare intervention, long-term conservation or adaptive management, which is totally inappropriate management for the site. These are the areas that need urgent intervention now in order to have the opportunity to try to fulfil our duties to protect the rare features.

4. Sand dunes are completely unique habitats and for this reason you will find here most of our species of international importance. The percentage in Wales of land known as dunes is very small these days and is under enormous pressure from all directions (human impacts), I believe that these are an invaluable resource and that it is worth taking special steps to protect them for the next generation.

5. There is no suggestion in the plan that open areas are to be created and managed in this way for insects, fungi, orchids, mosses, habitats for reptiles and nesting birds which are an integral part of the management of the natural world.

The failure to allow the site's natural processes to develop and influence management is also contrary to the core priorities of the SAC plan.

The plan presented in this consultation does not appear to reflect management of protected sites as a priority, but something to be fitted around the needs of the forest and recreation. In particular the proposed clearance of trees near the shore is proposed over a very long period and over rather conservative areas. The clearance process should be extended and accelerated significantly.

'Restore and maintain SAC dune habitat interest features along the coast, to favourable condition in accordance with the conservation objectives. These include embryonic, shifting and fixed dunes, dunes with Salix repens and humid dune slacks habitats. This may involve removing conifers from interest features and surrounding areas and allowing more room for the sand dune system to change over time' - I welcome this objective but see little evidence for how it is to be achieved on the maps. Much of the area where embryonic and shifting dunes might be expected seem to be marked as native woodland management. Contrary to the statement above, it seems that no additional room has been allowed for the sand dune system to change over time through natural processes.

'Increase Coastal Dune Woodland in the forest. It has been chosen as a suitable site for this rare habitat as part of the UK Biodiversity Action Plan.' - Planting trees on sand dunes does not create the habitat known as dune woodland, even if the trees are native. Many of the areas shown as broadleaved woodland are very close to the seaward edge of the forest. Dune woodland is generally found towards the back of a dune system and whilst the change from conifer to broadleaved woodland is likely to benefit biodiversity, it would be preferable to leave greater areas adjacent to the dune NNR and the beaches unplanted and managed as dune or dune grassland.

'Allow natural processes to become more dominant across the whole site' - It is unclear how this can be achieved while managing much of the area as conifer woodland. The removal of trees from the areas closest to the beaches and open dune should be prioritised and take place faster than indicated in order to allow natural coastal and dune processes.

Newborough warren is the most extensive dune system in Wales, it is an AONB, Plantlife IPA, and GCR as well as Being an NNR, SAC and SSSI. Currently, we are amid a nature conservation emergency with significant declines across taxa. Sites such as Newborough are of particular ecological value and significance.

In particular coastal dunes support a rich and unique species assemblage and habitat that can occur nowhere else aside from this thin strip of habitat present at just over 14 percent of the Welsh

coastline. Dunes hold a proportionately higher biomass of rare and threatened species than any other UK habitat.

Therefore, my colleagues and I were disappointed with the latest Forest Resource Plan for Newborough, in particular:

- The FRP proposes for the continued management of non-native and native woodland on a coastal dune site of significant nature conservation importance and ultimately threatens the continued existence of specialist habitats and species that have evolved over millennia under open dynamic processes. c
- Edaphic factors imposed on the sand dune body by woodland, have and continue to negatively impact priority statutory features. c
- The FRP as currently presented does not meet the requirements of the statutory features but rather favours species dependant on woodland habitat of lower conservation value. c
- The continued presence of woodland of any type on large areas of the site is fundamentally contrary to the objectives as defined in the text, i.e. to enable and restore natural processes and geomorphological integrity and restore statutory features. These include maintaining and restoring embryonic, shifting and fixed dunes and humid dune slack habitats. c
- Such a contradictory approach to sustainable management of natural resources is a failing of the plan.

Furthermore, water bodies, streams and riparian zones are critical to maintaining sustainable populations of herpetofauna and other taxa, including EPS great crested newt (*Triturus cristatus*) and declining species common toad (*Bufo bufo*) which have recently been elevated to qualifying features of SSSI designation in their own right.

It isn't just Newborough's amphibian assemblage that require increased connectivity across the site. Opportunities for reptile functionality, thermoregulation and foraging are currently limited and need to be improved for both sand lizard and also viviparous lizard (*Zootoca vivipara*). This could be achieved by enabling a mosaic of open dune and scrub structure to exist and persist across the entire site, and where appropriate, within the seral succession. Enabling the open dune, fixed dune, and slack to persist across the site would result in more robust populations of amphibian and reptile, as well as enabling specialist dune invertebrate and floristic species to proliferate.

The FMP in its current form appears to be managing the site for species and habitats which are not currently features of interest. Whilst they may be considerations, they are very much secondary to NRW's legal obligation. This raises the question; why are NRW perpetuating and managing the area as a forest and not addressing the requirements of the unique species which are SAC and SSSI statutory features?

NRW are currently prioritising the requirements of woodland species over and above the needs of dune dwelling species on a designated dune site of great importance. The dunes are over 1000 years old, and have evolved a fauna and flora over time, compared to the largely non-native forest which has been there for merely 70 years, and is an imposition on this rare and threatened sand dune system of European significance.

This creates new habitats that are not part of the main feature of the site – the dunes? In relation to - Improve the internal structure of the forest by developing age class diversity, varieties of tree size and mixtures of species where possible. This can be achieved by continuing forest management using low impact silvicultural systems. These may include small strip felling, group felling and continued thinning of conifer crops.

Yes – but without removing the conifers this will not happen *In relation to - Allowing natural processes to become more prominent across the whole site.*

NRW Response

The purpose of the forest resource plan is not to facilitate the removal of trees and ultimately Newborough forest from the area. It is to help manage the forest and develop it in such a way that primarily protects all the designated species and habitats and make sure it is legally compliant with UK legislation in doing so, whilst also meeting all the desired objectives of a multi-purpose forest that is already established and been present for over 70 years. The purpose is to create a plan that balances all the objectives highlighted between conservation, the forest and people. The removal of the forest would be an extreme and controversial solution to meet a single objective and not an acceptable solution for a number of stakeholders and the general public. It would also be contrary to the Forestry Act and the UK Forest Standard. It would also destroy habitats for protected species supported by the forest. Although the forest is man-made, it was acknowledged as an established feature of the site when designated as a Special Area of Conservation. Many of our protected sites are man-made and the primary reason why rare and unusual species thrive there. The SAC also covers a much larger area than the forest, and these areas also support the designated species and habitats.

In order to meet the requirements of the SAC core management plan and the conservation objectives in relation to the listed interest features, the plan does propose major changes to the forest. These include an increase of open habitats along the shoreline to meet the 95% target of dune habitat along the coastline of the whole SAC. These habitats will increase by approximately 40 ha over the next 30 years and at least 10 Ha in the next 10 years by clear felling areas of forest along the coast. Also dune scrub habitats will increase by around 20Ha. Both these changes will eventually result in a reduction of closed canopy woodland by 60Ha from 670Ha to 610Ha. Some of the new open areas will also contribute to improvements in the condition of Shore Dock habitat and dune slack vegetation. The other big change to the forest is the major reduction of conifers and increase in Native Dune Woodland over the next 30 years. Conifers will reduce by approximately 170 Ha from 550 Ha (82% of the forest area) to around 380Ha (62% of the forest area). Native Dune Woodland will increase by approximately 105 Ha from 125 Ha to 230 Ha (38% of the forest area). The increase in Dune woodland will also help to buffer interest features and improve hydrology adjacent to the Warren which in turn helps to meet the HRA conditions.

Climate change Impacts/ Shoreline Management Plan

Your plans do not consider the future of the carpark which will probably be affected by coastal erosion. They do not seem to have consideration for sea level rises and how this will affect the coastal areas along the Menai, the warren and the dune slacks. There appears to be no consideration or studies to show how sand movement might affect Newborough and surrounding areas if the dune slacks are increased in area - climate change means we are now subjected to more storms, surges, and dryer periods than back in the middle of last century, so it may not be beneficial to return to the past.

In recent years active coastal processes have resulted in significant erosion of the dunes including in front of the main carpark. There is no mention in the documents provided regarding future proofing the carpark. If the dunes continue to cut back, then it may be necessary to relocate both parking and trees a little further back from the beach. There may be other areas of the site where climate change

and or sea level rise will have impacts on site management, and I would have expected to see some reference to it.

The document refers to the SAC core management plan and a People Plan but fails to mention the Shoreline Management Plan and there is no evidence that it has been considered as part of the planning process.

Another critical factor that the FMP overlooks is the predicted sea level rise which threatens frontal and inland dunes and subsequently herpetofauna populations, in particular sand lizard and viviparous lizard which utilise the frontal dunes comprising marram thatch interspersed with bare sand, a habitat that is disproportionately important to sand lizards.

To mitigate against sea level rise, inland rollback of dunes will be vital to enable the sand lizard population to persist. Currently, mitigation against sea level rise is not possible due to non-native trees being present in places right up to the sea front.

At present, the available foreshore and foredune habitat at a significant area of Newborough is minimal. Reptile populations will be impacted on a notable scale if the lack of connectivity is not addressed.

Currently, minimal levels of reptile dune foci are possible as conifers persist right up to the seafront. Without sufficient connectivity due to woodland incursion on dune habitat, genetic impoverishment of the reptile population at Newborough is certain and will be further exacerbated without the reduction of woodland to *at least* 200 meters inland of the sea front to enable increased light levels and natural process to restore dune habitat. In order to restore much needed dune habitat whilst also mitigating the predicted sea level rise, felling operations need to undertake considerably more in advance of predicted sea level rise than is indicated by the FMP. Embarking upon the vital felling programme in 10 years' time, as currently specified in the FMP, would be far too late.

There is no mention of the Shoreline Management Plan which sets out the management requirement for 0 to 20, 20-50, and 50-100 years. The plan was a requirement of the Welsh Government and is a key consideration in terms of management of the coastline.

There is no mention of the fact that sea-level rise has exceeded expectations and will have a profound effect on Newborough.

The plan makes no reference to the Shoreline Management Plan (SMP2) which recommends the rolling back of the plantation to enable the shoreline to adapt. SMP2 is rapidly becoming overtaken by events as climate change accelerates, sea level rises and shorelines come under greater pressure. The plantation provides no "defence" against such coastal movement; trees are undermined and tossed into the waves, but it does prevent the orderly realignment of coastal habitats and processes.

NRW Response

The Shoreline Management plan for the area is a long-term 100-year plan. It proposes a change in the management of the coastline from defence and intervention, to where the whole area is allowed to respond more naturally. It suggests the management of Newborough Forest should consider adaptation to allow the natural development of the dune system in the long-term. Practically, it suggests removal of forestry to allow width for coastal adjustment due to climate change. The new Forest Resource Plan allows for this change to happen. The long term-vision in the Forest Resource Plan is a 30-year vision and will be reviewed every 10 years. As these changes

naturally happen over time the plan will be reviewed and adapted to meet these natural changes. Some areas may accrue sand and in other areas sand may recede over time as the coast evolves and adapts to rising sea levels. A reference to climate change and sea level change has been added to the objectives.

General poor approach to overall management of the area, past present and future

It would seem that historical mismanagement has caused a cavalcade of ecological mishaps in the area which will take a very long time to redress and bring back balance to the area.

Dune sand covers just 15000ha (0.7%) of terrestrial Wales but of this only 6200ha survives as near natural habitat. Such systems should be managed holistically because the processes of aeolian transport and groundwater hydrology operate across the whole land unit. Excising part of the system as a management unit runs counter to that holistic approach.

There's no mention of protecting smaller flora and fauna. For example, current work on dunes behind Traeth Penrhos is damaging the habitat for hibernating solitary bees that over-winter in the sloping sides of the track that runs between the dunes and the forest. The heavy plant is decimating these areas and, if the work is continuing further along the path towards the Malltraeth Estuary, the orchids that have recently had a couple of successful years will be decimated; this happened to orchids further into the forest during recent tree felling operations.

The plan proposes to "allow natural processes to become more dominant across the whole site" but without the recognition and an understanding of the underlying dynamic geomorphological processes it actually runs counter to that objective.

It is far from clear how management of the plantation influences marine water quality.

The draft plans shown regarding the forest boundary are the same plans put forward years ago when there was a huge outcry against these plans being put in place.

Before any felling at all was to take place a shelter belt was supposed to have been planted, this was to protect the vulnerable shallow rooted healthy trees behind the proposed felling from falling like skittles during the many strong off shore winds. This as far as I know hasn't been done.

There has been failure to plant new saplings under mature pine stands some of which had been drastically over thinned, and failure to manage excessive weed growth thereby suffocating both over-thinned older and young trees.

...what is presented as a forest resource management plan for a site like Newborough for the next 10 years and going forward causes me great concern. In my opinion this is a completely thoughtless forest management plan that hasn't fully considered the implications of what I would consider as a lack of management or inappropriate management of the forest and its effect on all important and rare features.

It is stated in your consultation package that this is an important addition within Newborough's core management plan. I believe that management of the forest as a resource in its own right should be very low on NRW's list of priorities and more consideration should be given to protecting and expanding the biodiversity, culture and heritage of the area and the incredible geology that is present here. By focusing too much on the management of the woodland for economic benefit,

tourism and leisure, there is a real danger that we will lose the main interests of the site within the next 10 – 20 years.

The prospective scheme is also contrary to the policy and objectives of the UK Forestry standards and FSC standards. In relation to the document NEWBOROUGH FOREST RESOURCES PLAN - PRIORITIES AND OBJECTIVES! The objectives in this written document are erroneous and completely contradictory. Coastal natural processes cannot continue and expand alongside woodland objectives. Maps attached as part of this consultation process do NOT convey or reflect my interpretation of your objectives and priorities for Newborough. You are selling me the perfect mindset but the maps convey heartbreaking features to say the least. I suggest that continuing with the prospective plan is a breach of law on NRW's part.

We are dismayed by the excavated large holes in the sand dunes either side of the Llandwyn Island causeway. In particular the sand piling onto the track that runs behind the dunes and spoilt this excellent walk by blocking the final section leading towards the main car park.

The Sands of Life seems to me to be a 'misnomer' as several tracks and paths have been completely smothered in sand. Where there were lots and lots of wild flowers e.g. Pyramid Orchids they are now dead or gone.

NRW Response

The many different aspects of management that are listed above, show the variety and contradictory views and opinions on past present and future management of the site. The Forest Resource plan is a strategic plan that steers management in a certain direction and allows for detailed proposals and aspects of management to be further developed. These have been in various guises such as the 'Sands of Life' project which in the past has used the strategic Forest Plan to guide it. As long as the Forest Resource Plan meets all the legal requirements, which it does, it can now form the basis of future decisions and more detailed plans. A detailed conservation management is being developed for the site which will also be shared in due course.

Tree Species

The plan lacks detail, in particular with regard to species composition of the proposed woodland. The use of beech is inappropriate – it can become highly invasive in some circumstances. The term "more varieties of broadleaves and natives " for instance, does not exclude the use of non-native broadleaves (such as southern beech) as well as natives.

The plan talks about native woodland – in the past this is code for pioneering species like birch and willow. These dominate the forest understory now, the plan suggests because of natural change, however this ignores the failure of NRW to actually plant alternatives for which there are no, or limited seed sources. Red squirrel inhabits high forest with a rich and varied mix of tree species. If NRW want to support red squirrels why are they so shy in listing the mix and how it will be ensured new planting survives. There is a forest term 'beating up' which refers to the practice of monitoring the survival of young trees in 3-5 year intervals and replacing those that have died. This simply doesn't happen in Newborough.

The plan proposes 'native woodland' (again as above not adequately defined in terms of species) to replace current pine stands adjacent to the warren. There is no need to do this. There are no hydrological data, no evidence of the forest reducing water tables in the open area.

NRW haven't been monitoring the squirrel population over the years so cannot have a clue as to what or how many suitable species of trees are needed in a mixed woodland.

The plan doesn't mention at all the relative value of future habitat to red squirrel, surely this should play a major part when designing a habitat suitable for these and many other creatures, and if Natural Resources Wales are at all serious about conserving the very important Native Red Squirrel they should start taking a serious interest in the habitat for this indigenous animal to ensure its survival and successful increase in numbers, which unfortunately has been sadly lacking over the years. AND if they do want to support red-squirrels why are they so quiet regarding listing the mix and how it will be ensured that new planting survives, as the practice of monitoring the survival of young trees and replacing as necessary doesn't seem to happen at all in Newborough.

It is critical to ensure the amenity and recreational features of this forest are maintained whilst looking after the varied woodland species and wildlife alongside a detailed plan of tree species to be planted to create a mixed woodland to support the endangered Red Squirrels, with connectivity to be maintained throughout the forest. Checks need to be carried out, on the health of young saplings replacing where necessary and a planting regime in place to ensure the future health of the forest.

The place should not be modified for red squirrels - Beech? In relation to - Diversify the species composition of the forest by promoting a more diverse restocking strategy, which will include more varieties of broadleaves and natives as well as productive conifers. Scot's pine, some fir species, hazel and beech are also suitable for red squirrel food provision.)

By all means, as long as it does not modify the true nature of the site, but the trees in the forest are not native plants nor hardly any of the woodland. There is no need for all the species to be native, only those that would move there naturally. *In relation to - Improve the visual and sensory and landscape habitat value of the forest by increasing natives and diversifying the woodland.*

NRW Response

As mentioned above, the Forest Resource Plan is a strategic document that sets out the broader categories of woodland types for the future. Predominantly Broadleaf woodland can be a mixture of native and semi-native and non-native species. The objectives at Newborough are to favour native woodland, but this is not exclusive as semi-native broadleaves can also thrive especially mixed within the conifer areas which are identified to help preserve the forest structure for red squirrels. In other areas, such as Dune Woodland there may be less semi-native species where other species and habitats can benefit. Detailed species composition will be developed in the conservation management plan to allow for all habitats and species in the forest area.

Against Red Squirrel management

The use of the term "Natural Reserve" is bizarre. Some of the areas proposed for this role are to be predominantly conifer plantation. If this is driven by red squirrel management that objective is already covered by the commitment to conifers and connectivity etc. though the need for conifers in a grey squirrel-free environment is highly debatable.

There are 4 references to the introduced red squirrel population. There is no reference to the introduced sand lizard population (a European Protected Species) and no account taken of its ecological requirements.

Red squirrels should not have been introduced here. Sand dunes are what are supposed to be here. Why didn't people consider having more bamboo here and introducing the panda to the site?
In relation to - Maintain a diverse and permanent forest ecosystem that includes both mixed conifer and native woodland, suitable as red squirrel habitat (red list and UK BAP species), with more successional woodland, woodland glades and open habitats along forest roads and rides.

NRW Response

Red Squirrels are a red list threatened species in the UK and Anglesey is a protected area and safe haven for them in Wales. Newborough forest was one of the areas that was suitable for reintroduction as it provided a large expanse of woodland on an Island with very little suitable woodland cover. They have established populations in Newborough forest hence the need to manage the woodland to allow red squirrels to thrive there. The Forest Resource Plan shows gradual change towards more broadleaf woodland on the shore side whilst trying to maintain mixed conifer forest further inland. This should allow the red squirrel to continue to thrive there whilst also allowing for the conservation of sand dune habitats.

Poor Water Management/Hydrology

The water courses in the forest have been devastated in recent years: with consequent devastating impacts on many of the forest's animals (and plants). Not all forest "ditches" are just ditches - they are ancient streams, they used to be maintained, now they are blocked, clogged, stagnant. They deserve specific inclusion in the plan.

The woodlands have a significant impact on the natural water supplies of such dunes and I see no suggestion of how to protect supplies or prevent drought in the future.

Now onto the proposed felling adjacent to the Warren, this again is part of an old plan being brought forward after years on the shelf. I fail to understand why such a chunk of forest needs to be clear felled as this was a hydrological experiment. A few years ago a one hectare 'paddock' was clear felled for this purpose to measure the effect upon the water table beneath the dunes near the forest. Some time has passed and no data has emerged, and as hydrological testing is carried out regularly in various locations it seems obvious that the forest DOES NOT have a detrimental effect on the dunes in general or the dune slacks, therefore no further felling should be necessary in this area.

The integrity of the hydrological system is directly impacted by the continued presence of extensive plantation and woodland.

NRW Response

NRW continues to monitor the groundwater levels at Newborough. Data will be used to further understand any impact of the forest on the dunes and inform future reviews of this Forest Resource Plan. In the meantime, the new plan will allow for management of the forest adjacent to the Warren to favour broadleaves. This will help reduce any potential impacts of the trees on the hydrology of the site. Other recent forest management such as the 'Sands of Life' work has helped open up some of the older watercourses across the forest.

Lack of Detail in the Plan

Red squirrel conservation is fundamentally about habitat composition and structure. What tree species are present and are the trees of a size that will provide arboreal corridors and nest sites. To predict how squirrel friendly a forest will be it is standard for basic information to be in plans. These include a precise description of the species of your saplings to be used in new planting, and the proportion of each species. The plan fails to provide this information.

The coloured zones of 'conifer' and other habitat classifications fail to provide the species and the mix which is aimed for. It is not acceptable to lack the fundamental data because without it there can be no specific target to measure success against.

The devil is always in the detail and this plan lacks key information. It also doesn't mention anywhere the relative value of future habitat to red squirrel. Native woodland could be birch and willow dominated 'squirrel apocalypse' providing zero food or the same habitat definition could be sweet chestnut, beech, hazel, cherry with 49% Scots pine. Similarly areas defined as commercial conifer could be up to 49% birch. Plans should be specific not vague.

'Restore and maintain habitats through appropriate woodland management so that they support other SAC/SSSI interest features in the forest. These include Shore dock, Medicinal Leech, Great crested newt, and Raven roosts.' - Again the objective is admirable but the maps fail to support it and there is insufficient information to judge the extent or detail of the proposals. There is no management information with this consultation so it is impossible to judge if open habitat management is in fact appropriate management or if the extents of the areas around species locations are adequate.

NRW Response

The Forest Resource Plan is a strategic plan which sets the general direction of long-term management for the forest. Further detail will be developed in the conservation management plan, which will deal with each individual habitats and species and how they will be managed to best achieve good conservation status.

Too Many Visitors

I also think it's a constant battle with the number of visitors and the sometimes, detrimental activity they engage in.

I am concerned about the number and effect of more visitors to Llanddwyn island and the management of that.

NRW Response

People have always visited the area, and it has always been a very busy site. A 'People Plan' is being developed to help manage the site for visitors and the local community, that will reduce pressures on the forest, surrounding areas and communities and habitats. The three plans: Forest Resource Plan; People Plan; and Conservation Management Plan will compliment each other and help balance the priorities between the forest, people and biodiversity.

Access to forest and Recreation

I am unsure what the point of the consultation is when decisions have already been made and actions to fulfil this plan are already under way. At the moment there are swathes of the forest and perimeter that have been fenced off and cleared to implement the more open areas and ponds defined in your plan. I realise while the habitats for the newts, frogs and plants in these areas are establishing it may be necessary to fence them off, but I hope this is not a long-term solution. Yes, they may contain protected species and may have areas of deep water, but education and not restriction should be prioritised. Fencing means people never learn about these areas and it also restricts our legal right to roam.

NRW Response

Open access and the right to roam remains at Newborough forest as part of the Welsh Government Woodland Estate. However, where grazing and temporary closures due to works occur, especially not on paths and roads, it may feel like wider areas are being restricted even though these might be temporary or just grazing enclosures. Fenced grazed areas which have paths do have gates to allow for access or routes around them where not practical.

Not enough facilities

There is insufficient parking or facilities for the thousands that pay to visit this beautiful spot. I dread to think what might happen if there was a forest fire or a serious jet ski accident...how can the emergency services squeeze past all the vehicles going in and out on a single-track road! There is no emergency first aid points, fire-fighting points, drinking water posts, no lifeguard service.

NRW Response

The site (as is the same with many UK tourist hot spots) has seen a significant increase in visitors since Covid lockdowns. We are currently trying to manage numbers but our intention is to calculate what numbers the site can support before it is damaging to wildlife, or to people's enjoyment. This in turn is influencing our work on developing a people plan which will help us manage behaviours as well as numbers. There are emergency plans and agreed protocols with all the emergency services. It's a complex balance between being out in a natural environment and supporting visitor needs.

Archaeology

Very disappointed that historical places are not earmarked and that no recommendations are made to cut and clean around them. Especially Tir Forgan as it is a site of national value to us Welsh.

NRW Response

There are a number of sites around Newborough forest that show clearances and more open areas around them. Tir Forgan is undesignated but the area which is currently semi-open is being extended to include an area around the building in the new plan. NRW's primary functions at the site are wildlife, people and timber. In times when resources are short we are unable to take on the additional responsibilities related to other interest features. We try to work with partners who are resourced to deal with historical sites but sadly do not simply have the budget to keep them all cleared

Other General Comments – Poor unclear Language

Some of the wording is very woolly and I don't understand what is meant by it.

Write in more simple, less woolly language that actually means something measurable or tangible (to ordinary people, not civil servants... e.g. what does "be a good neighbour" mean? what is working "co-productively"? what are "strategic travel links".

The primary plan aim is sand dune. It's the headline target. It mentions key habitats 'These include embryonic, shifting and fixed dunes, dunes with *Salix repens* and humid dune slacks habitats.' It then states that 'This may involve removing conifers from interest features and surrounding areas and allowing more room for the sand dune system to change over time'. What does 'may' mean? It is loose language, fuzzy and clearly facilitating virtually anything and everything. We have already seen massive clearance of forest from rocky areas apparently to make the formations more visible. Yet whilst this work was going on 2010-2020 there was no surveying of red squirrel population.

This is full of rhetoric. In relation to - Continue to provide access to this unique venue for education and a variety of research. Work with other research groups and partners to provide further evidence for the continuing sustainable management of the forest and all its ecosystems.

NRW Response

Objectives are often broad based and apply to many sites across the forest. They try and convey as best they can a summary of how the forest will be managed in future and a strategic direction of travel. As pointed out by many comments in the consultation, that the devil is in the detail, which is not always fully outlined in this type of plan. Hence, there will always be a range of solutions in order to achieve the desired outcomes of the plan, and the plan will adapt in the future to new evidence emerges.

Questions Raised by the Consultation (NRW replies in red):

I am uncertain what CNC mean in the NFPlan by silviculture systems. What exactly is the intention for these areas? I would appreciate a more detailed explanation. Also I would like an explanation of what exactly CNC are referring to when describing areas of broad-leaved trees. I would like an explanation to my questions about silviculture and broadleaf as they would affect Newborough.

Silvicultural systems with respect to 'Low Impact Silvicultural Systems' mean management of the stands of trees through thinning or small group felling and allowed to grow replacement trees under the current canopy or in small open areas. This means that they will not be clear felled. Usually there will be a continuous cover of trees on the site. Broadleaves refer mainly to trees that are mostly native to this country, such as oak, birch and willow, with flat deciduous leaves and are not conifers with needles such as pine.

The proposed felling to the east adjacent to Gallyt Y Rhedyn and Tyddyn Plwm - please can we have a site meeting to discuss the plans. What consideration has been made for the neighbouring properties especially in relation to protection from prevailing winds, also protection of indigenous species in particular bats (what impact surveys have been undertaken?)

A meeting was arranged and the area in question discussed and amended to maximise protection from prevailing winds whilst still managing the forest. All felling coupes are assessed for impacts on wildlife before felling takes place to minimise any impacts.

Where proposals are made to enhance the dune system and mobilise sand, what air quality and sand migration models have been carried out to determine the impact? What are NRW proposals to monitor for sand migration, especially given that storms are forecast to get more frequent and stronger. What consideration is being given to neighbouring properties?

Sand movement has always been a feature of the sand dune system at the foreshore. Further back in the system the dunes are fixed and there is also woodland cover which offers additional shelter from the prevailing winds, hence, there is little, or no sand movement predicted, that would affect the properties which are nearly 2km from the shore and behind the forest. Sand movement has been recorded by various studies which have offered predictions of the impact of climate change on the foreshore where sand movement occurs. Some areas will accrue sand and other areas will lose sand. The plan allows for a more natural movement of sand along the foreshore.

What does this mean? *In relation to - Be a good neighbour*

You talk about NRW being a good neighbour. This is a very passive statement and I would like to explore what this means for us as neighbours.

The phrase developed from some community engagement and NRW has strived to be a good neighbour since. Being a good neighbour means listening, communicating, and liaising with businesses, local people living in and around the forest about the management of the forest and the Warren. Neighbours are never perfect, but by hopefully by being open and transparent, and approachable we can share this part of the landscape with each other in a better way.

Are there opportunities for us to work together to create wildlife corridors and enhance habitat? Maybe we could include this in our site meeting.

Yes. Opportunities are welcomed if they provide extra benefits for wildlife.

You cleared a part of the forest, again on the eastern fringes and fenced it off. What was the purpose of this?

This area was cleared in 2016 as part of a hydrological trial to find out the impacts of the forest may have on the listed vegetation of the Warren. This is an ongoing trial with data still being collected. Part of the area will be reverted back to native Dune Woodland and part left to naturally develop into Dune Scrub Mosaic in due course.

Why is so much of the forest being fenced off?

This is due to the management of open habitat which is maintained by the grazing animals.

Are you linking up with the Menter Mon Glasffordd Mon project, which has a cross Anglesey walkway starting/ ending in Newborough and going all the way to Amlwch?

Yes. This is in the pipeline.

What does the NRW contribute to the local community from the revenues raised by the car park?

Currently, what NRW spends on managing the site far exceeds the revenue from car parking. We are currently reviewing our pricing and management strategy and will work with others to consider some direct community benefit.

As far as I am aware, shore dock, medicinal leeches and Great Crested Newts do not require the presence of woodland for them to flourish. Are you meaning that you will be removing more trees to create further scrapes and ponds with increased grazing areas to support these nationally scarce organisms?

The idea is to enhance these habitats by some tree removal and management by grazing. In the case of Great Crested Newts, tree removal is not necessary in every case but may improve light levels and riparian habitat around ponds

I appreciate that Ravens do need a roost, but they also need a food supply. For the colony to expand they will need additional food. With current legislation still stating that all fallen animals must be removed from the land and disposed of as quickly as possible, where is this additional food source to come from? There is also the debate raging between organisations such as the RSPB and farmers regarding the shooting of ravens in order to protect livestock. If we are to encourage population growth now, are we in fact going to see an increase in loss of livestock from local farms and heightened support for the general licence for lethal control?

Raven's will find natural food sources and the current roost is maintained by these sources. The important objective is to maintain rather than increase the size of the roost and not destroy it by bad forest management.

Managing invasive non-natives – noticed quite a few yuccas in there too. They didn't appear to be randomly dispersed. Had they been intentionally planted? Will these too be removed as they are of no intrinsic value to the biodiversity of the area? Are you classing any of the conifers as invasive non-natives? Judging by the number of seedlings everywhere, they do seem to be creating a problem.

Conifers in general are not classed as Invasive Non-Native Species (INNS) where the intention is to manage the forest as mixed woodland predominantly conifer in the long-term. Where the forest is to be Dune Woodland some control over conifer regeneration and management of the understorey will take place. Open habitats will be kept clear of both conifers and natives for the benefit of those habitats. There are a wide variety of non-native garden plants around Newborough forest due to the fact that garden waste was brought in when the forest was being established. There is now a major problem of regeneration of non-native garden plants across the site, which need to be removed, most notably Cotoneaster.

Planting native trees. How will you be managing the understory? At present there seems to be very little cover for small mammals, birds, invertebrates and reptiles in the plantation areas. The sand is littered with needles and not much else appears to be growing except for brambles, Carex pendula and dewberries. The root, herbaceous, shrub and certainly the climber layers seem to be noticeably absent.

Planting of natives to create an understorey will take place in a number of areas but only in a small proportion of the areas for eventual transition to Dune Woodland. Most of the regeneration and understorey will develop naturally as and when the conifer crops are thinned allowing enough light to stimulate woodland understorey growth and regeneration. The best areas where this is already happening naturally have been identified and shown on the maps as future Dune Woodland.

When you say that there are historically sensitive areas which require consultation to the Gwynedd Archaeological Trust, are you referring to the dwellings such as weaver's cottages and smithys, once occupied by the people of this historic dune landscape, that are currently in danger of being destroyed by tree roots?

This is a reference to a consultation with Gwynedd Archaeological Trust and refers to a number of areas identified by them which include Ynys Llandwyn, Cerrig Duon and the rock ridge, Pandy pools and mill and various other settlements including Gwninghar and Hendai.

How do you propose to move the carpark back into the forest as the coast erodes?

This is one of the most difficult and important questions that we face. There is no doubt that the car park's life time is limited, and that visits are governed by the location of the car park, which in turn impacts the wellbeing of the local community. The developing people plan is looking at potential solutions to the transport and access issues and opportunities around the site .

How are people finding out about this consultation? Is it only via email / online - are you leafletting locally? So many local people care about the forest but are always excluded from your "engagement" / "consultation" because there is such a reliance on being part of a clique and/or being online.

Over 2000 households in the 5 community council areas closest to the forest were informed of the consultation and drop-in sessions. Also over 200 other stakeholders with interests in the plans were also informed.

Have any of the very few Hazel saplings planted in 2018 been checked upon, I don't suppose they could have survived all the bracken, brambles and other weeds allowed to run riot across the floor of this forest.

How many trees will be planted annually to reflect the above. (With respect to maintaining red squirrel habitat and populations).

Some of the planted areas have not had much success. Others have been more successful. The new Forest Resource Plan has tried to address this. It focuses more on the areas that are regenerating naturally or show signs of regeneration so to give natural processes a helping hand rather than trying to establish something where it is struggling. This will be mostly done through further thinning of the overstorey to allow more light to ground level. Where this is naturally happening additional planting may help enhance the natural process. The key is periodically monitoring the progress and success of previous interventions, which is what the plan has considered.

..... the long-term management is a priority for us all. While this plan clearly shows a well developed strategy, it would help our understanding to know if this indeed a consultation, to be adapted

following discussions and if so to what extent are any concerns integrated. Given some of the start dates for works are 2022, this seems extremely tight.

The consultation has looked at all the responses and tried to address the different views and issues raised in a balanced way. The plan has also been consulted on internally and checked from a legal perspective to make sure it meets all the current environmental legislation. As is evident by this document, there is a wide variety of views, often highly opposed. Hence, consensus on many issues is hard to reach. However, some amendments to the maps and objectives have now been made and posted here as a result of the consultation.

Isn't that the main aim of this scheme? But it cannot be put into operation without clearing the alien plants that have been planted there - the conifers. Do you have a process for removing them? (What I have in mind isn't a small strip on the edge) *In relation to - Restore and maintain SAC dune habitat interest features along the coast, to favourable condition in accordance with the conservation objectives. These include embryonic, shifting and fixed dunes, dunes with Salix repens and humid dune slacks habitats. This may involve removing conifers from interest features and surrounding areas and allowing more room for the sand dune system to change over time.*

The purpose of the forest resource plan is to manage the forest in such a way so that NRW can meet the ecological and legal requirements, to achieve this conservation objective, which it does. The new plan also allows for further adaptation in future reviews to continue to meet the conservation objective. As well as this targeted management, it also needs to balance and achieve many of the other objectives outlined in the plan, hence wholesale removal of the forest is not a sensible or balanced option.

By all means, but why couldn't the conifers that cover everywhere be removed? *In relation to - Manage areas around the UNESCO Pre-Cambrian rock ridge geo-park, an SSSI feature and a regionally important geological site. Expose and make accessible key geological features for research study and educational use along a newly proposed geological trail.*

It is not the purpose of the plan to remove all the conifers from the forest. The objective can be met by targeted management around the rock ridge.

What's the point of worrying about cotoneaster. There is less of that there than conifers which play tricks with the hydrological system. Where is the consistency in worrying about alien plants with the least impact? *In relation to - Manage Invasive Non-Native species (INNS) such as Cotoneaster, Montbretia and Black cherry.*

Alien understorey species can prevent native Dune Woodland regeneration in areas where conifers will be phased out. Hence, there is a need to control areas of Non-native species.

Don't the conifers make a difference here? *In relation to - Ensure compliance with the requirements of the Water Framework Directive Regulations 2017 when undertaking operational activities by following best practice as outlined in the 'UK Forest Standard - Forest and Water Guidelines' to protect water quality and freshwater ecosystems within the forest.*

What is referred to in this objective is how the operations are managed to prevent any adverse effects on water quality from that management and not what kind of tree is managed. Impacts of trees species on the general hydrology of the site is a separate topic for discussion.

Red squirrels shouldn't be a factor – they shouldn't be there. Wasn't it said from the start that these should have no effect on the policy for the site? *In relation to - Maintain and reinstate canopy connectivity where possible for the benefit of red squirrel. Long term-retentions, Natural Reserves*

and delayed thinning in mature pine crops and new conifer planting in appropriate areas, will help achieve this.

Red Squirrels are a red list species and have been present at Newborough for a few decades now and have a strong population supported by the forest habitat. Anglesey is stronghold for red squirrels in Wales and the UK and Newborough is one of the largest extensive wooded areas on the island.

Coastal Dune Woodland is an unclear classification - what is it? In relation to - Increase Coastal Dune Woodland in the forest. It has been chosen as a suitable site for this rare habitat as part of the UK Biodiversity Action Plan.

Dune Woodland is essentially native woodland which develops on dune landscapes through natural succession. Closer to the shore it is classed as Dune scrub in a mosaic and as you move inland it forms stands of native woodland adapted to the local conditions. The UK has very little of this type of coastal woodland due to historical land management practices. Newborough was chosen as an ideal site for establishing this type of woodland habitat as it is already wooded and suitable to transformation to a native woodland more suited to the site and local conditions.

What is this? In relation to - Explore opportunities for new strategic and active travel links to the forest.

This is about creating and promoting alternatives to road transport, such as connecting cycleways and walkways, to access the forest from Newborough village and other communities further afield on Anglesey.

By all means, as long as it does not modify the true nature of the site. What is a soft attitude I wonder? In relation to - Consider the visual impact on visitors of forest management operations and long-term changes within the forest. A soft touch approach to forest management should be taken.

This is about gradual change and doing smaller scale operations on the site that minimise impacts for visitors. The nature of the site will gradually change with less conifers on the shorefront and much more open dune habitat and native Dune Woodland. If it was all to change in the next 10 years, the visual impacts would be massive and possibly also destabilise the remaining forest.

Does this deserve to be a bullet point? What then has to be done to achieve this? In relation to - Protect all monuments and historical features when carrying out forest management operations. Additional consultation may be necessary in archaeologically sensitive areas identified by Gwynedd Archaeological Trust

This objective is important as it reflects the importance of the archaeology on site and has been requested by the Archaeological Trust, to be consulted in certain areas of the site when carrying out forest operations.

On what basis are you modifying the site for squirrels? Are they now part of the designation? In relation to - Maintain woodland/forest cover as far as possible whilst meeting other objectives namely around SAC/SSSI interest features, management for Red Squirrel and recreation provision in Newborough forest.

They are a red list species which is also protected by law. Woodland cover is maintained where appropriate for red squirrel habitat and is not in conflict with the SAC features of the site. The SAC features take priority as they are protected by the Habitats Directive and current UK legislation. A

Habitats Regulation Assessment has been carried out, so the new plan meets the legal requirements of the Directive.

More trees for what? *In relation to - Continue working in partnership with Llyn Parc Mawr community woodland group and allow for further management agreements which may cover a larger forest area.*

This objective doesn't mean more trees. It relates to more woodland area coming under the groups management with a new management agreement.

Is the commercial activity profitable? Even if it is, how can we modify the management of a site like this to that? Do commercial considerations prevail over environmental considerations? *In relation to - Continue commercial activity and management of the current mature Corsican pine crop. Ensure the future commercial viability of the forest, by restocking the next generation of mixed conifer crops in appropriate locations.*

The site was planted over 70 years ago with mainly Corsican and Scots pine. It was designated as a SAC with an established maturing forest around 20 years ago. It is now commercially reaping the benefits in the investment made over the past decades with the maturing conifer crops that can be harvested and managed. The trees grown on the site are slow growing pine, which are commercially valuable and also have sequestered a good amount of carbon over the years. Management of the site as outlined in the new plan, will favour the SAC features, but the crops where appropriate can continue to be managed in such a way, that the commercial value and carbon sequestration is optimised.

Suggestions and Improvements to the plan

Suggestions which have been considered and dealt with as part of the consultation and Habitats Regulation Assessment

The following amendments to the draft plan as a result of the HRA have helped to address the suggestions outlined below:

- A commitment to the timings of frontal dune felling with allowance for adaptive management in future FRP's.
- Increased broadleaf (Dune Woodland) around Shore Dock catchments in Cerrig Duon and Fryddiau.
- Increased open space along the Shore Dock corridors (including open space created by 'Sands of Life' works), but with indicative pinch points in the canopy for woodland connectivity for red squirrels.
- Resulting changes to thinning and forest operations maps.

Please also make reference to NRW responses in the sections above to help explain the changes made in response to these suggestions.

With climate crisis rapidly becoming a reality, surely we should be encouraging the further development of saltmarshes which sequester far more CO₂ than any land habitat? Planning for the future and helping to tackle climate change has not even been mentioned anywhere in the objectives. I think that is something which needs to be redressed immediately. HRA protection of salt marshes.

Consult and take advice from a range of ecological specialists to ensure that your SAC obligations are fully included. On the botanical side maximise the amount of mobile and semi-fixed plant communities. Expand the areas of former dune slacks, so many of which were destroyed in the original planting of the site in the 1950 and 1960s. Open up the rock ridge to allow maritime heath to develop. Clear back conifers from close proximity to known sites of botanical importance e.g. Shore Dock site. Practise extensive grazing throughout greater areas of the Forest. Provide far more in-house resources for the management and interpretation of the SAC including human resources such as increased wardening staff.

The plan proposes to make no significant changes to the seaward areas before 2032 - and may indeed review (and therefore delay) any indicated changes thereafter. 2032 is an auspicious date because it marks 40 years since the EU Habitats Directive (in response to the Rio Convention and the Bern Convention) obliged the Government to put in place the necessary measures corresponding to the ecological requirements of the designated features of protected areas. Forty years is a pretty impressive administrative delay. The plan might therefore be improved by a sense of urgency to address the nature crisis.

Along the boundary of the plantation and the open Warren, the retention of woodland cover along a rigid straight line confirms the above assertion that this plan is a forest plan and not integrated with the wider geosystem site requirements. Neither is it compliant with an enlightened approach to forest landscape design, fitting with the natural contours and landforms. While the change from conifer to broadleaves appears to demonstrate a recognition of the impact of conifers on groundwater and therefore on dune slack hydrology, that impact, though reduced, is still present in

broadleaf woodland. Furthermore, the shelter-belt effect of woodland in this location is likely to impact on aeolian processes, reducing the effectiveness of measures undertaken at great expense to rejuvenate the adjacent dunes. Modification to this boundary to reduce the hydrological impact, maximise aeolian transport and conform to modern landscaping standards is required.

There really should be no felling of woodland to create dune habitat unless the precise nature and extent of the felling is defined and then consulted on. No more felling to expose rock formations at the expense of red squirrel habitat.

SAND dunes seem to be the primary plan aim, it mentions key habitats, embryonic, shifting, fixed dunes and humid dune slacks, and this MAY involve removing conifers from interest features and surrounding areas, allowing more room for the sand dune system to change over time, the word MAY covers a multitude of things and allows virtually anything to happen. No such fuzzy language should be used over such important issues, and if the time did come that it was agreed upon for further tree removal then space needs to be made to create equivalent tree planting in other areas so that no further forest area was lost, and I can't see how that could be achieved.

Newborough forest is a critical project site within the Natur am Byth programme being home to three of our target species: Baltic stonewort (*Chara baltica*), Shore dock (*Rumex rupestris*) and water vole (*Arvicola amphibus*). These species, although declining, have managed to cling on where appropriate ecological and hydrological conditions still exist.

Shore dock is one of Europe's most threatened endemic vascular plants designated as vulnerable on the International Union for the Conservation of Nature's Red List. The UK is stronghold for the species with 40 different locations across south-west England and Wales. In continental Europe, shore dock is restricted to the coast of Normandy and Brittany in France and Galicia in Spain. Despite its internally protected status, shoredock is declining across its range. In the past, this species has often been neglected due to its lack of charisma.

Conservation of shoredock must be a high priority at Newborough because this population represents the far north-west of its geographical range and if this species was lost from here, it would be unlikely to return due to the remoteness of the site from any other populations.

Formerly, this species would have been found nearer the sea at Newborough in the sand dune system, but it is now constrained to small, stream beds, and damp, pond edges within the forest. Each shore dock seed has a bladder allowing them to float in water. This means its dispersal is dependent on a constant flow of water running from Newborough's calcareous ridge to the sea that connects the forest's network of streams and ponds. At the moment, there is a stagnant hydrological environment in parts of Newborough forest, preventing seed recruitment along the water course, and putting the shore dock population in unfavourable condition.

We would be very supportive of any capital works undertaken by NRW at Newborough in order to change the status of the shore dock population within the forest to favourable, and secure the long-term conservation status conservation of the species.

What would favourable condition for shore dock look like in Newborough forest?

- Increased connectivity by removing and thinning of trees and vegetation along streams and around ponds.
- Ditch reprofiling to re-establish stream morphology.
- Restoration of hydrological integrity across Newborough forest.
- Connecting existing relic shore dock populations to their home, the sea.

During our project development phase, we have had several meetings with NRW staff, including Graham Williams, Tristan Hatton-Ellis, David Thorpe and Kathryn Hewitt to outline the work detailed in our project delivery plan. We have also commissioned a contract to Nick Stewart (stonewort specialist) to carry out an ecological baseline survey for Baltic stonewort in November 2022 and Robbie Blackhall-Miles from Plantlife is carrying ongoing monitoring of shore dock. Natur am Byth aims to raise the profile of target species found at Newborough. For shore dock, we plan to focus on telling the story of shore dock trying to find its way back to its home next to the sea.

It would be good to see an additional commitment to minimise impacts on the adjacent designated areas Glantraeth SAC and Malltraeth Marsh SSSI.

'Ensure compliance with the requirements of the Water Framework Directive Regulations 2017 when undertaking operational activities by following best practice as outlined in the 'UK Forest Standard - Forest and Water Guidelines' to protect water quality and freshwater ecosystems within the forest.' - Whilst welcoming this commitment there should be a further commitment to comply with requirements of the Habitats Regulations regarding SAC species and habitats.

General Suggestions which have already been considered or achieved in part or in full by the Forest Resource Plan

Maintain the close link between the forest and the upper shore and foredune zones. The public gain much in terms of health & well-being by being able to get exercise and enjoyment walking in all weather's but still able to see, smell and hear the sea. The benefit and shelter provided while still enjoying the proximity to the beach and sea cannot be over emphasized.

Recognise the geomorphological nature of the terrain and the dynamic nature of that terrain. This is a SSSI feature - and underpins all the SAC features - and is fundamental in understanding and managing the land resource. It is not even mentioned in the plan.

Timber and forestry are way down the summary list of objectives: they should be at or near the top for the forest area - it doesn't mean the other objectives are compromised, it just shows that the "forest" is a forest first and foremost (and will hopefully remain so

In future years it would be good to see further recovery of the dune extent.

Ensure that there is not a mass felling or pollarding of trees creating an ugly looking site of tree stumps.

Fewer conifers

More open areas to encourage biodiversity and protection of rare and threatened species.

Migrate frontal forest areas inland to better favour dunes.

It is good to see when harvesting trees, the aim is to reduce the impact on the forest and wildlife with the use of low impact silvicultural systems (LISS). However, we note that some areas are down for clear-felling over five-year periods because "it isn't always possible to use LISS, usually because the site is too windy (risk of trees blowing over)." Plantations can provide roosting areas for some bat species, especially if the trees develop potential roost features or are allowed to age. Windblown trees will provide partly fallen deadwood which can also support roost features for the future. We understand the importance of having suitable habitats for open habitat species and the need to extract timber for income and have consideration for health and safety, but we would like to recommend that unmanaged patches known as 'habitat islands' are retained long-term in logged areas where possible. This will provide habitat continuity and a roosting environment for woodland specialist bat colonies in the area as well as connectivity to adjacent forest compartments and to the wider landscape. This is not only valuable to resident bats, but other biodiversity will benefit too.

The beachside forest edge that runs from the residents' car park to the public car park should **NOT** be felled. It is the windward forest edge and vitally acts as a shelterbelt to protect the forest behind. It is essential for the survival of the forest. This strip of predominantly Corsican pine has over decades been sculpted by the strong prevailing SW'ly winds and has a ramped profile. Stunted trees at the front, some even dead but still breaking up wind. They pose no health and safety risk as they are so small, bonsai in form due to the harsh conditions. Trees behind this shelterbelt ramp get taller with thicker foliage as they rely on the trees in front for protection against the salty winds. This equilibrium has built up over many decades. It also creates the pleasing aesthetic appeal for which Newborough is famous, pine forest and sandy beach that the many visitors enjoy. Importantly from a cost benefit point of view the strip of trees between the beach and the residents track act as a natural sand filter to trap the windblown sand before it covers the residents' track. This point is illustrated by observing where the old viewing platform was placed (before it got washed away!) adjacent to the public car park at the start of the resident's track. Although only a narrow strip of

trees (less than 10m wide) was removed before building the beach viewing platform, it allowed the windblown sand to breach the shelterbelt and block the residents track with fine sand. This now has to be cleared periodically at time and cost to NRW. However, I must add that NRW have recognised this issue and about 5 yrs ago put-up chestnut fencing between the beach and track in this breached area. The fencing has helped greatly by lessening the amount of sand covering the track, and reduced the time and money in keeping it clear. But my point is, if the whole strip of forest edge was ever felled it would cause the track to be covered with sand completely in a matter of months and would destroy this important infrastructure at great unnecessary cost. It would render the residents track useless which would have a hugely negative impact on the Newborough residents, visitors who like to walk this way through the forest edge and the safety implications of denying the coastguard fast access to the beach in case of emergencies and the amenity use for parc run and sporting events etc. So please protect this windward forest edge for its strategic importance, if anything it could be further enhanced by under planting with native Caledonian provenance Scots pine to promote a diverse age class. Caledonian Scots pine, particularly western provenance is more resistant to RBNB than Corsican pine, it is also a vital food for red squirrels and crossbills which frequent this forest edge. These native Scots pine would then act as seed trees in future decades and could promote continuous cover management in this area. I am aware that sea level is rising, but this should NOT be used as an excuse to cut down this windward forest edge. The infrastructure and forest behind depends on it. By maintaining this forest edge it will also help protect against soil erosion.

Newborough forest is important for the health and well-being of people, and as Anglesey as a whole does not have many trees, and it has been proven that trees are good for our health it is a very important place to visit. The forest covers a relatively small area where it reaches the sea, something that many think is wonderful, but is commonplace in areas overseas, this is rare in the UK and should be enhanced upon not chipped away at, so enhancing the forest edge by the beach should be in the plans for the future, taking into consideration climate change of course.

Suggestions which will be considered in the new Conservation Management Plan

The Forest Resource Plan is broadly a more strategic and long term plan which sets the direction of travel for the forest area. The following suggestions which include more detail around specific species and issues, will be considered and addressed in the new Conservation Management Plan:

Clearer understanding of what species the native broadleaf areas would be made up of and how these would be managed.

Careful planting could add various trees which provide food for red squirrels at different times, including both native and (in the mainly conifer green areas) non-native species; I understand this may well be part of the intended plans, though this isn't completely clear.

With the right mix of enhancements of this kind for red squirrels, there would then be a stronger case to allow some more duneland restoration and dune scrub and succession areas, particularly where these border on present dune habitat (the east, south and south-west particularly).

Would definitely welcome intentional management of habitat to benefit sand lizards in the dune and dune restoration areas, particularly to encourage colonisation from the areas where they are present on the Warren (outside the forest-managed area), to the east of the site.

On the inner (Malltraeth) estuary, there is an opportunity to establish a valuable ecotone between open saltmarsh and native (predominantly willow) woodland which is rare elsewhere. This should be explicitly noted so that appropriate policy can be applied. Unfortunately the plan currently proposes areas of predominantly conifer along much of this shoreline. Another opportunity missed.

The forest tree species planting needs to be defined with lists of tree species and their proportions in planting. Similarly 'natural regeneration' scale and management needs to be defined.

Having read the document the reader will have no idea of how many red squirrels the plan will lead the forest to support. There should be defined population distribution and patterns of abundance reflecting the changes in habitat forecasted. To that end we need the number in '000s of young trees that will be planted annually. Follow the example of Forestry England and Nature Scot by planning red squirrel conservation using defined species in defined ratio mixes to predict future carrying capacities.

NATURAL regeneration scale and management needs to be defined.

This was a pioneering project to re-introduce red squirrels onto Anglesey and at that time Newborough forest in particular, to help protect this endangered animal that faces extinction because of the alien grey squirrel, so it is extremely important that the right mix of trees are planted to allow them to thrive alongside any commercial planting and felling, felling that should be 'continuous cover felling'.

Consideration should be given to choosing the right pine species going forward, including disease resistance, site suitability, climate change tolerant, cone seeds suitable for red squirrels and crossbills, and good value timber.

Some coupes should be managed for biodiversity. Underplanting with natives, removal of invasives etc.

The expression in the plan; "...numerous bird species, mammals such as bats and owls..." could be improved!

There is no mention (I didn't notice any mention) of otters - there have been a lot of negative impacts on their habitats.

I didn't notice any specific mention of amphibians and reptiles other than great-crested newts (just passing reference to the "woodland ecosystem") - ditto, an awful lot of deleterious management practices lately.

I didn't notice anything specific about birds (other than the same passing reference to "woodland ecosystem"), other than a mention of ravens - what about the crossbills (numbers declining), osprey, harriers, buzzards, other corvids, warblers, and all the more "usual" birds.

There are a number of rare plants within Newborough Forest which while not qualifying as SSSI or SAC features in their own right are nationally scarce and should be managed appropriately. These species do not appear to be covered explicitly by this objective or any other.

Thousands of these trees need to be planted such as Scots pine alongside a rich and varied mix of tree species. If NRW are serious about wanting to support and protect the red squirrels they need to get their act together by keeping a record of their numbers, planting these new trees on a regular basis to ensure survival at different growth ratios, and keeping an eye on their survival by keeping excessive undergrowth down. Suggestions for planting to help the increase in numbers and survival of the red squirrel are Scot's pine approximately 49 percent, beech, sweet chestnut, cherry and hazel, and areas defined as commercial conifer could contain birch.

The management structure of the Newborough site should be re-examined due to its European and international importance. This is an opportunity for an exciting major change for the area. Newborough is unique and needs its own unique management response, this is an opportunity to change our ways and trial a local approach rather than following the generic United Kingdom model of managing forestry estates.

Suggestions which will be considered in the development of the new People Plan

I would like to see much more consideration given to the historical dune environment and the organisms which live there and to the geological and archaeological features. So much more could be made of these and developed as important educational resources and visitor attractions.

I would also like to see some measures put in place to further protect wildlife from human and canine activity. Surely, protecting the biodiversity of the area should also have some mention of the coastal and marine habitats which are so intrinsically linked to Newborough? What about areas where dogs are not allowed at certain times of the year to protect ground nesting birds? And areas where dogs must be kept on a lead so they can't chase gulls and waders?

The continued location of all the recreation facilities at the main beach car park is high risk. Given the experience of the huge shoreline movement and loss of facilities at this point in 2013-14 it should be a high priority to relocate this to a more secure and sustainable location. This subject is not even broached in the plan; an opportunity lost to explain the pressing need to respond constructively to coastal change.

I didn't notice anything about traffic management planning - in the forest or accessing it.

Concern over the number of dog walkers not heeding the signs re which section of beach & when, leads etc (larger clearer signage required as it's not obvious what the rules are - even locals have differing opinions)

Concern over the number of visitors & mixed sports - swimming, kayaking, paddle boards, kit surfing etc (clearer direction as to safe areas so that mixed sports can take place but not all in the same space which is dangerous)

Access to the beach needs improving - after helping recently with an accident recently the access is extremely difficult in emergencies, plus is not accessible for wheel chair users . Also multiple entry points over used are causing erosion. (If there were proper entry points with better groundwork and gates to stop general cars accessing the beach - this would allow for emergency access and help with erosion)

I really feel you should continue the road to make a circular route coming out opposite Llyn parc mawr. Other carparks along the way could be made, or just for disabled.

I would also make a big park and ride area in some farm fields a distance away, then a continual shuttle to the beach by mini bus, or tractor and trailer, or by mini train, or pushing the boat out, build a cable car system from the field car park , over the trees at the edge of the village down to the beach. This reduces the pollution of the village and forest road, gives great views over Snowdonia and can run continually with beach equipment. This then releases the forest tracks for walkers and cyclists .

Please, please can we have some support for disabled people. There is nowhere to even view the beach now the platform is covered in sand. And wheelchairs don't work on soft sand or gravelly paths.....on the continent there are boardwalks. I've never been to Llanddwyn as I can't walk there, but live with it in my back garden! Some sort of warden landrover service for those who can't walk?

You should be having a fantastic bike'n'walking hire/ sales hub to promote healthy use of your site leading on to the rest of Anglesey.

It would be good to see a nice permanent cafe, bike hire and water sport hire facility down at car park. The commercial aspect of the plan not very developed or transparent.

Free access to the car park for local residents is definitely something that should continue. It is a valuable local resource.

Traffic issue into and out of the forest needs addressing to come up with a long term sustainable solution. The impact on Newborough village at peak times is an issue and the system of queueing to Pay on Exit does have a negative impact on visitor experience.

Keep tourist provision to the minimum.

Track exiting the forest at the barrier can often back up in busy times - this could be helped by reminding drivers to have their payment methods ready by placing a sign that is visible while they queue to exit.

It would be useful if events could be advertised more clearly and in advance - often the dates/times are not obvious when you are driving past and the signage only goes up when the event is actually on - maybe this could be put on the roundabout at the booth/entrance of the forest.

Free access to the car park for local residents is definitely something that should continue. It is a valuable local resource.

I didn't notice anything about traffic management planning, in the forest or accessing it

Include education.

Include more signage about trees - species, uses, benefits, etc

Work with the council to improve footpath access / safe traffic free access from the village into the forest - particularly for less able people or people with buggies etc.

There's a great deal of potential to use the forest for visitors by building camping and lodge sites (sensitively) and other facilities, improving car parking as there are summer days when the car parks are full and the traffic is backed up to Newborough.

It is an extremely popular site, attracting around 400,000 a year, where the quality of the natural environment contributes significantly to the well-being of local communities, as well as the enjoyment of visitors. It will be necessary to ensure sustainable management of the site now, and for future generations. From Anglesey County Council's (ACC) point of view, we are keen to ensure that the popularity of the site, and any future changes, have a positive benefit on neighbouring communities and the surrounding area (minimizing any negative effects at the same time) .

We emphasize the need for the Plan to recognize and build on the site's popularity. It is therefore essential to ensure that recreational and commercial events do not have a negative impact on traffic and the highways.

There should be a reference to Llanddwyn in the Plan. Many visitors use the forest as a gateway to Llanddwyn Island and the Beach. The asset needs to be considered in its entirety. The two locations go hand in hand.

The Plan will need to consider long-term solutions to traffic problems. Especially during the summer season when the supply of parking spaces does not meet the demand. This may include the

introduction of park and ride systems. There are lessons to be learned from locations in Snowdonia. We recognize and support the fact that NRW has put a short term plan in place (traffic management for the Square at Newborough at busy times). We emphasize the need for long, medium and short term planning in order to deal with the current and potential increase through these plans, in traffic volumes in this area.

ACC has an electric vehicle charging points scheme for the Island. The opportunity to discuss further with NRW the opportunities to consider electric car charging provision is appreciated.

Very supportive of the emphasis on the need to improve active travel links. ACC supports the Glasffordd Môn scheme, which is a traffic-free route that will connect the Newborough forestry area with Lôn Las Cefni and enable active travel users of all ages and abilities to walk and cycle to the nature reserve. The route will provide for residents' daily journeys and showcase Anglesey's unique landscape to visitors, thus distributing the benefits of tourism more evenly across the island. The route will contribute to creating a corridor of green and blue infrastructure that can increase biodiversity by creating, connecting and extending habitats to enable wildlife to move around.

ACC is considering options to develop an active travel route from the Marquis Bridge, Malltraeth to the village of Newborough, including Newborough Forest. This plan will contribute to the Glasffordd Môn vision, and will improve active travel links with the locations in question as part of this plan to manage the Newborough Forest.

It should be ensured that the plan does not have a negative impact on the coastal path.

The Plan will need to consider sustainable management of the land and water to support and improve community well-being

There is an opportunity through the Plans to promote South West Anglesey as a unique and popular place to strengthen the tourist economy, as well as providing opportunities for residents and visitors to take part in leisure activities.

There is also an opportunity through the plan to improve understanding about the natural environment of the Island (including Anglesey AONB and other designated sites).

It will be necessary to ensure closer collaboration between the new plan and the statutory AONB Management Plan for the Anglesey AONB [2022-27].

ACC has land near Lôn Llanddwyn which is located close to the centre of Newborough (where the old public toilets are). The opportunity to work together in order to acquire a community asset is welcomed, eg a cafe / EV parking / toilets / information point etc.

It will be necessary to work together and give consideration to how to encourage fewer vehicles to park and travel through the village of Newborough, in order to alleviate the effects of traffic on the community. Newborough Square can be problematic. We recommend that options are developed to explore different access routes, access and exit routes as well as different parking options.

The opportunity to discuss options regarding alternative travel schemes, including active travel, is welcomed.

The car park at Newborough beach is not sufficient at the moment to cope with all the visitors, so there is a need to consider the implications of this plan on a further increase in visitors.

NRW is asked to consider the implications of Climate Change on Newborough beach Car Park. It is in a vulnerable location and could be lost as a result of the effects of climate change.

It is important to ensure that maintenance and commercial forestry services continue to use the Malltraeth road and do not use the Newborough road to gain access to the forest.

ACC is responsible for managing the parking along the highway in this area (along the A4080). This area received the second highest number of parking fines during 21/22, a total of 35.

Little contextual information is given about the objectives so it will be difficult to monitor the success of the plan eg One objective is to allow natural processes to become more evident - what would be the likely effects of no or little intervention? What is the likely rotation period for the conifers and the likely impact of ongoing Low Impact Silvicultural Systems? We need more detail about the natural processes and should they be allowed to become more prominent? In addition there are no clear targets for the forest operations to support the objectives.

I would suggest that the Plan needs to refer to how it provides connectivity with nearby habitats [land bordering the NRW estate]

The conflict between woodland and shifting sand dunes needs better explanation.

Essential to the success of the new Plan, there will be a need for more collaboration and partnership work between stakeholders and partners.

The Scheme should work alongside GeoMôn (UNESCO Global Geopark) in relation to geological SSSI/RIGS site(s) to ensure appropriate management of the geological asset.

The Plan will need to consider the impact of the use of the forest roads on habitats and species.

A second access to the car park is necessary. So far there has been no need perhaps, but there could be an emergency at any time for a Fire Brigade to have access to parts of the forest and their path be blocked by other vehicles on the single-track road way. The same applies to other emergency vehicles e.g. ambulances needing access to sea accidents or people on the beach taken ill. I'm surprised this safety aspect hasn't been addressed before as I see it as essential.

The forest is very popular with visitors. Between Newborough Village and the Cob – main road A4080, the footpath needs to be made continuous for walkers to access the various points of entry safely. The road is straight and vehicles race along it, so either a speed limit or safe track on the very adequate verge should be considered a priority.

Maintain access to the residents car park via the residents track. Maintain existing access for local fishermen from the residents car park down the short track to the beach for launching small fishing boats. This short track is often covered with windblown sand, it is important that it is kept clear for local fishermen and the coastguard alike. An important safety element for the coastguard being able to attend beach emergencies quickly.

Visitor numbers and site capacity.

Newborough forest and warren include some very delicate ecosystems. These ecosystems are susceptible to too much human disturbance. Excessive visitor numbers cause a decline in the quality of these ecosystems. The site is currently at maximum visitor carrying capacity. Care must be taken

to prevent further excessive increase in visitor numbers. This can easily be achieved by **NOT** building any more car parks and **NOT** increasing the size of existing car parks. Car park capacity = visitor capacity. I think it is very important that NRW does not act as a tourist promoting organization, as it would be contradictory to preserving the precious natural resources of Newborough. Newborough doesn't need more tourists, the site is already at capacity. I find it questionable as to why some elements of NRW support the proposed Green Spine project, which quotes trying to attract 400,000 MORE VISITORS to the site!! This would be catastrophic for the wildlife of Newborough, not to mention exacerbating the traffic congestion problems and disturbance to the community. Please, NRW leave the tourism to the tourist board and concentrate on preserving Newborough Forest and warren. During holidays, weekends and peak times Newborough village suffers from visitor traffic congestion. Through various focus groups over the years the community have worked with NRW to try and manage this problem. The current system that has been adopted to address this problem is working well. Namely, when the beach car park is full an electronic sign on the Newborough roundabout advises vehicles that 'Beach car park full'. Traffic can then disappear to another area without causing gridlock in the village centre. Please keep up this good work NRW, Newborough residents appreciate it.

Suggestions to remove more trees and create more open habitat.

As mentioned above the plan proposes to expand open habitats along the shoreline and within the forest by approximately 40 Hectares over the next 30 years and semi open habitats by 20 hectares reducing the overall closed canopy forest cover down from 670 to 610 hectares. Some of the new open areas will also contribute to improvements in the condition of Shore Dock habitat and dune slack vegetation. The other big change to the forest is the major reduction of conifers and increase in Native Dune Woodland over the next 30 years. Conifers will reduce by approximately 170 Ha from 550 Ha (82% of the forest area) to around 380Ha (62% of the forest area). Native Dune Woodland will increase by approximately 105 Ha from 125 Ha to 230 Ha (38% of the forest area). The changes to Dune woodland will help to buffer interest features and improve hydrology adjacent to the Warren.

It is certainly necessary to cut all the trees on and around Creigiau Mawr, Cerrig Duon and also to completely clear Cerrig Gwladys so that everyone can see and appreciate the Geology.

There is a wide area of dead trees along the front of the woodland which is messy and this is to be left for a long period under the plan. This is contrary to the objectives of the AONB in terms of landscape.

More open areas within and on the edges of the forest.

Fewer woodlands, especially alien woodlands.

The copses are not a feature of the conservation area, *Rumex rupestris* is not a dock leaf that likes to be suffocated by conifers. The leeches aren't overly fond of shadows either. As far as I know they only exist in one pool. Once again – the conifers should be removed.

In the unique case of Newborough, appoint site managers who have expertise and a deep understanding of managing such vulnerable habitats. This is an opportunity for NRW to restore the horrific damage that was done when these deadly woodlands were planted in the first place.

As a matter of urgency, put plans and work schemes in place to remove trees across the edges / boundary of the current woodland in order to protect and restore valuable and rare habitats. Cut and clear enough [of the wood] as the specialists suggest, which would be beneficial to maintain the rare and characteristic wildlife. The dunes need to be given the freedom to spread naturally once again.

Look at the options available throughout Anglesey (green corridors) to create a series of woodlands on farmland. Woodlands can be created anywhere but you cannot create sand dunes. Dune wildlife is very specialized and their ability to spread would be impossible if you were to implement such a proposed plan.

Other General Suggestions

Most of these suggestions are general in nature around biodiversity or relate to general management practice not usually covered in a Forest Resource Plan. Others relate to processes and have been noted for future improvements.

Make an arboretum.

Don't obsess about "native" species.

Squirrels love spruce cones too (don't think they were mentioned - but where there are spruces in the forest, there are always squirrels).

Ditch the Geo-trail tree felling.

Get the Hydrological data that we are all promised would be available years ago. Managed from an informed position.

Be more specific about the shorter to medium term plans - what is happening over the next 5 years.

Publicise any surveys carried out by flora and fauna experts. I would hope that the impact on all wildlife (not just the bigger mammals and invertebrates) has been taken into consideration.

Plans should be specific not vague.

RECORDS need to be kept of squirrel numbers, and there should be defined population distribution and patterns of abundance reflecting the changes in habitat forecasted.

Be absolutely clear about NRW's objectives for Newborough and do not mislead with your objectives and priorities.

Give more consideration to what the area was like before the plantation appeared. Teaching about the language, heritage, land management practices and our close communities.

Giving more attention and priority to interpreting the incredible geology found here.

Give up your continued policy of ignoring the nature needs of this unique site and damaging the dune and all its rare and priceless species.

The plan will need to take advantage of opportunities to realize environmental improvements and benefits, as well as social, economic and cultural improvements and benefits.

It is suggested that the plan should be better aligned with the well-being goals of the Well-being of Future Generations [Wales] Act 2015 and the principles of long-term sustainable development, prevention, integration, collaboration and participation.

'Manage areas around the UNESCO Pre-Cambrian rock ridge geo-park, an SSSI feature and a regionally important geological site. Expose and make accessible key geological features for research study and educational use along a newly proposed geological trail.' - A good objective but it is hard to judge from the maps how much of the ridge will be made accessible. In creating any new trail care must be taken not to damage or disturb rare species, designated or not.

'Manage Invasive Non-Native species (INNS) such as Cotoneaster, Montbretia and Black cherry.' - A poorly worded objective, since manage can mean both enhancement or removal. I trust that the intention would be to remove these INNS, preferably before they reach seeding size. Any such species that seed from the forest onto the open sand dunes should also be controlled.

'Continue to provide access to a unique sporting event venue and film location' - It would be prudent to add a condition to this," so far as is compatible with conservation, recreation and other objectives."

'Improve the visual and sensory and landscape habitat value of the forest by increasing natives and diversifying the woodland.' - Care must be taken when introducing new species not to introduce any additional invasive species which may lead to management problems of the future.

Other General Comments

These are general comments that have been noted for future improvements for engagement and consultation purposes.

I think that we should think to the future and develop the eco system that we have to accommodate the warren and the woods. It should also accommodate humans and other animals as we are all part of the environment.

Hope that if a small number of loud, angry voices are very against this plan, and simply want the forest to stay as it is, that they won't be allowed to have disproportionate power and stall it. This seems to be what happened to proposals in past years.

Please keep the village included in your plans...people want to help. We love this place.

During recent tree felling, the over-use of heavy plant destroyed some of the tracks used by family for cycling and walking. It is now unsafe in some areas for young children to ride bikes. The collateral damage from tree-felling made it look like a bomb had gone off in the forest.

The main medicinal leech habitat has been almost completely destroyed. The reed cover around the edges of the pond were removed, exposing the leeches to predation and the impact of sunlight. The removal of the topsoil has left that area looking like a desert. The leech pond is now almost empty; their habitat has been damaged.

I think as the forest belongs to Newborough that we should benefit from the sale or felling of any timber as winter fuel for people in the community or profits from selling timber could be donated to local community providing funds for projects like refurbishment of the Pritchard Jones Institute or to contribute towards other local projects like undergrounding of electrical and telecoms cables.

Create strategic local groups and create a separate "complaints" platform.

There was no purpose in coming to your meetings unfortunately because it was only minor complaints that were voiced - although it is fair enough that people have a platform to do this. But a strategic group should be established that includes the voice of Môn's Welsh speakers and the indigenous local people who have lived in the area for centuries. There is too much "listening" and bowing down to incomers. You should rather listen to the voice of those who have a real long-term strategic interest in the site.

Extremely pleased that a consultation with the indigenous community is taking place and that there is finally an opportunity to express an opinion.

Good work has been carried out in Newborough over the past few years which is of benefit to wildlife. I would like to praise you for this work.

Maps 1 and 3 appear to show +/-the same information, with slightly different keys. It would have been more helpful to have additional information such as location of recreational facilities and conservation works.

The explanation of the map keys would have been more helpful had the hatching matched on both documents. The key to Map 1 refers to dormice, bats, wood ants, marsh / willow tit, wood warbler none of which are designated species on this site, in addition to wet and dry coastal dune woodland.

I presume that the keys on all forest plans are the same: it would be far more helpful if they were site specific.

Llyn Parc Mawr Community Woodland - Over the past 7years I have enjoyed being part of the group, working collaboratively with NRW and achieving several successful projects with the help of National lottery funding etc.... we now have:

Outdoor classroom - constructed from local timber (some of which was growing within 20 meters of the building).

Lakeside birdhide with sedum roof.

Circular path around the lake - constructed by working collaboratively with NRW.

Drainage improvements to the site.

We have valuable quarterly meetings with NRW to communicate projects and progress, although these did diminish a bit during Covid. Our ethos at LPMCWG includes championing biodiversity, conservation, education, community engagement, volunteering, fungus forays etc.

It was really encouraging to see the stakeholder engagement detail posted recently. During the online engagement sessions, this type of consultation was discussed at length and it is a welcome step in ensuring clear understandings and good relations.

Does this deserve to be a bullet point? In relation to - Continue to provide access to a unique sporting event venue and film location.