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To: The Forest Resource Planning Team.

9th June 2019

The Cambrian Mountains Society welcomes this opportunity to comment on **the Cwm Ionion and Upper Rheidol Forest Resource Plan**. As the Society's Acting Chairman I visited the open day at Syr John Rhys Primary School, Ponterwyd on Thursday 30th May and had a wide ranging discussion of the Plan with members of the planning team. On behalf of the Society's trustees and membership I would now like to make the following observations, but firstly brief details of the Cambrian Mountains Society (CMS):

CMS was formed in 2005 with the following objects:

- a) *To promote, for the benefit of local communities, and of the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest, and cultural heritage of the Cambrian Mountains.*
- b) *To advance the education of the public in the landscape, natural beauty, biodiversity, archaeology, scientific nature, cultural heritage and geodiversity of the Cambrian Mountains.*

CMS is a registered charity and at present has a membership of around 300. At the heart of the Society's work is that the glorious landscape of Cambrian Mountains might be better protected probably by joining the Welsh family of Protected Landscapes. This could be either as Wales' fourth National Park (NP) or fifth (sixth, including the Wye Valley joint Welsh/English designation) Area of Outstanding Natural Beauty (AONB).

- CMS see the majority of the project's objectives as positive. The objectives certainly give the impression that the blanket-planting of vast swathes of monoculture conifers just may be a thing of the past. If the new objectives are followed then, optimistically, we will see a more species-rich (including a large element of native broad leaf trees), landscape friendly, life enhancing, yet productive woodland across this section of the Cambrian Mountains. CMS considers that in these objectives NRW is taking on board a more holistic form of woodland management, delivering a diverse range of ecosystem services ranging from; timber production, through fresh water provision, to improving the visual and sensory landscape habitat value of the forest. CMS suggests that this model should form the basis of future woodland management across all of WG's woodland estate.
- **But** on a more cautious note the Society now moves on to considering the maps linked to the plan, and most notably, the Long Term Primary Objectives Map. CMS sees a mismatch between many of the project's 29 written objectives and this map, with its emphasis on "standard forest management"(shaded green on the map). Surely even if small coupe harvesting and/or continuous canopy cover techniques are used in these "green" areas this

could hardly be described as following the ecosystem approach to forest management? It is, in effect, old school forestry behind a veneer of more ecologically sensitive woodland. In the Society's opinion much more land within Cwm Einion & Upper Rheidol woodlands needs to be dedicated to;

- Native Woodland Management,
- Successional Woodland,
- Open Habitat Management,
- Recreational Sites (none of which the Society can see on the map!)

Surely as NRW follow their felling plan, as seen in the 10 year harvesting activities map for the estate, more land can be assigned to management methods listed above? Only then, in CMS's opinion, might the projects objectives be more fully met.

- Finally, CMS are very aware that both Scottish & Southern Energy(SSE) and Vattenfall have decided against progressing wind farm development in the Nant y Moch area [SSA area D]) which overlaps with Cwm Einion and Upper Rheidol woodlands. In the Society's opinion objective 29 ("Continue to explore the potential for wind energy projects.....") of the Plan should be dropped and, indeed, that NRW should be using their influence to persuade WG to revoke SSA area D from TAN 8. Two large energy companies, and the many people opposed to the industrialisation of this outstanding landscape, should be listened to!

Yours



Mr. Peter Foulkes, on behalf of the Trustees of the Cambrian Mountains Society.

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