



Nant Mithil Energy Park, Powys.
PEDW DNS Application Ref: DNS CAS-01907-D7Q6Z1.

CPRW-RE-think Chapter 15 on

Forestry

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Evidence by CPRW-RE-think on:

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This chapter sets out Planning Policy Wales (PPW) policy and summarises what is proposed followed by our objections to **Appendix 2.5** as an acceptable account of forestry plans for EIA purposes.

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Table of Contents

1. Introduction: Planning Policy Wales Policy	3
2. The Proposal	3
3. Our Objections.....	4
4. Conclusions.....	6

1. INTRODUCTION: PLANNING POLICY WALES POLICY

- 1.1. The undated **Appendix 2.5** identifies areas of forest to be permanently or temporarily removed together with proposed tree felling and replanting proposals with subsequent aftercare. It undertakes to identify areas permanently lost to forest cover, areas to be felled and replanted on site and demonstrate how the development fits within the future forest structure. It therefore covers construction and operation.
- 1.2. PPW 6. Outlines a stepwise approach to applying the DECCA framework.
- 1.3. PPW 6.4.42 addresses forestry loss to development. *Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Where a woodland or a shelterbelt area is lost as part of a proposed scheme, the compensation planting must be at a scale, design and species mix reflective of that area lost. In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers. The planting position for each replacement tree shall be fit to support its establishment and health and ensure its unconstrained longterm growth to optimise the environmental and ecological benefits it affords.*

2. THE PROPOSAL

- 2.1. Four forestry areas are described: total area **124.66 ha**. In order of size they are:
 - **119.35 ha** in total, comprising 16.93 open ground and 3.43 broadleaf, (leaving 99.08Ha conifers — our estimate) thinned in recent years. This is Esgairnantau Forest, privately owned coniferous plantation on a hill ridge rising up to 545 m above sea level (NGR 317884 261924) with indicative felling dates between 2031 and 2039;
 - **3.37 ha**. standing timber, contiguous with the larger coniferous shelterbelt to the south-east of Summerhill Brook;
 - **1.01 ha** coniferous shelterbelt, “recently felled” “near Fronddyrys, NGR 316316 259979;
 - **0.93 ha** mixed, mainly conifer woodland at NGR 317432 266799.

Of these:

- **52.60 ha** to be felled “*largely due to the need to fell to wind firm boundaries within the mid rotation conifer plantation*” but also including area 3, **1.01ha** “*for the substation*”;
- **42.11 ha** replanting in situ within Esgairnantau Forest;
- **10.49 ha** compensatory planting equating with stocked woodland area in the Forestry Study Area.

1.32 says the total area of permanent felling is the area taken forward requiring compensatory planting. This management and planting of the area taken forward is described:

- 5% native broadleaves or shrubs;
- 10% of other tree species;
- 10% open ground managed for biodiversity as a primary objective;
- Not more than 65% single species;
- Restocking 2-4y after felling.

App. 10.1 Table lists 938HGV journeys (inbound + outbound) over months 4 and 5 of construction. This is for export of 11,721 tonnes of timber (25 tonnes /export load).

3. OUR OBJECTIONS

- 3.1. Figures 2.5 a , b, and c, essential for an understanding of the entire App. 2.5 forestry plans are missing.
- 3.2. We are therefore unable to identify the four areas described for the plan and their relation to habitat assessments and infrastructure layout, including set-back for bat foraging and safety during construction and operation.
- 3.3. The boundary of the 'privately owned conifer plantation', Esgairnantau Forest, is not identified and there is no information about agreements or discussions with the unnamed owner about forestry operations during construction and operation or between March 2023 and commencement of construction. Therefore there is no security about the forestry operations.
- 3.4. The Environmental Statement (ES) should have confirmed that the baseline conditions, including any changes as a result of storm damage or forestry operations, still applied after the PAC and shortly before the submission of the application in December 2024. For instance, what has happened to (2) the recently felled shelterbelt? We do not know whether App. 2.5 relates to the final layout iteration submitted to PEDW.
- 3.5. Felling is "largely to fell to wind farm boundaries". The other needs for felling outside Esgairnantau Forest should be mapped.
- 3.6. There is no information about which areas will receive what replanting/management mix. It is impossible to match the green colours in the accompanying Drawing 1. to either the Drawing Key (where both grassland and broadleaf are very similar greens) or the text in App. 5.2. This is inappropriate compensatory planting – PPW 6.4.42 requires like for like, ie, broadleaf or conifer forestry. 5% of 10.49ha does not amount to 10.67ha and therefore the compensatory planting of broadleaf needs to be properly and transparently addressed and cross-referenced in both Appendices.

Figure 1: App. 7.10, Table 2, broadleaf planting of 10.67 ha description			
Broadleaf Planting (compensation)	10.67 ha	<ul style="list-style-type: none"> ➤ Other coniferous woodland; and ➤ Bracken 	<ul style="list-style-type: none"> ➤ Replacement of coniferous plantation to be felled, with broadleaf native species suitable for the local area including birch, willow, ash, oak and alder. ➤ Scattered native broadleaf planting within stands of bracken to improve fridd habitat suitability and structural diversity with species including birch, rowan, hawthorn and willow.

- 3.7. There is no description of how the infrastructure layout footprint, micro-sighting and buffer area requirements are calculated to arrive at possible replanting of 42.11 ha of Esgairnantau Forest.
- 3.8. The Substation is on grassland according to ES Vol 02 - Fig 07.01a to 07.04. We do not understand its relevance.
- 3.9. Nearly half the total forestry is to be felled. How much timber will this produce. How will it be exported. There are no estimates of timing or quantity to justify the timber export figures in App. 10.1. Restocking within 2-4 years of felling means forestry works will have a cumulative impact with other construction.
- 3.10. Temporary felling will leave large areas with changed habitat. There is no discussion of the environmental impact of felling mid-rotation instead of at estimated maturity. The premature felling of trees of this age will result in a significant loss of their future carbon uptake and the resultant product is likely to have little long term embedded value. Replanting will involve mechanical ground preparation disturbing the forest floor and habitat at a critical time and will take 15-20 years to reach any significant carbon absorption.
- 3.11. There will be logging noise and general construction noise will be amplified by the loss of dampening by trees
- 3.12. The forest is close to the Warren farm and camp-pod site (RVVA P148) and Water Breaks its Neck visitor attraction. The noise and disturbance impacts of forestry works and deforestation over many years has not been considered in the ES.
- 3.13. There is apparently no guarantee that the forestry work would be considered part of “project construction” and would have to await discharge of all conditioned pre-construction plans. This detracts further from the safeguarding of the environment.

4. CONCLUSIONS

- 4.1. App. 5.2 is rendered unfit for purpose by the omission of the essential Figures. Forestry is important for LIVA, Transport, Ecology - including Net Biodiversity Benefit and Protected Species, Noise and Carbon Calculation. There is no information elsewhere in the **ES** to compensate for the error of omission. Provision of the Figures will not provide answers to all our objections and therefore, if the examination is to continue, a new, dated, Forestry Appendix, cross referenced within the ES should be provided.

For CPRW-RE-think
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