



Company number: 04918475

Registered address: Ynys Uchaf, Mynydd Llandygai, Bangor, Gwynedd  
LL57 4BZ

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# Response to consultation on Parc y Bwlch Forest Resources Plan

Coetir Mynydd (CM) is a Company Limited by Guarantee with Charitable Objects formed in 2003 by residents of Mynydd Llandygai to own and manage Parc yr Ocar on behalf of the local community. One of the three objects of CM is “*promoting the enhancement, management and safety of woodland and common land in Mynydd Llandygai*”. Under this object CM has sought to promote local interests in the management plan for Parc y Bwlch since 2003 as summarised in Annex 1. There was some good progress with community consultation on plans for the forest when we were invited by Forestry Commission Wales (FCW) in 2009 to be a Pathfinder Project along with seven other communities in a programme intended “*to examine the process involved in taking a community group to a higher level of woodland management decision making, measure some of the outputs and resources required and put in place guidelines for FCW staff who work closely with communities*”. Under the Pathfinder FCW provided support and match funding for youth-led community consultations in the three closest villages of Mynydd Llandygai, Rhiwlas and Tregarth. The reports prepared by the three Youth Clubs are available to download from the CM website [https://coetirmynydd.co.uk/?page\\_id=318](https://coetirmynydd.co.uk/?page_id=318) and remain relevant to the current consultation. The Forest Design Plan (FDP) lapsed in 2015 and, despite the Pathfinder and some progress on a draft FDP in 2016, a new plan was never completed. Now in 2021, we are presented with the draft of a Resources plan (replacement for Design plans).

## The 2021 consultation

The material provided for consultation is very sparse when compared with expectations for management plan documentation contained in the UKWAS standard for certified forests. No explanation is given for what appears to be non-compliance with UKWAS standard 2.2, which should include documentation of 14 issues, while the material presented for consultation barely covers three of these, mostly as maps with very little supporting evidence or justification. These omissions greatly limit the transparency of decision-making and restrict the scope of consultation.

Transparency requires acknowledgement of previous engagement, presentation of evidence and rationale for decisions as well as clearly laid out, fair and equitable processes through which community views can be collated and influence decisions. All of this is missing from the current consultation.

CM has always expressed a preference for co-production of the forest plans with our role being an intermediary between the people in the community and forest managers. It is gratifying to note that

co-production is now more mainstream in Welsh Government policy than it was in 2004. Indeed, co-production is explicit in the NW Wales Area statement<sup>1</sup>; but it is not much in evidence here. However, this need not be the end of the consultation and maybe there is scope for continued consultation, perhaps with the involvement of the Area team? The Area team inputs should help widen the consultation to collaboration with neighbouring landowners and woodlands as suggested in UKWAS<sup>2</sup> especially where this could increase joint funding of increased public benefits as envisaged in Woodland for Wales strategy<sup>3</sup>.

The three maps on which consultation is invited are very similar in scope to those provided in the old FDP – except they have significantly less detail. The reason given for this is that broader prescriptions allow more room for decisions to be made at a more intimate scale and presumably at the discretion of the place-based staff. However, it is not clear whether the species and silvicultural choices for re-stock which have yet to be made will be open for community consultation and if so whether ideas should be presented now or when these decisions are made. The FDPs contained at least a re-stock plan which indicated species choice and the 3-D visualisations at least gave an indication of what to expect the future forest to look like. Consultation on the FDPs therefore provided an opportunity for comment on more aspects of the plan than the FRP provides.

As shown in the community consultations, recreation and biodiversity are of great interest to local people. CM is disappointed to see very little information on these issues in the FRP or included in the consultation. In conversation with NRW staff there are references to a ‘recreation team’ but no indication of who they are or if they and their plans are accessible to the public. Likewise for biodiversity, there is no account of the biodiversity value of the woodland which contains species such as Nightjar, Red grouse and most recently Red squirrel.

## Objectives and opportunities

The issues pertinent to the setting of management objectives were formerly assessed as *sensitivity* of the forest with Parc y Bwlch assessed as having High sensitivity. Sensitivity was made up of scores for Landscape, Conservation and Public access (see Annex 2 for FDP table from 2005). The basis for setting objectives for the forest is no longer transparent and it is not clear what evidence or rationale lies behind the draft objectives presented for consultation.

Nevertheless, a list of specific objectives for Parc y Bwlch with some general provisions under various headings is provided in the draft FRP. A brief response to each of these is laid out in the table below.

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<sup>1</sup> North West Wales Area Statement – Ways of working “*To embed the principles of co-production*”  
<https://naturalresources.wales/about-us/area-statements/north-west-wales-area-statement/ways-of-working/?lang=en>

<sup>2</sup> UKWAS standard 2.3.2 c) *Where appropriate and possible, the owner/manager shall consider opportunities for co-operating with neighbours in landscape-scale conservation initiatives.*

<sup>3</sup> Woodland for Wales strategy 2018 - 4.1 More communities are involved with, and benefit from their local woodlands and trees. What we want to happen: “*Community groups, NRW and local authorities and private landowners are able to develop legal agreements, access funding and the support required to increase the variety, longevity and depth of community management agreements, woodland enterprise opportunities and to support community ownership of woodlands.*”

NRW draft	CM response
<b>Specific objectives for Parc y Bwlch</b>	
<p>Parc y Bwlch will continue to produce a sustainable supply of timber production through design of felling coupes and choice of restock species to allow productivity through continuous cover forestry (CCF) in future rotations.</p>	<p>Is it possible for community to make suggestions for restock species? CCF is good – but how does this relate to the Forest management systems map which only indicates clear-fell and unassigned management? The area previously indicated as “Low Impact Silvicultural System” (LISS) (which can include CCF) has gone. Is the whole area to be allocated to CCF? If you intend CCF it would be useful to describe silvicultural regime(s) to be used to establish a mixed age/size structure and whether this is to be an intimate mix of species or monocultural blocks etc.. This is especially the case for the large areas indicated for clear-fell in 2022-26 and the unassigned area planted in 2016 as these operations would fall within the 10 year timeframe of the FRP.</p>
<p>Due to similar aged components within Parc y Bwlch, much of the crop is now approaching biological maturity and areas of clear-fell are going to be needed to prevent extensive wind blow.</p>	<p>In the 2012 draft FDP roughly half the forest was allocated to Long term retention. There is some blow in this area but much has been down for some time without much progression. What does ForestGALES indicate for topographic scoring (DAMS) for Parc y Bwlch?</p> <p>Topography in much of the forest is complex and it may still be the case that there are pockets of shelter which could be used as a basis for smaller group felling to diversify age structure and provide continuity in tree cover.</p>
<p>A development of native woodland buffer along the upper side of Parc y Bwlch adjacent to Moel y Ci to minimise natural regeneration of Conifer seedlings that may affect features of the adjacent Eryri SAC.</p>	<p>This is largely unchanged from the 2012 plans though at that time the emphasis was on moorland edge species e.g. the small resident Red grouse population with a suggestion that volunteers could perhaps help clear conifer seeding from moorland.</p> <p>The forest/moorland edge is very visible and very exposed and the old blow along the edge has developed into decent scrub habitat. Maybe it would be worth just leaving the edge to degrade naturally to provide shelter to the forest downslope. This might allow for some retention as well as shelter for new crops.</p> <p>This is the only mention of biodiversity in the plan and seems a little brief and makes no mention of biodiversity <i>within</i> the forest. There is considerable interest in biodiversity within the local community and perhaps an opportunity to work together to record and monitor species within the forest and pro-actively manage where appropriate and perhaps to mitigate the impact of large clear-fells?</p>

<p>Opportunities will be taken to soften the coupe edges after felling operations by allowing, regeneration or if needed by enrichment, of broadleaf species for consideration of neighbouring properties.</p>	<p>It is difficult to determine what this means since it is not shown on the indicative forest type map. The 2012 plan did show conifer blocks separated by broadleaves – is this what is intended? or would it only be around the outside edges immediately adjacent to neighbouring properties?</p>
<p>Tree species that are currently susceptible to severe pathogen attack will need to be felled for the health of the forest and safety of its users. Larch will no longer be used as a component of the forest species.</p>	<p>This is unfortunate and outside anyone’s control. However, the speed at which this is taken down and by whom is contested – see next point.</p>
<p>The preferred timber sales option would be Direct production, this would allow local interests, the opportunity to purchase parcels of roadside timber.</p>	<p>This is something but still leaves smaller scale local buyers with infrequent opportunities to buy large volumes of timber. They are unable to fell the trees or have anything like a sustainable supply of wood.</p> <p>Have the local timber buyers been approached in the consultation as required by UKWAS? What did they have to say about preferred options for timber sales to support the local economy?</p> <p>CM understanding is that smaller volume, frequent standing sales would better meet their needs and incidentally would fit with retention and small group felling. Would something along these lines through eSales under the NRW Timber sales and marketing plan 2021-26 be feasible – perhaps as a pilot study?</p> <p>Note that CM does not itself wish to purchase timber nor engage in volunteer-based forest operations. Our hope is that community economic benefits will accrue from provision of work and timber to established local businesses through existing procurement at a scale and frequency to meet their needs. The health and sustainability of small local businesses are the foundations of the local community and economy.</p>
<p><b>General objectives</b></p>	
<p><b>Recreation</b> Maintain and consider additional recreational benefits and minimise where possible disruption to current recreational areas.</p>	<p>There is no indication of how this general objective relates to the draft FRP. Where are recreation plans held? Is the development and maintenance of public access open for consultation or not?</p> <p>As shown in the community consultations Parc y Bwlch is heavily used and highly valued by local residents particularly those residing in Mynydd Llandygai and Rhiwlas.</p> <p>There are issues around incompatibility of MTB downhill routes, horse riding and quiet enjoyment of the forest which are yet to be fully resolved.</p>

	<p>The Mynydd consultation introduced the idea of a circular walk through the forest and this was further discussed in 2012 and 2016. The idea had been floated of installing a suitable footpath as a joint project between NRW and community. This is still a possibility perhaps funded through the Community Woodlands capital grant as a contribution to the National Forest.</p>
<p><b>Culture and Heritage</b> Identify heritage and cultural features to avoid damage, particularly around identified hotspot areas.</p>	<p>Again, no GIS layer or detail is provided on this objective. There are a number of ruined buildings within Parc y Bwlch along with numerous stone wall old field boundaries within the forest as well as the external estate wall onto Moelyci mountain. Are these considered as heritage features? Will they be protected during felling?</p> <p>When and to whom can the community contribute their views on sites of special cultural or historical significance in the forest as suggested in UKWAS 2.3.1?</p>

There is a provision in UKWAS 2.3.2 for cooperation with neighbouring land owners on landscape-scale conservation initiatives. Is this the right consultation to discuss such proposals with NRW? Or is this more appropriate for the Area Statement? If so, how do the Area Statements relate to the FRPs?

One concept in early discussion is that we could integrate Parc y Bwlch and Braichmelyn into a Dyffryn Ogwen scale woodland network project. This could perhaps be a partnership project based around CM, Partneriaeth Ogwen and the Carneddau Partnership to consolidate and complete a woodland corridor between Braichmelyn and Parc y Bwlch taking in Welsh Government Forest Estate (WGFE), private, Gwynedd Council and third sector woodlands.

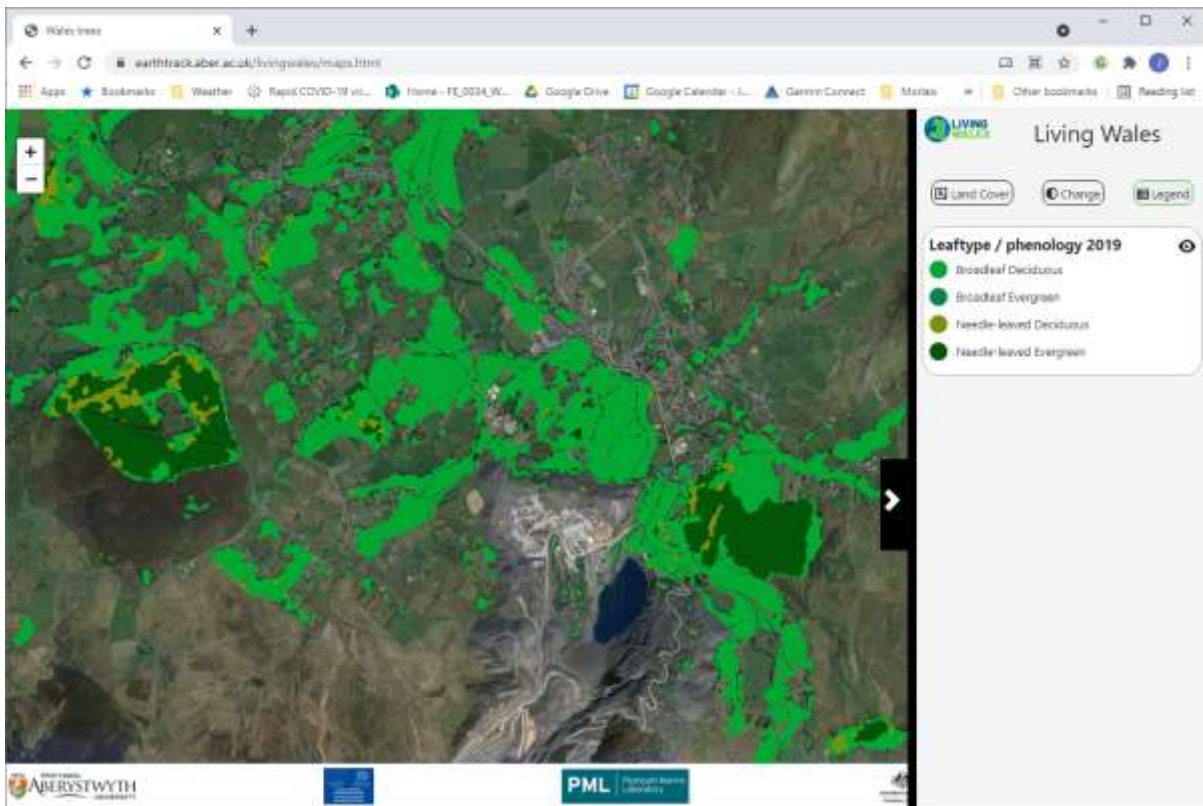
## Map 1 - Long term primary objectives

The key provided for the maps says that Map 1 “*provides enough information for the local forest planning team to develop forest establishment and Conservation and Heritage plans*”. It is these presumably more intimate plans which will be of most interest to the community and where consultation would be most relevant and useful. Are these plans part of the FRP? Have they already been prepared? Are they available for viewing, consultation or ideally co-production with the local community?

Map 1 includes data derived from the National Forest Inventory of mapped tree cover in woodlands greater than 2 ha. It is not clear what the inclusion of these data is for – is it context for discussions with neighbours on landscape scale projects? If so, it is a poor representation of the treescape in Dyffryn Ogwen as it excludes numerous small areas of new private tree planting schemes and areas of ancient woodland indicated on the base OS map but oddly not in the National Forest Inventory (NFI). The landscape scale approach to Sustainable Management of Natural Resources (SMNR) espoused in the Environment Act and embodied in the Area statement would perhaps be better informed by reference to tree cover mapping such as that derived from satellite imagery (e.g. the



Living Wales project at Aberystwyth University<sup>4</sup>) though even this doesn't show new plantings which are best taken from records of recipients of previous woodland grant schemes as collated by CM over the past 20 years as shown below.



Colours represent different woodland grant schemes e.g. WGS, BWW, Glastir over the past 20 years.

<sup>4</sup> <https://earthtrack.aber.ac.uk/livingwales/maps.html>

The long term primary objectives for Parc y Bwlch are expressed in terms of gross prescriptions and comprise Standard forest management (timber production takes priority) and Native woodland management (where biodiversity takes priority primarily by improving connectivity). The key provided for the maps refers to a “Map 4 to see 10 year management requirements to achieve these policy objectives”. However, no Map 4 is provided on the consultation portal.

The primary objectives for the forest are quite different from the 2012 draft FDPs which divided the forest into two putting landscape and conservation to the fore for the upper part of the forest and amenity/recreational use with LISS and long term retention in the lower part. All of the LISS and long term retention has gone. The LISS because it was larch which now needs to be felled because of disease but the long-term retention apparently because required thinning did not take place. Our experience has been that NRW have largely ignored forest plans and thinning and even final fellings have not taken place when prescribed. What assurances are there that these new plans will be implemented in a timely and sympathetic manner?



The former more explicit focus on outcomes or benefits seems more appropriate to aspirations of the SMNR and Well-being and Future Generation Act (WFGA) and we wonder why this has apparently been abandoned.

## Map 2 – Forest Management systems

It is difficult to follow why what appears to be assignment to clear fell coupes is a ‘forest management system’. Is it that clear fell is what is prescribed by the Standard forest management system indicated in Map 1? Allocating areas to a felling coupe is not really a “management system” – it is a felling plan. It would be reasonable to expect an UKWAS compliant management plan to contain at least some indication of the species and silvicultural regime to follow clearfell at least at the level of each sub-compartment or coupe.

The key indicates that areas marked as ‘unassigned management’ are those where the management system cannot be decided in the current FRP. Is this really the case for the area planted in 2007 – these trees require thinning to commence now and in ten years time they will be 24 years old and half way to maturity. When and by whom will the allocation to a specific silvicultural system? CCF is

mentioned in the objectives so should this not at least be indicated as LISS? Will this information be made public?

Where are the local thinning plans mentioned in the map key document described? What is the 'Coupe' layer mentioned in the key for LISS? Would these be the missing Map 4?

The plan indicates that over the next ten years we might expect the clear felling of the upper half the forest on two occasions maybe five years apart. This is not enough time for significant growth of re-stock and will in effect remove tree cover from either side of the main access and through route for a considerable period of time which will significantly degrade the amenity and recreational values of the forest. Is it not possible to spread felling over a longer period to maintain some continuity of tree cover?

### Map 3 - Indicative forest types

This is perhaps the most disappointing map – it is again a broad-brush classification with perfunctory boundaries with no indication of how these types will be achieved. When do the site assessments take place for planting and establishment? Will the community get sight of planting plans? Will there be opportunities for consultation on this – especially for species for local use e.g. western red cedar for cladding, Douglas fir for building, coppice sycamore for firewood etc.

### Other observations

A survey of firewood demand in the village under a Llais y Goedwig project in 2012 showed that 24% of houses use firewood for heating with an estimated annual demand of 1,434 cubic metres within the Mynydd Llandygai & Tregarth Ward. It was estimated that 60% of this firewood was purchased from local merchants. Might it be possible for fellings in Parc y Bwlch to flow into local firewood/biomass supply chains? Would it be possible for a section of the forest to be set aside for a silvicultural regime that could produce regular supplies of firewood for local markets e.g. coppice?

The Covid lockdown has increased use and appreciation of the value of local greenspace including Parc y Bwlch. Might it be possible to enhance the social and well-being services from the forest – perhaps through volunteer projects?

In 2010 the young people in Rhiwlas floated the idea of hosting a youth-led Welsh language music festival in the forest – which unfortunately didn't happen. But maybe the forest could be used for cultural activities to support the Welsh language in the future?

Although there are many specific suggestions made in this consultation response – it is more important that continuing engagement focuses first on the *process* of engagement to build trust, collate evidence, enable creative brainstorming and establish rules for decision-making (what is negotiable and what isn't). Consultation should have more depth than outline schematics for the forest design and aspire to visioning a resilient future forest able to support multiple benefits and shaped by sound silvicultural prescriptions. From these processes will arise the specific ideas and actions which can become a co-produced plan for the forest.

There is no indication of any communication over the process that follows this consultation. However, given earlier engagement with NRW, it is assumed that it should be possible to arrange for further consultation – moving towards more of a dialogue about what is possible. We would be happy to work with you and other stakeholders on further iteration of the FRP.



## Annex 1: Timeline of Coetir Mynydd engagement with FCW/NRW

Year	Engagement with FCW/NRW
2002	Proposal for partnership agreement for Bwlch Forest and Moelyci Forest Project This didn't come to anything, our understanding is this was because there was insufficient community consultation and support for plan.
2003	Participation in GLADE trial of management planning for Parc yr Ocar woodlands (property of Coetir Mynydd). Plan preparation commenced Sept 2003 and included three community meetings, open day on site and site visits by CCW Area officer and Woodland ecologist; Gwynedd footpaths officer and FC Woodland officer. Plan was approved at beginning of 2004 and implemented for 2004-2009.
	1 Oct 2003 Registration of Coetir Mynydd as Company Limited by Guarantee with Charitable Objects <i>Object ii) "promoting the enhancement, management and safety of woodland and common land in Mynydd Llandygai"</i>
2004	13-14 July 2004 FC yurt with design plan for consultation at Mynydd Open Day at village hall
	Bodfeurig school – Forest Education Initiative project to fell, plank and make table from tree in Parc y Bwlch
	Bangor University use Parc y Bwlch for Forestry BSc Final year management plan exercise
2005	March – Design plan approved
2006	Braichmelyn design plan complete and ready for consultation with expectation that there would be opportunity to make suggestions for species and design of restock of the central area due to be felled in early 2007. No further communication on this after change in Area Manager.
	Felling of central portion of Parc y Bwlch with no prior notice to CM or the community in general.
2007	Re-stock of felled area with monoculture of Sitka spruce with no consultation or notice. This was despite earlier assurances of consultation on species and involvement of Bodfeurig school in tree planting.
	Meeting with Area Manager concerning safety of informal downhill MTB trail.
2008	Youth Club undertake Parc y Bwlch consultation in Mynydd Llandygai with funding from Russell Commission.
2009	Jan – Consultation report completed and presented to community and FCW Area staff. Advised that consultation also needed for other neighbouring communities.
	Jan - CM and Parc y Bwlch recruited as one of six Pathfinder projects in which <i>"FCW would like to examine the process involved in taking a community group to a higher level of woodland management decision making, measure some of the outputs and resources required and put in place guidelines for FCW staff who work closely with communities"</i> .
	Nov - Area manager provides article for CM annual report <i>"we will be looking to start the review of the design plan in January next year and I look forward to meeting with you to discuss some of your ideas"</i> .
2010	Pathfinder project funds review of use of BWW for revising and preparing a community woodland management plan for Parc yr Ocar. New plan prepared for 2010-15.
	Pathfinder project match funds with GwirVol consultation by Youth Clubs in Tregarth and Rhiwlas.
	Forest design plan for Parc y Bwlch & Braichmelyn due for five year review
2011	May / June - Youth club consultations completed and presented at meetings in Tregarth and Rhiwlas to the communities and FCW.
	August - Better Woodlands for Wales grant scheme which funded the Pathfinder project closes. Assurances given by FCW that they remain committed to follow up consultations.

	Assessment of potential for Continuous cover forestry (CCF) in Parc y Bwlch prepared and presented to NRW by Phil Morgan of SelectFor.
2012	December - FCW hosted meeting in Mynydd village hall on draft Design plan. Presentation made by FCW indicates crops coming to economic felling age between 2012 and 2026. Forest divided into upper and lower areas. Lower area to be managed as LISS or long term retention with thinning as soon as possible. Detailed restock plan which set conifer blocks within a matrix of broadleaves. Meeting concluded with agreement more work on plan was required and further consultation was expected
2013	Natural Resources Wales replaces Forestry Commission Wales.
2014	
2015	March – end of ten year approval for 2005 design plan.
2016	June – Meeting with NRW at Gwydyr Uchaf regarding plans for Parc y Bwlch centred around WHAM felling for upper area with thinning/small group felling in remaining area under LISS as given in 2012 plan. Community Management Agreement could be considered for work in LISS area and to install circular footpath using external funding.
2017	
2018	CM revisited idea of community engagement with planning for Parc y Bwlch as is a good fit with Well-being and Future Generations Act.
2019	CM suggest Memorandum of Understanding regarding Parc y Bwlch (following example set by Llyn Parc Mawr).
2020	Cutting of road-side vegetation.
2021	January - NRW commenced revision of Resources plan May – public consultation commenced

## Annex 2: Excerpt from Coed y Mynydd Forest Design Plan Schedule dated 9 June 2005

Section name	Sensitivity				End of approval	Approval	Review year
	Overall	L	C	P			
Parc y Bwlch	H	3	1	1	May -04	Mar-05	2005/6
Braich Melyn	H	4	3	4	Jan -02	Mar-05	2005/6

No key given on table for L C P sensitivity figures – probably Landscape, Conservation and Public access with 1 as low and 4 as high ratings.