

From: [redacted]
Sent: 01 August 2025 15:46
To: [redacted]
Cc: [redacted]
Subject: RE: Rhos Farch site meeting, follow up

Hi [redacted],

Thanks for your email. Apologies I hadn't included the full email list into my response ive added now. Regarding the barriers work this is a bit difficult to give a timeline on. We are collecting stakeholder feedback with the intention to then carry out a prioritisation exercise to identify areas to work on which will have the greatest impact on tree planting. The timescales of work will very much be dependant on the areas identified, for example I expect "habitats" to be a common theme which would be high on the prioritisation list however this subject would take some time to work through because of the legislative framework. I'm happy for us to keep in touch as things progress but I wouldn't want your project to be held up waiting for potential changes to schemes which may not materialise in the near future.

Regards, [redacted]

From: [redacted]
Sent: 01 August 2025 15:14
To: [redacted]
Subject: RE: Rhos Farch site meeting, follow up

Hi [redacted],

Thank you for your feedback, your consideration of these points is very much appreciated. I'm going to circulate around my team and get back to you with any comments. In the meantime, please can you tell me what the expected timescale is for your Barrier Project? The timing of your project and the time it takes to implement any changes that are made to the WCGS as a result may have a bearing on our schedule for submitting planting plans, as (we're hoping) that a refreshed scheme might provide greater support for our woodland creation aspirations.

All the best,

[redacted]

Rheolwr Creu Coedwigoedd Glaw Celtaidd (Cymru)

Celtic Rainforest Creation Manager (Wales)

Ymddiriedolaethau Natur Cymru - Wildlife Trusts Wales

[redacted]

From: [redacted]

Sent: 01 August 2025 14:27

To: [redacted]

Subject: RE: Rhos Farch site meeting, follow up

Good afternoon [redacted],

So sorry it has taken a bit of time to get back to you in more detail on the points you have raised. I note [redacted] has already replied regarding the guidance docs. I've responded in blue to each of the additional points. More than happy to discuss further if required.

Thanks, [redacted]

- **The screening process acknowledges the overall ecosystem benefit of native permanent woodland as a Nature-Based Solution:** The wider benefits of habitat creation, carbon sequestration and ecosystem services of permanent native woodland creation proposals are acknowledged as part of the assessment process, and minor impacts on poor quality habitats are balanced by the wider overall benefits of a planting scheme relative to the status quo.

This is something which has been raised by others along with other potential barriers to tree planting in relation to environmental regulations. We are currently undertaking a piece of work looking at Barriers and expect habitats will be one of the key themes to consider in greater detail. I will add your feedback to the project so that it can be considered along side broader feedback on this issue.

- **Consultation responses from Heneb are regarded as advisory, rather than conclusive:** Where requests for geophysical survey for possible unknown historical features are upheld, there is an increase in the maximum level of grant aid for surveys. *At one of the programme sites, we have already experienced a change in approach in relation to Heneb advice during pre-app stage; this is reassuring.*

As above I will include comments in the Barriers project where similar comments have already been made. Levels of grants are also being considered here.

- **There is greater flexibility in relation to planting densities:** A 5m spacing option is available that aligns with WCC rules.

Rules have recently been changed to reduce the minimum block size from 0.1ha (10mx100m) to 0.01ha (10mx10m). this allows multiple planting options to be included within a field parcel giving flexibility to plant multiple different planting

densities. Whilst there is no specific option which offers 5m spacing many options allow clumped distribution with variable spacing to provide further flexibility.

- **There is greater flexibility in relation to fencing schemes:** The '10m rule' has been replaced with a flexible approach to fencing a planting scheme, enabling more practical fencing schemes.

Whilst the 10m rule exists there is already a process in place to allow derogations to this in specific circumstances where there are good environmental reasons, and each case will be considered independently. Applicants should raise this as a possibility at Pre App stage with it being requested by NRW via during verification.

- **There is greater flexibility in relation to time restrictions:** natural regeneration/colonisation is supported.

Natural regeneration/colonisation is not currently available but is being considered as an option for the future.

- **A greater tolerance for a reduction of stocking (as the 12-year grant period progresses):** There is an allowance for patchy losses, helping to create open ground within a woodland and allowing a more diverse structure to develop. Restocking is required for any losses above 20%, in line with Woodland Carbon Code rules.

Schemes currently require that there is 100% tree survival by the end of the Woodland creation Grant contract. Again this survival requirement has been raised in and will be considered under the barriers project.

From: [redacted]

Sent: 10 July 2025 15:55

To: [redacted]

Subject: RE: Rhos Farch site meeting, follow up

Excellent, I look forward to your response. If you need any clarification on these points in the meantime, please get back to me.

[redacted]

Rheolwr Creu Coedwigoedd Glaw Celtaidd (Cymru)

Celtic Rainforest Creation Manager (Wales)

Ymddiriedolaethau Natur Cymru - Wildlife Trusts Wales

[redacted]

From: [redacted]
Sent: 09 July 2025 08:42
To: [redacted]
Cc: [redacted]
Subject: RE: Rhos Farch site meeting, follow up

Dear [redacted],

Thank you for your email and thank you for the fantastic site visit to the Rhos Farch, it was great to hear about the exciting and ambitious plans for the site. We were pleased to see the positive cross-organisation conversations, and it's great to hear that the Wildlife Trusts felt their concerns regarding consent and support for woodland creation in Wales were acknowledged.

We appreciate the detailed bullet points you provided, highlighting the main issues faced when planning native woodland planting schemes. I have chatted with [redacted] and think there is merit in us coordinating a response between NRW and WG on the points you have raised, I will also capture your feedback within the barriers to woodland creation piece of work which I am currently undertaking. We will look to get back as soon as we can however there is significant work around SFS at the moment so it may take a little longer than normal.

Thank you once again for the productive meeting and for sharing your thoughts. We look forward to continuing this important dialogue.

Best regards,

[redacted]

From: [redacted]
Sent: 08 July 2025 12:15
To: [redacted]
Cc: [redacted]
Subject: Rhos Farch site meeting, follow up

Dear [redacted],

It was great to meet all of you yesterday. I was delighted that the cross-organisation conversations were positive; all of us at the Wildlife Trusts felt that the issues that we've been experiencing with getting consent and accessing support for woodland creation in Wales were being heard.

To follow on from the visit, I thought that it would be apt to send some bullet points in relation to the main issues we've been experiencing when planning native woodland planting schemes. To summarise, we'd like to have a woodland creation support system where:

- **The screening process acknowledges the overall ecosystem benefit of native permanent woodland as a Nature-Based Solution:** The wider benefits of habitat creation, carbon sequestration and ecosystem services of permanent native woodland creation proposals are acknowledged as part of the assessment process, and minor impacts on poor quality habitats are balanced by the wider overall benefits of a planting scheme relative to the status quo.
- **Consultation responses from Heneb are regarded as advisory, rather than conclusive:** Where requests for geophysical survey for possible unknown historical features are upheld, there is an increase in the maximum level of grant aid for surveys. *At one of the programme sites, we have already experienced a change in approach in relation to Heneb advice during pre-app stage; this is reassuring.*
- **The assessment process is transparent:** current versions of guidance docs, GN002 & GN009 are available online, and Woodland Planners notified when guidance is updated.
- **There is greater flexibility in relation to planting densities:** A 5m spacing option is available that aligns with WCC rules.
- **There is greater flexibility in relation to fencing schemes:** The '10m rule' has been replaced with a flexible approach to fencing a planting scheme, enabling more practical fencing schemes.
- **There is greater flexibility in relation to time restrictions:** natural regeneration/colonisation is supported.
- **A greater tolerance for a reduction of stocking (as the 12-year grant period progresses):** There is an allowance for patchy losses, helping to create open ground within a woodland and allowing a more diverse structure to develop. Restocking is required for any losses above 20%, in line with Woodland Carbon Code rules.

Please let me know if you would like any further information from our end, or to discuss any of these points further.

All the best,

[redacted]

Rheolwr Creu Coedwigoedd Glaw Celtaidd (Cymru)

Celtic Rainforest Creation Manager (Wales)

Ymddiriedolaethau Natur Cymru - Wildlife Trusts Wales

[redacted]

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein [hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. ----- On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

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From: [redacted]

Sent: 11 July 2025 16:04

To: [redacted]

Subject: FW: Rhos Farch site meeting, follow up

Good morning [redacted],

I thought it was worth giving a bit of feedback from our visit on Monday, [redacted] may have already done separately and have a different view. It was an impressive site and was very interesting to hear about the way Aviva are investing in the project and how the different elements of the Wildlife trust are working together on the project. We were given an overview of the aspirations and there were a few items mentioned below which were also touched upon. To be honest I was expecting a little more challenge and dialogue about the grant schemes and concerns and issues faced. Having spoken to [redacted] since she was of a similar view and that it was a missed opportunity for them considering they had a good audience from both NRW and WG. When speaking with the Wildlife trust UK programme manager it was however interesting to hear how there is somewhat conflicting views within the wildlife trust on the habitats issue. As mentioned below they would like to see some flexibility in the interpretation however there are parts of the trust who do not want this as it could undermine their position in general on habitat protections. He did also talk about flexible regulatory frameworks within the financial sector (regulatory sandbox) which encouraged innovation and whether this is something which would be worth considering in the environmental regulation area. I got lost a bit with this to be honest but got the principle that it could look to address the issue of concern over legal challenge when applying environmental regulations and would help to move away from the default position of the precautionary principle which seems to stifle progress. I did also have a useful conversation with [redacted] over lunch about the 10m rule on a different site which will usefully feed into the barriers work.

Thanks, [redacted]

From: [redacted]

Sent: 08 July 2025 12:15

To: [redacted]

Cc: [redacted]

Subject: Rhos Farch site meeting, follow up

Dear [redacted],

It was great to meet all of you yesterday. I was delighted that the cross-organisation conversations were positive; all of us at the Wildlife Trusts felt that the issues that we've been experiencing with getting consent and accessing support for woodland creation in Wales were being heard.

To follow on from the visit, I thought that it would be apt to send some bullet points in relation to the main issues we've been experiencing when planning native woodland planting schemes. To summarise, we'd like to have a woodland creation support system where:

- **The screening process acknowledges the overall ecosystem benefit of native permanent woodland as a Nature-Based Solution:** The wider benefits of habitat creation, carbon sequestration and ecosystem services of permanent native woodland creation proposals are acknowledged as part of the assessment process, and minor impacts on poor quality habitats are balanced by the wider overall benefits of a planting scheme relative to the status quo.
- **Consultation responses from Heneb are regarded as advisory, rather than conclusive:** Where requests for geophysical survey for possible unknown historical features are upheld, there is an increase in the maximum level of grant aid for surveys. *At one of the programme sites, we have already experienced a change in approach in relation to Heneb advice during pre-app stage; this is reassuring.*
- **The assessment process is transparent:** current versions of guidance docs, GN002 & GN009 are available online, and Woodland Planners notified when guidance is updated.
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Please let me know if you would like any further information from our end, or to discuss any of these points further.

All the best,

[redacted]

Rheolwr Creu Coedwigoedd Glaw Celtaidd (Cymru)

Celtic Rainforest Creation Manager (Wales)

Ymddiriedolaethau Natur Cymru - Wildlife Trusts Wales

[redacted]