

Subject: Article 17 reports and sand dunes

[Thomas, Nick](#)

25 Sep 2013

To: me

CC: Craig Shuttleworth

Ok thanks Ian - I will ask a few more questions and get back to you

Nick Thomas

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[Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.](#)

Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

From: ian miller <ianoceans@yahoo.co.uk>

Sent: 25 September 2013 12:58

To: Thomas, Nick

Cc: Craig Shuttleworth

Subject: Re: Article 17 Reporting and Sand Dunes

Dear Nick,

Thanks for your response to my query re. the Art 17 habitat assessment reports for Newborough. I'm afraid you have been misled by John Ratcliffe - nothing new there then!

The reports were produced by Julie Creer in 2012 and they were used to provide the Wales dune assessments for JNCC. Those reports were the completed habitat assessments and the following quote from just one of the Wales submissions to JNCC shows they were the key reports used to report dune habitat conservation status in Wales. They were 'referenced' by the Art. 17 report and if you check section 2.7.4 in other habitat reports to JNCC you'll find the same.

Section 2.7.4 Habitat type 2120 Art.17 report to JNCC 2013:

'Assessment of **structure and function** within designated sites (SACs and SSSIs) is mostly based on the results of common standards monitoring visits (mostly but not entirely undertaken between 2007 & 2012) (JNCC, 2004; CCW, 2005). These show that on the two SACs in Wales that have been assessed, Morfa Harlech-Morfa Dyffryn is in favourable condition and Abermenai to Aberffraw Dunes is in unfavourable condition. This main concern relates to poor or disrupted sand supply.'

The statement above clearly indicates the assessment of conservation status ['structure and function'] for the habitats at Newborough have been completed in 2012 and used to compile the Art. 17 rpt to JNCC [Feb.,2013].

What we have regarding this habitat type is a progression:

- Initial SDF assessment: grade A, 'excellent' conservations status. All aspects of structure and function in **excellent state**
- 2005, **three years later** - as if by magic - the mobile dunes are in 'unfavourable conservation status'. In fact John Ratcliffe made a mistake by allowing the assessment officer to actually report the good condition of the mobile dunes and had to resort to a misapplication of the zonation CSM target to achieve his objective of reporting the habitat in an unfavourable state.
- 2012/13 - the Wales Art. 17 report states the conservation status of the mobile dunes at Newborough is unfavourable [section: 2.7.4]. Having, from his perspective, messed up the 2005 report by allowing the true favourable condition of the habitat to be reported this time I imagine John Ratcliffe will have manipulated the data to indicate both condition and conservation status are unfavourable. He won't allow the actual good condition to hinder his objectives.

I actually had a good look at the mobile dunes along Traeth Penrhos this Aug. You couldn't have found shifting dunes with *Ammophila arenaria* in finer condition. The abundant seed heads made the dune ridge look like a field of corn or barley ready for harvest. To be in that condition both the levels of bare sand and the mobility of that sand must have been in a favourable state; the condition/structure and function/sustaining processes were favourable and uncompromised. This is the section of foredune your agency plans to trash by driving corridors through the foredune ridge as a result of the manipulation of the conservation status of this habitat type. An interesting take on 'conservation' and maintenance of habitat area and range.

John Ratcliffe is sitting on the habitat assessment reports and not releasing them until he has ensured there are no 'slip-ups' as there were in 2005 when the condition assessments actually reported the true good condition of the habitat.

I would suggest you and the agency stop allowing John Ratcliffe to destroy the agency's credibility and reputation.

As promised I enclose a brief compilation of the sand dune condition assessments from the 2005 habitat assessment reports. You can see that all four habitats met all the condition targets and were in favourable condition as I stated at the meeting in Newborough. Humid slacks were so badly surveyed that their condition was unclear.

Regards
Ian
[Dr Ian Miller]