

5th October 2026

Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

PEDW.infrastructure@gov.wales

Dear Sir or Madam

Application ref: DNS CAS-01927-F0T2T1: Banc Du Energy Park Limited: The construction and operation of up to six wind turbines and associated infrastructure and ancillary works on land 1 km North of Llangurig, Powys.

The Montgomeryshire Wildlife Trust (MWT) objects to the application in its current form.

Whilst we support the transition to renewable energy and recognise the importance of tackling climate change, we do not consider that the Environmental Statement has provided sufficient evidence to demonstrate that the proposal would avoid adverse effects on peatland function, hydrological connectivity, priority habitats and species, including Wet Modified Bog, Marshy Grassland, Small Pearl-bordered Fritillary, Golden Plover, Hen Harrier, Curlew and Lapwing, or that the requirements of national and local biodiversity policy have been satisfactorily met.

1. Impacts on Peatland Function, Priority Habitats, Priority Species and Ecosystem Resilience

The Environmental Statement has not adequately demonstrated that impacts on peatland function and associated priority wetland habitats have been avoided.

Whilst the applicant places considerable emphasis on the conclusion that no infrastructure would be located within areas identified as deep peat, Welsh Government policy is clear that consideration should extend beyond mapped deep peat deposits to include shallow peat soils and other soils that support the hydrological functioning of peatland habitats and ecosystems.

The assessment appears inconsistent in its treatment of this issue. Chapter 11 concludes that infrastructure has been designed to avoid peat soils and that significant peat-related effects



Gwarchod natur ar gyfer y dyfodol

Protecting wildlife for the future

Gregynog Tregynon Powys SY16 3PL

Tel/Ffôn: 01938 555654 | Email/Ebost: info@montwt.co.uk

Charity No. 512390 | Company No. 1612249 | Rhif Elusen 512390 | Rhif Cwmni 1612249

www.montwt.co.uk

can largely be discounted. However, Chapter 8 acknowledges that the proposed access track between Turbines T04 and T05 would cross a mosaic of Marshy Grassland and Wet Modified Bog priority habitat together with a priority running water habitat, and identifies changes to water levels, water quality and hydrological conditions as potential impact pathways. The Ecology Chapter also confirms that permanent habitat loss would occur within this wetland complex and that a priority watercourse would be crossed by the proposed floating road.

Whilst the use of a floating track is proposed as mitigation, the Environmental Statement relies heavily on the assumption that hydrological continuity will be maintained, without providing sufficient site-specific evidence to demonstrate that this will be the case. Published guidance and research recognise that even floating road construction can alter hydrology, affect water movement, compress peat and influence peatland ecological function. The Environmental Statement does not adequately demonstrate that the Marshy Grassland, Wet Modified Bog and priority running water habitats crossed by the track would be protected from such effects, nor that the ecological processes upon which these habitats depend would remain intact throughout the operational lifetime of the development.

Furthermore, the proposal would result in the direct loss of priority wetland habitat beneath the track footprint. Although the area affected may be limited, Planning Policy Wales requires impacts to be avoided in the first instance, then minimised, before reliance is placed on mitigation or compensation. The Environmental Statement does not adequately explain why direct loss of Section 7 priority habitat and construction within a priority wetland system should be regarded as negligible.

The assessment also gives insufficient consideration to the species supported by this wetland habitat mosaic. The Environmental Statement acknowledges that the Marshy Grassland and Wet Modified Bog habitats support, or have the potential to support, a range of priority species, including the Section 7 butterfly species Small Pearl-bordered Fritillary (*Boloria selene*), together with amphibians, reptiles and other wetland-associated species. It also confirms that Marsh Violet, the larval foodplant of Small Pearl-bordered Fritillary, was recorded within marshy grassland and mire habitat crossed by the proposed access track. This further demonstrates the ecological importance of the affected habitat complex and raises questions as to whether impacts on associated priority species have been fully assessed. Any degradation of hydrological conditions, habitat quality or habitat connectivity would affect not only the habitats themselves but also the species that depend upon them. The Environmental Statement has not provided sufficient evidence to demonstrate that these indirect effects have been fully assessed.



Gwarchod natur ar gyfer y dyfodol

Protecting wildlife for the future

Gregynog Tregynon Powys SY16 3PL

Tel/Ffôn: 01938 555654 | Email/Ebost: info@montwt.co.uk

Charity No. 512390 | Company No. 1612249 | Rhif Elusen 512390 | Rhif Cwmni 1612249

www.montwt.co.uk

In summary, the Environmental Statement has not demonstrated that the proposed development would avoid adverse effects on peatland function, hydrological connectivity, priority wetland habitat, priority running water habitat and the species that depend upon them. In the absence of such evidence, MWT considers that a precautionary approach should be applied. The proposal is therefore contrary to Planning Policy Wales, Section 6 of the Environment (Wales) Act 2016, and Powys Local Development Plan Policy DM2.

2. Birds

The site supports a diverse bird assemblage, including 35 Red- and Amber-listed Birds of Conservation Concern and at least 17 Section 7 Species of Principal Importance in Wales, demonstrating the ornithological value of the wider upland landscape.

Whilst the Environmental Statement predicts long-term biodiversity benefits through habitat enhancement, the extent to which these gains compensate for disturbance, habitat fragmentation and displacement arising from turbine infrastructure remains uncertain and relies heavily on future management assumptions.

Golden Plover (*Pluvialis apricaria*)

Golden Plover is one of the most significant ornithological interests associated with the application site. The applicant's surveys recorded 10,857 Golden Plover, with over 2.6 million seconds of flight activity and 74 flights crossing the Collision Risk Zone. The Environmental Statement identifies Golden Plover as an Important Ornithological Feature and concludes that the development would result in a significant adverse residual effect on the local population during operation.

MWT does not agree that the importance of this interest can be reduced simply because breeding was not confirmed. Golden Plover is a Red-listed Bird of Conservation Concern and Section 7 Priority Species, and the survey results clearly demonstrate that the site functions as an important wintering, passage and movement area. The conservation of declining migratory species depends upon the maintenance of functionally important non-breeding habitat as well as breeding locations.

The Environmental Statement also acknowledges evidence that Golden Plover may avoid operational wind farms, with reductions in abundance reported around turbine infrastructure. However, whilst this evidence is relied upon to suggest that collision mortality may be overestimated, the implications for displacement, avoidance behaviour and functional habitat loss have not been robustly quantified. Given the exceptionally high level of site use recorded, MWT considers that displacement may represent an impact pathway of comparable or greater significance than collision mortality.



Gwarchod natur ar gyfer y dyfodol

Protecting wildlife for the future

Gregynog Tregynon Powys SY16 3PL

Tel/Ffôn: 01938 555654 | Email/Ebost: info@montwt.co.uk

Charity No. 512390 | Company No. 1612249 | Rhif Elusen 512390 | Rhif Cwmni 1612249

www.montwt.co.uk

Furthermore, the assessment assumes that displaced birds can be accommodated elsewhere within the wider landscape and that habitat management measures will offset impacts but does not provide evidence to demonstrate this. In the absence of such evidence, MWT is not satisfied that impacts on Golden Plover have been fully assessed.

Displacement, Functional Habitat Loss and Cumulative Effects

MWT remains concerned that the assessment does not adequately address displacement, avoidance behaviour, habitat fragmentation and cumulative effects affecting priority upland bird species.

Hen Harrier (*Circus cyaneus*), Curlew (*Numenius arquata*) and Lapwing (*Vanellus vanellus*) are all species of conservation concern which were recorded within the study area and are identified as Important Ornithological Features within the Environmental Statement. However, impacts on these species are largely discounted on the basis of low predicted collision risk, limited survey records or absence of confirmed breeding activity. MWT considers that this places insufficient weight on recognised impact pathways associated with wind farm development. Published evidence demonstrates that impacts are not limited to collision mortality and may also arise through disturbance, displacement, barrier effects, habitat fragmentation and functional habitat loss. Responses vary between species and sites, meaning uncertainty should not automatically be interpreted as absence of effect.

This issue is particularly relevant for Curlew which have suffered severe long-term declines and are known to be sensitive to changes in habitat use and disturbance. Evidence indicates that displacement effects for Curlew can extend to approximately 500 metres from turbines, whilst displacement and avoidance behaviour have also been identified as important impact pathways for upland waders more generally.

MWT is also concerned that cumulative ornithological assessment is largely restricted to collision risk, focusing primarily on Red Kite and Golden Plover. No equivalent assessment is provided for cumulative displacement, habitat fragmentation or functional habitat loss. The assumption that displaced birds will simply relocate elsewhere within the landscape is not supported by the evidence.

In the absence of a robust assessment of displacement, functional habitat loss and cumulative effects, MWT considers that uncertainty remains regarding the likely effects of the proposal on important bird populations. A precautionary approach should therefore be applied. The proposal is consequently contrary to Planning Policy Wales, the Section 6 biodiversity and ecosystem resilience duty under the Environment (Wales) Act 2016, and Powys Local Development Plan Policy DM2.



Gwarchod natur ar gyfer y dyfodol

Protecting wildlife for the future

Gregynog Tregynon Powys SY16 3PL

Tel/Ffôn: 01938 555654 | Email/Ebost: info@montwt.co.uk

Charity No. 512390 | Company No. 1612249 | Rhif Elusen 512390 | Rhif Cwmni 1612249

www.montwt.co.uk

Summary and Conclusion

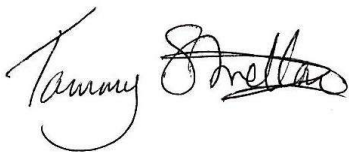
In its current form, the Banc Du application has not provided sufficient evidence to demonstrate that the proposal would avoid adverse effects on peatland function, hydrological connectivity, priority wetland habitats and priority species. In particular, significant uncertainty remains regarding the effects of the proposed floating access track on peatland hydrology and wetland habitat function, the adequacy of the assessment of impacts on Golden Plover, and the potential for displacement, functional habitat loss and cumulative effects affecting priority upland bird species.

MWT is concerned that the assessment relies heavily on assumptions regarding the effectiveness of mitigation measures, the availability of alternative habitat and the ability of displaced birds to relocate elsewhere within the wider landscape without ecological consequence. There remains limited independent evidence demonstrating how consistently such measures deliver their intended outcomes over the long term. The effectiveness of mitigation should therefore not be assumed and reinforcing the need for a precautionary approach. Where the effectiveness of mitigation remains uncertain, there is a risk that impacts on peatland hydrology, habitat condition, carbon storage, ecosystem function and associated species may be underestimated and may only become apparent years after construction. For irreplaceable habitats such as peatlands, the priority should be to avoid impacts through site selection and design rather than relying on mitigation measures whose long-term success has not been demonstrated.

Accordingly, Montgomeryshire Wildlife Trust objects to the application in its current form. The proposal conflicts with the precautionary and mitigation hierarchy principles of Planning Policy Wales, the biodiversity and ecosystem resilience duty under Section 6 of the Environment (Wales) Act 2016, and Powys Local Development Plan Policy DM2.

If there is any other information the Montgomeryshire Wildlife Trust can help with, please do not hesitate to contact us.

Yours sincerely



Tammy Stretton
Conservation Officer
Email: tammy@montwt.co.uk



Gwarchod natur ar gyfer y dyfodol

Protecting wildlife for the future

Gregynog Tregynon Powys SY16 3PL

Tel/Ffôn: 01938 555654 | Email/Ebost: info@montwt.co.uk

Charity No. 512390 | Company No. 1612249 | Rhif Elusen 512390 | Rhif Cwmni 1612249

www.montwt.co.uk