

## **OBJECTION to CAS -01907-D7Q6Z1- NANT MITHIL ENERGY PARK.**

**19<sup>th</sup> December 2025**

**Radnorshire Wildlife Trust**, Warwick House, High Street, Llandrindod Wells, LD1 6AG, objects to the application for the **Nant Mithil Energy Park**, Case Reference: **CAS-01907-D7Q6Z1**.

Radnorshire Wildlife Trust (RWT), one of the Wildlife Trusts in Wales, supports the need for secure and sustainable energy. However, renewable energy must be developed in the **right place with the right technology**. We strongly oppose developments that damage designated sites, irreplaceable habitats or cherished landscapes.

### **Radnorshire Wildlife Trust's position**

RWT believes that Wales's energy policy should be driven by:

**Reduction in demand and increase in energy efficiency** - Seeking reductions in energy demand through investment in energy efficiency measures should provide the central plank of energy policy, as the most cost-effective and sustainable approach. This should cover all sectors, including industry, transport, public and domestic, and relate to existing as well as new developments.

**Increase in renewable energy** - Renewable energy generation should continue to be an increasing proportion of our energy mix to provide a low-carbon and more sustainable approach in the future. Investments should be made in a broad mix of renewable energy sources (including solar, wind, offshore wave and wind, tidal and hydro) in ways that minimise impacts on the natural environment. Renewables should be subject to environmental assessment, to ensure they are sited at appropriate locations and at an appropriate scale to be effective, and to minimise damaging impacts on nature and the environment. We believe in "**right technology, right place.**" While renewable energy generation should be increased, this should not be at the expense of our most important wildlife sites. In particular, we would oppose any siting of renewable energy on designated sites or on irreplaceable habitats. We oppose any exploitation of new fossil fuel resources.

**Promotion of decentralisation, micro- and nano-generation and small-scale community energy projects** - Decentralisation of supply and micro-generation of energy should be encouraged and promoted through policies and incentives. We favour local solutions - decentralised and wildlife-friendly micro-generation schemes can help to encourage renewables at domestic and community levels, contribute to achieving a diverse and more secure energy



supply and lead to efficiency savings as energy loss through transmission is reduced. This can also have the benefit of supporting foundational economy and to empower local communities<sup>1,2</sup>. We aim to minimise our own contribution to carbon emissions<sup>3</sup>. As a landowner and manager, we aim to maintain substantial carbon within our sites, particularly in our peatlands and woodlands.

### Site specific – right technology in the right place

Seeking reductions in energy demand through investment in energy efficiency measures should be central to Wales's energy policy, and we recognise the importance of secure and sustainable energy supplies for the economy, our way of life and maintaining living standards in a modern society. Our key focus is on seeking a planning system that ensures that renewable energy does not impact nature's recovery. That is, renewables are not positioned on designated sites for nature conservation or on irreplaceable habitats. This forms the basis of seeking the right technology in the right place.

Sensitive wildlife sites, natural processes, features, and migration routes can be at risk of direct or indirect impacts from developments, infrastructure and changing land use as a result of energy generation and the operation of facilities. Since nature's restoration is the focus of our interest, the Wildlife Trusts in Wales will assess the merits of individual proposals for new energy facilities on a case-by-case basis, as with any other developments, using our best available evidence and resources to inform our judgements.

The proposed Nant Mithil Energy Park will negatively impact species and habitats on our **Mynydd Ffoesidoes Nature Reserve**, part of the *Radnor Forest Site of Special Scientific Interest (SSSI)*. The nature reserve is less than 500m from the development boundary, and parts of the SSSI overlap the project area. The Environmental Impact Assessment's (EIA) assumption that indirect habitat effects are limited to ~10m from construction footprints is not supported by evidence, and the conclusion of "negligible and not significant" effects on the SSSI is therefore not substantiated. The Environmental Statement (ES) appears to be deficient in several areas relating to Ecology (chapter 7), Hydrology/Peat (chapter 11) and Ornithological Impacts (chapter 8).

Radnorshire Wildlife Trust has been monitoring the situation, and we have concerns about the impact on key species and the rare habitats that they depend on for survival:

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<sup>1</sup> [Energy Generation | Community Energy Wales](#)

<sup>2</sup> [A Vision for Energy | The Wildlife Trusts](#)

<sup>3</sup> [Climate Action – Our Collective Approach | The Wildlife Trusts](#)



## Impact on key species

- **Birds (breeding and winter monitoring)** – The assertion that survey coverage during breeding bird and winter walkover assessments extended to within 100m across the site is not supported by the terrain constraints or the recorded survey effort. On upland ground, achieving the stated coverage would require impractical walking distances and survey durations, particularly given observation and notetaking requirements, morning survey constraints, and reduced winter daylight. Resulting anomalies include very low records for species known locally (e.g., Crossbill (*Loxia curvirostra*), Starling (*Sturnus vulgaris*)) and conservative density estimates for Skylark (*Alauda arvensis*) and Meadow Pipit (*Anthus pratensis*).

The site supports important bird species, including Nightjar (*Caprimulgus europaeus*), Red Grouse (*Lagopus lagopus*), Kestrel (*Falco tinnunculus*), Merlin (*Falco columbarius*), Peregrine Falcon (*Falco peregrinus*), Eurasian Curlew (*Numenius arquata*), and other upland waders such as Common Snipe (*Gallinago gallinago*) and Golden Plover (*Pluvialis apricaria*), as well as migratory birds such as Cuckoo (*Cuculus canorus*), Whinchat (*Saxicola rubetra*), Ring Ouzel (*Turdus torquatus*) and Greenshank (*Tringa nebularia*). (RWT records).

Wind turbines pose collision risks and cause displacement from feeding and nesting areas. **Nightjar** populations are particularly vulnerable during construction and operation phases, with potential nest disturbance and collision mortality<sup>4</sup>. No collision risk assessment was undertaken for Nightjar due to lack of nocturnal data; this is a material omission for a species of conservation concern.

Studies show **Curlew** populations declined by up to 40% within 620 meters of turbines during construction, and **Snipe** by 53%. For **Golden Plover**, a mean winter collision risk of 11.227 is reported; the applicant's presentation ("one bird every 0.09 years") understates potential winter period collision frequency (approximately two per winter month based on the EIA figures). Displacement raises concerns about breeding success and long-term population viability<sup>5</sup>.

<sup>4</sup> [\*The effectiveness of deterrent measures to minimize disturbance impacts to breeding European nightjar at an upland wind farm site in South Wales, UK, Shewring & Vafidis, 2017.\*](#)

<sup>5</sup> [\*Greater impacts of wind farms on bird populations during construction than subsequent operation: Results of a multi-site and multi-species analysis, Pearce-Higgins et al., 2012.\*](#)



- **Bats** - High-risk species (e.g. Noctule, Leisler's, Barbastelle) are present/likely, yet turbine level static detector coverage is incomplete, and curtailment is not proposed. The modified turbine layout has not been resurveyed adequately to assess location specific risk. A Population Viability Analysis (PVA) is absent, despite the EIA identifying “moderate adverse” and “significant” effects.
- **Otter** (*Lutra lutra*) and Water Vole (*Arvicola amphibius*) are scoped out on habitat suitability judgments without specialist surveys; any use of the site (including transient movements between catchments) creates functional linkage with the River Wye SAC and should be assessed.
- **Badger** (*Meles meles*) mitigation (underpasses) is mentioned without commitment or assessment of feasibility and land take.
- **Pine Marten** (*Martes martes*) and **Polecat** (*Mustela putorius*), both present in mid-Wales, were not surveyed or assessed.
- **Vascular plants** and **bryophytes** – Botanical coverage is limited (e.g., 14 NVC quadrats; no full species list). Bryophytes were not surveyed despite SSSI citation for scarce mosses and liverworts.
- **Invertebrates**, including potential Section 7 species (e.g., Small Pearl Bordered Fritillary), are under assessed, introducing gaps into the Habitats Regulations Assessment (HRA) considerations.

### Impact on rare habitat

Priority habitats (e.g., peatland, H18 heath, U4/U5 acid grasslands, M23 rush pasture) appear misclassified or undervalued. Lumping species-poor MG6/MG7 with higher-quality communities leads to impacts being “scoped out” inappropriately. The proposed substation is located on mapped U4 where minor layout changes could avoid higher-value habitats. Several standing water bodies appear to have been overlooked.

Although a large area of **M19** blanket bog vegetation around the turbine locations T18 – T20 has been mapped, the surveyor only took one sample of this vegetation and so failed to identify its importance as a good example of its type, or the fact that this links with larger area of similar M19 vegetation on adjacent SSSI sites.

There is similar **M19 blanket bog** on Mynydd Ffoesidoes and Black Mixen, which together are part of the most extensive upland plateaux in England and Wales, yet remain surprisingly understudied. This area contains the largest and finest example of ‘Eastern’ type blanket bog vegetation in Radnorshire. The vegetation on Mynydd Ffoesidoes is distinguished by high-quality



submontane shrub heath, which has remained largely intact and unaffected by fire or overgrazing for many years. Scattered bog pools across the nature reserve support a diverse assemblage of aquatic invertebrates adapted to acidic, peat-influenced waters.

The peat depths have also been underestimated in chapter 11 (too few samples in areas with peat 30-50cm). Consequently, the ES fails to adequately address the impacts on peatland habitat and so proposed mitigation is inadequate for the potential loss of Section 7 of the Environment (Wales) Act 2016 habitat<sup>6</sup>. The final site layout does **not** avoid peatland habitat, as is stated throughout the ES. As well as habitat loss and fragmentation a significant environmental risk is the disturbance of peat during construction, releasing stored CO<sub>2</sub> and impacting the local hydrology.

### In summary

RWT formally objects to the Nant Mithil Energy Park proposal due to its significant risks to protected species, sensitive habitats, and climate commitments. We urge the Planning Inspector to consider these points carefully and reject the application.

The consultation deadline of **23 December 2025** is unreasonable given the volume and complexity of documents, some of which are missing or have been severely redacted. Without robust, current data, a full assessment of adverse effects is impossible.

Radnorshire Wildlife Trust is also concerned about the cumulative effect of the Nant Mithil project alongside multiple other proposed wind farms in the region. Collectively, these developments risk overwhelming the local environment and causing significant harm to wildlife and habitats. They also threaten to reverse recent gains in peatland restoration and jeopardize Wales' Net Zero and biodiversity targets<sup>7</sup>.

Currently, there are at least seven wind farm proposals in central Powys, most of which target upland dry acid grassland. Recent policy changes appear to disregard the international importance of upland waxcap grasslands, which often extend to the altitudinal limit of enclosure and beyond. These habitats are critical for fungi of global conservation significance. We strongly recommend that ecological assessments explicitly include dry Agrostis–Fescue grassland to ensure these unique fungal communities are properly considered. Evidence suggests that at

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<sup>6</sup> [Environment \(Wales\) Act 2016, Llywodraeth Cymru Welsh Government](#)

<sup>7</sup> [Net Zero Strategic Plan, Llywodraeth Cymru Welsh Government, 2022.](#)





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least four other proposed wind farm sites in the area support grassland fungi of international importance.

Restoration of peatlands is not equivalent to recreation; once damaged, unique species and ecosystems will likely be lost forever. The **Natural Resources Wales 'Species in Peril'** report that was published less than a month ago, stated that more than 3,000 species in Wales exist in five locations or fewer. RWT is extremely concerned that the scale and cumulative impact of wind developments and the associated infrastructure proposed in Radnorshire will put the brakes on efforts to halt and reverse the catastrophic decline in biodiversity that has occurred over recent decades.

**Protecting wildlife for future generations.**



Gwarchod natur ar gyfer y dyfodol

Protecting wildlife for the future.