

**Nant y Moch Wind Farm, SSA D Ceredigion
PRELIMINARY ENVIRONMENTAL INFORMATION (PEI)**

**Comments on the Proposal by Mr. R.G. Woods on behalf of Plantlife -
the international plant conservation charity - and the British Lichen
Society.**

At this very preliminary stage I would like to register a strong objection to this proposal.

From the information provided it is not possible to assess the likely impact of the proposed development on significant areas of biodiversity known within the development site.

The PEI recognises the old metal mine sites as being of historical importance. It makes no mention of their biodiversity. Mine sites such as Esgair Hir, Esgair Ffraith, Eagle Brook - and undoubtedly others that still await detailed survey - form part of an internationally important suite of sites collectively called the "Cambrian Mountains Orefield". They are of outstanding importance on account of their metallophyte plants and fungi. The information required to justify this distinction has only recently been collated and a strategy to designate areas as SSSIs is being drawn up. Sites of similar diversity just to the south have already been designated as Special Areas for Conservation and SSSIs under the Habitats Directorate, being important examples of Calaminarian vegetation. The Global Plant Conservation Strategy signed up to by the Government is leading to the recognition of "Important Plant Areas" (IPAs). At least some of the mine sites within the development area are sufficiently important to be included in a Cambrian Mountains Orefield IPA. Metallophyte lichens are also recognised on Schedule 42 of the Natural Environment and Rural Communities Act (2006) as being a group of species the conservation of which is of special concern in Wales.

Whilst turbine bases may avoid such areas the road network could cause significant damage. The metallophyte lower plant interest requires assessment before any planning decision can be taken.

Long and bitter experience has also recognised the impossibility of confining damage within such large development sites. The easy availability of mine tips as sources of cheap hardcore puts them at particular risk from unscrupulous contractors. The Forestry Commission has in the past caused great damage by using such tips as sources for road metal. A very clear assurance must be obtained that no further robbing of such tips will take place by the developer or the site owners even if the wind power station development necessitates the construction of additional forest tracks as, for example, occurred at Cefn Croes.

All arisings from the development must be sent to approved sites. In connection with the Trannon Moor Wind Power Station, wetland areas off site were destroyed by arisings from that development. Here there will be an overwhelming desire to "landscape" old mine sites with any spoil arising from

the construction work. Ways must be found to ensure this does not happen. Written assurances will not do. Physical barriers will need to be established around any site considered to be at risk. The construction of miles of new road could for the first time permit lorry access to some sites. The theft of lichen rich spoil tips and worked stone from old buildings has been a cause of concern throughout the Cambrian Mountains orefield for many years. Many mine sites have also been adversely affected by fly tipping. This development should not be permitted unless these risks can be effectively controlled.

Roads passing close to metallophyte sites may as a result of vibration and dust cause damage. Old buildings, wheel pits, shafts, adits and opencuts in this zone will require assessment and if necessary careful and approved stabilisation work will need to be undertaken that does not unacceptably threaten their special interest or compromise the interpretation of their history. Dusty road surfaces may need to be sealed or efficient dust screens installed. In practice it will almost certainly be necessary for roads to be routed well away from such structures.

No mention is made of any lower plant surveys of semi-natural upland vegetation. This is a significant omission since such organisms make up a substantial proportion of the biodiversity of such areas.

The PEI identifies the major access route from the docks to the development site. It provides no indication as to whether any road improvement works are likely to be required nor any assessment of their likely impact. It appears inevitable that such work will be required within and close to the development site. This information should be supplied before a planning application is made.

Unless the above issues can be resolved this development should not be permitted.