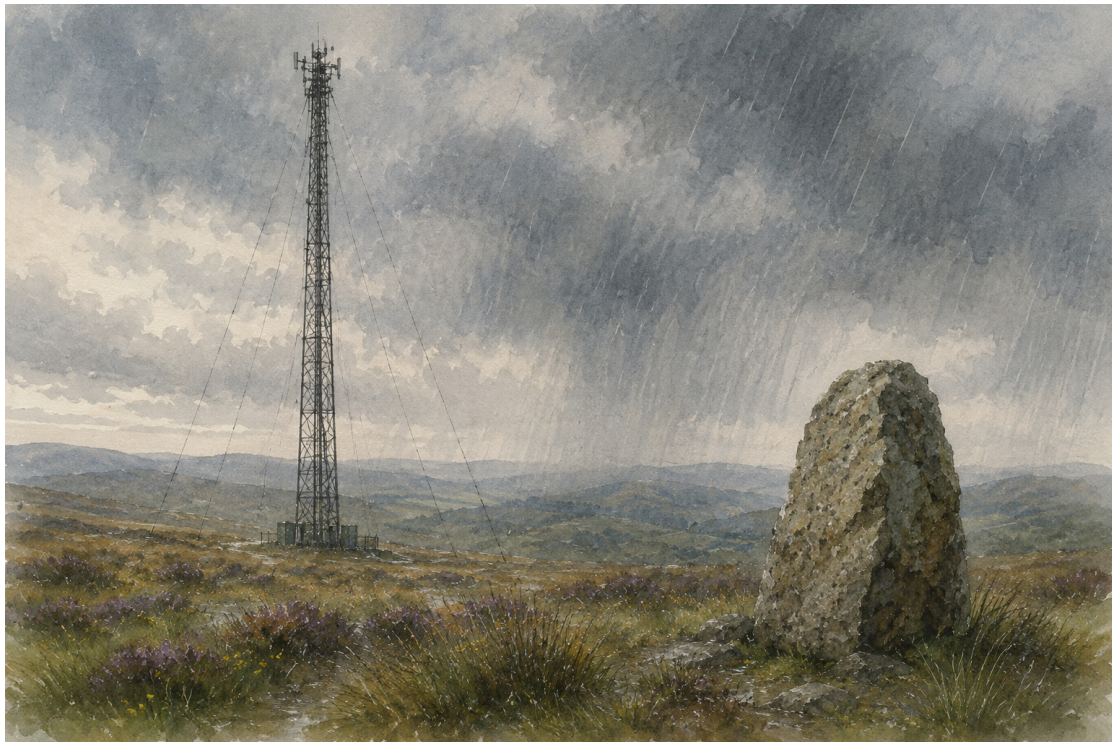


# Technical Addendum to the Joint Submission and Community Representation Response to 25/1679/FUL - Erection of a temporary meteorological mast and ancillary structures for measurement of wind and weather data

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Technical Addendum following submission of clarification data by the applicant to Powys County Council (PCC) Planning on 29th May 2026 and 16th June 2026.

This Technical Addendum must be read in conjunction with the Joint Submission and Community Representation Response submitted to the PCC Planning Department in response to planning application 25/1679/FUL - Erection of a temporary meteorological mast and ancillary structures for measurement of wind and weather data on Land South of Ffynnon Ffrydyll, near Merthyr Cynog, Brecon, Powys.

Submitted to Powys County Council by Email on 24th June 2026 (as agreed).

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## **1. Supporting Statement by Iain McIntosh MS**

I was pleased to support the original Joint Submission and Community Representation Response relating to planning application 25/1679/FUL and I remain fully supportive of the position taken by residents and stakeholders regarding this proposal.

The original submission identified a wide range of significant concerns relating to the adequacy of the information provided by the applicant and the potential impact of the proposed development upon the landscape, environment and communities of this part of Powys. Those concerns were not speculative; they were supported by detailed technical analysis, professional expertise and extensive local knowledge.

Since that submission was made, the applicant has provided additional information and Powys County Council has undertaken a further period of consultation. While one aspect of the proposal has now been clarified, the fundamental concerns that led to the original community objection have not been removed.

In particular, serious questions remain regarding the adequacy of the environmental evidence, the assessment of ornithological impacts, the effects upon landscape character and visual amenity, and the introduction of a 122.5 metre structure into an upland landscape that is valued by residents and visitors alike.

The fact that further information has had to be submitted is itself significant. It demonstrates that the original application documentation did not provide a sufficiently clear and comprehensive basis upon which informed decisions could be made. Residents were right to question the evidence placed before them and the need for clarification reinforces the importance of independent scrutiny throughout the planning process.

This Technical Addendum has been prepared to examine the additional material submitted by the applicant and to determine whether it resolves the concerns previously identified.

In my view, clarification of individual aspects of the proposal should not be confused with resolution of the wider environmental and planning issues that remain under consideration.

I continue to support the efforts of those residents who have devoted considerable time and expertise to reviewing this application and ensuring that the interests of local communities are properly represented. Their work has helped bring transparency and accountability to the process and has ensured that important questions are not overlooked.

This addendum should therefore be read alongside the original Joint Submission and Community Representation Response.

Together they demonstrate that substantial concerns remain regarding the proposal and that those concerns deserve careful consideration before any decision is reached.



*Iain McIntosh*

Iain McIntosh MS



**Iain McIntosh MS | AS**

Member of the Senedd for Brycheiniog Tawe Nedd

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### Community Representation Project Lead - Responsibility

The Community Representation Project Lead for planning application 25/1679/FUL is responsible for coordinating the community representation response and acting as the primary point of contact between local residents, consultees and the Local Planning Authority. This role includes reviewing submitted information, coordinating community input, publishing community responses and ensuring that relevant concerns raised by local residents are presented in a structured and evidence-based manner.

### Community Representation Project Lead - Introduction

My name is Gary Smith. I am a Chartered Fellow of the Institution of Occupational Safety and Health, a Health and Safety Engineer, and a Fellow of the Royal Society for Public Health. I have lived in Llanfihangel Nant Bran for more than thirty years and have extensive familiarity with the local environment, landscape, ecology and cultural heritage of the area affected by this proposal.

This document is submitted as a **Technical Addendum** to the previously submitted Community Representation Report relating to planning application **25/1679/FUL – Erection of a Temporary Meteorological Mast and Ancillary Structures for Measurement of Wind and Weather Data.**

The purpose of this addendum is not to repeat the matters already addressed within the original submission, but to present additional technical observations, newly available information, consultation responses, planning precedents and professional analysis that have emerged since the original report was prepared.

This addendum examines matters including:

- Additional ornithological information and survey evidence
- Consultation responses received from statutory and non-statutory consultees
- Landscape and visual assessment issues identified through further review of submitted material
- The relationship between the proposed meteorological mast and the wider Garreg Fawr Wind Farm proposal
- Relevant planning appeal decisions and comparable wind energy developments affecting designated landscapes
- Environmental Impact Assessment and precautionary principle considerations.
- Deficiencies, inconsistencies and evidential gaps identified within the submitted documentation
- Additional community-derived observations relating to environmental, ecological and landscape sensitivities.

This addendum should be read alongside the original Community Representation Report and supporting appendices.

Together, both documents provide a comprehensive review of the proposal and identify numerous areas where further information, clarification or assessment may be required before a fully informed planning decision can be reached.

The analysis presented remains evidence-based and draws upon published planning policy, environmental guidance, consultation responses, professional standards, technical literature and local environmental knowledge.

The intention is to assist Elected Members and the Local Planning Authority in ensuring that the application is assessed against the full range of relevant environmental, planning and public-interest considerations.

In addition, this addendum continues to incorporate community-derived observations relating to local ecological conditions, landscape character, hydrology, cultural heritage and the practical implications of the proposed development. These observations are intended to support a transparent, robust and context-sensitive assessment process.

I am happy to discuss any aspect of this submission and can be contacted at [gary@tyclyd.co.uk](mailto:gary@tyclyd.co.uk).

A handwritten signature in black ink that reads "Gary Stephen Smith". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Gary S. Smith

Cover image entitled: "[Uncertain Horizon](#)"

## 2. Executive Summary

This Technical Addendum has been prepared in response to additional information submitted by the applicant during the re-consultation process for Planning Application 25/1679/FUL – Erection of a Temporary Meteorological Mast and Ancillary Structures for Measurement of Wind and Weather Data on land south of Ffynnon Ffrydyll, near Merthyr Cynog, Powys.

It should be read in conjunction with the previously submitted Joint Submission and Community Representation Response, which remains extant and forms the principal community representation.

The purpose of this addendum is to assess whether the additional information materially alters the conclusions previously reached and whether the concerns identified by local residents, the Community Council, Bannau Brycheiniog National Park Authority and other consultees have been satisfactorily addressed.

The review confirms that the principal change arising from the re-consultation process is clarification of the proposed mast height and configuration. However, no substantive additional information has been submitted in response to the principal environmental and planning issues raised during consultation. The additional information therefore provides clarification on one aspect of the development description but does not include a substantial new environmental assessment - consequently the principal planning and environmental concerns identified within the original submission remain unresolved.

This addendum concludes that significant deficiencies, evidential gaps and areas of uncertainty remain across multiple environmental disciplines. In particular, the additional information does not materially address concerns relating to landscape and visual effects, recreational receptors, the setting and special qualities of Bannau Brycheiniog National Park, cultural heritage, peatland and hydrological sensitivity, construction impacts, restoration commitments and the adequacy of the supporting environmental evidence.

The most significant new information relates to ornithology. Long-term site-specific evidence submitted during the re-consultation process introduces approximately twenty years of local bird records and raises substantive questions regarding Curlew presence, collision risk, nocturnal movements, predator-perching effects and the adequacy of the applicant's ornithological baseline. Rather than resolving existing uncertainties, this evidence reinforces concerns regarding the completeness of the ornithological assessment.

The consultation responses received during the re-consultation process are also significant. Concerns regarding landscape, heritage, ecology, recreation and environmental sensitivity continue to be expressed by Bannau Brycheiniog National Park Authority, Trallong, Penpont and Llanfihangel Nant Bran Community Council, elected representatives and a Member of the Senedd. The persistence of these concerns demonstrates that important planning issues remain unresolved.

Taken as a whole, the re-consultation process has not resolved the principal concerns identified within the original Joint Submission and Community Representation Response. Whilst certain aspects of the proposal have been clarified, substantial uncertainty remains regarding the likely environmental effects of the development and the adequacy of the information upon which those effects have been assessed.

**Accordingly, this Technical Addendum concludes that the information currently before Powys County Council is insufficient to demonstrate that the environmental effects of the proposed development have been fully identified, adequately assessed or satisfactorily addressed.**

### **3. Introduction**

#### **Introduction - Document Control**

This document supplements, but does not replace, the Joint Submission and Community Representation Response submitted to Powys County Council on 4 January 2026. The original submission remains extant and is incorporated by reference.

This addendum addresses additional information submitted by the applicant following closure of the original consultation period and considers whether that information resolves, partially resolves or leaves outstanding the technical deficiencies previously identified.

The review also identifies any new issues arising from the additional information.

#### **Introduction - Purpose of this Addendum**

The purpose of this Technical Addendum is not to revisit issues that have now been clarified, but to assess whether the additional information materially alters the conclusions previously reached. The information reviewed during the re-consultation process primarily resolves uncertainty regarding mast height and configuration. It does not provide substantive new evidence capable of addressing many of the principal concerns identified within the original submissions.

#### **Introduction - Community Council Consultation Responses**

The additional consultation responses include a formal objection from Trallong, Penpont and Llanfihangel Nant Bran Community Council. The Community Council identifies concerns relating to landscape and visual impact, heritage setting, peat and hydrological sensitivity, recreational receptors, military safeguarding and the relationship between the proposed meteorological mast and the wider Garreg Fawr wind energy proposal.

Importantly, these concerns closely mirror multiple issues identified within both the Joint Submission and the objection submitted by the Bannau Brycheiniog National Park Authority. Whilst the Community Council's representation does not introduce new technical evidence, it provides independent support for the view that significant planning issues remain unresolved and warrant determination by Planning Committee rather than under delegated powers.

The additional consultation response provides independent support for concerns previously identified within the Joint Submission and Community Representation Response.

### **Introduction - Recreational Receptors and Public Rights of Way**

The additional consultation responses reinforce concerns previously raised regarding the treatment of recreational receptors within the Environmental Report and Landscape and Visual Impact Assessment.

Trallong, Penpont and Llanfihangel Nant Bran Community Council specifically identify walkers and horse riders using nearby public rights of way as highly sensitive receptors whose experience of the upland landscape would be affected by the presence of a 122.5 metre guyed mast and associated infrastructure.

This observation is consistent with concerns identified within the Joint Submission, which questioned whether sufficient weight had been given to the experience of recreational users within this open upland landscape.

**The additional consultation responses provide further support for concerns regarding recreational receptors and visual amenity.**

### **Introduction - Cultural Heritage & Importance of Landscape & Setting**

The Cultural Heritage Appendix acknowledges that wider landscape character and long distance views contribute to the significance of certain heritage assets within the surrounding area, including the Maen Richard Prehistoric Standing Stone.

This is an important acknowledgement because it confirms that the significance of at least some heritage assets is derived, in part, from their relationship with the wider upland landscape rather than solely from their physical fabric.

Whilst the applicant concludes that the proposed mast would not result in harm to heritage significance, the assessment nevertheless recognises the importance of landscape setting and long distance views as components of significance. This observation is consistent with broader concerns raised within the Joint Submission regarding the effects of prominent vertical infrastructure upon the character and perception of the wider upland landscape.

**The Cultural Heritage Assessment acknowledges that landscape setting and long distance views contribute to the significance of heritage assets within the study area.**

### **Introduction - Visibility and National Park Context**

The Zone of Theoretical Visibility prepared for the confirmed 122.5 metre mast demonstrates that theoretical visibility extends across a substantial area of the surrounding upland landscape, including parts of Bannau Brycheiniog National Park and sections of the Epynt Way.

The visibility mapping therefore reinforces concerns previously raised regarding landscape character, recreational receptors and the setting and special qualities of the National Park. Whilst the existence of visibility alone does not determine significance, the applicant's own analysis confirms that the proposed structure would not be confined to a purely local visual envelope.

**The ZTV continues to demonstrate visibility extending into the National Park and across important recreational landscapes.**

### **Addendum - Documents Reviewed**

This Technical Addendum has been prepared following a review of the additional information and consultation responses submitted in support of Planning Application 25/1679/FUL since publication of the original Joint Submission and Community Representation Response.

The review has included, where relevant:

- Additional engineering and technical information clarifying the proposed mast height and development description;
- Updated consultation responses from Natural Resources Wales (NRW);
- Responses from Powys County Council specialist consultees, including Ecology;
- Responses from the Ministry of Defence (MOD);
- Responses from Community Councils and elected representatives;
- Additional ornithological evidence, including long-term survey records and supporting information submitted by Mr D. Gareth Rees;
- Updated visibility mapping and Zone of Theoretical Visibility (ZTV) information;
- Cultural Heritage and Archaeological appendices;
- Supporting correspondence and technical clarification documents submitted during the re-consultation process.

This review has been undertaken alongside the original planning application documentation, Environmental Report, Landscape and Visual Impact Assessment (LVIA), consultation responses, Joint Submission and Community Representation Response, and the objection submitted by Bannau Brycheiniog National Park Authority.

The purpose of this addendum is not to repeat the original submissions, but to assess whether the additional information now available materially alters the conclusions previously reached and whether the concerns identified within the original submissions have been adequately addressed.

## Addendum - Methodology

This Technical Addendum adopts a focused review methodology.

Each item of additional information submitted during the re-consultation process has been reviewed against the findings of the original Joint Submission and Community Representation Response. The assessment has considered whether the new information:

1. Resolves a concern previously identified;
2. Partially addresses a concern previously identified;
3. Introduces new information requiring assessment;
4. Provides supporting evidence for an existing concern; or
5. Leaves the original concern unchanged.

Attention has been given to matters relating to:

- Development description and mast height;
- Landscape and visual effects;
- Effects upon the setting and special qualities of Bannau Brycheiniog National Park;
- Recreational receptors and Public Rights of Way;
- Ornithology and ecological impacts;
- Peatland, hydrology and environmental sensitivity;
- Cultural heritage and landscape setting;
- Cumulative effects and wider strategic context.

Where additional evidence has become available from independent sources, including long-term site-specific survey information, that evidence has been considered alongside the applicant's submissions to provide a balanced and proportionate assessment.

For each topic reviewed, a finding is provided identifying whether the issue has been resolved, remains outstanding, has been strengthened by additional evidence, or requires further clarification.

**The significance attributed to each issue has been determined having regard to the available evidence, consultation responses, relevant planning policy and applicable professional guidance.**

This addendum should be read in conjunction with the original Joint Submission and Community Representation Response. Unless expressly stated otherwise, the conclusions and concerns identified within those documents remain applicable.

#### **4. Status of Original Submission**

The Joint Submission and Community Representation Response remains the principal community representation submitted in relation to Planning Application 25/1679/FUL and should be read in conjunction with this Technical Addendum.

This addendum supplements, but does not replace, the original submission. All matters, concerns, objections, findings and conclusions contained within the original submission remain extant unless expressly stated otherwise.

The submission of additional information by the applicant does not invalidate or diminish the concerns identified within the original submission. The purpose of this addendum is to assess whether that additional information adequately addresses the deficiencies, evidential gaps and areas of uncertainty previously identified.

Where the additional information fails to resolve a concern, the findings and conclusions of the original submission continue to apply in full.

Where new information, consultation responses or technical evidence have become available since publication of the original submission, those matters are considered within this addendum and should be read as supplementary to, and forming part of, the overall community representation.

Accordingly, the original Joint Submission and Community Representation Response and this Technical Addendum should be treated as a single body of evidence for the purposes of determining Planning Application 25/1679/FUL.

## 5. Review of Additional Information Submitted During Re-Consultation

Natural Resources Wales reviewed the information submitted during the re-consultation process and advised that the principal amendment identified within the updated application material was clarification of the proposed mast height. NRW stated that no additional information falling within its regulatory remit had been provided for review and therefore referred the Local Planning Authority to its previous consultation responses.

This observation is significant because it indicates that the re-consultation exercise did not introduce substantive new environmental information requiring further assessment by NRW. Therefore, NRW's original observations and recommendations remain unchanged and continue to form part of the evidential basis for determination of the application.

The clarification of mast height followed correspondence between the applicant and the Local Planning Authority, during which the applicant confirmed that consent is sought for a meteorological mast of up to 122.5 metres in height and that the previously submitted 117.1 metre figure related to the approximate position of the aviation warning light rather than the overall height of the structure. Subsequent engineering information provided by Dulas Ltd confirmed the detailed configuration of the proposed 122.5 metre guyed mast, including anchor radii, instrumentation positions and aviation lighting arrangements.

Whilst this clarification assists in defining the parameters of the proposed development, it does not materially alter the environmental issues previously identified by consultees or those raised within the Joint Submission and Community Representation Response. Matters relating to landscape and visual effects, cumulative impacts, ecological interests, ornithology, recreational receptors and the setting and special qualities of the Bannau Brycheiniog National Park therefore remain relevant considerations in the determination of the application.

**The re-consultation process has therefore provided greater clarity regarding the dimensions of the proposed structure but has not materially changed the wider environmental and planning considerations previously identified.**

## 6. Application Amendments - Development Description and Mast Design

The proposed development comprises the erection of a temporary meteorological mast and associated ancillary infrastructure intended to collect wind and weather data in support of the proposed Garreg Fawr Wind Farm project.

During the application, questions arose regarding the height of the proposed mast. Earlier application drawings illustrated a mast with a height of approximately 117.1 metres, whilst other application documents referred to a structure of up to 122.5 metres in height.

Following correspondence with Powys County Council, the applicant confirmed that planning permission is sought for a meteorological mast of up to 122.5 metres above ground level and that the previously submitted 117.1 metre drawing represented an indicative example of a typical mast configuration rather than the maximum dimensions for which consent is sought.

The proposed mast would be supported by guy wires and associated anchor points and would remain in place for a temporary operational period before removal and site restoration.

Whilst the clarification of mast height assists in defining the development parameters, it does not materially alter the environmental, landscape, ecological, heritage or recreational considerations discussed within the original Joint Submission and Community Representation Response.

**The purpose of this addendum is therefore to examine the implications of the revised information and to consider additional evidence and consultation responses submitted since the original representation was prepared.**

### Application Amendments - Landscape and Visual Impact Assessment (LVIA)

The original Joint Submission and Community Representation Response identified significant concerns regarding the description of development and the absence of a clearly defined and consistently reported mast height.

Similar concerns were subsequently raised by the Bannau Brycheiniog National Park Authority, which noted that the Environmental Report contained inconsistent information, referring in different locations to a mast height of both 117 metres and 122.5 metres.

The National Park Authority concluded that the development had not been adequately defined and stated that the application should be refused on this basis. Furthermore, the Authority considered the description of development to be insufficiently precise to ensure the temporary nature of the proposal or to provide certainty regarding the scale of the structure proposed.

### **Application Amendments - Effect of Additional Engineering Information**

The applicant subsequently submitted detailed engineering information confirming that the proposal comprises a 122.5 metre guyed lattice meteorological mast. The information confirms multiple levels of guy wires extending to anchor points located at radii of approximately 25 metres, 40 metres, 50 metres and 60 metres from the mast base, together with an aircraft warning light mounted at approximately 117.37 metres above ground level and instrumentation extending to approximately 120 metres above ground level.

This additional information resolves the uncertainty regarding mast height identified within both the original Joint Submission and the objection submitted by the Bannau Brycheiniog National Park Authority. However, it also confirms that the structure to be assessed is the larger of the dimensions previously cited within the application documentation and demonstrates that clarification was required before the scale and extent of the proposal could be properly understood.

**Importantly, the resolution of the mast height discrepancy should not be interpreted as resolving the wider concerns identified by either the community submission or the National Park Authority.**

The significance of the new engineering information is material. The confirmed structure is not simply a temporary monitoring pole but a 122.5 metre guyed lattice mast extending above many prominent landscape features within the surrounding upland environment.

### **Application Amendments - Assessment of Additional Engineering Information**

The original Joint Submission and Community Representation Response identified concerns regarding inconsistencies within the application documentation relating to the height and description of the proposed meteorological mast. Similar concerns were subsequently raised by the Bannau Brycheiniog National Park Authority.

**The new engineering drawing does not address any of these substantive concerns.**

No evidence has been provided demonstrating that the visual assessment has been revisited to reflect the confirmed 122.5 metre height of the mast. Nor has any additional analysis been submitted addressing the omitted National Park viewpoints, recreational receptors, landscape susceptibility judgements or the National Park Authority's concerns regarding impacts upon the Special Qualities of the National Park.

The Joint Submission did not object solely because the mast height was unclear. The principal concerns related to the environmental, landscape, visual, ecological and ornithological effects of the development and the adequacy of the evidence used to assess those effects.

The additional technical information:

- does not provide any reassessment of landscape and visual effects
- does not address the concerns raised by the community regarding National Park receptors and Special Qualities
- does not resolve the deficiencies identified within the ornithological assessment
- does not provide a collision risk assessment for the confirmed guyed structure
- does not address the wider concerns relating to cumulative effects and environmental impact.

Accordingly, whilst the inconsistency regarding mast height can now be regarded as clarified, the additional engineering information does not materially alter the conclusions of the Joint Submission.

**The principal concerns identified within the original representation remain extant and should continue to carry substantial weight in the determination of the application.**

#### **Application Amendments - Public Rights of Way**

The additional information submitted by the applicant includes updated constraints mapping showing the relationship between the proposed mast site and surrounding Public Rights of Way.

The mapping confirms the presence of Public Rights of Way near the proposed development and demonstrates that recreational users form an identifiable receptor group within the surrounding landscape. This is particularly relevant given the upland character of the area and the role of the surrounding access network in providing opportunities for recreation and appreciation of the landscape.

The importance of recreational receptors was identified within both the Joint Submission and the objection submitted by the Bannau Brycheiniog National Park Authority. The National Park Authority specifically raised concerns regarding the omission of representative viewpoints reflecting the experience of recreational users and concluded that the assessment did not adequately represent the effects of the proposal upon people enjoying the National Park and its Special Qualities.

The additional mapping reinforces rather than resolves those concerns. The confirmed presence of Public Rights of Way in the vicinity of the site demonstrates that recreational users are not a theoretical receptor group but form an established component of the receiving environment. Their experience of the landscape therefore requires appropriate representation within the Landscape and Visual Impact Assessment.

No additional visual assessment has been provided from these recreational routes, nor has any evidence been submitted demonstrating that the concerns raised by the National Park Authority regarding omitted recreational viewpoints have been addressed.

Accordingly, the additional information supports the conclusion that the Landscape and Visual Impact Assessment may continue to under-represent the effects of the proposal upon recreational receptors and people's enjoyment of the surrounding landscape.

#### **Application Amendments - Assessment Methodology & Viewpoint Selection**

The applicant has submitted additional Landscape and Visual Impact Assessment methodology information intended to explain the approach adopted in the appraisal of landscape and visual effects.

The methodology confirms that the assessment relies substantially upon professional judgement in determining landscape sensitivity, visual receptor sensitivity, magnitude of change and overall levels of effect. It further acknowledges that GLVIA3 does not prescribe a fixed methodology and that the assessment criteria adopted have been specifically tailored by the authors for the purposes of this appraisal.

Whilst the exercise of professional judgement is an accepted component of Landscape and Visual Impact Assessment, it places particular importance upon the selection of representative viewpoints and visual receptors. Where an assessment relies upon professional judgement rather than a wholly prescriptive methodology, the conclusions reached are inherently dependent upon the viewpoints selected, the receptors represented and the assumptions adopted during the assessment process.

This issue is directly relevant to the concerns raised by both the Joint Submission and the objection submitted by the Bannau Brycheiniog National Park Authority. The National Park Authority identified concerns regarding the omission of representative recreational viewpoints, including locations at Twyn y Gaer and Pen-y-Crug, and concluded that the assessment did not adequately represent the experience of users of the National Park or the effects upon its Special Qualities.

The additional methodology information does not address these concerns. No evidence has been provided demonstrating that the omitted viewpoints have now been assessed, nor that the conclusions of the Landscape and Visual Impact Assessment have been revisited considering the confirmed 122.5 metre height of the proposed mast.

Consequently, whilst the applicant has provided further explanation regarding the methodology employed, the additional information does not resolve the substantive concerns identified by either the Joint Submission or the Bannau Brycheiniog National Park Authority. If representative viewpoints remain omitted, additional explanation of the methodology cannot remedy the resulting limitations in the assessment.

#### **Application Amendments - Conclusion**

The additional information submitted during the re-consultation process confirms that concerns previously raised were justified and resulted in clarification of the development description. The applicant has now confirmed that planning permission is sought for a 122.5 metre guyed lattice meteorological mast and that the previously submitted 117.1 metre elevation drawing was illustrative rather than representative of the maximum dimensions of the proposed development.

Whilst this clarification provides greater certainty regarding the scale of the structure under consideration, it also confirms that consultees and members of the public were originally asked to comment upon an application that contained materially inconsistent information relating to one of its most fundamental characteristics.

The clarification does not reduce the scale of the proposal. On the contrary, it confirms that the larger of the dimensions previously referenced within the application documentation is the one for which consent is sought.

More importantly, the additional information does not address the substantive concerns identified within the Joint Submission and Community Representation Response, the objection submitted by Bannau Brycheiniog National Park Authority, or the concerns subsequently raised by the Community Council and other consultees.

No revised assessment has been provided addressing the implications of the confirmed mast height for landscape character, visual amenity, National Park receptors, recreational users, ornithological interests, cumulative effects or the wider environmental concerns identified during consultation.

Accordingly, whilst one aspect of the development description has now been clarified, the principal planning and environmental concerns remain substantially unchanged. The additional information provides greater certainty regarding the nature of the development but does not provide sufficient information to conclude that effects would be acceptable, nor does it resolve the concerns previously identified by objectors and consultees.

**The clarification of the proposal should therefore be regarded as the resolution of a documentation deficiency rather than the resolution of the substantive planning issues that remain before the Local Planning Authority.**

## 7. Ornithology

### Ornithology - Issues Previously Identified

The original Joint Submission and Community Representation Response identified significant deficiencies in the ornithological assessment submitted in support of the application. These included the absence of raw survey data, absence of flight-height analysis, absence of collision risk assessment for a 122.5 metre guyed mast, limited transparency regarding survey methodology, insufficient treatment of species of conservation concern and inadequate assessment of cumulative and precautionary risk.

### Outstanding Ecological Review

The consultation record indicates that concerns were previously raised regarding the adequacy of the Curlew assessment and the need for a revised Curlew and wider ornithological assessment prior to determination.

Subsequently, the Powys County Council Ecologist withdrew his holding objection following consideration of additional information submitted by the applicant. However, the information accepted at that stage comprised a literature-based justification and interpretation of existing survey findings rather than a revised field survey or updated ornithological assessment.

This is significant because substantial additional ornithological evidence has since been submitted during the re-consultation process, including long-term site-specific bird records, Breeding Bird Survey data and more recent observations relating to Curlew activity within the locality of the proposed development.

The ecological review undertaken by the County Ecologist necessarily pre-dated the submission of this additional evidence and therefore could not have considered the full body of ornithological information now before the Local Planning Authority.

**Consequently, uncertainty remains regarding the extent to which the applicant's conclusions have been tested against the additional ornithological evidence subsequently submitted and whether the current assessment fully reflects the ornithological baseline now available for consideration.**

### Ornithology - Additional Information Now Available

Since the original submission, further ornithological evidence has been provided by Mr D. Gareth Rees, an established British Trust for Ornithology Breeding Bird Survey surveyor for OS Grid SN9537 and surrounding squares.

Mr Rees states that he has undertaken near-continuous bird recording in and around the proposed site since 2006, amounting to approximately twenty years of records. His evidence includes systematic BTO Breeding Bird Survey coverage and approximately 3,200 records held within the BTO BirdTrack system. The surveyed area includes four 1 km squares: Ysgirfechan Farm SN9637, Ysgirfechan BBS square SN9537, Llyn Dwr SN9536 and Cwm Ffrydyll SN9636.

This is important because the dataset substantially predates the current meteorological mast and wind farm proposals and provides long-term local context against which the applicant's shorter survey period must be assessed.

### Ornithology - Curlew

The most significant new evidence relates to Curlew, *Numenius arquata*. Mr Rees records that a territorial Curlew has been present at Llyn Dwr, or within 1 km of that pool, in 17 of 20 survey years since 2006. The only stated exceptions are 2016 and the pandemic-restricted years of 2020 and 2021. He further records that the territory was occupied during both of his 2026 visits, including an adult Curlew alarm-calling at corvids on 30 May 2026.

This directly strengthens the concern that the applicant's assessment may understate the ornithological importance of the area. It also raises a specific issue in relation to the applicant's reported absence of Curlew during its 2024 breeding bird survey work, because Mr Rees recorded Curlew on the relevant BTO BBS square during 2024.

This application concerns a species that Curlew Wales has warned could face extinction as a breeding species in Wales within the next decade.

**The additional evidence therefore does not support a conclusion that Curlew interest is absent, negligible or adequately resolved. Rather, it indicates a long-established territory within the wider zone of potential influence.**

### Ornithology - Distinction Between BTO BBS and Applicant's "BBS"

Mr Rees makes an important methodological distinction between the formal BTO Breeding Bird Survey and the applicant's use of the term "Breeding Bird Survey".

The BTO Breeding Bird Survey is a national, scientifically structured survey programme operated by the BTO, JNCC and RSPB. Mr Rees' evidence is derived from that long-term survey context.

By contrast, the applicant's "BBS" appears to refer to survey work undertaken by its consultants between 2022 and 2024. This addendum notes that the two should not be treated as equivalent unless the applicant's methodology, raw records, survey routes, dates, timings, weather conditions and detection data are disclosed and capable of independent review.

The absence of confirmed breeding in the applicant's data is therefore not the same as evidence of absence, particularly for Curlew, where proving breeding can be difficult without targeted and repeated nest-focused survey effort.

### **Ornithology - Other Species of Conservation Concern**

The additional evidence also identifies a wider assemblage of upland and open-ground species of conservation concern.

Mr Rees records that across the four routinely surveyed 1 km squares, 16 Welsh Red-listed species and 14 Welsh Amber-listed species have been recorded during the breeding season since 2010.

Species specifically relevant to the proposed mast and its guy wires include:

- Curlew
- Skylark
- Meadow Pipit
- Common Snipe
- Golden Plover
- Hen Harrier
- Short-eared Owl.

The record of Hen Harrier is especially significant because Mr Rees identifies a female “Ringtail” Hen Harrier hunting over MOD land at Llyn Dwr and the BBS square in early June 2016 and 2017. Hen Harrier is a Schedule 1 species, and its presence reinforces the need for proper assessment of open-country bird movements in the wider landscape.

### **Ornithology - Collision Risk**

The confirmed development is now a 122.5 metre guyed meteorological mast. The presence of guy wires is central to the ornithological issue.

The applicant's assessment has not provided a transparent site-specific collision risk assessment for the confirmed 122.5 metre guyed meteorological mast addressing the specific structure now confirmed. The additional evidence indicates the presence of wide-ranging open-country species and nocturnally active or crepuscular species whose movement patterns may bring them into potential conflict with guy wires, particularly in poor visibility or during night-time movement.

Curlew is particularly relevant because Mr Rees records local nocturnal activity and after-dark movement in the breeding season. This is important because mitigation based on visual line markers may not adequately address collision risk in darkness or poor visibility.

### Ornithology - Predation and Perching Risk

The applicant appears to have relied on generalised predation evidence to suggest that a mast would not materially increase predation risk. The new local evidence challenges that conclusion.

Mr Rees records Ravens near the Llyn Dwr breeding site in April 2026 and an adult Curlew alarm calling at corvids on 30 May 2026. The concern is not simply whether corvid predation forms a large proportion of national wader nest predation statistics. The relevant planning question is whether the introduction of a 122.5 metre guyed meteorological mast within an open upland landscape could influence predator behaviour within the zone of influence of a persistent Curlew territory.

The applicant's own assessment acknowledges that predators utilise existing landscape features such as trees, walls and other elevated structures as vantage points. The proposed mast would introduce a substantially taller structure not currently present within the immediate area. The issue is therefore not whether predator perches already exist, but whether the introduction of a structure of this scale could alter predation opportunities within the surrounding landscape.

The applicant's reliance upon existing walls, trees and other elevated features as predator perches effectively acknowledges that avian predators utilise vantage points within the landscape. The proposed 122.5 metre mast would not simply replicate an existing perch but would introduce a structure substantially taller than any comparable feature within the immediate upland environment, providing an elevated vantage point across a wide area.

The relevant question is therefore not whether predator perches already exist, but whether the introduction of a structure of this scale could alter predator behaviour and predation opportunities within the vicinity of a known and persistent Curlew territory. This issue has not been addressed within the submitted assessment.

**Further site-specific assessment is required to determine whether the proposed structure could influence predator behaviour within the local Curlew territory.**

### Ornithology - Lighting and Nocturnal Risk

Further concern arises from the applicant's reference to external lighting during the hours of darkness, apparently in the form of an infrared aircraft warning light located near the upper part of the mast.

The applicant's analysis appears to address only whether the proposed infrared light would attract insects and therefore foraging bats. Whilst this may address one potential ecological pathway, it does not demonstrate that the structure is free from ecological or ornithological impact.

The relevant issue is whether the 122.5 metre guyed meteorological mast, its associated guy wires and any lighting arrangements may alter collision risk for nocturnally active or nocturnally moving birds. This is particularly important given the evidence of long-term Curlew occupation within the wider area and the recorded use of the landscape by other open-country species whose movements may occur during periods of darkness, poor visibility or adverse weather.

The applicant has not assessed whether the presence of the mast and guy wires may increase collision risk for nocturnally active birds, nor has it demonstrated that the proposed lighting arrangement adequately addresses such risk. The assessment therefore considers only one potential impact pathway whilst failing to evaluate the wider implications of introducing a 122.5 metre structure into airspace known to be utilised by species of conservation concern.

**Accordingly, a conclusion of “no impact” based solely upon the absence of insect attraction cannot reasonably be extended to ornithological impacts. The applicant’s assessment does not adequately address nocturnal bird movements, poor-visibility conditions or the potential collision risk associated with the mast and its guy wires.**

#### **Ornithology - Assessment**

The new long-term ornithological evidence materially strengthens the original objection. The additional long-term ornithological evidence submitted by Mr Rees was provided to the Local Planning Authority following completion of the ecological review process and therefore could not have formed part of the evidential basis upon which the earlier ecological conclusions were reached.

It shows that the affected landscape supports a long-established Curlew territory, a wider assemblage of Red-listed and Amber-listed upland birds, and records of species whose behaviour makes them relevant to collision risk from a tall, guyed structure.

The evidence also demonstrates that the applicant’s survey findings should be treated with caution where they conflict with long-term local records. In particular, the applicant’s apparent 2024 absence of Curlew is contradicted by BTO BBS evidence from the same year.

**The applicant has therefore not demonstrated that the original ornithological deficiencies have been resolved, nor that the additional long-term ornithological evidence now before the Local Planning Authority materially alters the concerns previously identified.**

### Ornithology - Findings

The ornithological concerns identified in the original Joint Submission remain unresolved and are now strengthened by additional long-term, site-specific evidence.

The Local Planning Authority should not conclude that ornithological impacts are acceptable unless the applicant provides a transparent, site-specific and independently reviewable assessment addressing;

- Raw survey data
- Survey methodology
- Curlew territory location and use
- NRW's requested Curlew assessment buffer
- Collision risk from the 122.5 metre mast and guy wires
- Nocturnal movement and poor-visibility risk
- Predator-perching effects
- Schedule 1 and Red-listed species

### Ornithology - Review of Ecological Consultation Responses

The consultation responses from Powys County Council's Ecologist demonstrate that ornithological impacts were initially considered sufficiently uncertain to justify a formal holding objection pending the submission of further information. The original consultation response concluded that additional evidence was required before the application could be determined.

The subsequent withdrawal of that objection was based primarily upon additional information submitted by the applicant concerning Curlew displacement distances, predation risk and the absence of confirmed breeding activity within 300 metres of the proposed mast location.

However, the additional long-term ornithological evidence now available through the records of Mr D. Gareth Rees introduces a substantially larger evidence base extending over approximately twenty years and comprising systematic BTO Breeding Bird Survey coverage and approximately 3,200 BirdTrack records from the surrounding area.

Importantly, this long-term dataset identifies repeated occupancy of a Curlew territory associated with the Llyn Dwr area in 17 of the last 20 survey years and records Curlew activity during 2026. This evidence was not available to the Council Ecologist when the original holding objection was withdrawn.

**Accordingly, whilst the revised position previously adopted by the County Ecologist is noted, the Local Planning Authority must determine the application on the basis of all material information currently before it.**

**The substantial body of additional long-term ornithological evidence submitted during the re-consultation process was not available when the earlier ecological conclusions were reached and raises legitimate questions regarding the assumptions underpinning the conclusion that Curlew impacts are negligible.**

**The existence of a persistent local territory, together with the confirmed 122.5 metre guyed structure and associated collision-risk considerations, indicates that ornithological concerns cannot be regarded as fully resolved.**

#### **Ornithology - Reliance Upon Generic Literature and Site-Specific Evidence**

The applicant's additional ornithological submission seeks to address concerns raised by Natural Resources Wales and Powys County Council regarding Curlew displacement and predation risk. In doing so, the applicant relies extensively upon published literature relating to Curlew behaviour around operational wind farms and guidance concerning disturbance distances for sensitive bird species.

Whilst published research provides important context, it does not remove the need to consider site-specific evidence where such evidence exists. The applicant's conclusions are derived principally from generalised studies undertaken elsewhere and from survey data collected over a relatively limited period.

By contrast, the additional evidence now available from Mr D. Gareth Rees comprises approximately twenty years of local survey information, including systematic BTO Breeding Bird Survey coverage and approximately 3,200 BirdTrack records from the surrounding area. This dataset provides a substantially longer temporal record of species occurrence and site use than was available to the applicant during preparation of the Environmental Report.

The existence of this long-term local evidence reinforces the need for caution when relying upon generic assumptions regarding Curlew behaviour, territory use and displacement effects. The Local Planning Authority should therefore consider the applicant's conclusions alongside the available site-specific evidence rather than relying solely upon published literature derived from other locations.

It is further noted that the principal authority relied upon by the applicant in support of departure from the precautionary 800 metre approach advocated by Natural Resources Wales is Whitfield, Green & Fielding (2010).

Concerns regarding the age, status and applicability of this document are examined in detail within the separate ornithological submission prepared by Mr D. Gareth Rees, to which the Authority is respectfully referred. Where competing interpretations exist regarding the protection of a Red-listed species in continuing decline, the precautionary principle remains an important consideration.

**The additional information continues to rely principally upon generic ornithological literature and studies undertaken elsewhere. The Local Planning Authority now also has before it a substantial body of site-specific evidence, including the applicant's own survey records identifying a possible Curlew territory within NRW's recommended assessment buffer together with approximately twenty years of local ornithological observations. Taken together, this evidence reinforces the need for a site-specific assessment of likely effects rather than sole reliance upon generalised assumptions derived from other locations.**

#### **Ornithology - NRW Assessment Buffer for Curlew**

Natural Resources Wales' original consultation response identified deficiencies within the Environmental Report in relation to Curlew and advised that the assessment had not adequately considered potential displacement and predation effects associated with the proposed development. NRW specifically advised that a buffer of no less than 800 metres should be used when assessing these effects on Curlew.

**Significantly, the applicant's own breeding bird survey identified a possible Curlew breeding territory approximately 620 metres from the proposed mast during the 2023 survey period. This location falls within the 800 metre assessment buffer that Natural Resources Wales advised should be applied. The applicant's own survey evidence therefore identifies potential Curlew interest within the very buffer that the applicant subsequently seeks to discount.**

This is a significant consideration because it demonstrates that NRW initially regarded the potential zone of influence of the development as extending substantially beyond the immediate footprint of the mast and associated infrastructure.

The additional long-term evidence now available from Mr D. Gareth Rees indicates repeated Curlew occupancy within the wider landscape surrounding the development and records use of the area over approximately two decades. This evidence reinforces the importance of considering impacts at an appropriate landscape scale rather than focusing solely upon the immediate vicinity of the mast.

NRW subsequently concluded that its concerns could be addressed through the applicant's additional submission and proposed mitigation measures. However, that conclusion was reached before the submission of the additional long-term local evidence now available to the Local Planning Authority.

Accordingly, the existence of the original 800 metre assessment requirement remains relevant when considering the wider ornithological context of the proposal and the substantial body of site-specific evidence that has subsequently become available.

Therefore, whilst NRW ultimately concluded that its concerns could be addressed through the applicant's additional submission and proposed mitigation measures, the original 800 metre assessment requirement remains relevant to the determination of this application.

**The applicant's own survey evidence identified a possible Curlew territory within that buffer, and the additional long-term ornithological evidence now before the Local Planning Authority demonstrates repeated Curlew occupancy within the wider landscape over approximately two decades. Taken together, these sources provide substantial site-specific evidence supporting assessment at the wider landscape scale originally advocated by NRW and reinforce the need for a precautionary approach when evaluating potential effects upon Curlew.**

#### **Ornithology - Curlew Presence and Survey Interpretation**

The applicant's supplementary ornithological submission states that Curlew was not recorded during the 2024 breeding bird survey undertaken in support of the application. The submission further relies upon this and other survey findings when concluding that impacts upon Curlew are unlikely to be significant.

However, the long-term evidence subsequently provided by Mr D. Gareth Rees indicates that Curlew continued to be recorded within the wider survey area during the same period. This additional evidence introduces an important point of caution when interpreting apparent absences from short-duration survey programmes.

The issue is not necessarily that either dataset is incorrect, but rather that differing conclusions may arise depending upon survey timing, survey coverage, weather conditions, detection probability and the inherently mobile nature of Curlew within upland breeding landscapes.

The contrast between the applicant's findings and the longer-term local record demonstrates the importance of considering the full evidence base before concluding that Curlew interest is absent or of limited significance.

**The additional information highlights a difference between the applicant's survey findings and the available long-term local record. This reinforces the need for a precautionary approach when assessing Curlew presence and potential impacts.**

### Ornithology - Recognition of Bird Collision Risk

The applicant's supplementary ornithological submission references guidance recommending the installation of line markers on guy wires as a mitigation measure for meteorological masts and other guyed structures. This is consistent with the subsequent recommendations of the Powys County Council Ecologist, who advised that bird deflectors should be installed and maintained along the outer guy wires throughout the operational life of the development.

These recommendations are significant because they acknowledge the existence of a potential bird collision pathway associated with the proposed 122.5 metre guyed meteorological mast. The requirement for mitigation demonstrates that bird collision risk has been recognised as a relevant environmental consideration rather than a purely theoretical concern.

The planning issue is therefore not whether a collision pathway exists, but whether the nature, extent and significance of that risk have been adequately assessed.

Whilst mitigation has been proposed, no transparent site-specific collision risk assessment has been provided for the confirmed structure. Consequently, it is not possible to determine from the submitted information the level of risk presented to species known to occur within the surrounding landscape.

This issue is particularly relevant given the additional ornithological evidence now available, including records of Curlew, Golden Plover, Common Snipe, Hen Harrier and other species of conservation concern. The presence of such species reinforces the need for a robust understanding of potential collision risk before conclusions can be reached regarding likely effects.

**The additional information therefore recognises the existence of a potential collision pathway but does not provide sufficient evidence to quantify that risk or demonstrate that its implications have been fully assessed. Accordingly, uncertainty remains regarding the potential effects of the proposed development upon birds using the surrounding landscape.**

### Ornithology - Conclusion

The additional ornithological evidence submitted during the re-consultation period materially strengthens the concerns identified within the original Joint Submission and Community Representation Response.

The evidence demonstrates the existence of a long-established Curlew territory within the wider area surrounding the proposed development, supported by approximately twenty years of systematic recording and around 3,200 BirdTrack records.

It further confirms that the affected landscape supports a diverse assemblage of Red-listed and Amber-listed species, including species whose ecology, behaviour and flight characteristics are relevant to the assessment of a 122.5 metre guyed meteorological mast.

**The significance of the BTO data lies not merely in its duration but in the fact that it was collected using a nationally recognised, repeatable and standardised methodology.**

Importantly, the new information does not simply add further bird records. It raises substantive questions regarding the adequacy of the applicant's ornithological baseline, the reliability of conclusions drawn from a comparatively short survey period, and the extent to which the applicant's assessment reflects the long-term ecological reality of the site and surrounding upland landscape.

The applicant has not provided sufficient evidence to demonstrate that the concerns originally raised in relation to Curlew, collision risk, nocturnal movements, predator-perching effects, species of conservation concern or cumulative ornithological impacts have been satisfactorily addressed. Nor has the applicant produced a transparent and independently reviewable assessment capable of reconciling the differences between its findings and the long-term evidence now available.

Accordingly, the additional information submitted by the applicant should not be regarded as resolving the ornithological concerns identified within the original submission.

On the contrary, the new evidence increases uncertainty regarding the likely effects of the proposal and reinforces the need for a precautionary approach.

The 30 May 2026 observation of an adult Curlew alarm-calling at corvids provides behavioural evidence consistent with territorial occupation during the breeding season and reinforces the conclusion that Curlew remain actively associated with the locality.

**The purpose of this submission is not to demonstrate that significant ornithological harm will occur, but to demonstrate that the evidence currently before the Local Planning Authority is insufficient to reliably conclude that such harm will not occur.**

**The additional information submitted during the re-consultation process does not provide a comprehensive, transparent or independently verifiable assessment of Curlew, collision risk, nocturnal bird movements, predator-perching effects or impacts upon other species of conservation concern.**

**The significance of the additional ornithological evidence extends beyond Curlew alone. The long-term dataset demonstrates that the wider landscape supports a substantial assemblage of species of conservation concern, including multiple Welsh Red-listed and Amber-listed species. The issue for determination is therefore not confined to a single species but concerns the adequacy of the ornithological baseline and the assessment of bird interests across the wider receiving environment.**

**Accordingly, significant uncertainty remains regarding the likely ornithological effects of the proposed development. In the absence of sufficient evidence to properly assess these matters, the Local Planning Authority cannot reasonably conclude that the proposed development would avoid unacceptable impacts upon Curlew or other species of conservation concern present within the area.**

## **8. Peat and Hydrology - Review of Additional Information**

The original Joint Submission and Community Representation Response submitted on 4 January 2026 identified detailed concerns relating to peatland sensitivity, hydrology, drainage pathways, environmental risk and the absence of supporting technical information necessary to properly assess those matters.

The additional information submitted during the re-consultation process does not include any substantive new peatland, hydrological, hydrogeological or drainage assessment capable of addressing those concerns. Accordingly, the findings and conclusions set out within the original submission remain applicable and should continue to form part of the evidential basis for determination of the application.

**No substantive new peatland, hydrological, hydrogeological or drainage assessment has been identified within the additional material submitted by the applicant.**

**Accordingly, the additional information does not materially alter the conclusions reached within the original Joint Submission and Community Representation Response.**

**The concerns previously raised in relation to peat, hydrology, drainage pathways, potential environmental effects and the adequacy of the supporting evidence remain extant.**

## 9. Cultural Heritage

The additional information submitted during the re-consultation process does not materially alter the cultural heritage concerns identified within the original Joint Submission and Community Representation Response.

The applicant's own Cultural Heritage Assessment acknowledges that the significance of heritage assets within the study area is derived not only from the physical asset itself but also from its wider landscape setting, visual context and relationship with the surrounding upland landscape.

This is particularly relevant in relation to Maen Richard and other heritage assets whose significance is inseparable from their location within an open, undeveloped upland environment. Such assets derive part of their significance from their enduring relationship with the surrounding upland landscape and their relative separation from modern vertical infrastructure.

The additional engineering information now confirms that the structure proposed is a 122.5 metre guyed lattice mast incorporating multiple levels of guy wires, associated anchor points and aviation lighting. This is a substantial engineered structure that would introduce a prominent vertical feature into a landscape that has remained largely free from modern vertical infrastructure.

The issue is not simply whether the mast would be visible from individual heritage assets. The issue is whether the introduction of a structure of this scale would fundamentally alter the landscape context within which those assets are experienced and understood.

The additional information does not provide any substantive reassessment of this issue. Nor does it demonstrate that sufficient weight has been given to the effect of introducing a highly visible modern vertical structure into views that currently contribute to the significance, appreciation and cultural value of heritage assets within the surrounding landscape.

Indeed, confirmation of the mast's full height reinforces concerns previously raised by the community. The revised information confirms that the structure would be larger than illustrated in parts of the original application documentation and would remain a prominent and incongruous feature within an otherwise undeveloped upland setting.

**Accordingly, the additional information does not resolve the cultural heritage concerns identified within the original submission. On the contrary, confirmation of the scale of the proposed development strengthens concerns regarding the effect of the mast upon the landscape setting, visual context and appreciation of heritage assets within the wider area.**

## 10. Construction, Access and Restoration

The additional information submitted during the re-consultation process does not materially alter the concerns identified within the original Joint Submission and Community Representation Response regarding construction impacts, access arrangements, decommissioning or site restoration.

Whilst the proposed development is described as temporary, limited information has been provided regarding the practical implementation of construction activities, the management of environmental effects during installation, or the methodology by which the site would ultimately be restored following removal of the mast and associated infrastructure. No detailed Construction Environmental Management Plan has been identified setting out how potential impacts upon soils, vegetation, hydrology, ecology and surrounding environmental receptors would be avoided, controlled, monitored or remediated.

Similarly, whilst the application refers to eventual removal of the mast, limited information has been provided regarding the standards to which restoration would be undertaken, the methodology by which disturbed ground would be reinstated, the criteria by which restoration success would be measured, or the arrangements for post-restoration monitoring and remedial works should reinstatement prove unsuccessful.

These omissions are significant because the temporary nature of a development should not be assumed to guarantee that all resulting effects will also be temporary. Ground disturbance, excavation works, soil compaction, vegetation loss and changes to local drainage patterns may persist beyond the operational life of the structure unless effective restoration measures are implemented.

The additional information submitted during the re-consultation process does not provide substantive new assessment of these matters. Consequently, the concerns previously identified regarding construction management, access arrangements, decommissioning methodology and restoration commitments remain substantially unchanged. Accordingly, insufficient information has been provided to demonstrate that construction impacts can be adequately managed or that the site can be restored to its pre-development condition following removal of the proposed meteorological mast and associated infrastructure.

**The additional information submitted during the re-consultation process does not materially address the concerns previously identified regarding construction, access, decommissioning or restoration. Whilst the development continues to be described as temporary, the information before the Local Planning Authority does not provide sufficient detail to demonstrate how temporary infrastructure would be installed, removed, restored and monitored in a manner that would avoid longer-term environmental effects. The original concerns therefore remain applicable.**

### 11. Development Description - Physical Extent of the Proposed Structure

The additional engineering information provides greater clarity regarding the physical extent of the proposed development.

Whilst much of the discussion surrounding the proposal has focused upon the height of the mast, the engineering drawing confirms that the development comprises considerably more than a simple vertical structure.

In addition to the 122.5 metre lattice mast itself, the proposal incorporates multiple levels of guy wires extending to anchor points located at distances of up to approximately 60 metres from the mast base.

The physical footprint and zone of influence of the development therefore extends substantially beyond the mast itself. The engineering information confirms the presence of a complex guyed structure occupying a significantly larger area than may be inferred from consideration of the mast alone.

This clarification is relevant because a number of the concerns identified within the original Joint Submission relate not only to the mast but to the wider physical presence of the development, including its visibility within the landscape, potential interaction with birds, effects upon recreational receptors and the practical implications of construction, maintenance and restoration activities.

The additional engineering information therefore reinforces the importance of assessing the proposed development as an integrated structure comprising the mast, guy wires, anchor points and associated infrastructure rather than considering the mast in isolation.

**Whilst the new information provides limited clarity regarding the physical configuration of the proposal, it does not materially alter the concerns identified within the original Joint Submission and Community Representation Response. Instead, it confirms the scale and extent of the structure against which those concerns must now be assessed.**

## 12. Temporary Nature, Decommissioning and Restoration

The original Joint Submission and Community Representation Response raised concerns regarding the temporary nature of the proposed development and the absence of certainty surrounding the removal of the mast, ancillary infrastructure and restoration of the site following cessation of use.

These concerns were subsequently reinforced by the Bannau Brycheiniog National Park Authority, which concluded that the description of development was insufficiently precise to ensure the temporary nature of the proposal and recommended that decommissioning and restoration should be secured through a planning obligation rather than by planning condition alone. The National Park Authority further noted that the application documentation failed to provide adequate certainty regarding the scale of the proposed development and the arrangements for its eventual removal.

The additional information submitted during the re-consultation period has clarified aspects of the mast design and confirmed the proposed structure to be a 122.5 metre guyed lattice meteorological mast. However, no equivalent clarification has been identified regarding the legal mechanism by which decommissioning, removal of infrastructure and restoration of the site would be secured at the end of the operational period.

No additional information has been provided detailing restoration objectives, restoration standards, aftercare requirements, financial guarantees, bond arrangements or any proposed planning obligation intended to secure site reinstatement. Nor has any information been identified demonstrating how compliance with the temporary nature of the development would be monitored and enforced throughout the proposed operational period.

Accordingly, whilst the applicant has addressed the uncertainty regarding mast height, the concerns previously raised regarding decommissioning, restoration and the long-term protection of the site remain unresolved. The additional information therefore does not address one of the principal concerns identified by both the Joint Submission and the Bannau Brycheiniog National Park Authority.

**The additional information does not provide sufficient certainty regarding decommissioning, restoration or the mechanisms by which the temporary nature of the development would be secured and enforced.**

### 13. Confirmation of Development Parameters

The additional information confirms that the original application documentation contained differing descriptions of the proposed meteorological mast. The Indicative Elevation Plan submitted as part of the original Environmental Report illustrates a mast height of approximately 117 metres.

Subsequent engineering information submitted during the application process has now confirmed that the proposed structure is in fact a 122.5 metre guyed meteorological mast.

This difference is not insignificant. It demonstrates that the concerns raised within the original Joint Submission and subsequently by the Bannau Brycheiniog National Park Authority regarding the consistency and clarity of the development description were well founded.

Whilst the additional engineering information has now clarified the height of the proposed structure, the existence of materially different mast dimensions within the application documentation reinforces concerns regarding the adequacy of the information originally available to consultees and decision-makers.

**The additional information confirms that the application documentation contained materially different descriptions of the proposed mast height. The uncertainty has now been clarified, but the concerns previously raised regarding the consistency of the development description were justified.**

#### 14. Landscape Context

The additional information confirms that the proposed development would be located on undeveloped greenfield land described within the application documentation as agricultural land and open moorland, with approximately 0.90 hectares of greenfield land associated with the proposal.

Whilst this information does not materially alter the conclusions reached within the original Joint Submission, it reinforces the landscape context within which the proposal must be assessed. The receiving environment is not characterised by existing large-scale vertical infrastructure but by open upland moorland landscapes that contribute to the rural character of the area and the wider setting of the Bannau Brycheiniog National Park.

The clarification therefore supports, rather than diminishes, the concerns previously raised regarding landscape character, visual effects and the introduction of a substantial engineered structure into a sensitive upland environment. The confirmed 122.5 metre mast, associated guy wires, anchor points and aviation warning infrastructure must be considered in the context of this undeveloped landscape setting.

**The additional information reinforces the landscape context identified within the original Joint Submission and does not alter the conclusions against the grant of planning previously reached regarding landscape character and visual sensitivity.**

### 15. Cultural Heritage and Archaeology - Scope of Consultation Responses

The additional consultation responses from Cadw and Heneb have been reviewed as part of this addendum.

It is important to recognise that both responses relate to specific and limited areas of professional responsibility. Cadw's assessment is confined to the likely effects of the proposal upon designated heritage assets within its statutory remit, whilst Heneb's comments are directed towards the presence or absence of archaeological implications associated with the proposed works.

Neither response considers the wider planning concerns that form the basis of the Joint Submission and Community Representation Response.

Neither organisation has assessed landscape character, visual amenity, National Park Special Qualities, recreational receptors, cumulative effects, ornithological impacts, ecological impacts, collision risk associated with the guyed structure, or the adequacy of the supporting environmental information.

Consequently, whilst the consultation responses are noted, they should not be interpreted as providing support for the proposal in relation to the wider environmental and planning matters that remain under consideration.

The absence of concerns within the limited scope of heritage and archaeological consultation does not address, diminish or resolve the substantive issues identified within the Joint Submission, the Community Representation Response or the objection submitted by the Bannau Brycheiniog National Park Authority.

**Accordingly, the additional consultation responses do not materially alter the conclusions reached within the original Joint Submission and Community Representation Response.**

## 16. Planning Implications

The re-consultation process arose primarily because the application documentation contained materially inconsistent information regarding one of the most fundamental characteristics of the proposed development - its height.

This inconsistency was identified within the original Joint Submission and Community Representation Response and was subsequently highlighted by Bannau Brycheiniog National Park Authority. In the absence of clarification, consultees and members of the public were being asked to comment upon a proposal whose dimensions were not consistently described within the application documentation.

The circumstances giving rise to the re-consultation process are therefore significant. Public consultation can only function effectively where consultees are provided with sufficient information to understand the nature, scale and characteristics of the development for which consent is sought. The need for clarification demonstrates that this standard was not achieved when the application was originally submitted.

Whilst Powys County Council elected to seek clarification from the applicant and undertake a further consultation exercise, the re-consultation process should not obscure the fact that the original application documentation contained a material deficiency that required subsequent correction.

The clarification now provided resolves uncertainty regarding the height and configuration of the proposed structure. However, no equivalent body of new environmental information has been submitted in relation to landscape and visual effects, recreational receptors, cultural heritage, ornithology, peatland, hydrology, restoration commitments or the adequacy of the supporting evidence base.

The planning significance of this distinction is important. Clarification of the development description assists in defining the proposal before the Local Planning Authority. It does not provide evidence that the environmental effects of the proposal are less significant than previously assessed, nor does it resolve the concerns identified within the original Joint Submission and Community Representation Response.

The additional consultation responses received during the re-consultation period are also relevant. Concerns continue to be expressed by Bannau Brycheiniog National Park Authority, Trallong, Penpont and Llanfihangel Nant Bran Community Council, elected representatives and a Member of the Senedd. The persistence of these concerns following submission of additional information is itself a material planning consideration.

The purpose of the re-consultation exercise was to address uncertainty arising from deficiencies within the original application documentation. Whilst clarification has now been obtained regarding the scale of the proposed structure, the wider environmental concerns identified during consultation remain substantially unresolved.

**Accordingly, the principal planning balance remains materially unchanged. The re-consultation process has rectified a deficiency in the description of the proposed development but has not resolved the substantive planning and environmental concerns identified within the original Joint Submission and Community Representation Response.**

## **17. Remaining Deficiencies and Absence of Evidence**

Following review of the additional information submitted during the re-consultation process, multiple deficiencies and areas of uncertainty remain.

### **Deficiency - Landscape and Visual Impact Assessment**

- No reassessment has been undertaken to address concerns raised by Bannau Brycheiniog National Park Authority regarding omitted viewpoints.
- No additional assessment has been provided from representative recreational viewpoints identified by the National Park Authority.
- No evidence has been provided demonstrating that the effects upon the Special Qualities of the National Park have been reconsidered.
- No revised assessment has been undertaken addressing the concerns raised regarding recreational receptors and Public Rights of Way.

### **Deficiency - Ornithology**

- Long-term site-specific ornithological evidence submitted during the re-consultation process has not been incorporated into the applicant's assessment.
- No transparent reconciliation has been provided between the applicant's survey findings, including the identification of a possible Curlew territory approximately 620 metres from the proposed mast, and the long-term evidence indicating repeated Curlew occupancy within the wider landscape over approximately two decades.
- The applicant's conclusions continue to rely substantially upon generic ornithological literature and studies undertaken elsewhere, whilst significant site-specific evidence has subsequently become available.
- No transparent site-specific collision-risk assessment has been provided for species known to occur within the surrounding landscape.
- No assessment has been provided addressing nocturnal bird movements or collision risk during periods of poor visibility.
- No detailed assessment has been provided regarding the potential influence of the structure as a predator perch or elevated vantage point within the wider Curlew territory.
- No published evidence has been identified demonstrating that the revised Curlew and wider ornithological assessment previously requested by the Powys County Council Ecologist has been completed or independently reviewed.

### **Deficiency - Cultural Heritage**

- No additional assessment has been provided addressing concerns regarding the effect of the proposed development upon the landscape setting of heritage assets.
- No evidence has been provided demonstrating that the relationship between heritage assets and the wider upland landscape has been reassessed.

#### **Deficiency - Peat, Hydrology and Environmental Sensitivity**

- No substantive additional peatland assessment has been submitted.
- No substantive additional hydrological assessment has been submitted.
- No additional evidence has been provided addressing concerns regarding drainage pathways, hydrological connectivity or wider environmental sensitivity.

#### **Deficiency - Construction, Decommissioning and Restoration**

- No detailed restoration strategy has been submitted.
- No aftercare programme has been identified.
- No reinstatement specification has been provided.
- No mechanism has been identified securing restoration standards following decommissioning.
- No financial guarantee, bond or equivalent mechanism has been identified to secure site restoration.

#### **Deficiency - Planning and Procedural Matters**

- The re-consultation process has clarified aspects of the development description but has not materially addressed many of the substantive environmental concerns identified within the original submissions.
- Several consultation responses continue to rely upon information that remains incomplete, disputed or subject to professional judgement.
- Significant reliance continues to be placed upon assumptions, mitigation measures and future management arrangements rather than demonstrated environmental outcomes.

#### **Deficiency - Weight to be Attached to Outstanding Uncertainty**

The purpose of the planning process is not merely to identify possible impacts but to ensure that sufficient information exists to allow those impacts to be properly assessed. Where material uncertainty remains regarding environmental effects, it is appropriate for decision-makers to attach weight to that uncertainty when determining whether the application complies with relevant planning policy.

#### **Deficiencies - Overall Position**

The review undertaken as part of this Technical Addendum demonstrates that significant deficiencies, evidential gaps and unresolved uncertainties remain within the information submitted in support of Planning Application 25/1679/FUL.

Those deficiencies are not confined to a single technical discipline but extend across landscape and visual assessment, ornithology, cultural heritage, recreational receptors, environmental sensitivity, restoration commitments and the adequacy of the supporting evidence base.

The additional information submitted during the re-consultation process has not materially resolved these matters. In several areas no substantive new assessment has been provided, whilst in others the additional evidence has reinforced existing concerns and introduced further uncertainty.

Consequently, the Local Planning Authority remains without a complete, robust and independently verified evidential basis upon which to reach reliable conclusions regarding the likely environmental effects of the proposed development.

The concerns identified within the original Joint Submission and Community Representation Response therefore remain valid and are further reinforced by the findings of this Technical Addendum.

**Taken collectively, the remaining deficiencies are of sufficient significance that the environmental effects of the proposal cannot be regarded as having been fully identified, adequately assessed or satisfactorily demonstrated. The information currently before the Local Planning Authority is therefore insufficient to support a fully informed planning decision.**

#### **Material Issues Remaining for Determination**

Whilst clarification has been provided regarding the maximum height and configuration of the proposed meteorological mast, multiple material deficiencies, evidential gaps and areas of uncertainty remain relevant to the determination of Planning Application 25/1679/FUL.

The purpose of this addendum is not to demonstrate that the proposal would necessarily result in unacceptable environmental effects. Rather, it is to assess whether the additional information submitted during the re-consultation process resolves the concerns previously identified and provides a sufficiently robust evidential basis for determination.

Having reviewed the additional information, the principal conclusion is that whilst aspects of the development description have been clarified, substantial uncertainty remains regarding landscape and visual effects, ornithology, cultural heritage, recreational receptors, environmental sensitivity, restoration commitments and the adequacy of the supporting evidence base.

**Whilst each of the deficiencies identified within this addendum is significant in its own right, the principal concern arises from their cumulative effect.**

It is also relevant that many of the concerns identified within the *Joint Submission and Community Representation Response to Planning Application 25/1679/FUL – Erection of a Temporary Meteorological Mast and Ancillary Structures for Measurement of Wind and Weather Data*, submitted to Powys County Council on 4 January 2026, were not confined to matters of planning judgement or professional interpretation.

The submission included a dedicated review of evidential robustness, assessment integrity, document control and quality assurance, identifying concerns regarding factual accuracy, internal consistency and the reliability of the supporting documentation.

Since that submission was made, a number of the matters originally identified have required correction, clarification or supplementation through the re-consultation process, including issues relating to the description of the development, the reported mast height and other aspects of the supporting documentation.

**Whilst individual errors may be capable of correction in isolation, their occurrence in relation to fundamental aspects of the proposal demonstrates that the concerns raised regarding evidential reliability were not misplaced.**

This is relevant because the issue before the Local Planning Authority is not simply whether specific inaccuracies have now been corrected, but whether the supporting evidence, taken as a whole, provides a sufficiently robust, internally consistent and reliable basis upon which environmental effects can be confidently identified, assessed and evaluated.

The repeated need for clarification, amendment and supplementary explanation materially affects the weight that can properly be attached to the conclusions presented within the applicant's assessment and reinforces the wider concern regarding the reliability of the evidence base currently before the Authority.

The additional ornithological evidence submitted during re-consultation further illustrates this issue, as it introduces substantial long-term site-specific data that was not adequately reflected within the original assessment and which raises legitimate questions regarding the completeness of the ornithological baseline.

**The identified deficiencies are not confined to a single environmental discipline but extend across landscape and visual assessment, ornithology, cultural heritage, peatland and hydrology, construction impacts, restoration and the adequacy of the supporting evidence base.**

**The issue for determination is therefore not simply the existence of individual information gaps, but whether the evidence as a whole provides a sufficiently reliable basis upon which the Local Planning Authority can reach a fully informed planning decision.**

**The planning balance must therefore be undertaken in the context of the unresolved evidential deficiencies and continuing uncertainties identified in Table 1 overleaf.**

The table summarises the principal matters examined within this Technical Addendum and records whether they can reasonably be regarded as resolved based on the information currently before the Local Planning Authority.

The table demonstrates that a number of material issues remain unresolved and that important gaps persist within the available evidence base. Consequently, significant uncertainty remains regarding the likely environmental effects of the proposed development and whether those effects have been adequately identified, assessed and addressed.

| Topic                                  | Position Following Re-Consultation                                                                                                                          | Status      |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Development Description                | Mast height and configuration clarified as a 122.5 metre guyed meteorological mast.                                                                         | Resolved    |
| Landscape & Visual Impact Assessment   | No reassessment undertaken to reflect confirmed development parameters. Concerns regarding viewpoints, receptor selection and National Park effects remain. | Outstanding |
| BBNP                                   | Concerns regarding effects upon landscape setting, Special Qualities and National Park receptors remain unresolved.                                         | Outstanding |
| Recreational Receptors & Rights of Way | No additional assessment of recreational users or omitted viewpoints has been provided.                                                                     | Outstanding |
| Ornithological Baseline                | Long-term site-specific evidence raises questions regarding completeness of baseline information.                                                           | Outstanding |
| Curlew Assessment                      | Long-term records and applicant survey findings remain difficult to reconcile. Questions remain regarding territory use and assessment approach.            | Outstanding |
| NRW Curlew Assessment Buffer           | Applicant's own survey evidence identifies a possible territory within NRW's recommended assessment area.                                                   | Outstanding |
| Bird Collision Risk                    | No transparent site-specific collision-risk assessment has been provided for the confirmed guyed structure.                                                 | Outstanding |
| Nocturnal Bird Movements               | No detailed assessment of nocturnal movement or poor-visibility collision risk identified.                                                                  | Outstanding |
| Predator Perching Effects              | No site-specific assessment provided addressing potential changes in predator behaviour.                                                                    | Outstanding |
| Cultural Heritage                      | Concerns remain regarding landscape setting and the contribution of wider views to heritage significance.                                                   | Outstanding |
| Peat and Hydrology                     | Original concerns regarding environmental sensitivity remain substantially unchanged.                                                                       | Outstanding |
| Construction Management                | No substantive new information identified addressing construction-related environmental effects.                                                            | Outstanding |

## 18. Conclusion

This Technical Addendum has reviewed the additional information submitted by the applicant during the re-consultation process together with the consultation responses and independent evidence subsequently made available.

That review demonstrates that whilst one aspect of the development description has been clarified, the re-consultation process has not resolved the substantive concerns identified within the original Joint Submission and Community Representation Response.

The additional information does not provide a revised Landscape and Visual Impact Assessment addressing concerns raised by Bannau Brycheiniog National Park Authority regarding viewpoint selection, recreational receptors, National Park users or the Special Qualities of the National Park. Nor does it provide any substantive reassessment of the effects of the development upon the wider landscape context in which those impacts would occur.

The additional information does not materially address concerns relating to peat, hydrology, drainage pathways or wider environmental sensitivity. No substantive new technical assessment has been submitted in these areas and the concerns identified within the original submission therefore remain unchanged.

Similarly, no substantive additional information has been provided regarding construction management, decommissioning arrangements, restoration standards, aftercare requirements or the mechanisms by which long-term site reinstatement would be secured. Important questions therefore remain regarding the practical meaning of the development's claimed temporary status and the extent to which restoration outcomes can be guaranteed.

In relation to cultural heritage, the additional information does not demonstrate that sufficient weight has been given to the contribution made by landscape setting, visual context and wider upland character to the significance of heritage assets such as Maen Richard and others within the surrounding area.

The most significant new information relates to ornithology. The long-term evidence submitted by Mr D. Gareth Rees introduces approximately twenty years of local survey information and a substantial body of site-specific records that were not available when the original Environmental Report was prepared.

**This evidence raises legitimate questions regarding Curlew presence, the adequacy of the ornithological baseline, the interpretation of survey results, collision risk, nocturnal movements and wider ecological effects. Rather than narrowing the evidential gap, the additional evidence identifies further matters that have not been adequately assessed within the submitted information.**

The consultation responses received during the re-consultation process are also significant. Concerns regarding landscape, visual impact, heritage setting, recreational receptors, ornithology, peatland sensitivity and wider environmental effects have not been confined to local residents or community representatives.

Objections and concerns have been raised by Bannau Brycheiniog National Park Authority, Trallong, Penpont and Llanfihangel Nant Bran Community Council, elected local representatives and a Member of the Senedd. Whilst each has approached the proposal from a different perspective, there is a notable degree of consistency in the issues identified.

The recurring themes include the adequacy of the environmental information, the effect of the proposal upon the landscape and special qualities of the National Park, impacts upon heritage setting, recreational users and ecological interests, together with concerns regarding the relationship between the proposed meteorological mast and the wider Garreg Fawr wind energy proposal.

The significance of these representations lies not simply in the number of objections received, but in the breadth of professional, elected and statutory bodies that have independently identified similar concerns. The persistence of those concerns following the submission of additional information indicates that important planning issues remain unresolved.

The Local Planning Authority is therefore not faced with an isolated community objection, but with a body of evidence and opinion drawn from community representatives, specialist consultees, elected councillors, the Community Council, the National Park Authority and a Member of the Senedd, all of whom have identified matters requiring careful consideration before any planning decision is reached.

Taken as a whole, the re-consultation process has provided clarification in certain limited areas but has not removed the principal deficiencies, evidential gaps and areas of uncertainty identified within the original Joint Submission and Community Representation Response.

Accordingly, this Technical Addendum concludes that significant evidential gaps remain regarding the environmental effects of the proposed development, the adequacy of the supporting evidence and the robustness of several of the applicant's conclusions.

**Those uncertainties must be afforded substantial weight by the Local Planning Authority when determining Planning Application 25/1679/FUL.**

## 19. Requested Determination

This Technical Addendum has reviewed the additional information submitted during the re-consultation process together with the consultation responses and independent evidence subsequently made available.

The review concludes that, whilst certain aspects of the proposal have been clarified, substantial deficiencies, evidential gaps and areas of uncertainty remain. In several important respects, particularly ornithology, the additional information has strengthened rather than reduced concern regarding the potential environmental effects of the development.

The additional information has not resolved concerns relating to landscape and visual effects, recreational receptors, the setting and special qualities of Bannau Brycheiniog National Park, cultural heritage, peatland and hydrological sensitivity, construction impacts, restoration commitments or the adequacy of the supporting environmental evidence.

Furthermore, concerns regarding the proposal continue to be expressed by a range of independent bodies and individuals, including Bannau Brycheiniog National Park Authority, Trallong, Penpont and Llanfihangel Nant Bran Community Council, elected representatives and a Member of the Senedd. Whilst approaching the proposal from different perspectives, these parties have identified multiple common concerns relating to environmental assessment, landscape effects, heritage setting, ecology and the wider planning implications of the proposal.

The persistence of these concerns following the submission of additional information indicates that important planning issues remain unresolved.

Accordingly, it is respectfully submitted that the Local Planning Authority should conclude that sufficient information has not been provided to demonstrate that the environmental effects of the proposed development have been fully identified, adequately assessed or satisfactorily addressed.

Where material uncertainty remains regarding potentially significant environmental effects, the precautionary principle remains relevant to the determination of the application.

The findings set out within the original Joint Submission and Community Representation Response, together with the additional evidence and analysis presented within this Technical Addendum, demonstrate that significant deficiencies, evidential gaps and areas of uncertainty remain within the information before the Local Planning Authority.

Those deficiencies extend across multiple environmental disciplines and include matters relating to landscape and visual effects, recreational receptors, cultural heritage, ornithology, environmental sensitivity, restoration and the adequacy of the supporting evidence base.

This Technical Addendum has reviewed the additional information submitted during the re-consultation process together with the consultation responses and independent evidence subsequently made available.

The review concludes that, whilst aspects of the proposal have been clarified, significant evidential deficiencies, information gaps and areas of uncertainty remain.

The additional information does not materially resolve concerns relating to landscape and visual effects, recreational receptors, the setting and special qualities of Bannau Brycheiniog National Park, cultural heritage, ornithology, peatland and hydrological sensitivity, construction impacts, restoration commitments or the adequacy of the supporting environmental evidence.

**These deficiencies are not procedural or technical matters of detail. They relate directly to the identification, assessment and evaluation of the likely environmental effects of the proposed development.**

**Accordingly, the information currently before the Local Planning Authority is insufficient to demonstrate that the likely environmental effects of the proposed development have been fully identified, adequately assessed or satisfactorily addressed.**

**For that reason, the only planning decision that can properly be supported on the basis of the evidence currently available is refusal of Planning Application 25/1679/FUL.**

**To determine the application otherwise would require the Authority either to disregard unresolved evidential deficiencies or to reach conclusions that are not adequately supported by the information currently available.**