



Nant Mithil Energy Park, Powys.
PEDW DNS Application Ref: DNS CAS-01907-D7Q6Z1.

CPRW-RE-think Chapter 7 on
Access Traffic and Transport

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Evidence by CPRW-ReThink on:

Access Traffic and Transport

This chapter on Access Traffic and Transport will focus on missing key information and the impact to local residents and the environment.

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1. INTRODUCTION

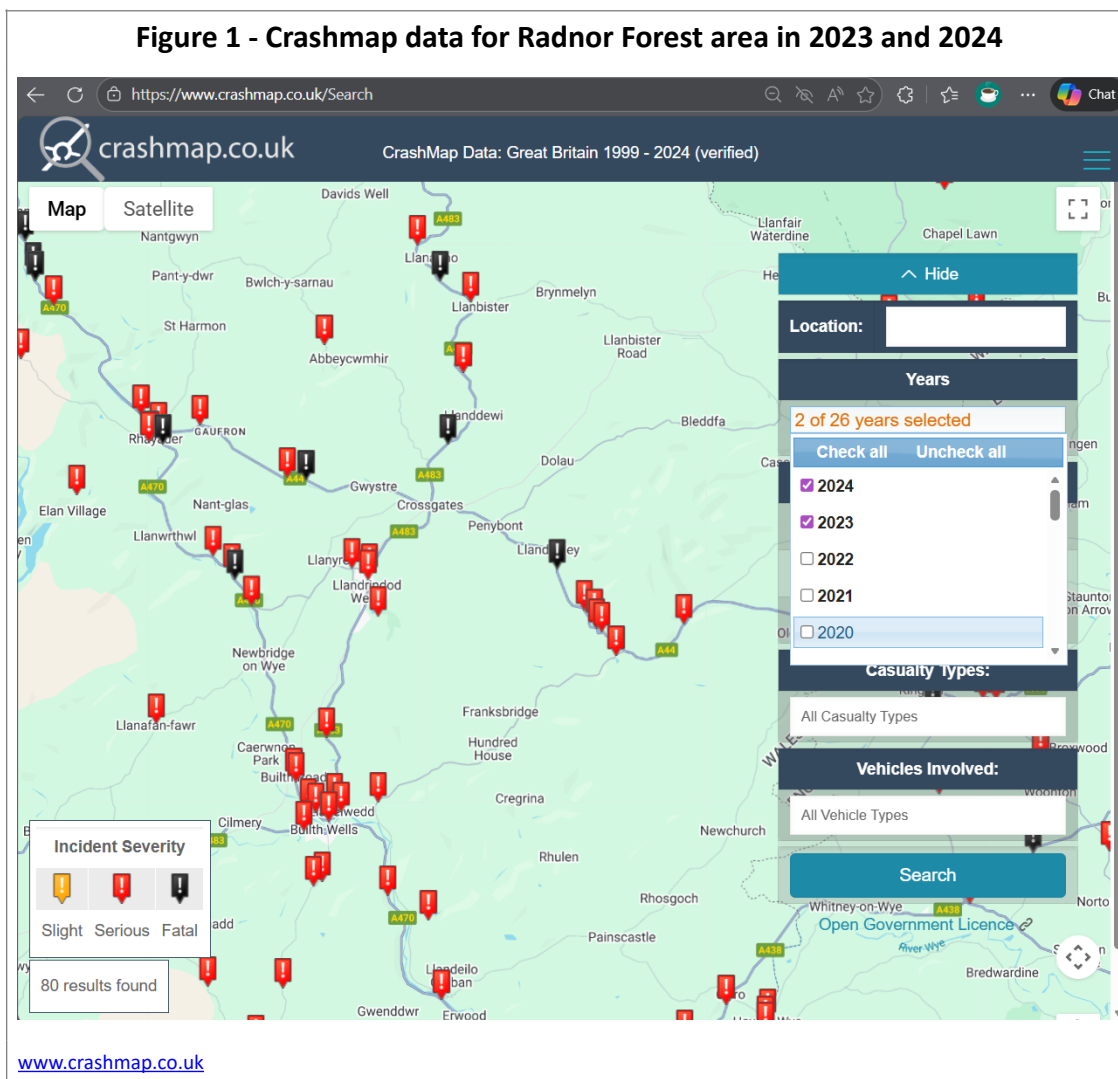
- 1.1. This chapter examines the applicant's proposals and assessments for access traffic and transportation. It will look at both the impact of the volume of construction traffic to site and also the transportation of the wind turbines.
- 1.2. This chapter will show that the applicant has not fully taken into consideration all impacts to local residents and local ecology.
- 1.3. This chapter will also show that the applicant's proposal for transporting the wind turbines and blades is lacking in key information and has not considered some key concerns.

2. ACCESS TRAFFIC

ACCIDENTS AND ROAD COUNT

- 2.1. TA Guidance requires an analysis of the Personal Injury Accident (PIA) Data in the vicinity of any development for at least the most recent 3-year period or 5-years if the site has been identified as being in a high accident area. The Applicant has not used data from the most recent 3-year period and instead has chosen to submit older data from 2018-2022.
- 2.2. Section 10.46 and Section 5.7, Construction Traffic Profile in ES Vol 03 App. 10.01 to 10.02 – Transport Appendices, uses Personal Injury Accident (PIA) data from 2018-2022. The source of the Accident data is stated as being from the website– www.crashmap.co.uk; According to the Welsh Government website <https://www.gov.wales/reported-road-casualties>, and <https://stats.wales.gov.wales/Catalogue/Transport/Roads/Road-Accidents/accidents/ksiroadaccidents-by-area-year> ; the number of serious and fatal accidents on the roads of Powys increased significantly in the years 2023 and 2024. This can be reflected by the view on www.crashmap.co.uk showing only the serious and fatal accidents in the years 2023 and 2024 (figure 1).
- 2.3. It is evident from the crash data that the main roads around the Radnor Forest site and those used by construction traffic are already roads with a high number of fatal and serious accidents. The significant increase in HGV traffic on these roads by the applicant and their subcontractors will only make the roads more dangerous and there is real concern that these additional HGVs will cause accidents on the local road network resulting in more serious and fatal incidents.

Figure 1 - Crashmap data for Radnor Forest area in 2023 and 2024



- 2.4. Section 5.3 of Construction Traffic Profile in ES Vol 03 App. 10.01 to 10.02 – Transport Appendices, states that there are limited pedestrian facilities in the immediate vicinity of the site and also in the wider study. This however does not mean that there are no pedestrians or cyclists. The local roads to the site often have cyclists and some such as the A481 will have a noticeable number of pedestrians throughout the year. An increase in HGV traffic along this and other local roads has the potential to cause harm and injury to pedestrians and cyclists who do not have facilities along the side of the roads to keep them safe.
- 2.5. Table 11, Construction Traffic Profile in ES Vol 03 Appendix 10.01 to 10.02 – Transport Appendices states that the peak traffic movements are expected to be over 7,000 for 5 consecutive months which averages at over 330 movements per day. The majority of these are stated as being HGV. Cross referencing this with the Average Traffic counts as found in Table 2 in ES Vol 03 App. 10.01 to 10.02 – Transport Appendices; shows that this additional HGV traffic would on average double the number of total HGV vehicles on the local roads. The A481 is the main road from the site to a large local quarry identified in Table 6. Average traffic on this road is noticeably lower than for the A44

and the additional HGV traffic would cause a substantial change in traffic flow along the road.

- 2.6. The **cumulative effect** on the local roads of multiple wind farm developments all being proposed within a 10 mile radius of Llandrindod and Builth Wells has not been taken into consideration. The A44, A483, A470 and A481 would see the highest cumulative effect with the A481 seeing the largest difference.
- 2.7. The IEMA Guidance advises that *“The Department for Transport has historically set out a range of indicators for determining the significance of severance. Changes in traffic flow of 30%, 60% and 90% are regarded as producing ‘slight’, ‘moderate’ and ‘substantial’ changes in severance respectively. The assessment of severance should also pay full regard to specific local conditions”*. The developer has made no reference in this Chapter to any specific local conditions, such as pedestrians walking on the road due to no footpath, regular bicycle races during summer months, ramblers crossing the roads as well as locals and visitors riding horses along the roads. The severance of the additional HGV traffic on the roads especially the A481 is more substantial than indicated in the submission from the developer with no sign of any mitigation.
- 2.8. The **ES** fails to assess how abnormal loads from the ports of Swansea or Birkenhead would traverse trunk road networks, roundabouts, bridges, and rural junctions. The feasibility of swept-path navigation and the structural integrity of these routes remain unverified, which obstructs decision-makers from determining whether the transportation of turbine components can occur safely or legally. This lack of critical information constitutes a significant procedural failure.
- 2.9. The A470, A481, A483, and B4567 would face additional strain, impacting communities such as Llandegley, Penybont, Crossgates, Dolau, Llandrindod Wells, Builth Wells, Llanellwedd, Erwood, and Llyswen. The developer's proposal to implement voluntary speed reductions through several villages implicitly acknowledges the safety hazards posed by construction traffic to vulnerable road users, school transport, and general community movement. During peak construction, heavy vehicle movements could exceed three hundred per day, a figure that is entirely incompatible with the safe operation of these rural corridors.
- 2.10. Roads such as the A481 are not shown to have much HGV traffic currently and there is concern that the significant additional damage would cause damage to the road. This damage would have a knock on effect on locals and the council who would need to repair the damage.

3. ABNORMAL LOADS (AIL): ROUTES

- 3.1. The submission from the Applicant has not fully considered all the safety and other impacts to the proposed abnormal loads for transporting the wind turbines and blades.
- 3.2. The document, ES Vol 03 App. 10.01 to 10.02 – Transport Appendices mentions two very different routes. The Applicant appears unable to decide if the turbines will arrive to site from the north or the south. With such a significant development, such basic information should be known and used in this application.
- 3.3. It is noted that a number of Police forces, authorities and councils were consulted about the routes as seen in App. 10.2. Some of these were automated responses with no sign of any detailed response from the authorities. It's also observed that not all the councils and police forces along the proposed routes have been consulted.
- 3.4. ES Vol 01 – Written statement, Table 10.11, Construction Phase Effects Summary states that the proposed development would require 334 AILs over a 10 month period, each requiring escort vehicles. Although it is noted in section 10.2 that emergency services will be informed of these loads, by their very nature emergencies are never planned. The roads on which the AILs will travel especially the A44, A438 and A483 are all used by ambulances to transport patients to the nearest hospital in Hereford. The proposed wind farm is located in the county of Powys which has no hospital with an emergency services unit. Furthermore, the Air Ambulance for Mid Wales will be moving away from the area. It is a concern that the developer and their transportation agents have not fully considered the potential loss of life that can arise from ambulances being held back because there is no physical way for them to pass an AIL along some of the narrower sections of the local roads.
- 3.5. The effects of transport extend beyond mere logistics, impacting ecological and landscape considerations as well. The anticipated road widening, hedgerow removal, bank cutting, and verge regrading—none of which have been mapped or quantified—would lead to additional habitat loss for bats, dormice, birds, and amphibians.
- 3.6. ES Vol 01 – Written statement Table 10.1 Consultation Responses states that the Applicant should be aware that any trimming of hedgerows may require ecological surveys. The table further states that a separate application for offsite works to include any mitigation measures proposed along the delivery route would be discussed and agreed prior to works commencing.
- 3.7. ES Vol 01 – Written statement 7.7 Effects Assessed in Full states that potential effects of damage/modification and loss of habitat IEF's are assessed in the ES.
- 3.8. ES Vol 01 – Written statement 7.11 Effects Scoped Out states that suitable habitats for hazel dormouse are out of the Proposed Development areas, therefore significant

impacts would be unlikely. Some of these habitats are potentially along the road modifications required due to transportation requirements during the construction phase.

- 3.9. ES Vol 01 – Written statement 11.6 Effects Assessed in Full states that direct effects during construction on hydrology, hydrogeology and geology were identified at the scoping stage for consideration in this assessment. We note that the creation and submission of this Offsite Works Application is separate to this DNS application and therefore we do not believe that the ES can credibly assert that it has fully assessed the ecological or landscape consequences of the construction transport.
- 3.10. There are several locations along the route with bridges which are lower in height than the maximum height/min diameter of the turbines on an AIL, which is stated in Table 1 of Section 2.3 of the App. 10.1 and 10.2 as being 4.8m for a tower section. There is no mention in the submission how the turbine can pass under a bridge which for instance is only 4.4m in height (fig. 2).



4. ENVIRONMENTAL IMPACT

- 4.1. The submission from the Applicant does not consider the noise from the construction traffic or the construction process.

ENVIRONMENTAL NOISE ASSESSMENT

- 4.4. ES Vol 01 – Written statement 9.1 Introduction details the construction as well as the operational noise assessment resulting from the Proposed Development. Transportation of the materials and the resulting increase in HGV traffic would create additional noise to local residents during the construction phase of the project.
- 4.5. Whilst App. 9.1 section 1.2 states that, *“Noise and vibration which arises from the construction of a wind farm is a factor which should be taken into account when considering the Proposed Development”*, the document then states that, *“However, in assessing the impacts of construction noise, it is accepted that the associated works are of a temporary nature.”*
- 4.6. It can be seen by reading Table 11, Construction Traffic Profile in ES Vol 03 App. 10.01 to 10.02 – Transport Appendices that construction traffic including HGVs will be expected for 23 months. At its peak the expected vehicle movements would involve 262, two-way HGV journeys a day.
- 4.7. For the residents along the transport routes and near the site, they will be impacted by almost 2 years of daily HGV and other additional traffic.
- 4.8. When considering the **cumulative effect** of the other nearby wind farms, this could potentially be 3+ years of continuous road disruption and noise for local residents, including those of nearby towns of Llandrindod Wells and Builth Wells. It is essential therefore that the noise impact of the construction traffic should be considered as it is not temporary and will be significant.

PREDICTED CUMULATIVE EFFECTS DURING CONSTRUCTION

- 4.4. Vol.1, Chapter 9 states that *“There are no known construction projects that will result in any additional noise being received at neighbouring properties during the potential construction phase of the Proposed Development. As a result, this aspect is considered not significant.”* It is well known through statutory consultations that the developer intends to also develop wind farms in nearby Aberedw Hill and Bryn Gilwern. In the consultations the developer has stated that the intended construction phase for these other wind farms is as follows:
- Aberedw Energy Park 2027/2028 (<https://bute.energy/aberedw/overview/>);
 - Bryn Gilwern Energy Park – 2028 (as seen in consultation brochures no longer on internet);

- Nant Mithil – 2028 (<https://bute.energy/nant-mithil/overview/>).

It can be seen therefore, that unless it's the intention of the developer to now stop these other projects, that the Applicant should have properly considered the cumulative noise from these other projects. Both these other parks are in the same study area for local traffic and most likely would share the same sources for construction materials and staff.

VEGETATION

- 4.4. ES Vol 01 – Written statement Table 10.1 Consultation responses states that, *“Trimming of roadside vegetation, any trimming of roadside vegetation required to facilitate the chosen AIL delivery route will, where required, be subject to approval via other consents, separate to the DNS application.”* In order to fully understand the full environmental impact of this proposed wind farm it is important that this information is available now. There is concern that sections of the A44 and A483 with numerous tight bends, that ancient woodland and important hedgerows will be lost.
- 4.5. The effects of transport extend beyond mere logistics, impacting ecological and landscape considerations as well. The anticipated road widening, hedgerow removal, bank cutting, and verge regrading—none of which have been mapped or quantified—would lead to additional habitat loss for bats, dormice, birds, and amphibians. Since these impacts hinge entirely on the undisclosed road modifications, the ES cannot credibly assert that it has fully assessed the ecological or landscape consequences of the construction transport.

5. CONCLUSIONS

- 5.1. *Planning Policy Wales* and *Future Wales* stipulate that major developments must demonstrate safe, acceptable, and environmentally sustainable transport impacts. The *Powys Local Development Plan* requires clarity regarding access design and the safeguarding of community safety. The submission for Nant Mithil fails to meet these requirements. It is not clear that the Applicant has accurately calculated the total volumes of materials they need to transport to site and the transportation vehicles required. The absence of transport engineering data, the unassessed feasibility of abnormal loads, the extensive road safety risks, and the deferred information collectively render the transport case untenable.

For CPRW-RE-think
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