



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

CPRW-RE-think Chapter 13 on

Public Rights of Way & Leisure Trails

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Evidence by CPRW-RE-think on:

Public Rights of Way & Leisure Trails

This chapter shows how the proposed development would affect Public Rights of Way (PROW) and Leisure Trails. It complements the chapter on Tourism and should be read in conjunction with our chapter on Secondary Consents and Landscape and Visual topics.

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1. INTRODUCTION

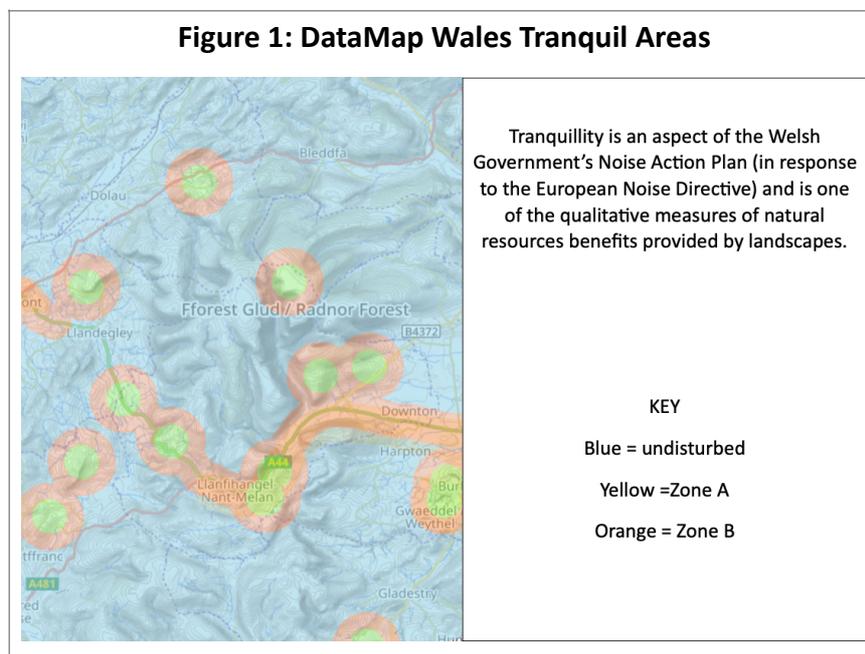
1.1. Application documents considered in this chapter:

- Vol 1, chapter 4
- Vol 1 chapter 5
- Vol 1 chapter 10
- Vol 2 figure 4.13
- Vol 3 appendix 10.1

1.2. We note that figure 4.13 key reads, Blade Swept Area (155m) however close inspection of this figure has shown that the Blade Swept Area is in fact 310m — ie, the rotor diameter has mistakenly been used as the radius.

2. BACKGROUND

2.1. In 1950 Radnor Forest was selected along with the Clun Hills to become an Area of Natural Beauty (AONB). Because this area straddles the English/Welsh border geopolitics proved its downfall and the area was never designated. 75 years later, this landscape is still valued for its special qualities such as panoramic views, tranquility and dark skies (figure 1). Currently the only tall vertical intrusions within 10km are communication masts and Hendy Wind Farm.



2.2. Powys County Council (PCC) is very aware of the value of the landscapes, PRoW and Leisure Routes within their administrative boundary and has chosen to protect them within the Local Development Plan (LDP): Strategic Policy SP7 - Safeguarding of Strategic Resources and Assets: *'To safeguard strategic resources and assets in the County, development proposals must not have an unacceptable adverse impact on the resource or asset and its operation. Recreational Assets, including: National Trails;*

Public Rights of Way; Recreational Trails; National Cycle Network. The valued characteristics and qualities of the landscape throughout Powys.'

- 2.3. PRoW are not just lines on a definitive map, they are part of our cultural heritage; man's best routes across a landscape for whatever purpose they were originally formed. An ancient route from point A to B still marked in today's landscape, such as the BOAT crossing the application site, is entirely different in character to the recently designated Heart of Wales Line Trail, a leisure route that runs to the west and then along the northern border of the application site. Although their legal status is different both carry equal weight in the LDP. The applicant fails to properly consider their value, both in terms of well-being to the local community and visitors plus the economy.

3. PROW WITHIN THE APPLICATION BOUNDARY

- 3.1. PRoW have legal status via the Highways Act 1980: Protection of rights includes safe and unhindered passage at all times: "S130, (1) *"It is the duty of the highway authority to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority, including any roadside waste which forms part of it."*

TEMPORARY PROW DIVERSIONS

- 3.2. The Applicant acknowledges there would need to be path diversions during construction but intends to leave this to a post consent Path Management Plan. We cannot agree with this because everyone needs to know the significance of effects before any decision. For reasons set out below we believe that to protect the public the whole PRoW network within the application site would need to be closed for the construction period, (with possible opening at weekends). This would last for a minimum of 23 months and would be a significant loss to public amenity.
- 3.3. The BOAT would become a main access track, ie, haul road, between the North and South of the site. There are to be groundworks on and beside it, access tracks adjoining it, cabling and a borrow pit abutting it. We do not know how a road, albeit unmetalled, could be diverted taking into account its user groups, the terrain, s7 habitats and the need to keep fences stock proof. How would its temporary status work legally? None of the practicalities are addressed in the ES.

PERMANENT DIVERSIONS OF PROW

- 3.4. At Scoping the PCC Public Rights of Way Team wrote: *"The proposals at Nant Mithil will have both direct and indirect impacts on public rights of way, common land and access land as set out below. Consideration of these impacts should form part of the Environmental Impact Assessment."* **and** "4. The developer must avoid siting turbines

on any of the public rights of way. In addition, micrositing of turbines that may result in public rights of way being located within the topple zone of turbines should be avoided. If turbines are located on the public rights of way, or the public rights of way are within topple zones, then a permanent legal diversion will be required, as a secondary consent, before any construction affecting the line of the public right of way can commence. Details of any proposed diversion route must be agreed with the Countryside Access and Recreation team beforehand, to ensure that the diversion route is appropriately located for accessibility, maintenance and connections with the surrounding network.”

3.5. Allowing for the inaccuracies in figure 4.13 we note:

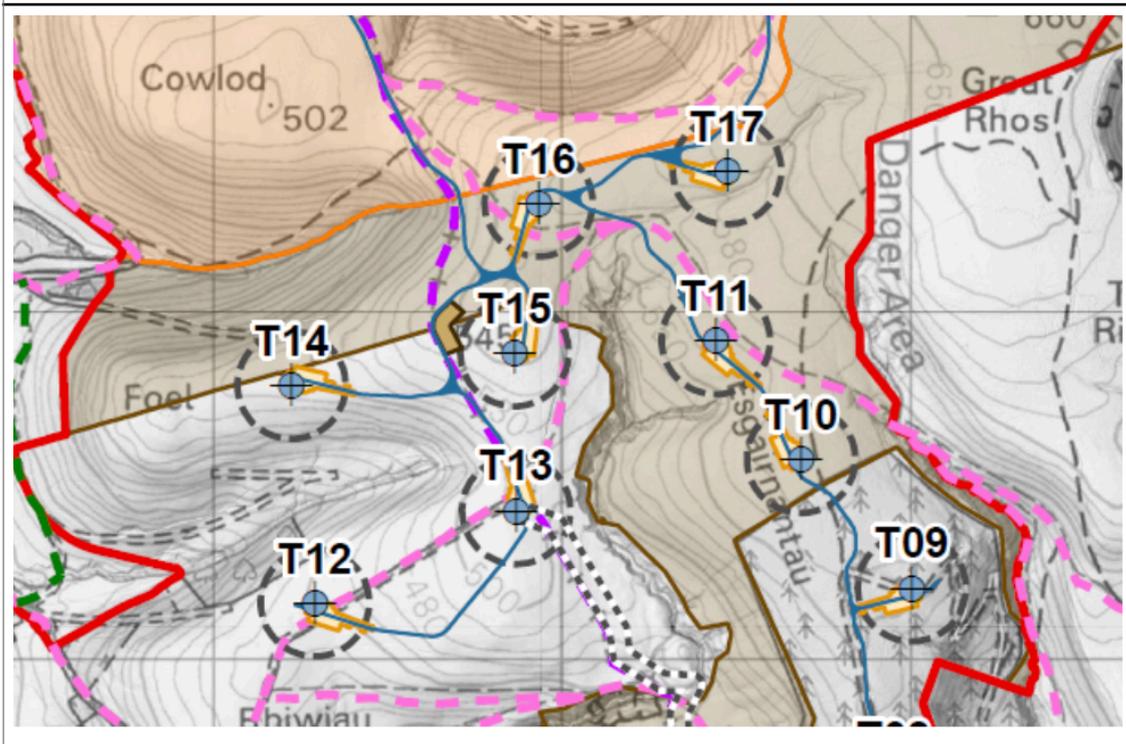
- T12, T13, T16, T21 or their infrastructure are directly on PRow;
- T11 T16 T23, will over-sail a bridleway;
- T15, T18, T26, T28, T30 are within fall over distance of a PRow;
- The cable route between T6 and T13 affects PRows

The 50m micrositing buffers and orientation of crane hard-standings, to be determined post consent, could exacerbate the negative impact on PRows yet further. For instance, the hard-standing of T23 appears to abut the PRow but might end up across it.

3.6. All the above turbines should require a permanent diversion as a secondary consent, but the applicant wishes this to be a post consent matter; this is unacceptable. By delaying this the applicant has dodged consideration of effects on public amenity which we contend will be significantly adverse and long term; for example, the loss of safe access for riders. Every loss of a safe bridleway is a right taken from that user group. No amount of mitigation proposed via the Strategic Recreation Plan will convince a rural rider that to ride amongst noisy turbines is a fair exchange for the status quo.

3.7. The cluster of turbines T11, T15, T16, T17 (see fig 2) surround 2 bridleways making them unsafe. T13 will also directly affect the BOAT and one of the bridleways. T13, T15 and T16 are close to the BOAT at points that could be perilous for equestrians because of the adjacent steep gradients. No rider would wish to divert between this cluster. Any route westwards is not an option because of the terrain. Any diversion to the East is away from the natural direction of travel and still requires passing within topple distance. As T13 would over-sail the BOAT there is also vehicular traffic to consider. Equestrians, cyclists or vehicles have no access rights over the Open Country or Common Land beyond the line of the PRow. We wonder if the applicant has had a conversation with both PCC and the landowners. Maybe landowners will not want a diversion, (temporary or permanent), on their land for any of many reasons. Neither is the need for gates onto the common considered. We need to know this information before determination of the application.

Figure 2: Turbine Cluster taken from Volume 2, figure 4.13



AMENITY OF USERS OF THE PROW

- 3.8. Vol 1, para 5.228: *“Users will experience large scale changes as turbines, onsite access tracks and other ancillary infrastructure will be introduced in close proximity..... There will also be open views of the substation from Open Access Land and PROWs in the southern extents of the Site.Users of the PROW network and areas of Open Access Land in the Site are judged to be medium-high. Users will experience a high magnitude of visual change during operation of the Proposed Development, resulting in **Major** (significant) visual effects, as they move through what will become a wind farm landscape.”*
- 3.9. The effects of a “wind farm landscape” are underplayed because the applicant has not considered mechanical noise and swish of blades or passing shadows from the blades.
- 3.10. We cannot agree with the assessment that users of the PROW will be medium high. Users of these PROW (except the landowners) are using them for leisure; they are therefore highly sensitive to their surroundings. People who currently use the PROW on Radnor Forest will be unlikely to return. There can be no onsite compensation despite the proposed Strategic Recreation Framework. It is an injustice to consider that tranquillity and open space can be exchanged for a stroll, ride or drive along a 5.5m gravel track through a noisy industrial power plant.

4. PROW AND LEISURE TRAILS BEYOND THE SITE

- 4.1. Vol 1, 5.229: *There will also be large scale changes to views for visual receptors located outside the Site but typically within 3 km, where open and elevated views are afforded and where turbines are in a direct line of sight or affect a substantial part of the available views, or provide a substantial contrast or juxtaposition with the existing view. These include the neighbouring areas of Open Access Land within the Radnor Forest upland complex, comprising open moorland and rough grazing and accessed by several PRow routes.*
- 4.2. We cannot agree that large scale changes will “typically be within 3km.” The wider area is a landscape characterised by a series of hills in close proximity and elevation to each other. Views between the hills are extensive and intervisibility over distances of 10km or more are common. Wind turbines over 200m high on top of the highest land in Radnorshire are not going to be hidden by the landform or forestry. The amenity of PRow and Leisure Trails will be significantly adversely affected.
- 4.3. The adverse effects will not just extend to PRow on “open moorland and rough grazing.” There is little consideration that the NRW forestry at Fishpools and Warren Wood are promoted as leisure destinations. These are working woodlands with planned rotational felling. There is no assessment of whether the felling will open up vistas of towering wind turbines, or how the noise or passing shadows may affect the sensory amenity of the woodlands.

LEISURE TRAILS

- 4.4. We wish to draw attention to our Chapter 5, LVIA, response, paras 8.07 and 8.08.
- 4.5. *Offa’s Dyke National Trail and Offa’s Dyke as a historic monument are singled out in Powys LDP Policy SP7, Resources and assets may offer multiple benefits, the Offa’s Dyke Path for example, contributes to historic, recreational, tourism and visual / landscape assets. Offa’s Dyke is a nationally important archaeological monument, part of which is designated as a Scheduled Ancient Monument, and other parts are unscheduled sections. The route of the Offa’s Dyke Path National Trail also follows along or near sections of the monument as it passes through the Plan area. The safeguarding to be applied under Policy SP7, in combination with the protection afforded at the national level to Scheduled Ancient Monuments, and in respect of archaeology generally, will serve to protect this asset and its setting.*
- 4.6. The stretch of Offa’s Dyke between Kington and Knighton is some of the best preserved and the National Trail follows the dyke closely; an historic boundary that even today defines a nation. People enjoying this trail are walking through history.

- 4.7. Offa's Dyke was designed to look West into Welsh territory. The Nant Mithil wind turbines would cause major adverse effects within the setting of the National Trail and the ancient monument for at least a whole day's walking.
- 4.8. There are two leisure trails within 15km that will be subject to continuous views of the proposed wind turbines over many miles but are omitted from the applicant's LVIA.
- 4.9. *"The Cistercian Way is more than a long-distance path: it is a walk into the heart of Wales. Explore the great abbeys of the Cistercian order, the little churches of the Welsh hills, the amazing geology of the Pembrokeshire coast, Stone Age burial mounds, medieval castles and sheep farms, picturesque landscaped gardens and the industrial heritage of the nineteenth and twentieth centuries. Originally developed by Friends of the Cistercian Way."*¹ Considered a pilgrimage route this passes through the Nant Mithil site using the BOAT.
- 4.10. There would be continuous views of turbines travelling North from Newchurch to Llanfihangel Nant Melan, then through a wind farm landscape over Radnor Forest via the BOAT within the application site. Travelling SE from Abbeycwmhir to site there would also be significant adverse visual effects. Whether travelling north or south this will be cumulative with Hendy Wind Farm.
- 4.11. *"The Radnor Forest Ride is a new addition to the National Bridleroute Network and is suitable for walkers and cyclists. The ride travels along bridleways, byways and quiet lanes passing through some of the most beautiful upland scenery in Wales. Across it's 70 mile (113 km) span, the ride links the Three Rivers Ride at the Brecon Beacons National Park Visitors Centre and the Jack Mytton Way in Shropshire. It also provides access to the Epynt Way."*²
- 4.12. Travelling North the ride follows the same route as the Cistercian Way from Newchurch to Llanfihangel Nant Melan, then it goes via Cascob to Bleddfa, where it heads NW before again turning north to Lloyney, near Knighton.

5. CONCLUSIONS

- 5.1. The Applicant wishes to defer consideration of onsite temporary and permanent PRoW diversions to a planning condition. They have failed to properly assess the amenity of users or the practicalities resulting from diversions, therefore adverse impacts cannot be quantified before determination.
- 5.2. The Applicant has not fully assessed the adverse effects of the proposal on the visual and perceptual amenity of PRoW and Leisure Trail users.

¹ [Cistercian Way \(Wales\) - LDWA Long Distance Paths](#), accessed 17/12/2025.

² [Radnor Forest Ride - LDWA Long Distance Paths](#) Accessed 17/12/2025.

- 5.3. LDP policy safeguards PRow and Leisure Trails because of their value to well-being and the local economy, however the applicant has scoped out socio-economic effects, therefore there is no assessment of the value of PRow and Leisure Trails.

For CPRW-RE-think
January 2026