

Electricity Act 1989

The Mid Wales (Powys) Wind Farms Public Inquiry

**The Electricity Generating Stations and Overhead Lines
(Inquiries Procedure) (England and Wales) Rules 2007**

Session 2 (SSA-B)

Supplementary / Rebuttal Evidence

Matt Russell

October 2013

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1 MATTERS COVERED

- 1.1 This rebuttal evidence is submitted in response to the proof of evidence submitted to the inquiry on behalf of RES by Mr Kevin Martin (RES-Local Transport-POE-Kevin Martin-SSA-B). This document should be read in conjunction with my main and summary proofs of evidence (my ref) which sets out the highways case I am presenting on behalf of Powys County Council (PCC). I should stress that I have not sought to rebut all points with which I disagree, focusing instead on a number of key issues and the fact that I have not rebutted a point should not be taken as my acceptance of it.
- 1.2 Further to submission of my transport Proof of Evidence, I have noticed that an incorrect reference is made at paragraph 2.8 in relation to the route of the AIL's to schemes to the southwest of Llanbrynmair and Carnedd Wen. I made reference to the route to the schemes being from Llanfair Caereinion when in fact the route is from Castle Caereinion.
- 1.3 Similarly, I have been made aware that at paragraph 3.54 bullet point a) reference is made to the an email from Welsh Government which is included in Appendix MR01. This appendix was not included with the Proof of Evidence but is appended to this rebuttal proof at Appendix 1.

2 EVIDENCE OF KEVIN MARTIN

Background Summary

- 2.1 Included in the Background Summary at section 1.3 of Mr Martin's proof, paragraph 1.3.2, is a list of the highway concerns that were raised by PCC as set out in Section 4.3 of the Cabinet Report dated 25th September 2013 (Document CD/RES/BAC/005). PCC as highway authority concluded that it should object to the application due to the general lack of information provided in relation to the proposed highway works and lack of information on agreement with owners of land adjacent to the public highway to enable the works to be implemented.
- 2.2 The PCC Cabinet report also noted discrepancies in the red line boundary information that was provided. Whilst revised red line boundary information has been included in the Consolidated SEI of August 2013, it is my opinion that there are still locations where the extent of the proposed highway works lie outside of the red line. I have identified some locations where that is the case later in this rebuttal proof, but I have only recently received electronic copies of drawing requested of the applicant. I am investigating further and hope to update the inquiry shortly.
- 2.3 At paragraph 1.3.6 of Mr Martin's proof he refers to a number of meetings and visits between 22 January 2013 and 2 May 2013 that were arranged in order for RES to develop an integrated and multi-disciplinary approach to address the concerns raised by PCC and NRW. Whilst I was not in attendance at the meetings referred to above, I have reviewed the notes that have been made available to me to date (namely the note of the site visit of 2 May 2013 and meeting of 18 April 2013). I do not know if these notes were agreed with David Williams, who was in attendance. There may well be other notes that I am not aware of and I am still seeking access to David Williams's records as at the date of this rebuttal. The process of meeting with PCC resulted in a revised set of drawings and additional information being submitted as listed in paragraph 1.3.7. However, Mr Martin then suggests at 1.3.10 that the highway and transport concerns identified by PCC have now been progressed to a "*satisfactory pre-planning position*". I do not accept this. The impact of the proposed highway works on the landscape, the local area and residents was raised as a concern by PCC in an email from Mr Williams of 18 April 2013 (contained in Appendix A of Mr Martin's proof) and that concern has not been satisfactorily addressed.

- 2.4 At paragraph 1.3.8 Mr Martin asserts that the first time the issue of a shared access with Carnedd Wen was raised by Powys was in early July 2013 with a further reference in the PCC 'Updated Outline Statement' at paragraph 7.1.2 circulated on 6th September 2013. I do not accept this.
- 2.5 I understand that the parties have been aware of this issue from the outset of this application. RES have confirmed in their letter of 5 July 2013 that discussions between RES and RWE on this date back to late 2008 and early 2009. The RES memorandum of 26th June 2013 as included in the Consolidated SEI of August 2013 (Appendix 10.1 (B)) confirms this. Further, PCC's position was set out in its Updated Statement of Case circulated in May 2013 and in its opening statement to the Inquiry in June 2013.
- 2.6 It should also be noted that at paragraphs 1.3.3 and 1.3.4 Mr Martin refers to the Countryside Council for Wales (now NRW) letter of 12 October 2012 (Document CD/RES/LAN/001). Mr Martin acknowledges that NRW raised specific concerns in paragraph 10 of that letter about the separation of access roads for the Llanbrynmair and Carnedd Wen schemes. They further identified that the works proposed for the Llanbrynmair scheme were substantial in extent and required major modifications to the county road. They objected to the Llanbrynmair scheme on the basis of landscape impact of the works to the county road and lack of consideration of alternatives in the form of using Carnedd Wen's access. This letter also refers at paragraph 78 to requests to the applicant to consider sharing the Carnedd Wen access road dating back to correspondence on 11 November 2010.
- 2.7 The approach taken by PCC to the Llanbrynmair access road is consistent with their approach taken towards the Carnedd Wen proposal. The proof of Mr Stuart Atkinson (ref.RWE/TRANS/POE/Atkinson/SSAB) at paragraph 2.2.2 acknowledges that the original access strategy for Carnedd Wen (2008 ES, Figure 14.2) which was for access from the Llanerfyl to Talerddig road was reviewed following discussion with PCC prior to the September 2011 SEI being prepared. Mr Atkinson acknowledges that it was both desirable and feasible to access the scheme from the north via the A458 and thus the access to the site from the Llanerfyl to Talerddig road was removed, as requested by PCC. The 2011 Carnedd Wen SEI confirms this position.
- 2.8 It therefore appears that applicant has been aware of concerns about the extensive works required to and use of the Llanerfyl to Talerddig road since 2010, and have not

addressed those concerns satisfactorily by producing a scheme that utilises the Carnedd Wen access despite that awareness.

Policy Context in relation to Transport Matters

- 2.9 Mr Martin indicates in his proof at 3.1.5 that matters of national transport policy will be dealt with in Session 4 of the Inquiry. Notwithstanding this, he makes reference to a number of policy documents and at paragraph 3.3 4 he makes the comment that the access proposals do not conflict with policy. However, I would note that there is no obvious recognition in his evidence of the National Policy NPS EN-1 which seeks to ensure that renewable energy infrastructure is designed to mitigate impacts such as landscape and visual impact, noise and ecology. Neither is any mention made of the statutory duty in schedule 9 of the Electricity Act 1989 to mitigate, which must be adhered to. RES have not demonstrated that those requirements have been met. Paragraph 2.5 and 2.6 of my proof of evidence addressed this point and further evidence will be given in session 4 by my colleague Mr Carpenter.
- 2.10 At 3.3.2 Mr Martin makes reference to Policy E3 of the PPC UDP (2010) and suggests that the latest highway improvements and access strategy satisfy the policy requirements in relation to transport matters. I disagree as is recorded in my proof at 2.7. The proposed works would have unacceptable landscape, visual and ecology impacts, as addressed by my colleagues, as well as causing unacceptable delay and inconvenience to road users.

Transport Impacts

- 2.11 In section 4 of his proof, Mr Martin describes the previous access proposals and highway mitigation measures as set out between 4.1.1 to 4.1.5. He goes on to describe the latest proposals following discussion between PCC and NRW at 4.2.1 to 4.2.9 with the emphasis being that overall the proposed works have been reduced as stated in 4.2.10.
- 2.12 Mr Martin suggests that this has been achieved by reducing the number of passing bays/AIL over runs with widening works being implemented as grass reinforcement rather than asphalt. However, limited detail of the full extent of widening and land take required to construct the works is given in Mr Martin's proof. My proof of evidence gives examples of the extent of works required. Requests have been submitted to RES

to provide CAD versions of the drawings in order that overall increase in surfacing can be calculated but these have only just been supplied at the time of submission of this proof and I hope to be able to update the inquiry with further information shortly.

- 2.13 At 4.2.11 Mr Martin refers to the amount of blacktop making up only a small proportion of the widening works. There is nothing within the proof to quantify this and again I hope to be able to update the inquiry with this information shortly.
- 2.14 At 4.3.9, Mr Martin refers to the RES letter of 5 July 2013 as included in Appendix 5 which explains why an access point from the north (A458) via Carnedd Wen has been disregarded. Having checked the appendices to the proof, Appendix 5 is in fact the Carnedd Wen Indicative Construction Programme and not the letter as currently referenced. However, I believe the reference is to the letter contained at Appendix 1 of my proof.
- 2.15 I disagree with Mr Martin's statement at Paragraph 4.3.10 that the proposed works are acceptable. The current access proposal is not considered acceptable by PCC. The proposed works have a significant impact on the landscape and visual impact compared to the existing situation as considered by Mr Russell-Vick. Similarly, the proposed alterations to the existing highway between Llanerfyl and Site Access 4 have a significant impact on ecology as considered further by Mr Woodfield. Furthermore I consider that the proposed works result in unacceptable delay and inconvenience to highway users.
- 2.16 In paragraphs 4.3.9 to 4.3.16 Mr Martin seeks to give reasons why a shared access with Carnedd Wen cannot be achieved. I disagree, and respond to his numbered paragraphs as follows.
- 2.17 At 4.3.11 and 4.3.12 Mr Martin asserts that there is no certainty that Carnedd Wen will be granted permission. I do not consider that the grant of permission for Carnedd Wen is a requirement for use of that access. The required upgrade could be implemented even if Carnedd Wen does not proceed, and it is not being suggested that Llanbrynmair's use of the access from the A470 be conditional upon Carnedd Wen proceeding. I have described it as a shared access simply because Carnedd Wen propose to use it, but it could equally be a sole access for the Llanbrynmair scheme.

- 2.18 At 4.3.13 to 4.3.15 Mr Martin suggests that the delivery of the Llanbrynmair wind farm would be delayed if it was to rely upon access into the site for AIL's from the A458. I do not agree. As set out in my proof at paragraph 3.54(b), whilst Appendix 5 of Mr Martin's proof contains details of an indicative construction programme, it would be possible to amend this if necessary to enable Llanbrynmair to progress the construction of their site. In this context, it should also be noted that at paragraph 1.3.4 of the RES Consolidated SEI (August 2013) that RES have requested that if planning consent is granted then a period of at least 8 years to implement the consent is permitted to allow for off-site grid connections. It should also be noted that the National Grid Mid Wales Connection website indicates a proposed timeline for construction of the grid connections in 2017 to 2019. The August 2013 SEI sets out the construction programme for Llanbrynmair being 3 years, starting in January 2016. There is therefore a time period of over two years available to RES to revise their proposals at Llanbrynmair, without any resulting delay to their proposed start date or completion.
- 2.19 At 4.3.16 Mr Martin suggests that the Llanbrynmair scheme is not contrary to policy. Whilst I defer to planning experts on the balance of competing material planning considerations in the policy context, which is referred to in my proof of evidence at paragraph 2.5, I do not believe that the Llanbrynmair scheme has identified the least harmful access solution and it is my view that the proposal fails to mitigate impacts by using or sharing the Carnedd Wen proposed access.
- 2.20 At 4.4.2 and 4.4.3 reference has been made to the swept path analysis undertaken along the route between Llanerfyl and Site Access 4. No evidence of swept path assessments were included in the Consolidated SEI (August 2013) or Mr Martin's proof, although I understand that these were provided to PCC by Mr Martin for review. I understand that Collett, who are experienced in the movement of Abnormal Indivisible Loads, were appointed to validate the local Traffic Management Plan proposals. Mr Martin suggests that Collett have provided a high level of confidence and robustness to the enabling works albeit they have not actually visited the site or the route described. However, I note that in the Collett review (included at Appendix 10.1 (K) of the August 2013 SEI, dated June 2013) suggestions were made as to changes to the proposed works that should be made, which do not appear to have been incorporated into the proposals before the inquiry.

- 2.21 This is evident at Ch.2500-2550 where Collett have suggested widening on the offside of the road due to concerns over the extent of widening and the difference in levels on the nearside. This has not been addressed on the latest plans.
- 2.22 Also, within the notes that are included on page 22 of the Collett Design Review Document, point 7 requires a minimum clear envelope along the nominated route of 5.0m wide by 5.0m high. Similarly, at point 9 it is recommended that a minimum road width of 4.5m is provided. I am in the process of checking that these requirements are met on the electronic drawings only now provided and hope to update the inquiry shortly.
- 2.23 At 4.8 in his proof, Mr Martin sets out the predicted journey times for AIL's along the county road with reference to Table 11 of the LTMP (Appendix 10.1) in the August 2013 Consolidated SEI. The table has been populated based upon two vehicle speeds of the AIL's convoy along the county road between Llanerfyl and Site Access 4. The LTMP assumes an AIL convoy speed of 10mph (16.1kph) along most of the C2031. However, the Collett Report of June 2013 sets out clearly that the review of the proposed enabling works is based upon an autotrack analysis of 5kph or 3mph. In my view, the predicted journey times along the county road underestimate the actual time it will take to transport the turbine components (AIL's) along this section of road.
- 2.24 I have recreated Table 11 of the LTMP, which is included in Appendix 2. It can be seen that Mr Martin estimates the AIL journey time from Llanerfyl to site access 1 as 35 minutes and 45 seconds at a speed of ten miles per hour, with slower speeds at Gosen Bridge and Dolwen Isaf. If the tracked speed of 3 miles per hour is used throughout the route, the time taken will be 1 hour 42 minutes. Increases of a similar order to site accesses 2 and 4 are evident, with delivery times of 2 hours 11 minutes from Llanerfyl to site access 2 and 2 hours 38 minutes to site access 4.
- 2.25 If the above delivery times are achieved, the disruption and inconvenience to road users will be far more extensive than is set out by Mr Martin. It is not possible to be categorical that these delivery times will be the actual times achieved, but absent tracking by the applicant at the speeds Mr Martin has assumed, I have to assume that this worst case will be the reality, based on the methodology of the review carried out by Collet and their experience of these types of deliveries.

- 2.26 Under the heading 'Long Term Community Benefits', at paragraph 4.9.20 Mr Martin refers to locations where he is of the view that long term community benefit is provided as a result of the highway works.
- 2.27 Whilst the A470 junction at Talerddig is improved to accommodate two way HGV movements, it is not clear what material community benefit arises from this. I am not aware of any Personal Injury Accident records for the junction in its current configuration and the only reason it is being improved is to accommodate HGV movements generated by the Llanbrynmair proposals.
- 2.28 Similarly, the extensive engineering works at Gosen Bridge will widen the existing road in order to permit two traffic movements over this reasonably small length of road. There is no evidence to suggest that widening of this road is necessary other than to accommodate the movement of AIL's. Mr Martin refers to anecdotal evidence of near misses but there is no Personal Injury Accident record at this location and the traffic flows are light along this part of the network and there is no evidence to suggest that single lane operation gives rise to safety or convenience concerns at this location. In any event, the widening is only over a 150 metre length and single lane working will still exist on either approach.
- 2.29 At Diosg Bridge Mr Martin suggests that additional parking and community space will be provided using the new overrun area. The only need for these areas is generated by the AIL movements associated with the scheme.
- 2.30 I do not agree that the proposed works provide any material community benefit.

The Current Position of PCC

- 2.31 At paragraph 6.1 to 6.11 Mr Martin covers the position reached between RES and PCC following submission of the August 2013 Consolidated SEI. Whilst Mr Martin refers to the Council's 'Statement of Case' for session 2 and PCC's recognition that the applicant has provided further work to demonstrate that access by AIL's is technically feasible, he notes PCC's position is that significant local access issues remain.
- 2.32 Reference is made to paragraph 7.5 and Appendix 7 in paragraph 6.6 of Mr Martin's proof on the actual impact that the proposed works will have on verges, trees and hedgerows. Whilst a request has been made to RES to provide electronic copies of drawings of the proposed highway works in order to accurately determine the extent of

the works in comparison to the existing arrangement, these have only recently been received and they are being reviewed to check the extent of impacts. I hope to update the inquiry shortly in that regard. There are however several locations that I am already aware of where I consider that more extensive works are required to the Llanerfyl to Talerddig road than are indicated in the drawings in the August 2013 SEI.

- 2.33 At chainage 1050 to 1150 (shown on drawing number 60283248-D-0002 Rev G) it is indicated that widening by 1 metre will be required. At this location, there is no road side verge to widen onto. Instead, there is an almost vertical bank, topped by hedgerow, which will, in my view, need to be removed.
- 2.34 At chainage 1130 to 1175 (shown on drawing number 60283248-D-0003 Rev G) it is indicated that widening of 1 metre is required. There is a very narrow verge at this location, which is not 1 metre wide. The verge has a steep bank with the existing hedgerow alongside the verge at the top of the bank. Stabilisation works will be required to this bank at this location if the proposed widening is required and these would, in my view, impact on the hedgerow. These works will also likely extend beyond the red line of the application, as shown on the current plans.
- 2.35 At chainage 1400 to 1450 (shown on drawing number 60283248-D-0003 Rev G) it is indicated that 2 metres of widening is required. The verge at this location is barely 2 metres wide, and there is a steep bank adjoining with coppiced trees and a drainage ditch at its base. The bank will require stabilisation if the widening is carried out and it is in my view likely that the coppiced trees over this length will be impacted upon.
- 2.36 As a result of the discovery of these discrepancies I am checking the electronic copies of drawings recently received to see if there are any other anomalies, and I hope to be able to update the inquiry shortly.
- 2.37 At paragraph 6.6 under the sub heading 'Severe disruption during construction' Mr Martin expresses the view that there is no discernible impact on section 1. I do not agree.
- 2.38 In paragraph 4.2.5 Mr Martin identifies that there will be 40 grass reinforced new passing bays/AIL over runs in section 1. Mr Martin also indicates in his Technical Note contained in Appendix 2 of his proof that works will be done either from within the highway where width permits or from the field where there is insufficient width.

- 2.39 Of the identified locations of works in section 1 shown in Table 1 attached to the Technical Note (at Appendix 2 of Mr Martin's proof) 29 of the locations require work to be done from the field. At other locations working will be required from the highway and at many of these locations, it is suggested that closures will not be required. I disagree.
- 2.40 I am concerned that the width of the road at locations identified as 1.2, 1.5, 1.6, 1.9, 1.12, and 1.17 in Table 1 (which can be located by reference to the notes on the Aecom drawings contained in the August 2013 SEI) is such that there will be a greater need for closures where works are carried out within the highway than is estimated by Mr Martin. A 3 metre running lane and a half metre buffer between plant and the running lane is required while works are carried out (see paragraph 6.3.3 of the LTMP included in the August 2013 SEI). If this 3.5 metres is deducted from the width of the road at the various locations in section 1, set out in Table 1 of the Technical Note, I am concerned as to whether there is sufficient remaining space left on the highway to carry out work without closure. The remaining road width within which working could be carried out is typically 1 – 1.5 metres.
- 2.41 I note that David Williams retained concerns about the extent of road closures and disruption when he was asked for his opinion on the Technical Note contained in Appendix 2 of Mr Martin's evidence, after seeking advice from PCC's local area road maintenance team (see the email of 30 August 2013 contained in Mr Martin's Appendix 2). I share those concerns and believe that the extent of closures and disruption is underestimated by Mr Martin.
- 2.42 It should be noted that RES has confirmed that they have not yet achieved acquisition of all land required to construct the scheme. The number of works carried out from the fields may be reduced, depending on the outcome of land negotiations, resulting in even more disruption than that which is currently anticipated.
- 2.43 At paragraph 6.6, under the sub heading of 'Bypasses for Construction Traffic only' Mr Martin refers to off-road sections of new access road being required at Sychtyn and Neinthirion. His comment in relation to Neinthirion being required regardless of whether an access through Carnedd Wen were available or not is incorrect. Under the shared access proposal that PCC have suggested (and which I support) the AIL's would gain access to Llanbrynmair via Carnedd Wen only. Construction traffic can access the

Llanbrynmair site from the A470 at Talerddig via Site Access 4 or the Carnedd Wen access. As Site Access 4 is to the west of Neinthirion then there would be no requirement for the Neinthirion bypass if PCC's proposal were adopted.

APPENDIX 1

Matt Russell

Subject: FW: Carnedd Wen and Llanbrynmair - access [GELDARDS LLP-Cardiff.FID1544146]

From: David Williams (CSP - Policy and Regeneration) [<mailto:david.williams1@powys.gov.uk>]
Sent: 16 September 2013 13:29
To: Charles Felgate; Trystan Mabbitt (CSP - Development Control); Dominic Woodfield - Bioscan
Subject: FW: Carnedd Wen and Llanbrynmair - access

Welsh Government is onside with the shared Carnedd Wen access.

David

From: Hudd, Debbie (EST - Transport) [<mailto:Debbie.Hudd@Wales.GSI.Gov.UK>]
Sent: 16 September 2013 12:43
To: David Williams (CSP - Policy and Regeneration)
Subject: RE: Carnedd Wen and Llanbrynmair - access

Hi David,

The Welsh Government as highway authority for the trunk road network in Wales has no objection in principle to the use of the proposed new A458 access into Carnedd Wen for abnormal loads or construction traffic associated with the Llanbrynmair wind farm.

We would have more concerns about proportional increase in traffic using the Talerddig junction. If agreement could be reached between the two developers regarding phasing of the two projects, such that the maximum daily flows through the Talerddig junction don't significantly increase, we would have no objection in principle to this either.

Hope this helps.

Kind regards,

Debbie

Debbie Hudd

Rheolwr Llwybr Ffyrdd / Route Manager

Trafnidiaeth / Transport

Adran yr Economi, Gwyddoniaeth a Thrafnidiaeth / Department for Economy, Science and Transport

Llywodraeth Cymru / Welsh Government

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APPENDIX 2

Journey Times from Llanerfyl to Site Accesses

Location	Start Ch (m)	End Ch (m)	Speed (mph)	Time (hh:mm:ss)	Addn Time (mins)	Leg Time (hh:mm:ss)	CumTotal (hh:mm:ss)	Comments
Llanerfyl to Diosg	0	950	3	00:11:48	0	00:11:48	00:11:48	Speed based on Colletts report June 2013
Diosg to Gosen	950	4450	3	00:43:30	0	00:43:30	00:55:18	Speed based on Colletts report June 2013
Gosen Bridge	4450	4600	3	00:01:52	0	00:01:52	00:57:10	Assume average speed of 3mph through Gosen Bridge
Passing Place 1 - Gosen to Sychtyn Access Track - Chainage 4750 - 58 minutes into journey								
Gosen Bridge to Dolwen Isaf	4600	7200	3	00:32:19	0	00:32:19	01:29:29	Speed based on Colletts report June 2013
Dolwen Isaf	7200	7450	3	00:03:06	0	00:03:06	01:32:35	Assume average speed of 3mph through Dolwen Isaf Bridge
Passing Place 2 - Dolwen Isaf to Dolwen Uchaf Access Track - Chainage 7500 - 93 minutes into journey								
Dolwen Isaf to Site Access 1	7450	8250	3	00:09:57	0	00:09:57	01:42:32	Speed based on Colletts report June 2013
Site Access 1 to Neinthirion Bypass	8250	8950	3	00:08:42	0	00:08:42	01:51:14	Speed based on Colletts report June 2013
Neinthirion Bypass	0	1000	3	00:12:26	0	00:12:26	02:03:39	Speed based on Colletts report June 2013
Passing Place 3 - Neinthirion Bypass - Chainage 8950 - 9550, 124 minutes into journey								
*Neinthirion Bypass to Site Access 2	9550	10150	3	00:07:27	0	00:07:27	02:11:07	Speed based on Colletts report June 2013
Site Access 2 to Site Access 4	10150	12350	3	00:27:20	0	00:27:20	02:38:27	Speed based on Colletts report June 2013

*Note: Two small passing places are located between Neinthirion and Site Access 2 at Chainage 9900 and 10000. Due to their proximity to the access and the Neinthirion bypass, they have not been listed above.