



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

CPRW-ReThink Chapter 20:

Planning Balance & Conclusions

Application for Planning Permission under the
TOWN & COUNTRY PLANNING ACT 1990 and PLANNING (WALES) ACT 2015

REPRESENTATION on behalf of **CPRW** the countryside charity, and **RE-think**, a Third-Party Objector Groups of affected local residents, in relation to an application for a ‘Development of National Significance’ (reference number: CAS-01907-DZQ6Z1), under the Town and Country Planning Act 1990 as amended by the Planning (Wales) Act 2015 and the Developments of National Significance (Wales) 2016 (as amended) and subsequent Regulations, for ‘the construction and operation of an energy park including wind energy developments and associated infrastructure and habitat management areas’ on land ‘approximately 9km east of Llandrindod Wells’, Powys.

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1. INTRODUCTION

- 1.1. This submission provides a **Representation** to the Application for a 'Development of National Significance' (reference number: CAS-01907-DZQ6Z1) (Application), under the Town and Country Planning Act 1990 as amended by the Planning (Wales) Act 2015 and the Developments of National Significance (Wales) 2016 (as amended) and subsequent Regulations, for 'the construction and operation of an energy park including wind energy developments and associated infrastructure and habitat management areas' consisting of 30 wind turbines with a tip height of up to 220m and associated access tracks, known as 'Nant Mithil Energy Park' (Proposal) on land 'approximately 9km east of Llandrindod Wells', Powys (Site). The Application is made by Nant Mithil Energy Park Ltd, a subsidiary of Bute Energy (Applicant) (Applicant's Environmental Statement [ES] 1.10).
- 1.2. The Representation is submitted jointly by RE-think, a Third-Party Objector Group of affected local residents, and CPRW ¹, a charity, established in 1928, which seeks protection and enhancement to the countryside and environment in Wales. Whilst both groups support the need for renewable energy to address climate change, they feel that this Proposal does not address that in a way that is sympathetic to and in keeping with the need to sustain nature and the environment. The submission has been prepared by Dr Christopher Ford, a Chartered Town Planner specialising in the spatial aspects of energy systems and energy policy. The author's credentials are given Annex 1 to Chapter 2.
- 1.3. This Representation completes a series of submissions prepared by CPRW and RE-think to assess the Proposal, the Application documents and the Applicant's Environmental Impact Assessment. These submissions cover almost every aspect of the Applicant and the effects which would be caused by the Proposal. This submission reviews those CPRW & RE-think submissions and brings them together to consider the overall **Planning Balance and Conclusions** for this case. The planning policies and criteria to be used for assessing the merits of this Application come from Future Wales, the National Plan 2040 (FW2040), Planning Policies for Wales (PPW) and the local development Plan for Powys. These were reviewed in the CPRW and RE-think's Planning and Energy Policy document (Chapter 2), which forms part of this series of documents being submitted to PEDW for this case at the same time. CPRW and RE-think's Planning and Energy Policy submission also reviewed UK Energy Policy and recent developments taking place with the energy system.
- 1.4. Annex 1 to this submission, which is also repeated in the CPRW and RE-think Introduction, lists all of the documents which are being submitted as Representations for the Application at the same time. Whilst these documents are referred to here, the full terms of each are set out in each document.

¹ Campaign for the Protection of Rural Wales.

- 1.5. CPRW/ RE-think would like to be treated as an 'interested person' or party in this process.
- 1.6. This submission initially considers the relative merits and Planning Balance for the Proposal, going through each main policy criteria and weighing the effects arising. Then 'other material considerations', relevant to decision making on the Application, are discussed. Next, various other factors which ought to be taken into account are outlined. Finally, this submission, and the suite of associated Representations, closes by giving overall Conclusions.

2. PLANNING BALANCE

- 2.1. Following the review of circumstances and potential effects arising for each topic, set out in the associated suite of submissions, this section assesses the Planning balance for each factor, measuring these against the planning criteria laid out in policy. It deals with these by following the approximate order given in the key relevant planning policy, which is Future Wales Policy 18. The chapter number, given in brackets, refers to the CPRW and RE-think Representation chapters, in the suite of associated submissions.
- 2.2. LANDSCAPE AND VISUAL AMENITY (Chapter 4): FW2040 identified PreAssessed Areas (PAA) where the landscape impact of wind energy development was found to be acceptable, subject to local constraints and circumstances to be assessed during proposal decision making. Whilst 12% of the Site is in a PAA, the Applicant's choice of this Site means that the majority of the Site was excluded from PAA. This area was excluded from the PAAs because of the visibility and impact on the nearby Shropshire Hills scenic landscape. Outside of the PreAssessed Areas FW2040 Policy 18 applies.
- 2.3. CPRW/RE-think's professional landscape assessment finds that the Applicant has not achieved their design objectives to reduce and contain adverse effects on the landscape. That is because the Proposal is of such a size compared to landform at the Site that it would dominate the smaller-scale populated areas to the west, north and south of the Site. Accordingly, the Proposal is substantially out of scale, and not sympathetic to the local landscape.
- 2.4. The Proposal would affect the immediate Radnor Forest landscape with major adverse effects as well as major effects for the adjoining landscapes of the Aberedw and Llanbister-Penybont Uplands. Areas further distant, such as the Shropshire Hills National Landscape, Offa's Dyke and other surrounding areas would experience moderate adverse effects. This is because the size of the Proposal turbines are disproportionate to the scale of the local landscape. For example, 200m-plus high turbines are being proposed to sit on top of hills which sit 150-200m above the surrounding populated valleys, whilst also being alien visible structures across the landscapes of other hills in the area.

- 2.5. CPRW/RE-think's professional landscape assessment is that the visual effects of the Proposal are extensive because of the prominence of the hill it is located on, added to which the structure of the 200m typical turbine height would look incongruous. The Applicant finds viewpoints will experience significant effects but then only applies a conservative assessment to their conclusions. Whereas CPRW/RE-think's professional landscape architect finds major effects along key long distance recreational access routes, open access land, summits and principal transport corridors. Again, for settlements it is found that the elevated prominent position of the Proposal leads to moderate effects, while CPRW/RE-think's professional landscape architects find these effects to be major at *"Llanfihangel Rhydithon and Dolau due to broad, dominant views of the development across the hillsides above these villages"*.
- 2.6. In respect to visual effects on dwellings there are 22 affected properties including one with an overbearing effects. On transport and recreational routes, moderate-major to major effects are found out to over 10km. This affects important recreational paths, a railway line and main roads including some where the Proposal would fundamentally alter the users experience.
- 2.7. On landscape and visual impacts FW2040 Policy 18, including 18.1 and 18.2, require there to be no *"unacceptable adverse impact on surrounding landscape"* and *"no unacceptable adverse impacts on nearby communities and individual dwellings"*, while *"the cumulative impacts ... should be considered"*. It is not apparent that the Proposal has met these criteria.
- 2.8. The CPRW and RE-think's Representation Introduction sets out the high density of dwellings there would be within close proximity to the Proposal. The nearest dwelling would only be 650m from a 205m high turbine, which is sited some 200m above. In such circumstances it is difficult to see how there can be *"no unacceptable adverse visual impacts on nearby communities and individual dwellings"* as FW2040 requires. CPRW and RE-think's Landscape Architect finds overbearing residential visual amenity effects, with a large number of properties, with 149 properties within 2m, affected by the Proposal, with 22 properties encountering a 'high' level of effects.
- 2.9. HISTORIC ENVIRONMENT (Chapter 5): FW2040 requires that *"there are no unacceptable adverse impacts on statutorily protected built heritage assets"*. The Applicant has concluded that the effects on the scheduled barrows within the Site would be moderate and adverse. CPRW/ RE-think's heritage expert, Mr Welch MCIfA, notes that the Applicant *"underplays the impact upon the scheduled barrows"* on the Site, and that the effect upon the barrows would be major and adverse. But in any case, a moderate or major adverse effect on a scheduled monument is a significant effect in EIA terms. Mr Welch also questions the methodology and judgement applied by the Applicant to their assessment in respect to listed buildings. Their approach incorrectly seeks to exclude from appropriate assessment a number of listed buildings. Consequently, the Applicant has not produced a sound assessment of heritage assets.

Mr Welch gives examples of listed buildings where an appropriate assessment would have identified an adverse effect. Consequently, the Proposal does not comply with the requirements of FW2040 Policy 18.6.

- 2.10. ECOLOGY AND ORNITHOLOGY (Chapter 6): CPRW and RE-think's experienced ecological consultant finds that there are several areas of the ES that are deficient, and the field habitat surveys that should underpin this, are in places inadequate. Like Natural Resources Wales (NRW) we find that ES's coverage of peat resources and peatland habitats is deficient. Without an appropriate baseline of data, subsequent attempts to plan a wind farm design in accordance with the mitigation hierarchy and provide for Net Benefits for Biodiversity would be flawed. Expecting micro siting and post decisions controls to be able to deal with potentially significant changes to the scheme is unsound. The possible relocation or removal of turbines, post decision, would require other aspects of the assessment of the Proposal to be revisited if the EIA as a whole is not to be rendered incomplete.
- 2.11. CPRW and RE-think note that inadequate surveys and baseline data potentially affects protected species. Surveys appear to have been undertaken in such a way that their findings are not robust, for example on White Clawed Crayfish where late season surveys in a drought year have led to conclusions based on conjecture. In relation to bats, the scope for significant impacts is identified, but the measures to be taken in mitigation are not certain or transparent, and insufficient evidence is provided as to their delivery and effectiveness. It is therefore not apparent the Proposal is policy compliant.
- 2.12. The adequacy of ornithological surveys is also questioned, particularly in respect of effort/coverage, incongruity with the empirical evidence of other parties and in the Applicant's failure to update the wintering birds surveys despite being directed to do so by PEDW. This appears to lead to significant omission on the resultant datasets for breeding and wintering birds. The data inadequacy issue arises despite the review Inspector's letter of 18/2/25 (paras 13 and 14 and at Annex 1) suggesting updated ornithological surveys. The Applicant has also not responded to earlier comments regarding Red Kite. Potential effects of the proposal on Nightjars are also affected by data uncertainty.
- 2.13. CPRW and RE-think note that the Habitat Management Plan (HMP), which has critical importance for the protection of ecology, remains affected by significant uncertainty over whether it can be delivered due to the doubts over the commitment of key stakeholders. This to the point that the HMP is rendered "*incapable of meeting the relevant policy test for consent to be granted*" (Chapter 6). Overall, CPRW's ecological consultant finds that the ecology and ornithological provisions in the Application result in "*a huge measure of uncertainty hanging over the deliverability of the proposed mitigation and compensation*", thereby questioning the suitability of the Proposal against the policy criteria. It also noted that CPRW and RE-think's consultant has been

restricted in his assessment due to inappropriate redactions of information in the ES (see below). Representation Chapter 6 is referred to for its full terms and content.

- 2.14. ACCESS, TRAFFIC AND TRANSPORT (Chapter 7): The CPRW and RE-think's assessment also raises concerns about the Applicant's traffic and transport plans. The Applicant's quantification of the transport requirement for construction is unconvincing and it is not apparent that they have appropriately considered the circumstances of the local roads. The arrangement for Abnormal indivisible Loads (AIL) lacks detail. It is therefore not assured that these AILs can be delivered to the Site, and what the impacts and environmental effects from this would be.
- 2.15. HYDROLOGY, HYDROGEOLOGY AND GEOLOGY (Chapter 8): CPRW and Re-think find that the Applicant needs to undertake more detailed study before the hydrological impacts of the Proposal can be properly judged. There is a lack of information, from the Applicant, baseline water quality conditions, historical flooding, clear buffer zones for vulnerable features such as water courses and private water supplies. This means that the impact of construction activity, for example from the extensive access tracks required across the Site.
- 2.16. SHADOW FLICKER (Chapter 10): FW2040 requires that there are no unacceptable adverse impacts by way of shadow flicker. CPRW and RE-think's assessment shows the methodology and findings, by the Applicant, are not transparent and cannot therefore be relied upon. The Applicant relies on the discredited notion of only measuring shadow flicker effects up to ten times rotor diameter. Aside from the Scoping Direction questioning this, the Applicant's assessment does not take account of the circumstance at this Proposal's Site, where turbines will be situated on ground up to 250m over and above the dwellings below. The Applicant's use of software for their calculations cannot be verified. The Applicant uses a misleading adjustment by applying only estimates of the hours of sunshine each year. Even by their own self-limited assessment the Applicant identifies nineteen turbines which will create shadow flicker. That is extremely high for any wind energy development anywhere in the UK. Especially when dwellings are only 650m from turbines. Even then the Applicant fails to accurately count the number of dwellings that would be affected by shadow flicker. In practice, more than 432 dwellings will be affected by shadow flicker. In mitigation the Applicant offers to control turbine rotation, despite the fact that experience shows this method is unreliable. Once consented the Applicant has a strong commercial self-interest to not shut down turbines, whilst planning enforcement is weak. Contrary to FW2040 Policy 18.7, there would be unacceptable adverse shadow flickers impacts.
- 2.17. CLIMATE CHANGE AND CARBON BALANCE (Chapter 11): The Applicant's assessment of the Climate Change effect and carbon balance of the Proposal, set out in Chapter 14 of the ES, is deeply flawed and should not be relied upon. The core of their assessment is based on the Scottish Government's Carbon Calculator Tool. Whilst they say this was

not available at the time of lodging their Application and that their assessment is based on an earlier use of the tool, they do not acknowledge why the tool is unavailable. The Carbon Calculator Tool is unavailable because it is discredited and known to be unreliable. As a result, the Scottish Government has withdrawn it, and no longer backs it. Even the Applicant's use of the tool, prior to withdrawal, is unsound. The Applicant has failed to apply the necessary adjustment factors. Consequently, the Applicant's carbon balance assessment and claim on benefits for the Proposal's contribution to addressing climate change cannot be relied on. (Also see below regarding the Proposal's energy efficiency –Representation Introduction [Chapter 1], paragraphs 5.02-5.28).

- 2.18. CUMULATIVE EFFECTS (Chapters 1 and 19): CPRW and RE-think question whether the criteria for selecting other relevant developments for cumulative effects assessment have been applied appropriately by the Applicant. This raises grave doubts over the Application's compliance with the last sentence of FW2040 Policy 18.
- 2.19. NEED (Chapter 1): Particularly important to the 'other material considerations' is the Welsh and UK Governments' energy policy and the ongoing changes to the regulation of the energy system being made by the UK Government. This is set out in the CPRW and RE-think's representation Chapter 2. From this it is evident that this Proposal is not needed to achieve net zero and the two Governments' policy objectives. The Applicant presents no evidence that they have considered the UK Government's policies and the measure being taken to achieve delivery, and incorrectly considered the Welsh Governments policies.

3. OTHER MATERIAL CONSIDERATIONS

- 3.1. As well as assessing this Proposal against the criteria set out in planning policy, 'other material considerations' also need to be taken in account in the decision making on this Application. These are discussed here.
- 3.2. GRID CONNECTION: As set out in the Introduction Chapter 1 of CPRW and RE-think's Representation, this Application has various flaws and problems. Not least amongst these is the exclusion from the Application of due consideration of the necessary grid connection. If the grid connection cannot be provided the claimed benefits of the Proposal, the supply of renewable electricity, will not materialise.
- 3.3. There is a related question of whether the Proposal, being 'Environmental Impact Assessment (EIA) Development', is legally competent and whether all of the environmental effects arising from the development have been duly considered since, due to the basis of the Application (for only the energy park), the grid connection has been 'salami sliced' out of consideration.

- 3.4. The EIA Regulations specify Ministers “*must not grant*” permission “*unless an EIA has been carried out*” and that the EIA “*must identify, describe and assess the ... significant effects of the proposed development*”.² Following the caselaw and common sense, CPRW and RE-think state the grid connection intended to be used for the export of electricity from the Site is part of the ‘EIA Development’ of this Proposal. Therefore, the predictable significant effects of the grid connection need to be considered within this decision.
- 3.5. A further issue with the Proposal’s grid connection is its efficacy and the waste of energy. The Applicant states they intend to use the Towy-Usk 132kV overhead line. As set out in the CPRW & RE-think representation Introduction (Chapter 1), this is far from the shortest available grid connection to link to the National Electricity Transmission System (NETS) and, given it passes through protected landscapes, would not be the option with the least adverse environmental effects. It is therefore unsurprising the Applicant seeks to exclude these effects from full assessment of the EIA Development.
- 3.6. ENERGY HIERARCHY FOR PLANNING: The Proposal’s intended grid connection is also gravely energy inefficient, both generally and when compared to other options. By utilising a 97km power line at 132kV, rather than a shorter 400kV line, the Applicant is wasting the potential energy benefit of the Proposal. This means that much of the potential renewable energy benefit of the proposed 198MW wind farm will be lost. This is estimated at 36% wastage. The Proposal is therefore directly contrary to the Welsh Government’s ‘Energy Hierarchy for Planning’ (PPW2024 5.7.13). The second step in the hierarchy is to ‘use energy efficiently’. Specifically, PPW 2024 states “*increasing energy efficiency through location and design of new development will assist*” address climate change. Entirely contradicting this, the Applicant’s intended grid connection for the Proposal means the ‘location’ of the 97km Towy Usk line and the ‘design’, using a 132kV line, is not ‘using energy efficiently’.
- 3.7. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (Chapter 12): A further material consideration is the Applicant’s ‘Outline Construction Environmental Management Plan’. For similar developments across the UK, it is usual for applicant’s to present a ‘Construction Environmental Management Plan’(CEMP). The Applicant’s ‘outline’ CEMP does not meet this standard. This therefore raises questions whether the Applicant’s Proposal is fit for purpose. As the CPRW/ RE-think chapter (17) sets out, overall, the Applicant’s approach to construction management lacks sufficient detail to be able to assess and judge several matters. In terms environmental consequences this means there is no assurance on issues such as: pollution prevention, drainage, soils protections, appropriate protection of ecology, the delivery of biodiversity, peat management, construction noise. It is also concerning that the way Applicant has chosen to deal with health and safety, by delegating this to a principal contractor,

² Town and Country Planning (Environmental Impact Assessment)(Wales) Regulations 2017, sections 3 & 4.

which indicates they do not recognise their legal responsibility. The Applicant's approach demonstrates a lack of technical competence of the processes required to construct a wind farm. The Site has several distinct challenges, which are unusual for many wind farms developments. Unlike other wind farm developments, it is not evident that the Applicant understands these and has the competence to manage and deal with them.

4. OTHER FACTORS TO BE CONSIDERED

- 4.1. As well as assessing this Proposal against the planning criteria and material considerations other factors also need to be considered when determining this Application.
- 4.2. The accuracy and reliability of the Applicant's environmental information is in doubt in respect to several aspects of the proposed development and the ES. The Site contains locations where the incline of access track would be exceedingly steep. On such alignments cutting into hillside is necessary to provide the roadway, but the cutting is not detailed in the plans.
- 4.3. There are many other topics areas where uncertainties have been aired in CPRW & RE-think's Representation. This includes chapters on: Transport, Hydrology, Aviation and Telecommunications, Shadow Flicker, Carbon Balance, the CEMP, Public Rights of Way, Tourism, Forestry, Noise, and Secondary Consents. The absence of adequate baseline and potential effects information for Ecology and Ornithology is particularly concerning.
- 4.4. Overall, there is a common theme throughout the Environmental Statement and the Application of a lack of adequate environmental information. It is therefore unclear what the environmental effects of the Proposal would be. It is not evident that the Applicant has been able to appropriately assess the effects of the Proposal and accurately identify the significant effects. This is to such an extent that it is not evident that the Environmental Statement has met the terms required of the Applicant by the EIA Regulations.³

5. CONCLUSIONS

- 5.1. In summary therefore, there are several areas where the Applicant's information and assessment of the potential effects of the Proposal lacks adequate information. Either their baseline data or their assessment of potential effects is deficient. In important subject areas such as ecology, ornithology and hydrology, the Applicant has not established a baseline of the 'current state of the environment', as is required under EIA Regulations Schedule 4.3. For topics, such as shadow flicker and carbon balance,

³ Town and Country Planning (Environmental Impact Assessment)(Wales) Regulations 2017, (as amended).

the Applicant's assessment is handicapped by inadequate assessment or by using flawed methodologies. With topics such as CEMP and Transport the Applicant's assessment of potential effects lacks rigour and sufficient detail to be able to reach the conclusions they assert.

- 5.2. Recognising this uncertainty, in some fields there are effects of the Proposal where the potential effects of the Proposal can be established and adjudged against policy criteria. These are the effects on landscape and visual impact, effects on nearby communities and individual dwellings, and the effects on heritage assets. These relate to FW2040 Policy 18, point 1, 2, 6 and 7 respectively.
- 5.3. With most of the Site lying outside Pre-Assessed Areas, Policy 18.1 is applicable. It requires proposals to have 'no unacceptable adverse impact on the surrounding landscape'. CPRW and RE-think's professional landscape advisor finds the Proposal would affect the immediate Radnor Forest area and the adjoining Aberedw and the Llanbister-Penybont Uplands with major adverse effects, whilst more the distant area of the Shropshire Hills National Landscape, Offa's Dyke and other areas would incur moderate adverse effects. This is because the size of the Proposal is disproportionate to local landscape, with 200m plus turbines located on hills of 150m-200m. The visual impact of the Proposal would be extensive because of the prominence of the hill the Proposal is located on and the size of the proposed turbines. CPRW and RE-think therefore find that the Proposal does not meet the assessment criteria set in FW2040 Policy 18.1.
- 5.4. In respect to the effects on nearby communities, the number of dwellings affected by the Proposal is very high for such a development, with a 149 residences within 2km. We find that 22 properties are directly affected by the Proposal including one where the effect would be overbearing. Accordingly, it is found that the Proposal fails against FW2040 Policy 18.2. Effects on dwellings are also relevant to FW2040 Policy 18.7. Whilst the full impact of the Proposal is not entirely clear, due to shortcomings in the Applicant's methodology, given the number of residences within 2km, it seems like to the Proposal will also not meet the requirements of Policy 18.7.
- 5.5. Regarding the effects of the Proposal on heritage assets CPRW and RE-think's experienced specialist finds that the Applicant has not appropriately assessed the effects of the Proposal on all of the affected listed buildings. Questions are also raised about the methodology and judgement applied in respect to the historic environment. In any event it is found that the effects of the Proposal on Scheduled Monuments is adverse, either moderate or major, but it would be 'significant'. Consequently, it is found that the Proposal does not meet the required criteria set out in FW2040 Policy 18.6.
- 5.6. PPW requires that when considering proposals due account is taken of the contribution a proposal could make to renewable energy targets and cutting

greenhouse gas emission (PPW 5.9.19). At the same time proposals should ‘avoid or mitigate adverse impacts’ on local communities, natural and historic environments, cumulative effects, grid connection issues, transport and design building and operation of renewable energy (PPW 5.9.19). Assessing these factors for and against the Proposal it is noted that the adverse effects of the development would be considerable. Even were the potential benefits of the Proposal (198MW of renewable electricity generation) to be fully achievable, these adverse effects would be sufficient to militate against the proposed development.

- 5.7. Added to these assessments of policy criteria and material considerations is the serious issue of whether the Proposal is lawful due the exclusion from consideration of the effects of the Proposal’s grid connection. Without a viable grid connection, the Proposal cannot achieve its claimed benefits. Even if this can be achieved and is lawful, due to the considerable energy losses of the Proposal’s grid connection the claimed benefits of the Proposal are in grave doubt. It would not comply with the Welsh Government’s energy hierarchy and would provide a very poor energy yield for a high environmental cost.
- 5.8. Consequently, weighing the “*merits of the individual proposal*” in accordance with Planning Policy for Wales (5.9.15), Edition 12, and the policy criteria set out in Future Wales, The National Plan 2040, together with the ‘other material considerations’, this Proposal should be refused planning consent.

CDF
for CPRW & RE-think
February 2026

ANNEX 1: LIST OF CPRW & RE-THINK'S REPRESENTATION DOCUMENTS

on the Nant Mithil Energy Park,
 DNS Application (PEDW Reference: CAS-01907-DZQ6Z1)

Representation Chapters and Authors			
Chapter	Subject	Name	Specialism
1	Introduction	Dr C Ford	Planning & Energy
2	Policy	Dr C Ford	Planning & Energy
3	Project Elements & Description	Dr C Hugh-Jones	
4	Landscape and Visual	Ms K Platt	Landscape Architect
5	Heritage	Mr C Welsh	Archaeologist
6	Ecology & Ornithology	Mr D Woodfield	Ecologist
7	Transport	Mr J Andrews	Engineer
8	Hydrology	Dr H Rodda	Hydrogeologist
9	Aviation & Telecoms	Mr J Andrews	Engineer
10	Shadow Flicker	Dr C Ford	Planning & Energy
11	Climate Change & Carbon	Dr C Ford	Planning & Energy
12	CEMP & HSE	Mr R Wilson	Geoscientist
13	Public Rights of Way	Ms S Bond	
14	Tourism	Ms M Porter	
15	Forestry	Dr C Hugh-Jones	
16	Noise	Dr C Hugh-Jones	
17	Conditions, PAC & Deficiencies	Dr C Hugh-Jones/Ms J Chryss	
18	Secondary Consents	Ms S Bond	
19	Cumulative	Dr C Hugh-Jones/Ms J Chryss	
20	Balance & Conclusions	Dr C Ford	Planning & Energy