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For the attention of Inspector A D Poulter BA BArch RIBA

24th February 2013

By email only

Dear Sir,

The Mid Wales (Powys) Conjoined Public Inquiry into 5 Windfarm Applications and a 132kV overhead Electric Line Connection.

1. With the benefit of your guidance given to us during the course of the PIM on 18th February we understand that what is required of us is:
 - (i) our best further indication of the number of professional 'expert' witnesses expected to be called in order to assist in developing an Inquiry programme, and
 - (ii) our best indication of topics expected to be covered by our 'expert' witnesses (raised by Mr Trinnick QC so that he knew which specialisms he could expect to need to consider involving).

2. Most if not all the promoters have now offered to supply us with complimentary hard copies of their ES and SEI material which will be a great help in enabling the Alliance more quickly to focus and refine its material from an alternative and more workable format than via large numbers of large web pages. We express our appreciation for that. That will, in turn,
 - (i) allow the Alliance more readily to see what material has already come into the public domain and from which it can draw: it may even be that some, at least, of the concerns will be seen to have been addressed satisfactorily,

- (ii) allow the Alliance more quickly to establish whether the scope of its likely evidence could be shortened or reduced – and may even allow the Alliance simply to adopt evidence which it learns is to be offered by others, and
- (iii) greatly assist the Alliance in preparing its full Statement of Case.

But at this stage we can offer the following observations in relation to the two specific points raised.

3. In reverse order, we do not expect to call any 'expert' evidence outside the scope of those listed at RWE's OSoC at para 4.2 and nor, for the avoidance of doubt, outside of the topics listed (in their various ways) in other parties' OSoC, although, before being entirely definitive, we must await
 - (i) digesting the SEI promised for March 2013 by Llandinam (Brodies OSoC para 5.4.2) and
 - (ii) digesting the SEI offered by Llanbadarn Fynydd (Burges Salmon OSoC para 7.1)

(The weblink offered by Llanbadarn Fynydd via the copy notice in the London Gazette (VATT-004) as a source for the new SEI was inoperative when we tried it last Friday and we have notified them of that.)

4. As to which and how many 'experts' we intend to call and in what topics, we are presently juggling budget, cash flow and diary availability before we can be sure as to numbers and specialisms and, if the application to defer the Inquiry succeeds, any plans will need revisiting.
5. But, in order to meet these constraints and challenges, the Alliance presently expects that all or certainly most of its professional 'expert' material will be presented during Session 4 when its professional witnesses will be able to address all the available material for all aspects of these projects individually and collectively in the most cost and resource-efficient manner. The only caveat to that is that the Alliance is presently engaged in assessing whether or not to bring 'expert' hydrology evidence to earlier sessions and awaits results of work which it has commissioned before it can make a decision.

6. Within that last and each other session, the Alliance expects to call evidence addressing topics which are listed (in no particular order) below:
- (i) Planning policy;
 - (ii) Community consultation;
 - (iii) Need – energy mix, security of supply, cost/benefit;
 - (iv) Landscape and visual impacts including designations, visualisations, cultural and historical association;
 - (v) Tourism and local economy;
 - (vi) Transport and highways;
 - (vii) Wildlife;
 - (viii) Community costs and benefits;
 - (ix) Health and well-being;
 - (x) Community effects in the uplands;
 - (xi) Community effects in the lowlands;
 - (xii) Need for, and type of grid connection(s);
 - (xiii) Hydrology (under consideration);
 - (xiv) Peat.

Yours sincerely

The Alliance