



Craig Y Perthi Solar Farm Resubmission

Environmental Statement

Chapter 03: Alternatives

Prepared for

RWE

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CONTENTS

3.0	ALTERNATIVES	1
3.1	Introduction	1
3.2	Location	2
3.3	Layout.....	6
3.4	Technology	12

FIGURES

Figure 3.1 - Sequential Analysis Assessment

APPENDICES

Appendix 3.1 Glint and Glare Study

Appendix 3.2 Noise Assessment

Appendix 3.3 Arboricultural Impact Assessment

Appendix 3.4 Statement Regarding Agricultural Land Classification



3.0 ALTERNATIVES

3.1 Introduction

- 3.1.1 Regulation 17(3)(d) and paragraph 2 of Schedule 4 of the EIA Regulations require an Environmental Statement to describe the reasonable alternatives studied by the Applicant that are relevant to the Proposed Development and its specific characteristics. This may include alternatives relating to location, layout, size, scale and technology. The ES must also identify the principal reasons for selecting the preferred option, taking account of the likely environmental effects.
- 3.1.2 This chapter describes the reasonable alternatives considered during the development of Craig Y Perthi Solar Farm. It focuses on the principal options that materially influenced the location, extent, composition and environmental effects of the Proposed Development, rather than documenting every minor adjustment made during detailed design.
- 3.1.3 The alternatives considered are reported under the following headings:
- i) **location**, including the influence of the available grid connection and the assessment of alternative development areas;
 - ii) **layout and scale**, including the development of the Previous Application and the subsequent selection of a smaller and revised scheme; and
 - iii) **technology**, including the inverter arrangement, solar-array design and removal of the previously proposed battery energy storage system.
- 3.1.4 This chapter should be read alongside Chapter 1.0, which summarises the planning history, and Chapter 4.0, which describes the Proposed Development being assessed. The Design and Access Statement provides the wider narrative of the design process and the way in which the final scheme responds to the Site and its surroundings; this chapter is confined to the alternatives considered for the purposes of the EIA and the environmental reasons for the preferred option.
- 3.1.5 This version of the chapter has been prepared for statutory Pre-Application Consultation. Representations received during consultation will be reviewed and, where relevant, the consideration of alternatives and reasons for the selected option will be updated before submission of the DNS application.



3.2 Location

Grid Connection and Search Area

- 3.2.1 The availability and location of a suitable grid connection are fundamental considerations in identifying reasonable locations for a large-scale solar farm. A potential site must be capable of connecting to the electricity network at a point with sufficient capacity and must be sufficiently close to that connection to remain technically and commercially deliverable.
- 3.2.2 Following discussions with the network operator, a Grid Supply Point was identified at Uskmouth Power Station. This provided an available connection capable of accommodating the electricity generated by a nationally significant solar development.
- 3.2.3 The Applicant consequently focused its search for potential development land within approximately 7.5 km of the Uskmouth Grid Supply Point. This distance was adopted as a practical search parameter reflecting the cost, complexity, electrical losses and environmental effects associated with a longer grid-connection route. It was not treated as an absolute limit where land immediately beyond the search area could reasonably form part of a viable site.
- 3.2.4 The coastal location of the Grid Supply Point and the presence of the River Usk materially influenced the geographic search area. Land to the east of the river was prioritised to avoid the technical and environmental complexity associated with a river crossing.
- 3.2.5 The proposed grid connection from the Site would extend for approximately 10 km, principally within the existing highway boundary. This route allows the solar farm to connect to Uskmouth without requiring extensive above-ground infrastructure or a separate cross-country cable corridor.

Planning and Environmental Context

- 3.2.6 National and local planning policy does not identify specific pre-assessed areas for large-scale solar development within the Newport area. Potential locations were therefore considered against their individual planning, environmental, technical and land-use characteristics.



3.2.7 The initial search considered whether land was affected by significant constraints, including:

- i) Special Protection Areas and Special Areas of Conservation;
- ii) Sites of Special Scientific Interest and National Nature Reserves;
- iii) Scheduled Monuments, listed buildings, conservation areas and registered historic landscapes;
- iv) country parks and other areas of recognised landscape or recreational value;
- v) Best and Most Versatile agricultural land;
- vi) flood risk;
- vii) proximity to residential and other sensitive receptors;
- viii) topography and solar orientation;
- ix) access and construction deliverability; and
- x) land availability and the ability to assemble a site of sufficient scale.

3.2.8 These constraints were used to identify areas where a nationally significant solar development would be unlikely to be acceptable or deliverable and to compare the relative environmental opportunities and limitations of the remaining land. The results are illustrated on Figure 3.1.

3.2.9 Figure 3.1 – Alternative Sites and Environmental Constraints

Previously Developed and Allocated Land

3.2.10 The first preference was to establish whether sufficient allocated or previously developed land was available within the search area. No land had been specifically allocated for solar or other renewable-energy generation at the scale required.

3.2.11 Areas of previously developed land associated with the former Llanwern Steelworks were reviewed. However, these areas were subject to existing industrial uses, committed regeneration and development proposals, physical constraints or fragmented land availability. They were not capable of accommodating a deliverable solar development of the required capacity without conflicting with existing or planned uses.

3.2.12 No other available area of previously developed land was identified within the reasonable search area that could accommodate the necessary generating



infrastructure, landscape and ecological measures and associated access while maintaining a viable connection to Uskmouth. It was therefore necessary to consider greenfield land.

Consideration of Greenfield Alternatives

- 3.2.13 The availability of unconstrained greenfield land within the search area was limited. Large parts of the area are affected by existing settlements, committed development, industrial and logistical uses, the coastal floodplain, environmental designations and the landscape and ecological sensitivities of the Gwent Levels.
- 3.2.14 Land north of Llanwern and west of Langstone Lane was discounted because it forms part of the Llanwern Village development area and is committed principally to residential and associated development.
- 3.2.15 Land east of Langstone Lane and west of Underwood was considered less suitable because development in this location would:
- i) reduce the remaining separation between Underwood, Llanwern, Milton and the M4 motorway;
 - ii) affect a greater concentration of residential receptors;
 - iii) comprise smaller and more fragmented field parcels, reducing the efficient use of land;
 - iv) lie closer to several designated heritage assets;
 - v) potentially require greater use of Best and Most Versatile agricultural land; and
 - vi) have a more urbanising influence on the remaining open land between existing settlements.
- 3.2.16 Other land closer to Uskmouth was substantially constrained by the Gwent Levels designated sites, flood risk, existing industrial and logistical uses and the requirement to avoid or minimise effects on the reën and ditch network.

Selection of the Craig Y Perthi Area

- 3.2.17 The broad Craig Y Perthi area was identified as offering a comparatively suitable combination of:

3.2.18



- i) proximity to the available Uskmouth grid connection;
 - ii) land availability and the ability to accommodate a development of nationally significant scale;
 - iii) predominantly Grade 3b and Grade 4 agricultural land rather than Best and Most Versatile land;
 - iv) established field boundaries, hedgerows, trees and woodland capable of providing landscape structure and visual containment;
 - v) opportunities to retain meaningful separation from Bishton and other residential receptors;
 - vi) access to the strategic highway network via the M4 and B4245;
 - vii) relatively limited requirements for alteration of the existing landform; and
 - viii) opportunities to combine electricity generation with continued agricultural use, habitat creation and public-access improvements.
- 3.2.19 The Site was not free from environmental constraints. Its relationship with the Gwent Levels, nearby heritage assets, Public Rights of Way, residential properties, areas of flood risk and the established landscape framework required detailed assessment and an iterative approach to the layout. Selection of the broad development area therefore did not predetermine the extent of land that would ultimately contain solar infrastructure.
- 3.2.20 The Alternative Sites Assessment did not identify another available and deliverable location within the reasonable search area that offered a clearly preferable overall combination of grid access, sufficient land, agricultural quality, residential separation, environmental effects, access and deliverability. The Craig Y Perthi area was therefore selected for more detailed design and environmental assessment. The original Alternative Sites Assessment and the proposed updates for the revised application are provided with the Planning Statement.

Relationship with the Revised Proposed Development

- 3.2.21 The location assessment identified the broad Craig Y Perthi area rather than establishing that every field within it was suitable for development. The subsequent layout process considered the relative sensitivity of individual land parcels and progressively removed or avoided areas where environmental effects would be greater.



- 3.2.22 The Previous Application extended into part of the Gwent Levels – Redwick and Llandeenny SSSI. Following its examination and refusal, the southeastern part of the scheme was removed entirely. The revised Site no longer includes any land within the SSSI, bringing the preferred layout into closer alignment with the avoidance principles applied during the initial location search.
- 3.2.23 The revisions do not alter the underlying reasons for selecting the Craig Y Perthi area. Rather, they refine the extent of development within that area to avoid the most environmentally sensitive land while retaining the benefits of the available grid connection, suitable agricultural land, established landscape framework and deliverable access arrangements.
- 3.2.24 On this basis, the Applicant concluded that retaining the broad Craig Y Perthi location and reducing and redesigning the scheme represented a more reasonable alternative than relocating the development to land with greater grid, planning, environmental or deliverability constraints. The consideration of alternative layouts within the selected location is described in Section 3.3.

3.3 Layout

Initial Layout Development

- 3.3.1 Selection of the broad Craig Y Perthi area did not establish that every field within it was suitable for development. The layout was developed iteratively to determine which land parcels could accommodate solar infrastructure while avoiding or reducing likely environmental effects.
- 3.3.2 An initial desk-based review identified the principal environmental and technical considerations influencing the layout, including:
- i) the established pattern of agricultural fields, hedgerows, trees and woodland;
 - ii) the Gwent Levels – Redwick and Llandeenny Site of Special Scientific Interest ('SSSI') and its associated ree and ditch network;
 - iii) nearby residential properties, principally within and around Bishton;
 - iv) iv) the setting of Bishton Castle, St Cadwaladr's Church, Wilcrick Hill Camp, Llanwern Park and other heritage assets;
 - v) local landscape character and views from Public Rights of Way;
 - vi) areas susceptible to flooding;

- vii) agricultural land quality;
- viii) important trees and potential ancient or veteran trees;
- ix) existing farm accesses, tracks and field gates;
- x) overhead electricity infrastructure; and
- xi) potential noise and glint-and-glare effects.

3.3.3 The following principles were applied during the initial layout process:

- 3.3.4 i) retaining the established field pattern, hedgerows, trees and woodland wherever practicable;
- 3.3.5 ii) using existing farm accesses, tracks, gates and field openings to minimise vegetation loss;
- 3.3.6 iii) retaining the existing landform by using driven posts for the solar-panel supports rather than extensive earthworks;
- 3.3.7 iv) maintaining appropriate separation from woodland, important trees, hedgerows, reens and drainage ditches;
- 3.3.8 v) locating sensitive electrical infrastructure outside areas of material flood risk and away from residential properties; and
- 3.3.9 vi) retaining sufficient spacing between the arrays to allow agricultural and ecological management to continue.
- 3.3.10 A preliminary layout was reviewed by specialists in landscape and visual impact, cultural heritage, ecology, arboriculture, noise, glint and glare, agricultural soils, hydrology and transport. Their findings informed successive layout revisions before the Previous Application was submitted.
- 3.3.11 The solar-array orientation and proposed planting were reviewed through the glint-and-glare assessment. The layout sought to avoid unacceptable effects on residential properties, the M4 motorway, the B4245 and the South Wales Main Line railway through the positioning and orientation of panels and the retention or reinforcement of intervening vegetation.



- 3.3.12 Flood-risk information informed the location of the principal operational infrastructure. While the solar arrays would be raised above ground level and would not generally be vulnerable to localised surface-water flooding, the substation, control buildings and other electrical infrastructure required more careful siting.
- 3.3.13 Agricultural Land Classification surveys confirmed that the land considered for the solar farm comprised Grade 3b and Grade 4 agricultural land rather than Best and Most Versatile agricultural land. This supported the continued consideration of the Site, while the layout was developed to allow grazing and other appropriate agricultural management to continue during operation.
- 3.3.14 Landscape and heritage review identified opportunities to remove development from more sensitive fields, retain separation from Bishton and nearby historic assets, strengthen existing field boundaries and provide wider landscaped corridors along Public Rights of Way.

Development of the Previous Application

- 3.3.15 The layout prepared for the Previous Application was progressively amended through environmental assessment and consultation. Fields were removed from the proposed development area near Bishton, St Cadwaladr's Church, Wilcrick Hill and Llanwern Park to reduce landscape, visual and heritage effects.
- 3.3.16 Separation distances from residential properties were increased, particularly around Bishton. Existing accesses and field openings were used wherever practicable, while buffers were introduced around hedgerows, woodland, drainage features and important trees.
- 3.3.17 Surveys identified that the fields most frequently used by lapwing differed from the area initially proposed for species mitigation. The 2024 layout was consequently amended by exchanging land proposed for solar arrays and lapwing habitat. This increased the amount of solar infrastructure proposed within the southeastern part of the Site, including within the Gwent Levels SSSI.
- 3.3.18 Other changes made during the development of the Previous Application included:
- i) relocation of the operational substation to avoid areas of greater flood risk;



- ii) introduction of archaeological no-dig areas and alternative construction techniques where required;
 - iii) additional native planting to respond to views from residential properties and Public Rights of Way;
 - iv) reinforcement and management of retained hedgerows;
 - v) provision of wider corridors along public routes; and
 - vi) refinement of infrastructure locations in response to noise, arboricultural and access considerations.
- 3.3.19 The resulting Previous Application extended to approximately 240 ha, of which around 135 ha was proposed to be enclosed and occupied by solar panels and associated infrastructure. It included battery energy storage, central inverter stations and approximately 12 ha of dedicated lapwing habitat. Part of its southeastern extent was located within the Gwent Levels SSSI.

Reconsideration Following the Previous Application

- 3.3.20 As summarised in Chapter 1.0, the Previous Application was examined during 2025 and subsequently refused by the Welsh Ministers. The principal environmental matters concerned development within the SSSI, protected and priority species, landscape character and visual amenity, and the setting of nearby heritage assets.
- 3.3.21 Following the decision, the Applicant reconsidered whether a viable development could be accommodated within the broad Craig Y Perthi area while avoiding or materially reducing the identified effects. The location assessment described in Section 3.2 remained relevant, but the extent and composition of the development within that area required substantial revision.
- 3.3.22 The preferred alternative was therefore not to retain the 2024 layout with additional mitigation. Instead, the Applicant selected a reduced layout that applies avoidance at the outset and removes the principal area of conflict with the statutory ecological designation.

Development of the Revised Layout



- 3.3.23 Approximately 44 ha has been removed from the southeastern part of the Previous Application. This reduces the overall Site from approximately 240 ha to 196 ha and reduces the fenced and panelled area from approximately 135 ha to around 111 ha.
- 3.3.24 The revised layout excludes all land within the Gwent Levels – Redwick and Llandeenny SSSI. No solar panels, access tracks or associated construction activities are now proposed within the designated site. This also removes development from the area in which buried peat deposits were previously identified.
- 3.3.25 The dedicated lapwing habitat has been increased from approximately 12 ha to 16.5 ha. Two additional contiguous fields have been included to provide a larger and more coherent area capable of being managed for nesting and foraging lapwing.
- 3.3.26 Approximately 43.3 ha of diverse wildflower meadow would be established across the Site, including areas managed to provide suitable habitat and food plants for shrill carder bee. The habitat areas would connect with retained hedgerows, woodland, reens, ditches and field margins.
- 3.3.27 The battery energy storage system and central inverter stations included within the Previous Application have been removed. The revised layout uses string inverters associated with the solar-panel rows, reducing the requirement for concentrated areas of containerised infrastructure. The technology alternatives informing this change are described further in Section 3.4.
- 3.3.28 The revised layout continues to retain substantial undeveloped areas around Bishton and nearby heritage assets. Solar infrastructure remains arranged within existing field parcels, with the majority of established hedgerows, trees and woodland retained.
- 3.3.29 The locations of the substation, switchgear buildings, transformers, access tracks and construction compounds have been reviewed against flood risk, residential amenity, ecology, arboriculture, landscape and cultural heritage constraints. Existing farm accesses, tracks and field openings continue to be used wherever practicable.
- 3.3.30 The Public Rights of Way and permissive-path network has also been incorporated into the revised green infrastructure framework. Wider corridors, habitat margins and planting would provide separation from the solar arrays while maintaining and improving movement through the Site.



- 3.3.31 These revisions have resulted in a materially smaller and simpler layout. They do not merely remove the southeastern fields from the Previous Application but reconsider how the generating infrastructure, ecological mitigation, landscape proposals and public routes function together across the Site.

Environmental Comparison of Layout Alternatives

- 3.3.32 Table 3.1 summarises the principal differences between the layout submitted as part of the Previous Application and the revised Proposed Development.

Table 3.1 – Comparison of Layout Alternatives

Consideration	Previous Application	Revised Proposed Development	Principal environmental implication
Overall Site area	Approximately 240 ha	Approximately 196 ha	Reduced geographical extent of the development. Removes direct impacts within SSSI.
Fenced and panelled area	Approximately 135 ha	Approximately 111 ha	Reduced area occupied by generating infrastructure
Gwent Levels SSSI	Part of the development extended into the SSSI	No part of the Site lies within the SSSI	Avoids direct development within the statutory designation
Peat-bearing land	Identified deposits lay within the former scheme area	Peat-bearing area excluded from development	Avoids piling, trenching and other intrusive works within the identified deposits
Battery storage	Containerised BESS included	BESS removed	Reduces containerised infrastructure and associated noise, fire-risk perception and operational complexity
Inverters	Central inverter stations	String inverters distributed alongside panel rows	Removes larger centralised inverter containers and simplifies the infrastructure layout
Lapwing habitat	Approximately 12 ha	Approximately 16.5 ha	Provides a larger and more coherent mitigation area
Wildflower habitat	Habitat creation included within the landscape proposals	Approximately 43.3 ha of diverse wildflower meadow	Provides an extensive and connected habitat resource
Landscape extent	Extended farther into the lower-lying southeastern landscape	More compact layout with southeastern area removed	Reduces the spread of development towards the Gwent Levels
Public access	Existing Public Rights of Way and permissive routes incorporated	Enhanced routes retained within the revised green infrastructure framework	Maintains recreational benefits within the smaller scheme

- 3.3.33 The comparison demonstrates that the revised layout avoids direct development within the SSSI, reduces the land occupied by solar infrastructure and removes substantial areas of containerised electrical equipment. It also provides a larger dedicated lapwing area and an extensive wildflower and landscape framework.
- 3.3.34 These changes are expected to reduce the potential for ecological, landscape, visual and heritage effects compared with the Previous Application. The significance of the effects of the selected layout is assessed within the relevant technical chapters of this ES; the comparison in this chapter does not replace those assessments.

Selection of the Preferred Layout

- 3.3.35 The revised layout has been selected because it provides a materially improved environmental alternative to the Previous Application while retaining a viable nationally significant solar development and the benefits of the selected location and grid connection.
- 3.3.36 In particular, it gives priority to avoiding the most sensitive land rather than relying on additional mitigation within it. The selected layout also retains sufficient land for renewable electricity generation, landscape integration, ecological enhancement, continued agricultural management and improved public access.
- 3.3.37 The Proposed Development described in Chapter 4.0 and assessed throughout this ES is therefore the revised layout identified through this alternatives process.
- 3.3.38 This version of the layout is presented for statutory Pre-Application Consultation. Representations received, completed technical work and any further environmental information will be reviewed, and proportionate refinements may be made before submission of the DNS application.

3.4 Technology

- 3.4.1 The principal technological alternatives considered by the Applicant relate to:
- i) the type and arrangement of inverters;
 - ii) the use of fixed or tracking solar arrays; and
 - iii) whether battery energy storage should form part of the development.



- 3.4.2 The selected technologies have been considered alongside the environmental constraints of the Site, the operational requirements of the Proposed Development and the need to maintain a commercially and technically viable generating scheme.

Inverter Arrangement

- 3.4.3 Solar panels generate electricity as direct current, which must be converted into alternating current before it can be exported to the electricity network. This conversion is undertaken using either central or string inverters.
- 3.4.4 Central inverters comprise larger units serving a substantial group of solar panels. They are generally located within dedicated inverter stations distributed across a solar farm. This approach can reduce the total number of inverter units but requires larger areas of concentrated electrical infrastructure.
- 3.4.5 String inverters are smaller units connected to individual strings or groups of solar panels. They are positioned close to the panel rows and distribute the conversion equipment across the development rather than concentrating it within larger inverter stations.
- 3.4.6 The Previous Application used central inverter stations. As part of the reconsideration of the scheme, the Applicant reviewed whether that arrangement remained appropriate for the reduced and simplified layout.
- 3.4.7 String inverters have been selected for the revised Proposed Development because they:
- i) remove the need for larger central inverter containers;
 - ii) can be installed alongside and visually associated with the solar-panel rows;
 - iii) reduce the extent of concentrated electrical infrastructure across the Site;
 - iv) allow individual units to be maintained or replaced without taking a larger part of the solar farm out of operation; and
 - v) provide greater flexibility when arranging infrastructure around environmental buffers and retained landscape features.
- 3.4.8 The use of string inverters contributes to the simpler and more dispersed infrastructure arrangement described in Section 3.3. Their location, dimensions and



operational characteristics are described in Chapter 4.0 and have been considered within the relevant technical assessments.

Solar Arrays

3.4.9 Two principal forms of solar-array technology were considered:

- i) arrays; and
- ii) tracking arrays.

3.4.10 Fixed arrays are installed at a predetermined height, angle and orientation. They contain no motors or moving parts and remain in the same position throughout the day.

3.4.11 Tracking arrays use mechanical systems to alter the orientation of the panels in response to the position of the sun. This can increase electricity generation at certain times of day but requires moving components, additional maintenance and a layout capable of accommodating the movement of the panels.

3.4.12 The Applicant selected fixed arrays for the Proposed Development because they:

- i) provide a predictable maximum height, angle and orientation;
- ii) contain fewer moving components and require less operational maintenance;
- iii) do not generate noise from tracking motors;
- iv) can be arranged more readily within the established field pattern and environmental buffers;
- v) allow glint-and-glare effects to be assessed against a fixed panel orientation; and
- vi) are capable of retaining sufficient clearance beneath and between the panels for vegetation management and agricultural use.

3.4.13 Although tracking arrays may produce a higher yield from each individual panel, their additional mechanical and spatial requirements were not considered to provide sufficient advantages to outweigh the greater design and environmental complexity at this Site.



Battery Energy Storage System (BESS)

- 3.4.14 The Previous Application included several BESS, comprising containerised battery units and associated electrical, cooling and safety infrastructure. Battery storage was therefore a technological alternative considered during development of the project.
- 3.4.15 The BESS has been removed from the revised Proposed Development. The selected scheme is now focused solely on the generation and export of electricity from the solar farm.
- 3.4.16 Its removal:
- i) reduces the amount of containerised infrastructure within the Site;
 - ii) removes the operational noise associated with battery cooling and ventilation equipment;
 - iii) removes the need for battery-specific fire-safety and emergency-response infrastructure;
 - iv) simplifies the operational compound and internal electrical arrangements; and
 - v) reduces the overall scale and complexity of the development.
- 3.4.17 The removal of the BESS, together with the replacement of central inverter stations by string inverters, results in a materially simpler technological arrangement than that proposed within the Previous Application.

Selection of Technology

- 3.4.18 The combination of fixed solar arrays and string inverters, without battery storage, was selected because it provides a reliable and flexible means of generating and exporting renewable electricity while reducing the amount and concentration of ancillary infrastructure across the Site.
- 3.4.19 The selected technologies form part of the Proposed Development described in Chapter 4.0 and have been taken into account in the assessment of likely environmental effects throughout this ES.



Appendix 3.1 Glint and Glare Study

Appendix 3.2 Noise Assessment

Appendix 3.3 Arboricultural Impact Assessment

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