

Number: WG23953



Llywodraeth Cymru
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Consultation – annex to summary of responses

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Judith Jones	
Organisation	Merthyr Tydfil County Borough Council	
Address	Unit 5 Triangle Business Park Pentrebach Merthyr Tydfil CF48 4TQ	
E-mail address	judith.jones@merthyr.gov.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:			

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: It is unclear what has determined the threshold figures proposed				

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Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: Clarification would be useful to define what is deemed an extension to a development i.e. an application for a small residential scheme that does not normally require to be screened could be located next to a recently completed scheme which required an EIA. Should this be treated as an extension or as a new and separate proposal? Would the period of time between completed development proposals have an influence on what is deemed an extension to an existing development.</p>			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: As above</p>			

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: The provision of a screening opinion can be a time consuming process that diverts valuable officer time and there is currently no charge for screening requests. If reasons are required for all screening opinions, the process would likely be more time consuming. What would be the level of detail required in the reasons given and would there be a standardised format that all LPA's should follow to ensure consistency.</p>			

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments: This should equally apply to the submission of details for the discharge of conditions where an environmental statement has been provided, which is essentially the same as reserved matters applications. The need to re-consult on the discharge of conditions can result in a significant additional cost to the LPA.</p>				

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Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:				
<p>Whilst this may give LPA's the option to consider LDO's on sites which require an environmental statement, the cost of preparing the LDO is likely to place a significant burden on LPA's. Furthermore, there would be no planning fees received as a result of the LDO to recover the costs.</p> <p>The cost implications of the LDO is not likely to encourage the use of LDO without funding support from the Welsh Government.</p>				

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Consultation reference: WG23953

Comments:			

I do not want my name/or address published with my response (please tick)

How to Respond

Please submit your comments in any of the following ways:

Email
Please complete the consultation response form and send it to: planconsultations-f@wales.gsi.gov.uk
Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Peter A Ogden : Director	
Organisation	Campaign for the Protection of Rural Wales	
Address	Ty Gwyn 31High Street WELSHPOOL Powys SY21 7YD	
E-mail address	peter@cprwmail.org.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input checked="" type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

CPRW is concerned that whilst there may good reasons for adjusting the thresholds as suggested, we do not agree that this should be done unilaterally especially in a rural context. Likewise we do not with this suggested relaxation, if sites have not been designated for such developemnts in any prevailing Development Plan, if the policies of which themselves have not gone through a rigorous SEA procedure.

We are particulrly concerned that these increased thresholds are likewise not appropriate in any area designated as aProtected Landscape or where a site would be in close proximity to its boundaries, as there would be a serious risk that such schemes would significant impact to the amenity or special qualities of that designated area.

We would apply the same principle to locations close to Scheduked Ancient monuments, Historic landscapes or within or in close proximity to World Heritage sites or Conservation areas. In all these circumstances we consider the existing thresholds should be retained.

We also consider a threshold of 150 for dwellinghouses is also far too high and it should be recognised that in many rural locations, even developments of 25 or more propertes can have significant implications on the local environment of a community especially if these sites have not be evaluated through the planning process as being environmentally acceptable for developments of this scale. We therefore do not agree that these thresholds should be increased in rural areas where even developments of 25 houses should still be subject to EIA requirements.

CPRW therefore believes the thresholds for an EAI should be in proportion to the size of the community where the development is located and matched against the size of the development proposed. Each Local Planning

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Authority should be required to indicate through an appropriate document or in their respective policy documents the thresholds it considers appropriate to trigger the need for such "residential" EIA. We do not agree that these thresholds should be increased in rural areas.

We therefore believe that the term "sensitive area" needs to be clearly defined before any change is proposed to ensure that all the above circumstances are accounted for.

CPRW does not believe that there will be that many locations in rural areas or outside the development boundaries of medium sized urban areas where this new provision would be applicable unless land has already been evaluated and allocated for such developemnt purposes in an existing plan .

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: See comment above in respect of Question 1				

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: CPRW supports this proposed change			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
Comments: CPRW supports this proposed change			

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: CPRW supports this proposal and belives that such decisions should be made publically available so that individuals and / or Third parties are able to consider the reasons given by the Authrotiy for not requiring an E?IA			

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and be able to challenge them if they are considered to be inappropriate.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:
 CPRW believes that a modified form of public consultation should be adopted whereby public notice is given by the relevant LPA that is minded to accept the scope and content of an initial EIA where it considers it is still fit for purpose, unless it receives any representations to the contrary within a prescribed period of 21 days after the public notice is published.

We believe it is only right that individuals and Third parties have the opportunity to consider whether the view of the LPA is correct and the merits of an original EIA still remain valid in the light of the reserved matter details which have subsequently submitted.

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:
 CP~RW supports this proposed change

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Again we believe that such a process should be transparent and the public allowed to comment on the implications of Schedule 2 developments even in an LDO context.

We also believe that is this change is made that the releavnt regualtions make it clear what information is required to be included in any Environmental Statement to ensure that all the relevant details of the threats to the status of the site are properly accounted for in the decision making process.

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?		
<p>Comments: We repeat our comments in relation to Question 8 regarding the need for sufficient robust and up to date environmental information to be made available to ensure that any decision made is based on sound evidence</p>			

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: We repeat our comments in respect of Q9</p>			

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments:</p>			

I do not want my name/or address published with my response (please tick) <input type="checkbox"/>
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How to Respond

Please submit your comments in any of the following ways:

Email
<p>Please complete the consultation response form and send it to: planconsultations-f@wales.gsi.gov.uk</p>
Post

Consultation reference: WG23953

Please complete the consultation form and send it to:

Development Management Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Additional information

If you have any queries on this consultation, please

Email: planconsultations-f@wales.gsi.gov.uk

Telephone: Alan Groves on 029 2082 5362

Newidiadau arfaethedig i'r Rheoliadau Asesiad o'r Effaith Amgylcheddol a Gorchmynion Datblygu Lleol		
Dyddiadau'r cyfnod ymgynghori: 26/03/2015 – 18/06/2015		
Enw	Gareth Jones, Uwch Reolwr, Gwasanaeth Cynllunio, Amgylchedd a Gwarchod y Cyhoedd	
Sefydliad	Cyngor Gwynedd	
Cyfeiriad	Stryd y Castell, Caernarfon., Gwynedd. LL55 1SE	
Cyfeiriad E-bost	GarethJones3@gwynedd.gov.uk	
Math (<i>dewiswch un o blith yr isod</i>)	Busnesau/ Ymgynghorwyr	<input type="checkbox"/>
	Awdurdod Cynllunio Lleol	<input checked="" type="checkbox"/>
	Asiantaeth Llywodraeth/Sector Cyhoeddus arall	<input type="checkbox"/>
	Cyrff Cyhoeddus/Grwpiau Buddiant	<input type="checkbox"/>
	Sector gwirfoddol (grwpiau cymunedol, gwirfoddolwyr, grwpiau hunangymorth, sefydliadau cydweithredol, mentrau cymdeithasol, sefydliadau crefyddol a sefydliadau dielw)	<input type="checkbox"/>
	Arall (grwpiau eraill heb eu rhestru uchod) neu unigolyn	<input type="checkbox"/>

	Ydw	Nac ydw
C1 Ydych chi'n cytuno bod y trothwyon sgrinio ar gyfer prosiectau datblygu trefol a prosiectau stadau diwydiannol, fel y'u gosodir yn Atodlen 2 o'r Rheoliadau EIA, yn rhy isel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sylwadau:
Nifer o brosiectau yn gyson yn disgyn yn o fewn y trothwy sgrinio ond ar sail maint arwynebedd heb unrhyw bryderon/materion eraill sy'n berthnasol i'r broses yn cael eu codi. Credu fod hyn yn ddi-angen ac yn arafu'r broses.

	Ydw	Ydw (gyda sylwadau pellach)	Nac ydw
C2 Ydych chi'n cytuno gyda ein trothwyon sgrinio arfaethedig ni?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sylwadau:
Nid yw lha yn drothwy uchel iawn ac nid yw'n llawer uwch na'r trothwy presennol.

Cyfeirnod yr ymgynghoriad: WG23953

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C3	A oes gennych unrhyw sylwadau am y dull sy'n cael ei gynnis i fynd i'r afael â newidiadau neu estyniadau i ddatblygiadau sy'n dod o dan Atodlen 2?	Oes	Nac oes
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sylwadau:

C4	A oes gennych unrhyw sylwadau am y dull sy'n cael ei gynnis i fynd i'r afael â newidiadau neu estyniadau i ddatblygiadau sy'n dod o dan Atodlen 1?	Oes	Nac oes
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sylwadau:

C5	A oes gennych unrhyw sylwadau ar y cynnig i ddiwygio'r Rheoliadau Asesiad o'r Effaith Amgylcheddol i'w gwneud yn ofynnol i roi rhesymau am bob barn sgrinio a chyfarwyddyd sgrinio?	Oes	Nac oes
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p>Sylwadau: Yn dilyn hufforddiant a drefnwyd gan Llywodraeth Cymru am sgrinio ac er cysondeb a thryloywdeb rhwng holl Awdurdodau byddai'n fuddiol a defnyddiol pe bai templed neu arweiniad clir yn cael ei ddarparu ar gyfer darparu'r wybodaeth sgrinio.</p>
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C6	Yn achos cais dilynol (cais ar gyfer materion a gadwyd yn ôl) lle darparwyd datganiad amgylcheddol gyda'r cais amlinellol gwreiddiol sy'n parhau i fod yn addas i'r diben, a ydych yn cytuno nad oes gwerth ailadrodd y broses o ymgynghori'n gyhoeddus?	Ydw	Ydw (yn amodol ar sylwadau pellach)	Nac ydw
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau:

Cyfeirnod yr ymgynghoriad: WG23953

C7	A oes gennych unrhyw sylwadau ar y dull arfaethedig o weithredu'r Gyfarwyddeb Storio Daearegol?	Oes	Nac oes
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sylwadau:			

C8	A ydych yn cytuno y dylid diwygio Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012 a'r Rheoliadau Asesiad o'r Effaith Amgylcheddol er mwyn galluogi i Orchmynion Datblygu Lleol roi caniatâd cynllunio i ddatblygiadau sy'n dod o dan Atodlen 2?	Ydw	Ydw (yn amodol ar sylwadau pellach)	Nac ydw
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sylwadau: Credir fod hyn yn angenrheidiol os yw Gorchmynion Datblygu Lleol am fod o unrhyw werth				

C9	A oes gennych unrhyw sylwadau ar y cynnig i atal cyflwyno gorchmynion addasu ar gyfer datblygiad sy'n destun Asesiad o'r Effaith Amgylcheddol oni bai bod Datganiad Amgylcheddol gyda'r gorchymyn a bod hynny'n cael ei ystyried wrth wneud neu gadarnhau'r gorchymyn?	Oes	Nac oes
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sylwadau:			

C10	A oes gennych unrhyw sylwadau ar y cynnig i atal cyflwyno gorchmynion dirwyn i ben ar gyfer datblygiad sy'n destun Asesiad o'r Effaith Amgylcheddol oni bai bod Datganiad Amgylcheddol gyda'r gorchymyn a bod hynny'n cael ei ystyried wrth wneud neu gadarnhau'r gorchymyn?	Oes	Nac oes
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sylwadau:			

Cyfeirnod yr ymgynghoriad: WG23953

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C11	A oes gennych unrhyw sylwadau ychwanegol ar y papur ymgynghori?	Oes	Nac oes
		<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau:

Nid wyf eisiau i fy enw / fy nghyfeiriad gael eu cyhoeddi gyda fy ymateb (ticiwch y blwch) <input type="checkbox"/>

Cyfeirnod yr ymgynghoriad: WG23953

Sut i Ymateb

Anfonwch eich sylwadau atom mewn unrhyw un o'r ffyrdd isod:

E-bost
Llenwch y ffurflen ymgynghori a'i hanfon i: planconsultations-f.@cymru.gsi.gov.uk
Post
Llenwch y ffurflen ymgynghori a'i hanfon i: Cangen Rheoli Datblygiadau Y Gyfarwyddiaeth Gynllunio Llywodraeth Cynulliad Cymru Parc Cathays Caerdydd CF10 3NQ
Gwybodaeth Ychwanegol
Os oes gennych unrhyw gwestiynau am yr ymgynghoriad hwn anfonwch e-bost at: planconsultations-f.@cymru.gsi.gov.uk neu ffoniwch Alan Groves ar 029 20825362

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Rhidian Clement	
Organisation	Dwr Cymru Welsh Water	
Address	Linea Fortran Road St. Mellons CF3 0LT	
E-mail address	Rhidian.Clement@Dwrcymru.com	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input checked="" type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

Currently the existing thresholds for urban development projects and industrial estate projects can require proposals to progress through Schedule 2 screening, even when they are considered unlikely to give rise to significant environmental effects. Dŵr Cymru Welsh Water (DCWW) agrees that in many cases the environmental impact can be properly assessed and addressed through the determination of the related planning application.

Having said that, smaller developments can have significant impacts depending, for example, on their location and the potential cumulative impacts of several developments. Local Planning Authorities should be given the discretion to commission environmental statements if they have material reasons for considering that it is justified: in such circumstances LPAs must give their reasons if requested by an interested party.

Consultation reference: WG23953

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: DCWW notes that there will continue to be safeguards relating to developments within “sensitive areas”. DCWW agrees with this, and suggests that the WG might consider expanding this to include developments within or which could impact upon, sensitive areas, particularly Natura 2000 sites: this would ensure join up between the implementation in Wales of the EU EIA Directive and the EU’s Habitats and Birds Directives.</p> <p>Given the overarching need to maintain public water supplies and public safety, we would like the term “sensitive areas” to be expanded to include developments that are upstream of abstractions for public drinking water supplies; and to developments that are downstream of large raised reservoirs (the latter is defined in the Reservoirs Act 1975 as amended).</p> <p>As an additional safeguard, it would also be useful to remind local planning authorities of their statutory duty (under Regulation 17 of SI 2003, No 3242) to have regard to the River Basin Management Plans produced by Natural Resources Wales or the Environment Agency: hopefully this would go some way to protecting inland, groundwater and coastal waters from inappropriate development that would otherwise threaten compliance with the EU Water Framework Directive. Again this would encourage coherence in the implementation of EU environmental legislation in Wales.</p>				

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments: DCWW have no further comments in respect to Q3</p>			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments: DCWW have no further comments in respect to Q4</p>			

Consultation reference: WG23953

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 In the interests of transparency, DCWW considers it appropriate that the reasoning behind a negative screening decision is published.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 With subsequent applications, DCWW agrees that in cases where the risk of significant environmental impact is unchanged, and the statement remains fit for purpose, there is no justification for repeating the public consultation process.

However, it is important to identify and define the factors which determined that the original environmental statement was considered “fit for purpose” and the circumstances in which this would no longer be the case. This would help determine whether or not a fresh public consultation is warranted.

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:
 DCWW have no further comments in respect to Q7

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Assuming that a robust and accountable process is in place to ensure the suitable validation and analysis of a comprehensive environmental statement, there should be no increased risk of significant environmental impact from any grant of planning permission though an LDO subject to Schedule 2.

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Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: DCWW have no further comments in respect to Q9			

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: DCWW have no further comments in respect to Q10			

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: DCWW have no further comments in respect to Q11			

I do not want my name/or address published with my response (please tick)

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Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Mark Stringer (Planning Policy Officer)	
Organisation	Newport City Council (NOTE: Comments provided on behalf of the council's planning officers, not the authority itself)	
Address	Civic Office Godfrey Road Newport South Wales NP20 4UR	
E-mail address	mark.stringer@newport.gov.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
Q1		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:			

	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
Q2		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments:				
<ul style="list-style-type: none"> • Agree. However, it is not clear why the threshold for urban development projects (one hectare) is so much lower than the threshold for “industrial estate development” (five hectares). These thresholds might mirror those in England (since April 2015), but perhaps Welsh Government could explain the substantial difference between the two. • Criterion (iii) refers to the “overall area of the development”, while criterion (i) refers to the “development”. Is this distinction intentional? If so, what is its purpose? Does the former refer to the site area and the latter to the 				

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development footprint, or vice versa? Perhaps Welsh Government could clarify this point.

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- Under the proposals, LPAs would screen Schedule 2 development when the change/extension could have significant adverse effects on the environment and the changed/extended development as a whole met or exceeded certain thresholds.
- The purpose of the change is clear — that is, to ensure that United Kingdom law complies with the EU Directive — but there appears to be a loophole. A change/extension could have the potential to cause substantial harm to the environment, but, if the overall development fell short of a threshold, the LPA would have no cause to screen it. Wouldn't this expose the environment to unnecessary risk?
- Also, in the case of a development that did meet or exceed the threshold, what would the LPA screen — just the change/extension or the changed/extended development in its entirety?

Example:

- o An LPA determines an application for a large residential estate (5,000 houses) that required an Environmental Statement because it exceeded the applicable area threshold and was situated in a sensitive area.
- o The LPA subsequently receives an application to change the house types for 200 of the houses.
- o Under the proposed regulations, LPA would refer to paragraph 13 of the revised regulations and decide that (i) 200 houses could have significant adverse effects on the environment and (ii) the changed/extended development exceeded one hectare in area (and comprised more than 150 dwellinghouses). Consequently, the LPA would have to screen the proposal.
- o At this point, would the LPA screen merely the change or the whole development? Would it make sense to screen the change (200 houses) in isolation? Is this what the authors of the Directive and the regulations had in mind?
- o The alternatives would see the LPA either stating that 200 houses could not have significant adverse effects on the environment (a difficult position to adopt, let alone defend, given the previous requirement for an Environmental Statement) or screening the entire development again and requesting an additional ES. Would the latter course be reasonable or sensible, though? Would the 200 houses pose a substantially greater threat to the environment than the previously assessed and approved scheme did? At this point, would the LPA be able to use common sense and say that the proposed change to the residential development, raising no issues over and above those previously assessed, did not require a new Environmental Statement?
- o At present, a proposed change/extension to a larger scheme could have significant environmental effects, but the LPA would not have to screen it if those effects were considered as part of a previous EIA and the new scheme raised no environmental issues over and above those previously considered.
- o The proposed changes to the regulations are likely to require LPAs to undertake more screening opinions (on cases where it currently applies the threshold to the change/extension rather than the whole development);
- o What is meant by "whole development"? In the case of a large urban expansion project with build-out timescales of more than 10 years, what does WG reasonably consider to be the "whole development"? For example, the LPA may receive an application for 100 houses on a site that forms part of a larger development site that is, by the time of the application, well established, having been built out and occupied for the past 10 years.

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- It isn't clear why WG should treat Schedule 1 development and Schedule 2 development differently.
- Under the proposals, LPAs would screen Schedule 2 development when the change/extension could have

Consultation reference: WG23953

significant adverse effects on the environment and the changed/extended development as a whole met or exceeded certain thresholds.

- By contrast, LPAs would screen Schedule 1 development when the change/extension could have significant adverse effects on the environment AND either the changed/extended development as a whole could have significant adverse effects on the environment or the change/extension met or exceeded certain thresholds.
- This seems to be a confusing way in which to structure Part 13 of Schedule 2. Is it necessary to create two slightly different procedures? It is not clear why one approach could not be applied to both schedules. Could not the regulations simply require LPAs to screen a proposed change or extension, be it Schedule 1 development or Schedule 2 development, if the changed/extended development could have significant adverse effects on the environment? Why does there need to be any reference to thresholds for changes and extensions?

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 The proposal seems reasonable, but WG needs to clarify what a screening opinion is. Its own Circulars are not consistent on this point. For instance, they appear to suggest that screening only occurs once the threshold has been met or exceeded or the location is sensitive and that the process of screening begins by checking the list of development in schedule 1 and 2. The existence of two seemingly incompatible interpretations in national guidance is confusing for LPAs.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Please ensure that the requirements in the regulations are clear.

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow	Yes	Yes (subject to further	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Consultation reference: WG23953

	LDOs to grant planning permission for Schedule 2 development?		comment)	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments:				

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>If the EIA regulations cannot be simplified, Newport City Council officers would welcome the publication of a new Welsh Government circular on the subject. Such guidance might allow LPAs to apply the regulations to proposals with greater confidence.</p>			

I do not want my name/or address published with my response (please tick) <input type="checkbox"/>
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Consultation reference: WG23953

How to Respond

Please submit your comments in any of the following ways:

Email
Please complete the consultation response form and send it to: planconsultations-f@wales.gsi.gov.uk
Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Simon Gale	
Organisation	Rhondda Cynon Taf County Borough Council	
Address	Sardis House Sardis Road Pontypridd CF37 1DU	
E-mail address	Simon.Gale@rctcbc.gov.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
Q1		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:			

	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
Q2		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments:				

Consultation reference: WG23953

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: It is agreed that this increase in threshold will reduce the administrative burden on the LPA in assessing applications that currently have EIA potential.			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: It is agreed that this is a good idea (to at least have a chance to screen the development to see if there are any wider “in combination” issues)			

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: It is an additional administrative burden however it is not unreasonable to expect any interested party to see why the LPA has made a (any) decision.			

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: While not a major factor which has been experienced in RCT, the reduction of any administrative phases of the EIA process is welcomed.				

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: Carbon capture is normally only applicable on certain projects where the output is greater than 299MW (which is why Hirwaun Power and Pen Y Cymoedd Wind Farm applied for up to 299MW). The types of development carbon capture may apply to would be limited and there are no issues with adding these categories to the			

Consultation reference: WG23953

Regulations to reflect the EU Directive.

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
Given the proposed Trefforest LDO this removes a potential obstacle to granting quite far reaching powers which are intended to help facilitate development on the Estate. It is considered that this should be supported.

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
This is simply ratification of a Court decision and asks whether all such cases should be accompanied by ES to be taken into account when making the Order. There is no objection to this.

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
DOs are rare. This decision (as the one above) only relates to development that has significant environmental impacts and it is reasonable that the decision maker (the Welsh Ministers in this case) have regard to these impacts before making a decision.

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Consultation reference: WG23953

I do not want my name/or address published with my response (please tick)

How to Respond

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Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Karen Whitfield	
Organisation	Wales Environment Link This response is supported by Bat Conservation Trust, Butterfly Conservation Wales, CPRW, Cymdeithas Eryri/Snowdonia Society, Open Spaces Society, RSPB Cymru, Wildlife Trusts Wales	
Address	3rd Floor, Baltic House, Mount Stuart Square, CF10 5FH	
E-mail address	karen@waleslink.org	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input checked="" type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
Q1		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

We remind the Welsh Government that there are four factors which must be considered :

- Type of project
- Criteria and thresholds
- Environmental sensitivity
- Likelihood of the project as proposed causing significant effects.

Thus project type, criteria and threshold alone are not the only factors – the likelihood of the project as proposed causing significant effects must also be taken into consideration. We thus draw your attention to the ECJ case C-72/95 the Kraaijveld (Dutch Dykes) case. The EIA Directive should be interpreted as having a ‘wide scope and broad purpose’. The fact that a particular development or type of development is not listed within the categories of Projects in Schedule 1 or 2 does not imply that it is exempt from the EIA process.

Notwithstanding the above, the WEL considers that raising the threshold could mean that development proposals which are likely to damage the environment would not be screened for EIA, and for this reason we object to it.

In any event, screening arrangements pursuant to the new Directive will be tightened, therefore it is likely that the next review of the Regulations will have to undo what is attempted here anyway.

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We note reference at para 7 to new research carried out by Welsh Government in respect of this matter, however this is not referenced, and we would be most grateful if you could supply us with a copy of this research.

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: See answer to Q1.				

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: WEL agrees with this proposal. However, we again remind the Welsh Government that an overly-mechanistic reliance on thresholds alone risks proposals in sensitive areas and of a type likely to cause damage not being captured by the need to screen for EIA.			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:			

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: However, this proposal does not go far enough. Clarification is needed as to how and within what time period reasons for negative screenings will be published and whether there will be opportunities for third party challenge/comment to negative screening decisions.			

Consultation reference: WG23953

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Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Adverse effects may manifest themselves at the reserved matters stage which were not examined at the outline stage, and the public should be consulted about them. Additionally, we consider that competent authorities should press a proposer to submit a complete project and complete environmental statement (including consultation arrangements) to ensure that the aims of the EIA Directive are not being frustrated by submission of a series of separate applications.

We believe that lack of public consultation at this stage is contrary to the Aarhus Convention which provides the right to participate in environmental decision-making. This states that “Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it”.

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

We agree with this proposal.

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

This is a very retrograde proposal. The consultation contains no reasoned justification for it, and sets out no measures which could allay the concerns of the environment sector. LDOs grant blanket permission over extensive areas, therefore damaging development could be granted without proper consideration via the production of an environmental statement, because that consideration would not take place at the appropriate scale, because not enough detail would be known at the LDO stage to enable a thorough understanding of the environmental implications of such a planning permission.

WEL reminds the Welsh Government that these proposals may well not be in conformity with the new Directive, and will therefore have to be removed as part of the next consultation, before 16th May 2017

Consultation reference: WG23953

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Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		☒	☐

Comments:
 WEL agrees with this proposal.

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		☐	☒

Comments:

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		☐	☒

Comments:

I do not want my name/or address published with my response (please tick)

How to Respond

Please submit your comments in any of the following ways:

Email

Consultation reference: WG23953

Please complete the consultation response form and send it to:

planconsultations-f@wales.gsi.gov.uk

Post

Please complete the consultation form and send it to:

**Development Management Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ**

Additional information

If you have any queries on this consultation, please

Email: planconsultations-f@wales.gsi.gov.uk

Telephone: Alan Groves on 029 2082 5362

**RTPI Cymru**mediation of space · making of place
cyd drefnu gofod · creu cynefin

Royal Town Planning Institute
Cymru (RTPI Cymru)
PO Box 2465
Cardiff
CF23 0DS
Tel +44 (0)29 2047 3923
email walespolicy@rtpi.org.uk
Website: www.rtpi.org.uk/rtpi_cymru

18 June 2015

e-mail response sent to: planconsultations-f@wales.gsi.gov.uk

Dear Sir/Madam,

Response to: Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to comment on the above consultation. The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

We have the following observations and queries to raise in response to the consultation.

The consultation is not accompanied by a draft set of Regulations, and it is therefore unclear how the proposals will be transferred into legislation.

The changes set out in the consultation appear to attempt to introduce similar arrangements as found in England in relation to screening thresholds for certain development projects. (as per Paragraph 7) We would be interested to know how many proposals would likely to be subject to screening based on the new thresholds in Wales, and how many would be taken out of the system; the consultation document states that a “significant majority did not require EIA”. We would be interested in the detailed results of the analysis. For example, how many requests for screening directions are received? How many directions are issued? The nature of the developments receiving directions is not clear, are ‘urban development projects’ a particular problem?

In relation to the proposed screening thresholds we question whether the site size is the most appropriate threshold to use. While it is encouraging to see the dwelling

number threshold used as well as the site area/ hectare, we feel it is the nature and quantum of development which is likely to be the most important factor, not necessarily dwelling numbers and site area (hectares). We question whether floor space is a more appropriate threshold instead?

The current thresholds for urban development proposals include relatively small scale proposals for developments such as residential and employment sites over 0.4ha. There are likely to be situations where the current thresholds are appropriate and a development even of this scale requires an EIA. The EIA process is relatively stream lined if undertaken at the application stage as a simple delegated decision. Delay only occurs where a positive screening opinion is issued and a direction requested. If the Welsh Government (WG) considers that too many positive screening opinions are being issued then it could address this issue through training and advice to LPAs.

In relation to question 6 of the consultation there is no definition of what remains 'fit for purpose.' Clarification of this is required.

Paragraph 34 of the consultation document suggests that WG believe that the Local Development Order (LDO) proposals will contribute towards delivering more LDOs. We question if this will in fact be the case and if there is evidence to back this up? The research referred to in the report does not make any comment on Environmental Impact Assessment (EIA) in relation to LDOs, with only one mention of the regulations in terms of time limits for determining planning applications within paragraph 3.5. It does not provide evidence in support of the change proposed and it is not clear that this is a significant reason behind their limited use.

Circular 11/99 will need to be revised to provide up to date guidance on the regulations as amended. There is a considerable amount of case law and established interpretation since the publication of this circular. This update is therefore required urgently for clarity.

If you require further assistance, have any queries or require clarification of any points made, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott MRTPI

Director
RTPI Cymru

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	HELEN RICE (PRINCIPAL PLANNING OFFICER)	
Organisation	THE WELSH NATIONAL PARK AUTHORITIES	
Address	BRECON BEACONS NATIONAL PARK AUTHORITY PLAS Y FFYNNON CAMBRIAN WAY BRECON LD3 7HP	
E-mail address	helen.rice@beacons-npa.gov.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: If the evidence supports the claim that most screening opinions recently determined by WG is that EIA is not required.			

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: There may be merit in increasing the Schedule 2 thresholds, however, it is unclear how the new thresholds have been determined especially given that they are equivalent to a 10 fold increase on current thresholds. The increase from 0.5ha to 5ha would effectively discount a large majority of infrastructure projects, and it is considered that there would be little difference in the potential environmental impact of a 4.9ha scheme compared to a 5.1ha scheme. A lower threshold of possibly 2ha or 2.5ha would be more appropriate, but nevertheless, any change in the				

Consultation reference: WG23953

thresholds should be based upon robust evidence that could be relied upon. Notwithstanding this, the three Parks fully supports the continued stance that the thresholds are not applicable within sensitive areas.

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 This is a sensible approach and one which could be supported - it would prevent developers submitting sequential schemes which fall just under EIA thresholds to avoid the need for EIA. Extensions which take an existing scheme over EIA thresholds should trigger an EIA of the scheme as a whole. It appears that this stance would also fall in line with the changes imposed by the 2011 regulations in England.

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Agree

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 This represents a common sense approach whereby the reasons are documented, however, it is considered that the guidance should stipulate that the reasons need not be overly detailed but rather sufficient to provide a reasonable explanation. This is especially the case for "sensitive areas" whereby virtually all developments are screened, and thus a requirement to provide full details/assessment would present a significant workload burden. The Brecon Beacons National Park Authority has adopted a "pro-forma" screening opinion form which is used for virtually all applications and it is suggested that this approach would be sufficient.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Yes but only in cases whereby it has been assessed that the original EIA remains fit for purpose. This may not always be the case if there is a significant delay between the outline application and reserved matters application

Consultation reference: WG23953

as the environmental factors and species are dynamic and not static.

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Whilst this proposal is agreed in principle, it would be on the basis that the proposed thresholds are lowered in accordance with the answer to question 2 above. However, it should be clarified that an LDO does not necessarily override the requirement to screen such developments.

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Agree with this proposal.

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Agree with this proposal

Consultation reference: WG23953

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

I do not want my name/or address published with my response (please tick)

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Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Glyn P. Jones	
Organisation	Flintshire County Council	
Address		
E-mail address	glyn.p.jones@flintshire.gov.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: Yes. The rationale for the changes proposed is basically sound although the screening process itself should not cause undue delay in the planning application process. Clearly there is an advantage to adopting the same screening thresholds as are now operational in England, particularly for a border Authority such as Flintshire.			

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: Having sought the consistency with the English regime (see above) the Welsh proposals do not follow the wording in T&CP, England (T&CP(EIA)(Amendment) Regulations 2015). The table in Regulation 3 of the above (Urban Development projects) refers to "The development includes more than 1hectare of urban development which is not dwellinghouse development...." The equivalent in the Welsh proposals refers to: "the development exceeds 1 hectare and dose not include the				

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construction of dwellinghouses".
 On the former (England) a mixed development which contained an element of dwellinghouses (providing that this was not the dominant element, in which case it would be "dwellinghouse development") would avoid screening.
 On the Welsh proposal a mixed development which contained one dwelling (or to be pedantic two, as 16 (i) refers to dwellinghouses in the plural) would require screening.

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: It seems a matter of common sense to adapt the regulations in light of the judgement			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: As above but it is not clear how the "significant adverse effects on the environment" are to be assessed.			

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: It is not clear what is achieved by this. Under current practice the local Planning authority (certainly in Flintshire) screens all planning applications. Most development proposals are neither Sch 1 nor Sch 2 and the relevant box is ticked on our recording system to confirm this. The process of screening Sch 2 proposals involves the assessment of the likelihood and significance of environmental effects (by reference to Sch 3, etc.) Section C. of the determination asks for and gives "the Local Planning Authority's reason(s)". If it is simply a case of making this a statutory requirement then there is no objection to it			

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: Agreed. The 2008 amendment was clearly based on a legal ruling and is not challenged in this consultation but it				

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should be noted that the approval of "reserved matters" does not grant a fresh planning permission and the amount of information now required with an outline application sets the clear parameters for the development which should in most cases render further screening for EIA unnecessary. Any change which reduces these complex and confusing provisions is to be welcomed

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Yes provided that the conditions and limitations on the LDO make provision for requiring EIA if it is deemed, when it comes forward, that an individual Sch.2 proposal would require one.
 In the statement : "LDO's that could grant planning permission for Schedule 2 EIA development, subject to consideration of an environmental statement", it is not clear at what stage this would be submitted and how this would be assessed without going through the planning application process, in which case it would not be benefitting from the LDO permission.
 Where the factor that might trigger EIA is known this could be done at the outset to establish the type of development which the LDO would permit.

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Seems like a matter of common sense but the occurrence of Modification Orders (and the Discontinuance Orders in the next question) is so rare that this is almost hypothetical

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Statement that is taken into account when making or confirming the order?		
Comments: As above		

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

I do not want my name/or address published with my response (please tick) <input type="checkbox"/>
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How to Respond

Please submit your comments in any of the following ways:

Email
Please complete the consultation response form and send it to: planconsultations-f@wales.gsi.gov.uk
Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Consultation reference: WG23953

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Neil Richardson	
Organisation	RWE Generation UK plc	
Address	Electron Building, Windmill Hill Business Park, Whitehill Way, SWINDON, SN5 6PB	
E-mail address	neil.richardson@rwe.com	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input checked="" type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:			

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: While we agree with the proposed screening thresholds for urban development projects and industrial estate developments, we consider there are also very strong arguments for raising the threshold in Schedule 2 for Item 3(a) (Industrial installations for the production of electricity, steam and hot water) in that Schedule. At present the threshold is 0.5 ha, irrespective of the nature of the development, whether or not any new or additional electrical or thermal capacity is proposed and whether or not it is located within the curtilage of an existing generating station.				

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This threshold is currently interpreted in practice as applying both to new installations and to additions and alterations to (often much larger) existing installations such as existing main generating stations (e.g. Aberthaw and Pembroke), including alterations entirely on existing operational land. Many of these additions and alterations are minor works in the context of the existing installation. Such projects arise from, among other reasons, the need to meet tighter emission limits. In most cases they do not add any thermal or electrical capacity to the installation (if they did they would require a Development Consent Order under the Planning Act 2008 if the installation’s capacity after the alteration would be 50MW electrical or above).

Were it not for their status as Schedule 2 developments for the purpose of EIA, many such projects would be permitted development under Part 17 Classes G (d), (e) or (f) of Schedule 2 of the current (in Wales) General Permitted Development Order. These sub-classes apply only to development on existing operational land of the undertaking concerned. The scale of any buildings and structures which may be erected under these permitted development rights is already limited either absolutely or in relation to existing structures on the site by the provisions of Part 17 Class G.

The argument that 0.5 ha is too low a threshold applies even more strongly to projects on existing generating station sites than to industrial estate or urban development projects, for which it is proposed to relax this threshold.

We would suggest that the threshold for Item 3(a) should be as follows:

(1) The capacity created or added by the proposed development or extension (as the case may be) is 20 MW rated thermal input or more; or

(2) The area of the development exceeds 5 ha in total or 1 ha outside any existing electricity generation undertaking’s operational site boundary

whichever of (1) or (2) is the more restrictive in the particular case.

The usual exclusion for sensitive areas should apply.

20 MW thermal is suggested as a threshold as it is also the threshold above which a Part B environmental permit would be required for a free-standing development.

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
	<p>Comments:</p> <p>We would suggest that a more logical approach for extensions would be to align the screening thresholds with any relevant permitted development rights for the type of development concerned, especially in the cases of developments on existing industrial sites (Schedule 2 Part 8 to the current (in Wales) GPDO) and development on the operational land of statutory undertakers, (Schedule 2 Part 17 to the current GPDO, in particular Class G (d) to (f) in relation to electricity undertakings' operational land). It is illogical to grant permitted development rights for what are by definition minor developments having minimal environmental effects (otherwise they should not be permitted development) and then require EIA screening before those rights can be used, defeating the purpose of granting permitted development rights in the first place. In the case of electricity generation-related development and industrial installations for the production of steam and hot water, however, it is appropriate to require screening for EIA in all cases where any additional combustion plant (of whatever type) is proposed exceeding 20 MW rated thermal input.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Consultation reference: WG23953

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Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 The proposed changes are proportionate and from our point of view would have the effect of maintaining the existing position where minor works on operational land at existing major generating stations such as Aberthaw and Pembroke do not require screening for EIA in many cases. We think there is scope for increasing the screening thresholds for such works (see answer to Question 2 above).

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 We support this proposal for reasons of transparency and maintaining public confidence in EIA screening decisions.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Consultation reference: WG23953

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Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Yes. LDOs are particularly well suited to larger industrial estate/business park type developments which are subject to EIA because of their scale.

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Consultation reference: WG23953

I do not want my name/or address published with my response (please tick) <input type="checkbox"/>
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How to Respond

Please submit your comments in any of the following ways:

Email
Please complete the consultation response form and send it to: planconsultations-f@wales.gsi.gov.uk
Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Gaganpreet Gata-Aura	
Organisation	National Grid plc	
Address	National Grid House Warwick Tecnology Park Gallows Hill Warwick CV34 6DA	
E-mail address	gaganpreet.gata-aura@nationalgrid.com	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input checked="" type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
National Grid agrees that the existing thresholds are unnecessarily low for the reasons given in the consultation document and there is a case for raising the thresholds. It is worth noting that in instances where EIA is not required, as a matter of good practice, National Grid does normally consult with local planning authorities on the reporting of relevant environmental issues in seeking planning permission.

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
National Grid agrees that the existing thresholds are unnecessarily low. However we consider that the screening thresholds for all types of urban development projects should be raised, so all such projects benefit from the revised thresholds not just the development of residential dwellings. This would help reduce the burden and costs

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involved and would assist in focusing resources on those projects which are more likely to require EIA.

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 We recognise this principle but care should be taken about unintended consequences of small works that fall within permitted developments that ordinarily statutory undertakers would not be required to screen but which may become subject to screening and EIA as a result of the proposed changes.
 Local Authorities, who are not familiar with our types of development, might now consider these small works that are within permitted development rights would have an environmental effect through taking an overly precautionary approach, despite the small scale nature of development, and as such require us to carry out full EIA. This could lead to significant delays and additional costs to facilitate development that in the past would have been relatively straightforward. We would request further detail on how this would work practically and that further consultation should be undertaken prior to any final arrangements being put in place. For example, some of our substation developments fall within urban developments and we would want to understand what the implications might be for any future developments of these sites.
 We would encourage guidance around this and that it includes appropriate wording around EIA and screening thresholds in a way that does not cause an overly onerous process for these types of works..

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Please see answer to question 3.

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

Comments:
 No comments.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Comments:
Yes, for reasons set out in your consultation document.

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

Comments:
No comment

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:
No comment

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

Comments:
No comment

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

Comments:
No comment

Q11	Do you have any additional comments on the	Yes	No
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consultation paper?	<input type="checkbox"/>	<input type="checkbox"/>
Comments: No comment		

I do not want my name/or address published with my response (please tick) <input type="checkbox"/>
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How to Respond

Please submit your comments in any of the following ways:

Email
Please complete the consultation response form and send it to: planconsultations-f@wales.gsi.gov.uk
Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please Email: planconsultations-f@wales.gsi.gov.uk Telephone: Alan Groves on 029 2082 5362

Consultation reference: WG23953

Consultation Response Form

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders

We would like your views on our proposals to make changes to the Environmental Impact Assessment Regulations and Local Development Orders.

Please submit your comments by 18/06/2015.

If you have any queries on this consultation, please email: planconsultations-f@wales.gsi.gov.uk or telephone Alan Groves on 029 2082 5362.

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response or tick the box at the end of this form. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders		
Date of consultation period: 26/03/2015 – 18/06/2015		
Name	Rhian Jardine	
Organisation	Natural Resources Wales	
Address	Ty Cambria, 29 Newport Road, Cardiff, CF24 0TP	
E-mail address	rhian.jardine@cyfoethnaturiolcymru.gov.uk	
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input checked="" type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
Q1		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

Natural Resources Wales support in principle the revised thresholds. We recognise that there are some projects that are subject to Environmental Impact Assessment that are sometimes unnecessarily accompanied by overly complex supporting statements. Natural Resources Wales wishes to see an efficient process of assessment that is proportionate to the effects of development being proposed. However, we advise that if the screening thresholds are increased, it will be important to set out clear guidance to Local Planning Authorities that all environmental impacts, including cumulative impacts, should continue to be thoroughly assessed and taken into account in decision making, irrespective of the need for an Environmental Impact Assessment. We would be happy to advise on appropriate wording for any future guidance. Without this, there is a risk that some small, but environmentally harmful projects, would not be properly assessed as a result of a higher screening threshold.

The retention of the commitment in paragraph 15 to screen all Schedule 2 ‘urban development projects’ that are located in a ‘sensitive area’, irrespective of their size, is welcomed. We advise that screening of projects should also take place for all projects located partly within a sensitive area. We would also welcome a clear commitment that the new regulations require all Schedule 2 ‘industrial estate projects’ located within sensitive areas to be screened. Similar provisions are already in force in England (as of 6th April 2015). The imposition of the revised thresholds will bring Wales in to line with England.

Whilst we welcome the proposals to screen all Schedule 2 urban development projects located within sensitive areas, we advise that urban development and industrial estate projects outwith of sensitive areas can still lead to likely significant effects on the setting of some sensitive areas such as National Parks and Areas of Outstanding Natural Beauty. We advise that the EIA Directive and rulings by the European Court identify that Article 2(1)

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states “that projects likely, by virtue inter alia of their nature, size or location; to have significant effects on the environment are to be subject to an impact assessment”. Natural Resources Wales, therefore, considers that the potential effects on sensitive areas from a development project should be considered at the screening stage, regardless of whether the proposed project is “...in, or partly in...” the defined sensitive area. Screening for likely significant effects, so that all potential environmental impacts on sensitive areas arising from development are properly assessed, ensures that Natural Resources Wales continues to be consulted where Environmental Impact Assessment is required and that we can advise on the appropriate protection for the natural environment, in line with relevant legislation and policy.

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: We have no further comment here.				

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: The proposed changes reflect recent case-law (Baker judgement) and we support this provision. The provision seeks to amend paragraph 13 (a) (i) of Schedule 2 to the Environmental Impact Assessment Regulations so that references to thresholds apply to the whole development, as modified by the change or extension, and not just the change or extension itself.			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: These proposals also reflect recent case-law (Baker judgement) and we support the proposals in principle. However, Natural Resources Wales consider that more guidance is required to provide clarity and certainty on what information should be required from applicants at the screening stage to enable the decision maker to make a judgement on the likelihood of significant environmental effects. We feel that without guidance there is some ambiguity whether there will be sufficient information at the screening stage to enable a local planning authority to make a judgement on significance of effects.			

Q5	Do you have any comments on the proposal to	Yes	No
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Consultation reference: WG23953

	amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Comments:
 We support this proposal as it provides transparency in decision making. Transparency in decision making is one of Natural Resources Wales' key values. Our view is that the new requirements help to enhance existing expectation of Local Planning Authorities' role.

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 Natural Resources Wales support this provision in principle. We agree that there is little value in requiring the submission of a further Environmental Statement and going through a further public consultation exercise where sufficient detail was provided at the outline stage. However, we would recommend that guidance is prepared to provide clarity and certainty on when a further public consultation would be required for example where insufficient information is provided at the outline stage, where further information becomes available or the scenario was not set out within a Rochdale Envelope at the outline stage.

Q7	Do you have any comments on the proposed approach to implementing the Geological Storage Directive?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:
 We have no comments to make regarding this proposal.

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:
 We welcome this provision in principle subject to appropriate safeguards and provided that conditions on Local Development Orders are properly enforced. However, we consider that the consultation process leading to adoption of Local Development Orders where Schedule 2 development is included is unclear and recommend further detail is provided about these consultation arrangements and that this should be clearly set out in the regulations. Whilst we note that there will be limitations and conditions attached to Local Development Orders, we are unclear what the procedural arrangements are where changes or extensions are proposed to Schedule 2 development after a Local Development Order to grant planning permission for Schedule 2 development is adopted. We feel that the regulations should make clear what changes, if any, in these circumstances, will be allowed.

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Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		☒	☐

Comments:
 Natural Resources Wales welcome this proposal in principle as this proposal reflects the Smout v Welsh Ministers and Wrexham County Borough Council, Case number C1/2011/0188 judgment which makes it clear that modification orders comprise development for the purposes of the EIA Directive, where the making of a Modification Order by the Local Planning Authority could lead to development that may potentially give rise to significant environmental effects.

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		☒	☐

Comments:
 We welcome this proposal because it will prevent discontinuance orders being confirmed or made where they are likely to have significant effects on the environment. We also welcome the provision to prevent the making or confirming of an order unless the order takes account of the environmental statement. However, Natural Resources Wales advise that it should be made clear that in circumstances where further information is required to address omissions in Environmental Statements that discontinuance orders should not be confirmed or made until further information has been provided to the satisfaction of the decision maker.

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		☒	☐

Comments:
 We welcome in principle the main changes to the Environment Impact Assessment Regulations, particularly the increased transparency with regard to reasons for screening decisions.

 Natural Resources Wales consider that there should be some updating to the Schedule 2 criteria to include reference to new and novel technology. We have experience of problems trying to determine which part of Schedule 2 certain projects fit into. For example, this issue occurred with an application for a solar farm, where it was not clear which criteria should be used in Schedule 2 of the Environment Impact Assessment Regulations. Natural Resources Wales would be happy to assist with any future review of categories for Schedule 2.

 We also reiterate here and recognise that some projects that are subject to Environmental Impact Assessment are sometimes accompanied by overly complex supporting statements. Whilst we support in principle an increase in the screening thresholds, this is subject to our advice that for smaller projects not subject to Environmental Impact Assessment, it will be important to set out clear guidance to Local Planning Authorities that all

Consultation reference: WG23953

environmental impacts, including cumulative impacts, should continue to be thoroughly assessed and taken into account in decision making. We would also be happy to advise on appropriate wording for any future guidance. Without this, there is a risk that some small, but environmentally harmful projects, would not be properly assessed as a result of a higher screening threshold.

We reiterate here too that whilst we welcome the proposals to screen all Schedule 2 urban development projects located within sensitive areas, we advise that urban development and industrial estate projects outwith of sensitive areas can still lead to likely significant effects on the setting of some sensitive areas such as National Parks and Areas of Outstanding Natural Beauty. We advise that the Environmental Impact Assessment Directive and rulings by the European Court identify that Article 2(1) states “that projects likely, by virtue inter alia of their nature, size or location; to have significant effects on the environment are to be subject to an impact assessment”. Natural Resources Wales, therefore, considers that the potential effects on sensitive areas from a development project should be considered at the screening stage, regardless of whether the proposed project is “...in, or partly in...” the defined sensitive area.

We note the intention to issue a separate consultation on the new EIA Directive 2014/52/EU as adopted by the European Parliament and Council on 16 April 2014 and would welcome an opportunity to meet to discuss the scope and detail of the consultation document in due course.

I do not want my name/or address published with my response (please tick)

How to Respond

Please submit your comments in any of the following ways:

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Post
Please complete the consultation form and send it to: Development Management Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ
Additional information
If you have any queries on this consultation, please

Consultation reference: WG23953

Email: planconsultations-f@wales.gsi.gov.uk

Telephone: Alan Groves on 029 2082 5362

Development Management Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff CF10 3NQ

planconsultations-f@wales.gsi.gov.uk

18 June 2015

Dear Mr. Groves,

Consultation on Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders

Thank you for the opportunity to comment on these proposed changes.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,250 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

CIfA's Wales / Cymru Group has over 300 members practising in the public, private and voluntary sector in Wales.

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders

General

CIfA supports measures which facilitate sustainable development, but is concerned to see that any proposed changes are truly sustainable and fully address the management and protection of the historic environment.

Specific Questions

Question 1: Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?

1.1 No comment, save that Environmental Impact Assessment plays an important role in the management and protection of the historic environment (including both designated and undesignated assets) through the operation of the planning regime and any changes to the existing thresholds should only be made if it is clear that this can be done without the risk of significant harm to the historic environment.

Question 2: Do you agree with our proposed screening thresholds?

2.1 No comment save that, if new thresholds are to be set, they should be set at levels which ensure that proposals likely to cause significant harm to the historic environment are subject to assessment.

Question 3: Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?

3.1 No, save that it is accepted that the Regulations should accurately reflect the substance of the Directive.

Question 4: Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?

4.1 The proposed approach is sensible.

Question 5: Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?

5.1 ClfA supports this proposal in the interests of transparency and accessibility.

Question 6: Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?

6.1 Only if the full implications for the historic environment of any subsequent proposals are adequately addressed in the original environmental statement.

Question 7: Do you have any comments on the proposed approach to implementing the Geological Storage Directive?

7.1 No comment.

Question 8: Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?

8.1 No, unless the full implications for the historic environment of any development envisaged by a Local Development Order are fully addressed through an environmental statement and effective mechanisms exist to ensure that unsustainable development which harms the historic environment is not allowed to proceed and that any development which is permitted proceeds subject to appropriate safeguards for the historic environment.

Question 9: Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?

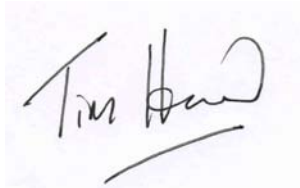
9.1 No comment.

Question 10: Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?

10.1 No comment.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor, Chartered Institute for Archaeologists

Proposed changes to the Environmental Impact Assessment Regulations and Local Development Orders

Date of consultation period: 26/03/2015 – 18/06/2015

Name	James Caird	
Organisation	Institute of Historic Building Conservation	
Address	Jubilee House High Street Tisbury SP3 6HA	
E-mail address		
Type <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input checked="" type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Q1	Do you agree that the screening thresholds for urban development projects and industrial estate projects, as set out in Schedule 2 of the EIA Regulations, are too low?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: Yes, but reluctantly to ensure consistency with England. We are far from convinced that developments of industrial estates are potentially so much less environmentally damaging than other forms of development to merit a threshold of 5ha rather than 1ha. It appears to us that this is a sop to industry with little environmental justification.</p>			

Q2	Do you agree with our proposed screening thresholds?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: Yes, subject to our comment at Q1.</p>				

--

Q3	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 2 development?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: We agree with the proposal.			

Q4	Do you have any comments on the proposed approach to addressing changes or extensions to Schedule 1 development?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: We agree with the proposal.			

Q5	Do you have any comments on the proposal to amend the EIA Regulations to require reasons to be provided for all screening opinions and screening directions?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: This is a good idea.			

Q6	Do you agree that, in the case of a subsequent application (e.g. reserved matters application), where an environmental statement was provided with the original outline application and remains fit for purpose, there is no merit in repeating the public consultation process?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: We agree with this in principle. However, reserved matters sometimes have elements that, while not strictly in accordance with the outline consent, are within acceptable parameters of variation. We do not think such flexibility should apply to EIA. So if a reserved matters application contains aspects not envisaged at outline stage further consultation should still take place.				

Q7	Do you have any comments on the proposed	Yes	No
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approach to implementing the Geological Storage Directive?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: We support this but no thresholds seem to be currently proposed.		

Q8	Should the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPO) and the EIA Regulations be amended in order to allow LDOs to grant planning permission for Schedule 2 development?	Yes	Yes (subject to further comment)	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: We think the process should mirror that for planning permission.				

Q9	Do you have any comments on the proposal to prevent modification orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: We agree with this.			

Q10	Do you have any comments on the proposal to prevent discontinuance orders for EIA development being made or confirmed unless the order is accompanied by an Environmental Statement that is taken into account when making or confirming the order?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: We support this.			

Q11	Do you have any additional comments on the consultation paper?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:			

I do not want my name/or address published with my response (please tick)

How to Respond

Please submit your comments in any of the following ways:

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Please complete the consultation response form and send it to:

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Please complete the consultation form and send it to:

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Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ**

Additional information

If you have any queries on this consultation, please

Email: planconsultations-f@wales.gsi.gov.uk

Telephone: Alan Groves on 029 2082 5362

From: [Groves, Alan \(NR - Planning Directorate\)](#)
To: [Struthers, Owen \(NR - Planning Directorate\)](#)
Cc: [Worsey, Cerys \(NR - Planning Directorate\)](#)
Subject: FW: Welsh Government consultation on proposed amendments to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and Local Development Orders
Date: 15 June 2015 12:02:46

For info.

From: May, Helen (Cadw)
Sent: 15 June 2015 12:00
To: Groves, Alan (NR - Planning Directorate)
Cc: Coward, Matthew (SF - Culture & Sport - Cadw)
Subject: RE: Welsh Government consultation on proposed amendments to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and Local Development Orders

Hello Alan,

Thanks for your email. We are happy for you to record the comments below as Cadw's response to the consultation paper.

Best wishes,

Helen

Helen May

Arweinydd Tim Gwaith Achosion/ Casework Team Leader

Amgylchedd Hanesyddol / Historic Environment

Cadw

Llywodraeth Cymru / Welsh Government

Plas Carew

Uned/Unit 5/7 Cefn Coed

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Ffôn / Tel: 01443 336098

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Helen.may2@cymru.gsi.gov.uk

Helen.may2@wales.gsi.gov.uk

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From: Groves, Alan (NR - Planning Directorate)

Sent: 15 June 2015 11:48

To: May, Helen (Cadw)

Cc: Struthers, Owen (NR - Planning Directorate); Worsey, Cerys (NR - Planning Directorate)

Subject: RE: Welsh Government consultation on proposed amendments to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and Local Development Orders

Hello Helen,

Thanks for the comments. Just to confirm that, if the proposed changes to LDOs are taken forward, there would be a formal screening process for any EIA development.

We're happy to record the comments below as CADW's response to the consultation paper if that's ok with you?

Kind Regards

Alan

Alan Groves

Cangen Benderfyniadau | Decisions Branch

Y Gyfarwyddiaeth Gynllunio | Planning Directorate

Llywodraeth Cymru / Welsh Government

Parc Cathays / Cathays Park

Caerdydd, CF10 3NQ / Cardiff, CF10 3NQ

e-bost / e-mail: Alan.Groves@Wales.GSI.gov.uk

Ffôn / Tel: 029 20825362 Ffacs / Fax: 029 20825622

GTN: 1208 1619

From: May, Helen (Cadw)

Sent: 15 June 2015 09:41

To: Worsey, Cerys (NR - Planning Directorate)

Cc: Coward, Matthew (SF - Culture & Sport - Cadw); Maylan, Neil (CADW)

Subject: Welsh Government consultation on proposed amendments to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and Local Development Orders

Hello Cerys,

I am writing further to the current consultation on proposed amendments to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and Local Development Orders.

Having considered the consultation document, it does not appear to be clear within the consultation what provision is to be made to screen the likely environmental effects of a Local Development Order. This is of concern and Cadw would like some assurance that such screening will take place so that any EIA development is highlighted early in the process to ensure that proper regard is subsequently given to any likely significant impacts on the historic environment.

Cadw doesn't have any comment on any other aspect of the consultation. If you would like me to respond formally to Consultation question 8, please let me know.

Best regards,

Helen

Helen May

Arweinydd Tim Gwaith Achosion/ Casework Team Leader

Amgylchedd Hanesyddol / Historic Environment

Cadw

Llywodraeth Cymru / Welsh Government

Plas Carew

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