Planning Guidance for Smaller Scale Wind Turbine Development Landscape and Visual Impact Assessment Requirements Supplementary Planning Guidance

Consultation Report

Gillespies were commissioned by Blaenau Gwent County Borough Council on behalf of the Heads of the Valleys Local Authorities to prepare this study. The assessment approach was developed with the client group and with representatives from the South Wales Landscape Liaison Group.

This report sets out the consultation that was undertaken on the draft document, including a summary of the responses received and how they have been taken into account by the Group.

A 6 week consultation exercise was carried out between 7th November 2014 and 19th December 2014. The consultation included an email to over 100 organisations which included all Welsh Local Planning Authorities, Statutory Bodies, National Organisations, local interest groups and Planning and Landscape Consultants. The email informed them of the consultation and provided a link to the document and comment form.

A consultation event was held on Tuesday 16th of December at the Norwegian Church, Cardiff. This was well attended by environmental groups, local authority planners and landscape architects and landscape consultants.

Ten responses to the consultation were received. These were from a range of Local Planning Authorities, Industry Representatives and Environmental Groups including NRW.

The following table contains the representations made during the consultation period and the response to them. Where appropriate, the document has been amended to take account of the views received.

Questionnaire Results

- All 7 agreed that guidance is required to ensure landscape and visual impacts of wind turbines are addressed in a consistent manner.
- 4 agreed and no one disagreed with the typologies proposed in the guidance
- All agreed with the size of the study areas being proposed for each typology
- 3 agreed and 3 neither agreed or disagreed with the minimum requirements for the submission of an EIA screening
- 4 agreed and 3 disagreed with the methodology proposed for EIA screening
- 6 agreed and 1 disagreed with the proposed approach to cumulative effects and the proposed search distances
- 4 agreed and 2 disagreed with the proposed cumulative threshold for other infrastructure

- All 7agreed with the general minimum requirements of information to be provided for Landscape and Visual Impact Assessment 6 agreed and 1 disagreed with the specific requirements for Landscape and Visual Impact Assessment
- 5 agreed and 1 disagreed with the use of LANDMAP as part of the Landscape and Visual Impact Assessment

Please note that not everyone answered the questionnaire and not everyone answered every question.

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Q1: Do you agree that guidance is required to ensure landscape and visual impacts of wind turbines are addressed in a consistent manner? If you agree please indicate below what status should the guidance have, should it be Supplementary Planning Guidance, a Planning Advisory Note or simply for information?				
Phil Ratcliff, Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Planning Advisory Note status is more appropriate than SPG, since the material is procedural rather than policy. However, it will be a matter for individual Local Planning Authorities to decide.		
Sarah Chapple Landscape Architect Soltys Brewster Consulting	Agree			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	In terms of status, the guidance would most likely be adopted as a planning advisory note for the purposes of Merthyr Tydfil due to the procedural nature of the guidance and the non-direct link to the requirements of renewable energy and landscape related policies within the Local Development Plan.		
Oliver Buxton Project Manager Seren Energy Ltd	Agree	Supplementary Planning Guidance		

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree	Guidance is very welcome in principle. Guidance encourages LPAs to go through a systematic process and demand a minimum of maps of proper scale, precise information about locations and details of turbines applied for and of other turbines (in planning, consented and operational), precise details of distances from dwellings, correct ZTVs, photomontages and wireframes, and other key features. We have witnessed the hasty determination of many wind turbine applications without the Developer being required to supply very basic essential information of the proper quality. Consistency in EIA screening is very welcome. EIA, where appropriate, tends to provide better quality environmental information and gives a better time-scale for third parties to respond to bring up important environmental information missed by Developers. We agree that there should be a transparent relation between threshold for EIA and both the scale of development and environmental sensitivity of the location. Guidance would carry most weight as SPG applied throughout Wales.	Noted	
Mary O'Connor Associate Director WYG Group	Agree	For information only.	Noted	
Natural Resource Wales	Agree	Optional to each planning authority, they may use as guidance or adopt as SPG.	Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Q2: Do you agree with the typologies being proposed in the guidance (pages 0.3 and 0.5)? (Introduction)				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Neither Agree nor Disagree	The typologies are simple but seem to be quite restrictive. With most wind energy sensitivity studies, the size of turbine and the number of turbines are separated to allow flexibility in the future with changes in technologies and pattern of development. Single or double turbines over 109m to VBT are now coming forward so it is likely that the Very Large category will be challenged. It is apparent that the strategy is to concentrate any Large or Very Large developments in SSAs and Medium or smaller developments everywhere else. Whilst this might be true of the HOV study area, we are not sure that this will achieve government policy/targets if applied everywhere in Wales. The only difficulty encountered with applying the typologies is where one development comprises turbines in more than one height category e.g. 3 at 100m plus 7 at 120m. Splitting the scheme into two typologies results in one Large typology adjacent to one Very Large typology, which should probably be treated as one Very Large typology. A note to cover this situation is needed.	Not entirely sure what is meant by i*t is likely that the Very Large category will be challenged*. These would fall within the V large category. We are unable to comment on government policy/targets. Generally we think that schemes which incorporate different turbines should be discouraged. The scheme described would fall under the very large typology due to the number of turbines involved (10). I believe such situations, which are likely to be rare, can be left to the good sense of the planning officer. In addition the scheme described would be greater than 5MW and we are proposing to make it clearer that the guidance is aimed at under 5MW schemes.	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	The proposed typologies in Table 1 are generally considered to be appropriate. There are, however, inaccuracies in Figure 1 (Illustrative Example) and it is considered that this illustration could cause confusion. There is a minor concern that the typologies could encourage a high number of wind turbines within certain landscape units. For instance, certain landscape units are identified as having no capacity for large/very large scale wind turbines, but some capacity for medium scale wind turbines. In order to generate 2MW of energy within this landscape, a developer is likely to propose four, 0.5 MW, medium scale turbines rather than one, 2MW, large scale turbine. Would the former have a less detrimental impact on the landscape than the latter?	Noted If an area has been assessed as having no capacity for large /very large turbines that is a landscape judgment. A developer could put forward a scheme with 4 turbines up to 45m although there is not much evidence that this is the current pattern of development proposals. Such a proposal would fall to be judged on its merits and whether it was consistent with the siting criteria.	Inaccuracies have been corrected
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Neither Agree nor Disagree	A clear typology is useful in principle but: Incorporating the potentially independent variables of turbine tip-height and turbine number into a single typology of "development size" causes conceptual difficulties. The information could be clearer. Introduction Table 1 says "*To decide in which typology a development belongs it must satisfy both the height and the turbine numbers criteria. See the examples on page 0.5*." This is misleading as you cannot necessarily satisfy both. Deciding on development size is a sequential process: you have to decide turbine height and, after this, apply the number to find the minimum development size. If the advantages of a single typology are accepted, is this typology the best possible for purpose? The results are often difficult to reconcile with ordinary experience: examples are: 1 x 80m turbine, 4 x 80m turbines and 4 x 50m turbines are all in same medium type which does not necessarily require EIA; 5 x 50m turbines do not necessarily require EIA; 3 x 50m turbines are three magnitudes of type different from 6 x 50m turbines. A "small" 50m turbine is	You must satisfy both criteria to be included in a typology. So, for example, more than five turbines of any size would constitute a very large scheme. This is not however a common development scenario and we considered that significant numbers of small turbines would be likely to have significant impacts and therefore justify being included in a typology for which the requirements are more onerous We looked at a number of typologies . Most are concerned with 'wind farms' rather than smaller scale development and have not come across a better example that addresses smaller scale development The guidance cannot state categorically that any development which is not Schedule 1 (EIA regs) must have an EIA, that is the role of the LPA. Any typology will have a range across a category where the top of the range is closer to the bottom of the range	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		already 3 times higher than most neighbouring buildings and towers over trees. In view of the devastating negative impact turbines can have on our landscape, visual receptors, and residential amenity, we think the "numbers" contribution to the final typology is too permissive (number in each typology too high) with respect to EIA being required.. Suggest reducing the numbers to reflect impact: Small - 2 or fewer; Medium - 3 or fewer; Large - 4 or fewer The Typologies have not addressed the problem of same Developer adding to existing development.	above. Consequently our requirements have been considered in terms of being sufficient for the top of the range (not the middle) although sometimes this may make them appear quite demanding from the lowest point of the range. This change is minor and we do not feel it is justified This is addressed in the cumulative section	
Mary O'Connor Associate Director WYG Group		The category "very large" is confusing; surely even six wind turbines especially at over 100m height must constitute a "wind farm" scale development? Categories might be better expressed in a matrix	This is a good point. I think it has become clear that we need to explicitly exclude 'wind farms' (over 5MW) from the guidance. This will need a revision to the introductory sentence and to be made explicit on the matrix proposed in response to comment below. As the topologies have not been well	Revise introduction. *This guidance is aimed at smaller community based wind farm schemes (generally less than 5 MW) as described in Planning Policy Wales Technical Advice Note 8 Planning For Renewable Energy as suitable for areas outside Strategic Search Areas.* Add matrix - use the

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		where the height of turbines and the number of turbines can be accounted for Other categories seem logical	understood we will add a matrix	matrix to exclude schemes above 5MW
Natural Resource Wales	Neither Agree or Disagree	We would prefer to have typologies that also refer to power output in addition to heights. An example of this multi faceted typology is evident in the recently adopted Conwy LDP, elements copied below*. There are many similarities to the typology of this guidance and combining some of the additional detail from this approach would be more informative and our preferred approach. • Align the terminology used in Table 1 to be consistent with the thresholds used for SSAs and NSIPs to provide clarity. • State the range in all typologies rather than 'or less'. For example, small to medium with range 50-79m • Identify the size of turbines and range of cluster sizes separately to give multiple contexts to the scale of development in the note at the bottom of the	The guidance is intended to help LPAs dealing with small scale development proposals. It is very hard for guidance that tries to cover everything to provide the nuanced guidance that we were asked to prepare for the range of small scale wind turbine applications that the LPAs are having to deal with. We will make the guidance more explicit that it is excluding schemes that would considered as wind farms within an SSA. this will automatically also rule out NSIPs. The landscape and visual impact of WTD is not dependant on the power output and we therefore do not think it is useful to include it. We have removed the range from all the tables as 'less than' is more accurate.	Add note to intro that this guidance is not intended for either SSAs or NSIPs projects Range removed from all tables

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		table. There is a considerable difference between 6 or more small scale turbines and 6 or more very large turbines. For example, could a medium class be either 51-80 m OR comprising of 4 turbines? • Any modifications in the typologies may need to be reflected in updated study area distances and the document updated accordingly. • It would be important to link any changes to the typology & study areas with any Natural Resources Wales Turbine and Vertical Structures guidance for consistency. Natural Resources Wales would welcome engaging in any discussion relating to any proposed amendments/additional information to be included in the typology. *We would prefer to have typologies that also refer to power output in addition to heights, example from Conwy. Micro Under 50kW • Single or twin turbine applications. • Turbine below 20m to blade tip. Small Under 5MW • Turbines up to 3 in number. • Turbines below 50m to blade tip. • Viewed as a small group. Medium Over 5MW but below 25MW • Turbines up to 9 in number. • Turbines below 80m to blade tip. • Viewed as a large group. Large Over 25MW • Turbines over 10 in number.	We would welcome discussions with NRW in achieving consistency with any forthcoming guidance on Wales Turbine and Vertical Structures. See comment above	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		• Turbines over 80m to blade tip. • Viewed as a large-scale wind farm. • Located within the SSA. Very Large Over 25MW • Turbines over 10 in number. • Turbines over 110m to blade tip. • Viewed as a very large-scale wind farm. • Located within the SSA. Strategic Over 50MW • Typically over 15 in number • Turbines typically over 100m to blade tip. • Viewed as nationally strategic • Located within the SSA Applications for which are determined by National Infrastructure Planning delivered through PINS.		
Q3: Do you agree with the size of study areas being proposed for each typology				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Need to state in all the tables that the study area is a radius from the turbine site (i.e. not a diameter!).	Agreed	Will add
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree (given revision of numbers in Typologies)	A clear definition of "**study area**" would help non-professionals not to confuse this with the variable search areas for specific features in Q4	Will add however this guidance is aimed at professionals, both those submitting applications and those reviewing them and some level of knowledge has to be assumed. It is our experience that non-professional who are interested in wind turbine applications quickly become very knowledgeable.	Will add clearer definition of study area
Mary O'Connor Associate Director WYG Group	Agree	No evidence base is given for the study area extents; however, the range of "minimum" study areas is reasonable & possibility of flexibility in relation to presence of sensitive receptors beyond these	Noted	
Natural Resource Wales	Agree	NRW has provided comments previously on the size of the study areas proposed. The study area distances have been slightly increased following these discussions so we are happy with the current relationship of height to study area. If there are any changes to the height classes in the typology then	Noted	
Q4: Do you agree with the minimum requirements for submission of an EIA screening opinion for each typology				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Neither Agree nor Disagree	Page 1.1 states that Large and Very Large developments will require a detailed LVIA, which seems to be the explanation of why there is no Section D or E for Large and Very Large developments. Could this important point be made more clear and prominent? Should it say LVIA *and CLVIA*?		We will reiterate this point and include CLVIA as well as LVIA
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Neither Agree nor Disagree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree (given revision of numbers in Typologies)	Mention that Public Rights of Way must be clearly visible Each section mentions the on-line database: All parts of Wales need an online wind turbine data base. The database for S.Wales is an exceedingly impressive and powerful tool. The amount of development, reporting and data-input required may make it too costly and technically ambitious as a model for all other areas. However it would be very useful if a reduced version with more limited data and features were required for all areas of Wales. As an absolute minimum LPA's should be required to have an up-to-date map of all OCP turbines with location and height in order to verify application information and to inform developers and third parties. Maps could be backed up by clearly arranged tables of applications awaiting data entry.	It is not within the power of this guidance to require this.	Will add
Mary O'Connor Associate Director WYG Group	Neither Agree nor Disagree	Generally agree except requirements re "other large scale infrastructure" (c10, d10) for which the information may not be readily available; heights of mast and pylons are not likely to be available.	If they are unavailable that will be sufficient 'defence' for not providing them. It would be useful if the demand for such data promoted its more ready availability.	
Q5: Do you agree with the methodology for EIA Screening				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Disagree	"Indicates that EIA is required" replaces the draft version "EIA required" in 2 places, as mentioned in the 16/12/14 presentation. For clarity, I think the phrase needs to be "Indicates that EIA is required on landscape and visual grounds". The heading "Turbine Class" is confusing. Does "class" here mean "height" or "typology"? It would be logical for the heading to be "Turbine Typology", which means the chart can be simplified slightly: • Under "Micro", only 1 turbine is possible, so the confusing "2 turbines or more" line can come out. • Under "Small", only 1, 2 or 3 turbines are possible, so the confusing "4 turbines or more" line can come out. • Under "Medium", only 1 to 4 turbines are possible, so the confusing "5 turbines or more" line can come out. The four sub-headings are confusing. They appear to refer to the typologies (which are already defined earlier by height and number), yet have overlapping height specifications (e.g. 50m is in both small and medium), which must be unnecessary anyway. There should be no need for the "No. Of Turbines" line of boxes, for the same reason – i.e. the typologies are already defined by height and number.	Proposed changes will improve the clarity	Will add Diagram to be changed
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree			

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	In general, the methodology for EIA Screening is considered to be acceptable. The recognition in the explanatory notes that professional judgement will still be required in certain circumstances is particularly welcome given that the distance thresholds are likely to indicate that more EIAs may be required. It is recommended that the methodology be tested against previous screening opinions and directions to ascertain whether it is broadly in line with previous decisions. Finally, Figure 2 indicates that both small and medium scale wind turbines include 50 m high turbines. This should be amended to avoid confusion.	This would only confirm that the guidance is in line with current practice. It would not provide any information on whether current practice is based on sound and consistent principles. It is the principles set out in the guidance that we need to be agreeing.	Will amend
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree (given revision of numbers in Typologies)		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Mary O'Connor Associate Director WYG Group	Disagree	The methodology provides a simplified approach to screening, and where "EIA may be required", the focus should be on whether the proposal is likely to give rise to significant effects In Note 1, p2.2, distinction should be made between landscape & visual impact assessment (LVIA) forming part of an EIA and landscape and visual appraisal which is outside the EIA framework. The guidance in GLVIA3 and Landscape Institute's Statement of Clarification in this regard should be followed. (http://landscapeinstitute.org/PDF/Contribute/GLVIA3StatementofClarification1-13.pdf)	The presence of sensitive receptors within certain distances **is an indicator** of whether the proposal is likely to give rise to significant effects. However professional judgements will still be required as their presence may not give rise to significant effects (due for example to screening) or receptors beyond the distance identified may have very heightened sensitivity. This can only be judged in the context of a particular application	Note added to the bottom of page 0.2. *There is a difference between a landscape and visual assessment that forms part of an EIA, a Landscape and Visual Impact Assessment (LVIA), and one that does not form part of an EIA which is described as a Landscape and Visual Appraisal (LVA). Throughout this guidance the term LVIA has been used to cover both kinds of assessment.*

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		Query whether the LANDMAP requirements are consistent with Guidance Note 3		*Guidelines for Landscape and Visual Impact Assessment Third Edition Statement of Clarification 1/13 published by the landscape Institute provides further clarification.*
Natural Resource Wales	Disagree	• The assessment for whether a project requires an Environmental Statement (ES) should be based on whether a project is a schedule 2 project and then meets the thresholds as set out in Circular 11/99. The criteria in figure 2 in assessing whether an ES is required are misleading and removes the judgement from the decision maker as to whether significant effects are likely.	The presence of sensitive receptors within certain distances **is an indicator** of whether the proposal is likely to give rise to significant effects. Professional judgements will still be required as their presence may not give rise to significant effects (due for example to screening) or receptors beyond the distance identified may have very heightened sensitivity. This can only be judged in the context of a particular application	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		• The figure 2 methodology should take on board the comments in question 2 on definitions of turbine class. The Environment Circular 11/99 Indicative Criteria/ Thresholds states 'the likelihood of significant effects will generally depend upon the scale of the development, and its visual impact, as well as potential noise impacts. EIA is more likely to be required for commercial developments of 5 or more turbines, or more than 5 MW of new generating capacity'. • Figure 2 requires a reconsideration to take this point on board. As an example, if a scheme consists of 5 turbines or more it does not automatically mean an ES is required. All it means is that an ES is more likely to be required and this is where an assessment of the significance of effects is important.	Unclear what the point here is. the Environment Circular 11/99 Indicative Criteria/ Thresholds states that developments of more than 5 turbines are likely to require an EIA. However EIAs have been required of many smaller schemes and the brief for this work was to help LPAs decide when they should be asking for an EIA for schemes that are less than 5 turbines / 5MW but above the EIA regs schedule 2 criteria. Figure 2 is clear that it cannot say that an EIA is required this is a decision for the LPA it can only provide guidance on when it is likely.	
Q6: Do you agree with the approach to cumulative effects and the proposed search area distances				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Disagree	There is a slight confusion throughout page 2.3 and table 3 where turbines are said to have / belong to a typology. This is confusing because *turbines* have heights, whereas *turbine developments* have typologies. For example: • Where it says "Small turbines within 8km", I believe it really means "Small developments within 8km"; • In table 3, instead of "Typology of Application Turbine(s)", for clarity it needs to say "Typology of Application Development" • In table 3, I believe "the typology will be determined by the height to blade tip criteria only" is meant to say "the typology will be determined only by (a) the height to [vertical] blade tip and (b) the number of turbines" - unless the existing sentence is factually correct, in which case some more explanation would be helpful. For clarity, a definition is needed within the body of table 3, e.g. the CSA will be land within the stated distance of the application development.	The online database only categories turbines by height. It does not consider turbine numbers. We do not consider that this causes a problem with regard to CLVIA issues as turbine heights are the most determinative feature with regard to the distance at which there is potential for cumulative issues. Page 2.3 and Table 3 have been revised to make this clearer.	Page 2.3 and Table 3 revised to clarify the fact that the Online database only categorises turbines in terms of height
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree	Make clear that this refers to EIA screening and LPAs have discretion to increase distances in scoping requirements for LVIA	This is the case for all the distances given in this section of the guidance .	
Mary O'Connor Associate Director WYG Group	Agree		Noted	
Natural Resource Wales	Agree	As with Q3, NRW has provided comments previously on the size of the study areas proposed. The study area distances have been slightly increased following these discussions so we are happy with the current relationship of height to study area. If there are any changes to the height classes in the typology then the study area distances would require appropriate amendment based on the agreed parameters to redefine the study and search areas.	Noted	
Q7: Do you agree with the proposed cumulative thresholds for Other Infrastructure				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Last paragraph above Table 4: • "... potential cumulative *landscape and visual* impacts ..." • There is some confusion here as the first sentence refers to EIA and the second to LVIA /CLVIA. This needs expanding to say what it really means, which isn't clear now. I suspect the first sentence should refer to LVIA/CLIA and not to EIA. Other Large Scale Infrastructure is defined elsewhere in the document, but the definition needs repeating in table 4. Need to clarify in Table 4 that occurrence of only *existing* OLSI is being taken into account. Important Note on page 2.4: Need to add another caveat to the effect of: "This guidance only considers landscape and visual effects. Even if the LPA concludes that EIA is not necessary on landscape and visual grounds, EIA may still be necessary on the grounds of likely significant effects other than landscape and visual effects."	Do not agree that there is any confusion here. This part of the guidance relates to EIA screening. the comment is making a separate point that even if an EIA is not required large and very large developments will always require a detailed assessment of landscape and visual effects and cumulative landscape and visual effects . Definition repeated. It would be reasonable to assess large scale infrastructure that was consented or in planning so we do not thing we should stress existing We don't think this is necessary as the Guidance says early on that it is only concerned with L&V effects. The note here is to address an approach we have come across in applications that say because no EIA was required it means there can be no significant effects and no reasons for refusing it.	added Definition repeated.

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Sarah Chapple Landscape Architect Soltys Brewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	Although examples of other infrastructure can be found within the document, it would be helpful if they were clearly defined within this section.		Definition repeated.
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Disagree	**Table 4.** Given the vast range of possibilities, it seems too ambitious (and provocative) to establish these cumulative thresholds. Table 4 is confusing because micro, small, and medium seem to apply to application typology but it is not clear to this reader to what turbine heights the numbers of turbines in the (horizontally colour-coded) second column apply and how anyone can establish a threshold when there is a mixture of turbine sizes and infrastructure of different height in any study area	The second column is derived from the cumulative search areas in Table 3. Professional judgement will be required. The thresholds are indicative	add within cumulative search areas to Table 4
Mary O'Connor Associate Director WYG Group	Disagree	"other large scale infrastructure" is not defined; Why only infrastructure and not other forms of development? Comment re distinction between LVIA and appraisals above applies here too.	Large scale infrastructure is the most likely to be an issue but professional judgment may bring in other forms of development	Definition repeatedLVIA /LVA distinction referred to in introduction

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Natural Resource Wales	Neither Agree nor Disagree	• P.2.3 Table 4 – do the distances in Table 3 apply? E.g. more than 15 medium (80m) turbines within 12km would be a threshold for EIA? 15 seems like quite a lot – significant effects could potentially result from less than this if they were close to a sensitive asset? • Table 4 sets out cumulative thresholds. Whilst this may be useful as a guide, it should always be based on a case by case assessment depending on the topography, landscape, setting and so on.	Note added about case by case assessment. This stage in the screening process only comes into play if it has been concluded that there are **no other reasons** (such as the presence of sensitive assets) that might trigger an EIA	
Q8: Do you agree with the general minimum requirements of information to be provided for Landscape Visual Impact Assessments				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Non-EIA LVIAs are often called landscape and visual appraisals (LVAs). Need to specifically include this term to clarify that they are covered by the guidance.		Note added to introduction
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree	Suggest amendment to include: The details of any road construction/road improvement schemes required to provide access to the proposal site beyond the site boundary should be included in the minimum requirements. The preferred route or options for any new grid connections should be included even if there is no definitive decision.		Added Added
Mary O'Connor Associate Director WYG Group	Agree	Make & model of turbine is unlikely to be known at this stage Details of grid connection is unlikely to be known at this stage Comment re distinction between LVIA and appraisals above applies here too.	It says where known It says where known	Added to introduction
Natural Resource Wales	Agree		Noted	
Q9: Do you agree with the proposed specific requirements for Landscape Visual Impact Assessment				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	3.3 • The Typology column is confusing by including qualification of the listed typologies with overlapping height criteria (e.g. 50m is both Small and Medium), but the typologies are defined by height and number in the repeated Table 2 on page 3.2, so the typologies shouldn't need any qualification in Table 5. • Need to state Study Area is radius. Suggest it should be called a Minimum Study Area. The requirement for a written assessment has been missed out for Large and Very Large – or is written assessment implicit in "Full CLVIA"? **Application of LANDMAP data:** 2nd sentence is inaccurate. Should read: "Aspect areas outside the site should be considered in line with LANDMAP Guidance Note 3: using LANDMAP for landscape and visual impact assessment of onshore wind turbines" (see Part 3: Section C of this guidance).	We were asked to add heights as a quick reminder so people didn't need to keep referring back to the original table. Although Table 2 is opposite in the document here people often print out single pages. I think the document as a whole makes it clear that typologies also include number of turbines Table 2 says it is a minimum study area radius to be clarified elsewhere Yes implicit in full CLVIA	Adjusted to avoid overlap Will consider adding numbers as well Will consider adding to this table Revised in line with suggestion *All aspect areas affected by the footprint of the development should be considered in detail. Aspect areas outside the site should be considered in line with LANDMAP Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines. (See Part 3: Section C of this guidance).*

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree with reservations	**Objective visualisation of the proposed scheme, easily understood by the public, is important for all schemes.** A 25m Micro turbine is higher than surrounding residences and a visualisation of its relation to existing buildings is important in assessing impact. Wirelines alone should not be sufficient for Small and Medium Types as they do not give the LPA and the public a clear enough impression of the impact of the proposal on its site and surroundings . **Residential Study Areas** We agree that it is better to have Residential Study Area as a function of tip height rather than Development Type but query the smaller Residential Study Areas generated for Micro and Small Types and suggest a minimum RSA of 500m to allow impact on residential amenity to be properly assessed. **Public Access** Although National Trails are mentioned in the guidance, there is no mention of other rights of way or the impacts of any scheme when viewed from land designated as Open Access land under the CROW Act. There does not seem to be any discussion of key visual receptors which should be included in a LVIA. Any micro siting allowance should be included in the application information and all distances adjusted accordingly. Without this, the indicative distances in the guidance can be breached.	It is not considered proportionate to ask for wirelines or photomontages for micro turbines.It is not considered proportionate to insist on photomontages for small and medium turbines but LPAs may request them if they believe they are dealing with a particularly sensitive location. 10 x blade tip height has been generally shown to include all properties where it is likely that unacceptable effects will occur. The note says that if there is clear visibility then properties just beyond this distance should also be included The Guidance says the assessment should be carried out in accordance with GLVIA3 which sets out how an assessment should be undertaken and, for example it identified that the users of PRoWs and open access land have high sensitivity. Agreed that Micro-siting can be a significant issue with regard to the residential assessment so a note has been added to this effect	Residential study area note to be amended to include a reference to micro siting T*he Residential Study Area is the area within which a residential visual amenity*

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Mary O'Connor Associate Director WYG Group	Disagree	Computer generated ZTVs should not be required; manually drawn zone of visual influence or visual envelopes may be acceptable – the emphasis should be on the purpose i.e. to identify where visual receptors may be found. The LANDMAP requirements should be consistent with Guidance Note 3	Computer generated ZTVs are a commonly expected requirement for wind turbines We have worked with NRW to agree requirements	
Natural Resource Wales	Agree		Noted	
Q10: Do you agree with the proposed use of LANDMAP as part of the Landscape Visual Impact Assessment				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree		Noted	
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree with reservations	We appreciate the importance of LANDMAP for Wales and the advantages of the "layer/aspect" methodology but nevertheless we recognise that LANDMAP data is more robust in some instances than others and evaluations made in the past are themselves a matter of judgement and may not always reflect contemporary situations or value attributed by the public. We think it is important to allow flexibility to take this into account to avoid excessive wind energy development on aspect areas which are highly valued by the public but not classified as high or outstanding in Visual/Sensory Scenic quality or Character.	Agree that the quality of LANDMAP data can be variable and have added a note to this effect to the note at the bottom of page 3.6	It is essential that the LVIA analyses and interprets the LANDMAP data and does not merely quote from it. *The quality of LANDMAP data can be variable.*
Mary O'Connor Associate Director WYG Group	Neither Agree nor Disagree	Any LANDMAP requirements should be consistent with Guidance Note 3 It is not always straightforward to "interpret" the LANDMAP information and the interaction of the aspects	Agreed	
Natural Resource Wales	Agree	Under initial consideration • The first sentence 'all aspect layers' should be changed to 'all aspect areas' • Second paragraph, add 'regardless of their overall evaluation' at the end (so that it is clear that if the turbine is located within an aspect area it is considered fully even if it is not outstanding or high) Under detailed consideration • The first sentence 'all aspect layers' should be changed to 'all aspect areas'	I think adding this note may be confusing here. It is stressed n Table 6 in the heading to column 4	Changed to all aspect areas Changed to all aspect areas

Respondent	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Part 3 section C photomontage guidance: As stated above, the visual representation of windfarms good practice guidance, SNH 2014 should be referred to. Therefore the Highland Council guidance is not needed.	2014 SHN Guidance will be referenced. Highlands Council Standards have not been superseded. As we are in Wales photomontages are not required to be done to either of these standards but it is worth pointing developers to the Highlands Council Standards as we consider they are less onerous than the latest SNH guidance and as informative, especially when dealing with small scale developments.	
Kay Foster Senior Landscape Officer Conwy Council	I would like to say that I find the document very concise	THANK YOU - WE TRIED HARD	
Sarah Chapple Landscape Architect Soltys Brewster Consulting	I attended the consultation seminar at the Norwegian Church which was really helpful. One comment – Is there anyway a 'How to Use' guide could be produced for the ICLOUD Mapping system It looks like a great resource but it would be helpful if there was some kind of tutorial available to make better use of the system	This may depend on if funding is available. There is some quite good guidance on the GIS cloud site	

Respondent	Comment	Response	Change
Colette Bosley Principal Landscape and Countryside Officer Monmouthshire County Council	• Introduction 0.7 – A statement on the need for suitably qualified Landscape Architect here would be helpful to ensure landscape consultants are at the table from the beginning. e.g. "Developers and agents considering the submission of a planning application for wind development are advised to engage a Landscape Consultant from an early stage to ensure professional judgement is applied in undertaking the Landscape and Visual Impact Assessment (LVIA). A LVIA will be required of all wind turbine applications. This document however clarifies that the scope of the LVIA study varies and is to be proportionate to the scale of proposed development and sensitivity of its landscape and visual context, and sets out the steps and considerations required in establishing whether or not the proposal requires an Environmental Impact Assessment." • Part one; minimum requirements for the EIA screening It came up in the seminar, but needs clarification in the document after section D the information to be provided for Large and Very large developments, otherwise it appears there are some missing pages. • 3.4 note 3. "The choice of viewpoints and which ones require photomontage visualisations will need to be agreed with the determining authority". • 3.11 – the text loses the message. Suggest inserting at the top – The assessment of cumulative effects often needs to look beyond the Typology Study Area	We have added a note about a Landscape Consultant but we think the other part reiterates what is said elsewhere Note on page 1,1 given more emphasis and note added to Page 1.2 under turbine typologies	Added *Developers considering the submission of a planning application for wind development are advised to engage a Landscape Consultant from an early stage to ensure professional judgement is applied in undertaking the Landscape and Visual Impact Assessment (LVIA)* *The location of viewpoints and visualisations will need to be agreed with the planning authority.* Text revised

Respondent	Comment	Response	Change
Barbara Morgan Network Rail	Network Rail has been consulted by Blaenau Gwent County Borough Council on the Wind Turbine Development. Thank you for providing us with this opportunity to comment on this Planning Policy document. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below. Developers of turbines must consider shadow flicker and its effect upon railway infrastructure. Network Rail would request that developers must consider when constructing wind turbines or wind farms the likely effect upon the railway, particularly where safety is critical. There may be a minimal risk to driver's vision (how they perceive signalling, the route ahead, stopping in the case of emergency etc.) which may be impacted by a wind turbine(s). Network Rail utilises radio/signalling equipment and we would not want to see this interfered with by wind farms/wind turbines, particularly as it is safety critical and absolutely integral to the operation of the railway. There is some concern that vibration from turbines can affect ground conditions; with the possible issue here being embankments and potential instability, in which case Network Rail would raise an objection to any applications for turbines close enough to the railway to create these issues and would wish consultation on a possible repositioning. The construction of the towers, heavy blades, gearbox and generator as well as guy lines	I do not think that any of these comments are relevant to the landscape and visual aspects of wind turbine development	

Respondent	Comment	Response	Change
	to hold the tower in place put strain on the ground at the base of the structure. Many wind turbines are now a minimum of a 45 metre long tall tower with concomitant long blades, as such it may be necessary for the developer of any proposal for a wind turbine or turbines to gain consent from Network Rail's Structures Engineers and Level Crossing Managers to cross Network Rail infrastructure in particular over a Network Rail bridge prior to construction on site. Consent may be needed as bridges have a maximum load and a wind turbine(s) plus blades and vehicle transporting said equipment may be over the limit for that bridge. Network Rail should be consulted on applications for wind turbine(s) as standard, and this should be added to the council's policy. We would also request the policy to require applicants to engage in pre-application consultation with the Network Rail Asset Protection Team to determine if a proposed wind turbine(s) / wind farm(s) impacts upon Network Rail land and the safety, integrity and operation of the railway and its infrastructure for the reasons as stated above. At this stage the construction and usage of wind turbine(s) is relatively rare, but Network Rail Town Planning has seen an increase in applications and it is highly probable that the numbers of developments with wind turbine(s) will increase as the drive toward sustainable, renewable, carbon neutral energy production increases.		

Respondent	Comment	Response	Change
Oliver Buxton Project Manager Seren Energy Ltd	I welcome this more prescriptive advice for smaller scale wind development. However my only concern is the line "*it is likely that all wind turbine development where the turbine height to blade tip is greater than 80m or where there are more than five turbines will require an EIA.*" There is already clear guidance from a circular in regards to EIA thresholds and guidance. This additional threshold for 80m tip is unnecessary. A single turbine with a tip height of, for example 86.5m (Enercon E53 800kW) in an appropriate location away from sensitive landscapes should not be subject of an EIA. The screening process is already suitable and this addition is unnecessary.	Many authorities do not find the existing guidance clear enough hence commissioning this guidance. The guidance says 'it is likely an EIA will be required'. In the example given of a turbine towards the bottom end of its typology in a non-sensitive location it would be up to the developer to put forward a case as to why an EIA was not required.	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	CPRW welcomes a fairer, clearer and more consistent approach to EIA screening and LVIAs for wind energy applications which can be applied throughout Wales. **Third Parties should be mentioned in the Guidance.** The guidance says it is written for Planning Officers and Developers to introduce clarity, consistency and avoid lengthy discussion of irrelevant issues. Third Party stakeholders are not mentioned. All those current and future generations who derive health and pleasure from the countryside, Welsh residents and independent organisations, including conservation charities, are also stakeholders – perhaps the most important ones. They have a right to public consultation processes and an interest in improved information and fair process resulting from good guidance. **A plan for on-going assessment and timely review and updating of the guidance should be included.** The problems of applying out-dated guidance are amply illustrated by the plight of wind farm neighbours resulting from the retention of ETSU-R-97 guidance for noise assessment of wind turbines.	We agree that third parties should be involved. With regard to the process of deciding what should accompany an application for WTD this involvement will be via consultation with the LPA. It is beyond the remit of this guidance to prescribe what those consultation processes should be - that would need a separate piece of work. I don't know what provision there is for review of the document	

Respondent	Comment	Response	Change
	We can predict neither the future of onshore wind energy nor the unintended consequences of this guidance. We have all witnessed how rapidly the wind energy sector changes in response to energy and planning policy, economic incentives, technological development and the decrease in available sites. It is significant that we are calling the 79m single turbines so popular with Developers "medium developments" when these turbines are larger than those making up extensive windfarms a decade ago. 70m to 80m turbines are usually derated to 500kw in order to avoid the step-decrease in feed-in tariff over 500kw, demonstrating how quickly development adapts to economic incentives. The proposed guidance itself could have an analogous impact on patterns of application by making it clear how to bring a development in under the EIA threshold – like the impact of the recently abolished stamp-duty "slab-tax" on house prices. For instance, the guidance might encourage the peppering of the countryside with small groups of 3 turbines just under either 51m or 81m. It should be made even clearer at the outset that this is not guidance for making planning decisions. Perhaps the "Important notes" (2.4.) should be highlighted in the introduction. Ultimately an ES is a Developer's business case targeted at LPA permission and it is only too easy for a demonstration of superficially correct procedure to be interpreted by Planning Officers and Statutory Consultees as a demonstration of correct information and correct planning conclusions. This very slippery slope should be avoided at all costs. ETSU-R-97 illustrates how	Whilst there is truth in this comment, taken to its logical conclusion it would mean that no guidance was ever produced and no thresholds set for fear of unintended consequences. A review of the effectiveness / consequences of the Guidance would be good practice. It is clear in the name - one of the reasons for sticking with a long winded name instead of something snappy We think that it is better where it is. the heading **Important Note** should make it hard to overlook. A well produced, clearly written assessment that includes all the correct information is always a help and never a hindrance in	

Respondent	Comment	Response	Change
	"*guidance for assessment of wind turbine noise*" has made it virtually impossible for Planning Officers not to accept any Developer's noise assessment, whatever the scientific shortcomings.	determining applications.	
	If the current approach is to be successful: · All EIA screening assessments and scoping exercises should be undertaken by accredited staff. Staff should be required to complete specific professional training in this approach and should only be accredited when they have demonstrated their competence in applying the methodology.	We do not have a remit to impose this	
	A public register of all turbine schemes should be maintained and the outcome of any screening / scoping exercise of any such scheme should be included in the register.	We do not have a remit to impose this but the online database is planned to include information of refused and withdrawn applications as well as approved ones	
	· An Authority should be required to publish their decisions, with reasons, why a scheme submitted to them does not require an EIA screening request or how a EIA screening decision is reached.	It is unclear as to whether this is already required by the EIA regs with regard to Schedule 2 development	
	We are also aware that the success of this approach relies heavily on the quality of the data and landscape information upon which any judgements are based. We therefore believe that any such assessment must be based upon professionally and independently accredited landscape capacity and sensitivity studies which themselves use the same methodology.	Independently accredited landscape capacity and sensitivity studies are currently being undertaken for various areas within Wales	
	An on-line Database is essential to this project As an absolute minimum LPA's should be required to have an up-to-date map of all OCP turbines with location and height in order	We do not have a remit to impose this	

Respondent	Comment	Response	Change
	to verify application information and to inform developers and third parties. Maps could be backed up by clearly arranged tables of applications awaiting data entry.		
Mary O'Connor Associate Director WYG Group	Photomontages: the guidance referred to is now out of date: revised SNH guidance has been published in July 2014 and supersedes Highland Council guidance; the LI Advice Note is under revision in response to the new SNH guidance; NB: the SNH guidance on visualisations is for commercial scale wind farms in Scotland (see Introduction to the Guidance) not for smaller scale development and not for developments outside of Scotland; it should be reviewed critically before adopting it for less than commercial scale wind developments in Wales and only adopted so far as it is usefully applicable. p3.12: there is confusion here about location and visual receptor – see GLVIA3 which is clear that the visual receptor is the person viewing the landscape and not the location of the person e.g. the national trail as stated here. Consistency should be ensured between this and the Carmarthenshire & Pembrokeshire Guidance. The Online WT Database is very welcome; support should be	To be updated Agreed Agreed This has been achieved as far as possible although one of the key purposes of this guidance was to establish study and search areas which more accurately reflected likely significant effects and this has meant a reduction in the minimum study areas from some existing guidance. If we keep consistency with everything that has gone before we can't bring in change. Agreed	We will revise this section in the light of the updated guidance and add a note on scale. Changed

Respondent	Comment	Response	Change
	sought from Welsh Government to extend it to all Wales.		
Natural Resource Wales	Natural Resources Wales welcomes this guidance and the collaborative approach that has been instrumental in developing it. We have engaged in providing feedback on this document on previous occasions whilst it was still in draft form, notably on 5th March, 6th March, 4 June, 9 June and 1 July 2014. Our comments have been considered and included at all stages and where they have not been included – satisfactory explanations have been given. Therefore only additional comments are included in this document. An officer has recently used this draft guidance in a live case as a test and found it to be a very logical process that will help in deciding on EIA requirements. Previously a ZTV would have been requested for the extent of visibility in order to inform their decision, but as the flow chart in figure 2 follows a logical process based on distances from more sensitive landscape areas, they felt it would make the screening process much simpler. Natural Resources Wales would be very pleased to work with you to arrange an event to launch and communicate the Guidance to Local Planning Authorities, Natural Resources Wales staff, consultants and developers. Additional comments on the draft document follow: 0.1 Suggest replace 'Environmental assessment is a procedure that ensures that the environmental implications of proposals are taken into account before decisions are made. An Environmental Impact Assessment (EIA) assesses the possible impact that a proposed project may have on the environment and this information is submitted to the Local Planning Authority (LPA) or the Welsh Government in the form of an Environmental Statement (ES)'. With:	This wording followed legal advice and we would like to keep it. It is more strictly factual with regard to EIA regulations than the suggested replacement.	

Respondent	Comment	Response	Change
	'Environmental Impact Assessment (EIA) is a process by which information about the likely environmental effects of certain projects is collected, assessed and taken into account both by the applicant, as part of project design, and by the decision making body (Local Planning Authority or if called in, by Welsh Government) in deciding whether permission should be granted. Thus EIA has two roles – improving decision making and project planning.'		
	Introduction p.2 - CLVIA – should this say that other development as well as wind turbines should be considered (as referenced on p.4 Part 2)?		Reference added
	P.1.2 a8 – it would be helpful if the site plan showed features such as mature trees/woodland/hedgerows as well as contour lines/spot heights.	This would not be a usual requirement at a screening stage. If an applicant was relying on such screening as a reason for not requiring an EIA it would be up to them to add it to their plans and make their case.	
	P1.3 b4 –Include sensitive seascapes?	We are not aware of an agreed definition of a sensitive seascape	
	P.1.5 – the screening distances e.g. 3km from the National Park for medium, there could be significant effects within the 5km study area?	Effects with 5km would be assessed even if an EIA was not required. The purpose of the screening is to identify likely triggers for an EIA not to cover all possible significant effects	