



ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) SCREENING

PROPOSED RESIDENTIAL DEVELOPMENT ON LANDS AT BEACH ROAD, DUBLIN 4.
An Bord Pleanála Pre-Application Consultation Reference Number: ABP 308090-20



PREPARED FOR:

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Friday, 21 May 2021



The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

Friday 21 May 2021
[By Hand]

Dear Sir,

RE ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING – PROPOSED RESIDENTIAL DEVELOPMENT AT BEACH ROAD, DUBLIN 4

1.0 INTRODUCTION

This Environmental Impact Assessment Report (EIAR) Screening is submitted by Tom Phillips + Associates (TPA), Town Planning Consultants on behalf of Maxol Property Limited in respect of the proposed residential development at a c. 0.385 hectares site that currently accommodates a Maxol Petrol Filling Station and a vacant motor sales/service garage (formerly Michael Grant Motors), at Beach Road, Dublin 4 (Eircodes D04 A9P3 and D04 T4A0).

The proposal comprises a residential development of 112 No. units with associated residential amenities.

The purpose of this Report is to provide:

- i. An assessment of the proposed development in the context of the relevant thresholds for this form of development (residential), which require the preparation of a mandatory Environmental Impact Assessment Report (EIAR);
- ii. An assessment of sub-threshold considerations for the proposed development, and;
- iii. An outline of the scope and content of the proposed development and all relevant assessments enclosed, which we propose to submit in lieu of a formal EIAR regarding the proposed development.

This Report has had regard to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003. We have also considered the provisions of the *Environmental Impact Assessment of Projects (EIAR) Guidance on Screening* published by the European Union in 2017. The Screening Checklist included in that document is enclosed as Appendix A to this Report.



1.1 Summary

In summary, having regard to the relevant thresholds set out in Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* regarding mandatory EIS (now EIAR) provision for this form of development, in our opinion, the subject proposal comprises a sub-threshold development.

Secondly, according to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development, August 2003*, a formal EIAR would not be required for this particular development. This is due, *inter alia*, to the development site area (c. 0.385 ha.) and its locational characteristics, the proposed number of residential units (112 ha.) and the fact that this proposal is unlikely to give rise to significant environmental effects.

Thirdly, while it is considered that a formal EIAR is not required in this instance, it is proposed that detailed and comprehensive assessments as required accompany the planning application, which assess and address all of the relevant potential planning and environmental issues pertaining to the subject development. These assessments informed development responses to the specific issues raised by development within the site. The assessments enclosed with the application will also be designed to address the issues raised by this type of development and provide the requisite levels of environmental assessment to the appropriate standards.

2.0 STATUTORY INSTRUMENTS

2.1 Schedule 5 of the *Planning and Development Regulations 2001 as amended*

Part X of the *Planning and Development Act 2000* (as amended) provides a basis in primary legislation for EIA. Part X of the Act establishes a framework for EIA with the detail provided in Schedules 5, 6 and 7 of the *Planning and Development Regulations 2001 as amended* (Regulations).

Schedule 5 of the Regulations sets out types of development for which mandatory EIA is required and is, therefore, an important reference point in the context of establishing the threshold for EIS preparation.

In terms of the different categories of development listed in Schedule 5 of the Regulations, the subject development relates to Part 2(10)(b)(i) and (iv) of the *Planning and Development Regulations 2001 as amended* regarding 'Infrastructure Projects' respectively and provides the relevant area/development thresholds as follows:

'Construction of more than 500 dwelling units'

'Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.'

(In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use)'



The proposed development in this case comprises 112 no. residential units, which is significantly below the above threshold. As such, it is considered that a mandatory EIAR is not required on the basis of number of dwelling units. This is further borne out by the EIAR Screening Checklist enclosed as Appendix A.

With regard to urban development and site area, the site is considered to be located in an area that would be considered to comprise 'other parts of a built-up area' as per the above definition.

The subject site area is c. 0.385 ha., which is significantly below the threshold of 10 hectares.

Thus, having regard to the above thresholds and the nature of the subject proposal, it is submitted that a mandatory EIAR is not required in respect of this development.

2.2 EIA Guidance for Consent Authorities regarding Sub-threshold Development

The issue that consequently arises is whether the proposed development, which is sub-threshold, still warrants EIAR. In this regard, we have assessed the proposal against the criteria as identified in the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003.

The primary aim of this document is:

"To provide practical guidance for the competent/consent authorities in deciding whether or not a sub-threshold development is likely to have significant effects on the environment. The guidance should also assist developers and EIA practitioners in forming an opinion as to whether or not EIA would be appropriate to a specific sub-threshold development proposal".

The guidance also notes that:

'Irish EIA legislation mirrors the mandatory requirement in the Directive to carry out EIA in respect of certain project classes. In many cases, Ireland has adopted a substantially lower threshold than set in the Directive.'

As illustrated above, the subject development is very substantially below the mandatory EIA thresholds identified in the Regulations.

Paragraph 3.4 further states:

'In light of the approach by Ireland (i) in setting mandatory thresholds for each of the Annex II project classes and (ii) in setting these thresholds at substantially lower levels than comparable Annex I thresholds in the Directive, the need for sub-threshold EIA should be fairly limited in Ireland'.

We concur with this statement and consider that the current proposal similarly does not require the preparation of a formal sub-threshold EIS.



2.2.1 Key Issues

The stated key issue for the competent/consent authorities in the context of the possible need for an EIA regarding sub-threshold developments is *‘whether or not such development is likely to have significant effects on the environment’*. The document, therefore, provides guidance to assist authorities in determining whether or not *“significant”* effects on the environment are likely in the context of sub-threshold development.

While the guidance acknowledges that *‘there are no hard and fast rules which can be applied’*, it sets out three criteria which competent/consent authorities must have regard to, in assessing whether or not the likely effects are *“significant”*.

The stated criteria for determining whether a development would or would not be likely to have significant effects on the environment are:

- i. Characteristics of the Proposed Development;
- ii. Location of the Proposed Development, and;
- iii. Characteristics of Potential Impacts.

The guidance also advises that particular attention should be paid to projects which are *‘close to the national statutory thresholds’*, which is not the case here as illustrated above.

3.0 SCREENING

Given the nature, location, and scale of the project, the project is not Annex I. The project is assessed under Annex II / Part 2, and Annex III / Schedule 7. The pertinent references from Schedule 5 of PDR, 2001, as amended by *The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018*, are as follows:

3.1 Part 2 Class 10 – Infrastructure Projects

In particular, subsection 10(b)(i):

“Construction of more than 500 dwelling units”

Comment

The proposal provides for 112 No. residential units which is below the mandatory EIA threshold of 500 units. Therefore, it is considered that a mandatory EIA is not required.

Conclusion – EIA NOT REQUIRED



3.2 Part 2 Class 10 – Infrastructure Projects

In particular, subsection 10(b)(iv):

“Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere”

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)”

Comment

As previously outlined above, the subject development involves a site area of c.0.385 ha and is situated in an area which would be classified as being ‘other parts of a built-up area’. The appropriate threshold for development in such areas is 10 hectares. The subject development, therefore, falls well below this threshold and therefore EIA is not triggered by the site area.

Conclusion – EIA NOT REQUIRED

3.3 Part 2 Class 15

“Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.”

Comment

It is considered that the subject proposal comprises a development type which is listed within Part 2 but does not exceed the specified limits, and is therefore considered to be a ‘sub threshold’ development. Therefore, notwithstanding that the development does not trigger a mandatory EIA, it is considered prudent to investigate if the proposal would be likely to have significant effects on the environment thus requiring a sub-threshold EIA. This is examined in more detail in Section 3.4 of this Screening Report.

Conclusion – SUB THRESHOLD EIA MAY BE REQUIRED



SUMMARY TYPE / CLASS	SUMMARY	COMMENT	EIA REQUIRED?
Part 2 Class 10(b)(i)	<i>Construction of more than 500 dwellings</i>	Proposal involves construction of 112 No. dwellings	NO
Part 2 Class 10(b)(iv)	<i>Urban development on area greater than 10 ha in built-up area</i>	Site area is c.0.385	NO
Part 2 Class 15	<i>Any project not meeting thresholds of Part 2 but would still be likely to have significant environmental impacts having regard to criteria in Schedule 7</i>	Proposal should be examined with regard to potential significant impacts on the environment	REQUIRES FURTHER ASSESSMENT

3.4 Sub Threshold Screening

At the outset it is noted that the 2014 Directive requires the following:

In order to ensure a high level of protection of the environment and human health, screening procedures and environmental impact assessments should take account of the impact of the whole project in question, including, where relevant, its subsurface and underground, during the construction, operational and, where relevant, demolition phases.

Schedule 5 Part 2 Class 10 (b) (i) and (iv) may or may not be triggers for EIA depending on whether the development would be likely to have significant effects on the environment, by reference to the criteria of Schedule 7.

For the purposes of this screening, the updated criteria set out in Schedule 7 and Schedule 7A of the Planning and Development Regulations, 2001 – 2018 (as amended) will be considered. The following section assesses the proposed development as per the information required under Schedule 7A:

1. A description of the proposed development, including in particular—

- (a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
- (b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.



3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant, and

(b) the use of natural resources, in particular soil, land, water and biodiversity.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

1. Characteristics of the Project

The characteristics of the project must be considered with particular regard to be given to:

Criteria	
(a) the size and design of the whole project;	<p>The existing land use of the site is a petrol filling station with ancillary retail and vacant lands with unused buildings in disrepair.</p> <p>In this regard, the proposed development of the site for residential purposes will accord with the existing long established residential land use that characterises the area, which was previously confirmed as being acceptable in principle on the subject site by way of previous planning permission (ABP Ref. ABP 302082-18; DCC Reg. Ref. 2001/18). Thus, it is not considered that the existing land use will be adversely affected in environmental terms by the proposed development.</p>
(b) cumulation with other existing and/or approved projects;	<p>The guidance references the issue of cumulation with other projects. In this regard, a review of adjacent proposed and permitted developments has been undertaken using an online planning search function. A 10 year planning permission was granted on 28 January 2020 (DCC Reg. Ref. PWSDZ3270/19) in relation to the development of the Former Irish Glass Bottle (IGB) & Fabrizia Sites, Poolbeg West, Dublin 4 for site infrastructure to facilitate Phase 1 development provided for under the <i>Poolbeg West SDZ Planning Scheme 2018</i>. However, it is not likely that cumulative impacts of the proposed development with other existing and/or approved projects will have significant effects on the environment.</p>



<p>(c) the use of natural resources, in particular land, soil, water and biodiversity;</p>	<p>The proposed development will not involve the use of natural resources, therefore this is not a considered relevant consideration in terms of the subject proposal.</p>
<p>d) the production of waste;</p>	<p>The production of waste is not considered a primary characteristic of the proposed development. An Operational Waste Management Plan has been submitted as part of this planning application and the management of same will be integrated into the overall management regime for the development.</p> <p>Construction waste will be disposed of using licensed waste disposal facilities and contractors.</p> <p>Storm Water Drainage All surface water run-off from roof areas and hardstanding areas shall be collected in an underslung gravity pipe network in the basement. Surface water collected by the drainage system shall be attenuated in an attenuation tank which caters for a 1:100 year return period storm event, plus 20% climate change. It is proposed to connect the drainage system to the existing public 300mm diameter combined sewer located on Church Avenue, to the north of the site.</p> <p>Foul Water Strategy It is proposed to discharge the foul water to the public sewer line at Church Avenue as per the previously permitted scheme (DCC Reg Ref. 2001/18; ABP 302082-18) This discharges to the Ringsend Wastewater Treatment Works.</p>
<p>e) pollution and nuisances;</p>	<p>Best practice methods will be utilised during construction to mitigate potential impacts from pollution on the local environment during construction.</p> <p>There will be some potential for short-term noise and vibration impacts during construction, and prevention measures to reduce nuisance will be set out in the Construction Management Plan and Construction Noise Impact Assessment which accompany the planning application. Significant impacts are unlikely to arise.</p>
<p>(f) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;</p>	<p>Best practice construction measures will be employed throughout the construction phase. It should be noted that the subject lands are not proximate to any Seveso site. A Site Specific Flood Risk Assessment (SSFRA) has been prepared by Punch Consulting Engineers and accompanies this planning application. The SSFRA concludes that:</p> <p>A review of flooding and flood risk in the area was carried out and it was ascertained that the development lies within the defended zone of a 1 in 1000 year flood. As such there is a residual risk of coastal/fluviial flooding to the site of the proposed development. Flood maps produced as part of the Eastern CFRAM Study and flood maps produced as part of the SFRA from the relevant City Development Plan were consulted to establish the outline Flood</p>



	<p>Zone. A precise flood level at the site of 2.967m AOD was obtained from the CFRAMS modellers. Advice from Dublin City Council suggested that the Finished Floor Level (FFL) should be set at 400mm above the current 1 in 1000 year flood level in the defended zone. The ground floor FFL was set at 3.37m AOD which is 403mm above the 1 in 1000 year flood level. Additional mitigation measures have been prescribed to prevent flooding of the basement and to ensure that the proposed development does not worsen flooding elsewhere.</p> <p>Appropriate measures have been taken to ensure that the proposed development will not be at risk of flooding, as described in Section 5.4, and also to ensure that impacts related to flooding elsewhere will not worsen as a result of the development. The mitigation measures proposed will ensure that the development is in compliance with the relevant sections of the Dublin City Development Plan as outlined in Section 2.2 as well as in full compliance with The Planning System & Flood Risk Management Guidelines.</p>
(g) the risks to human health (for example due to water contamination or air pollution).	<p>Foul and Surface water will discharge to the existing public network.</p> <p>No impact on air quality is envisaged due to the nature and scale of the project.</p>

2. Location of the Project

The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to:

Criteria	
(a) the existing and approved land use;	The subject site is zoned Z1 Residential and residential development is permitted in principle.
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	The proposal will require the removal of soil to facilitate basement construction, however significant impacts are not envisaged.
<p>(c) the absorption capacity of the natural environment, paying particular attention to the following areas:</p> <p>(i) wetlands, riparian areas, river mouths;</p> <p>ii) coastal zones and the marine environment;</p>	<p>(i) Surface water will drain by gravity to the existing surface water network.</p> <p>(ii) The <i>Natura Impact Assessment</i> provided by Altermar confirms that the proposed development would not impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status</p>



<p>(iii) mountain and forest areas;</p> <p>(iv) nature reserves and parks;</p> <p>(v) areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC;</p> <p>(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;</p> <p>(vii) densely populated areas;</p> <p>(viii) landscapes and sites of historical, cultural or archaeological significance.</p>	<p>(iii) The proposed development site is not within or directly connected to any mountain or forest areas.</p> <p>(iv) The proposed development is not within or directly connected to any nature reserves or parks. The adjoining parks are located in an urban environment and it is not considered that the proposed development will adversely affect these parks.</p> <p>(v) The site is located c. 530 m from the South Dublin Bay and Rover Tolka SPA and c. 480 m from the South Dublin Bay SAC. The NIS concludes that there will be no adverse effects on the integrity of any Natura 2000 sites.</p> <p>(vi) The site is not located within such an area.</p> <p>(vii) The site is located within a reasonably dense residential area. Procedures will be put in place at construction stage to minimise potential adverse construction impacts to the local population in terms of vehicular movements, noise or vibration. There is not considered to be any likely operational impact to the local population given the existing residential nature of the area.</p> <p>(viii) The site is located within an urban, primarily residential area with no specific landscape designations. Photomontages are provided with the Application documentation</p>
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3. Type and Characteristics of the Potential Impacts

The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account:

Criteria	
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); (b) the nature of the impact;	The proposal relates to a petrol filling station (with ancillary retail) and a vacant site with little to no existing ecological value. During the construction phase, the proposal will have a moderate impact in terms of noise and vibration on the local population. This impact will be temporary.
(c) the transboundary nature of the impact;	There are no transboundary impacts.
(d) the intensity and complexity of the impact;	No impacts of significant complexity or intensity are foreseen.
(e) the probability of the impact;	The impacts are likely to occur, however are not considered to be significant.
(f) the expected onset, duration, frequency and reversibility of the impact;	Some temporary disruption may occur during the construction phase. The ecological value of the site will be improved at operational stage as a result of proposed landscaping and open spaces.
(g) the cumulation of the impact with the impact of other existing and/or approved projects;	It is considered that cumulative impacts with other existing and/or approved projects are not likely to cause significant effects on the environment.
(h) the possibility of effectively reducing the impact.	In overall terms, the impact of the project will be positive as the proposed development will facilitate a range of habitats on a site with almost no soft landscaping.



4.0 CONCLUSION

We trust that this information fully addresses the issue of EIAR screening and that, in this particular case, an EIAR is not required in respect of this development.

Yours faithfully,

Julie Costello

Julie Costello
Associate
Tom Phillips + Associates



**Appendix A
EIA Screening
Checklist**

Questions to be Considered For further guidance on factors to be considered see the more detailed questions listed in the Scoping Guidance	Yes/No/? Briefly describe	Is this likely to result in a significant impact? Yes/No/?- Why?
1. Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes. The development will comprise the provision of a new high density residential development and additional population on a currently part commercial, part vacant, brownfield site. Thus, a new land use will be established on the site.	No. The adjoining area is characterised by residential, educational and amenity development and the site is zoned for residential development in the statutory <i>Development Plan</i> for the area.
2. Will construction or the operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	No. Whilst zoned serviced urban land is a scarce resource in Dublin, the proposed scheme will deliver a sustainable high density residential proposal that ensures the site will be efficiently used.	No.
3. Will the Project involve the use, storage, transport, handling or production of substances or material which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?	No, other than the small amounts typically used in residential households and minor commercial units.	No.
4. Will the Project produce solid wastes during construction or operation or decommissioning?	No. Whilst the development will require the excavation and transport of soil, this is not considered significant in the context of a residential development.	No.



<p>5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC)?</p>	<p>No. The development comprises a residential proposal that will not give rise to pollutants. Construction activities will be subject to on-site management.</p>	<p>No.</p>
<p>6. Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?</p>	<p>No. The development comprises a residential proposal that will not give rise to noise/vibration impact, light, heat energy or electromagnetic radiation. Construction activities will be subject to on-site management to mitigate any short term impacts.</p>	<p>No.</p>
<p>7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>No. The development will connect to the existing public mains water supply and drainage systems. Construction management will ensure no impacts will affect surface or ground water.</p>	<p>No.</p>
<p>8. Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?</p>	<p>No. Best construction practice will mitigate the risk of accidents during the construction stage.</p>	<p>No.</p>
<p>9. Will the Project result in environmentally related social changes, for example, in demography traditional lifestyles, employment?</p>	<p>No. The new residential development will add marginally to the local population but this is not deemed a significant impact. No traditional lifestyles or employment will be affected as a result of this development.</p>	<p>No.</p>
<p>10. Are there any other factors that should be considered such as consequential development which could lead to environmental impacts</p>	<p>No. There are no significant planned developments in the area that will give rise to cumulative impacts.</p>	<p>No.</p>



<p>or the potential for cumulative impacts with other existing or planned activities in the locality</p>		
<p>11. Is the Project located within or close to any areas which are protected under international, EU, or national or local legislation for the ecological, landscape, cultural or other value, which could be affected by the Project?</p>	<p>Yes. The site is located c. 530 m from the South Dublin Bay and Rover Tolka SPA and c. 480 m from the South Dublin Bay SAC.</p>	<p>No. The NIS concludes that there will be no adverse effects on the integrity of any Natura 2000 sites.</p>
<p>12. Are there any other areas on or around the location that are important or sensitive for reasons of their ecology eg. Wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands that could be affected by the Project?</p>	<p>Yes. The site is located close to the coast.</p>	<p>No. The Ecological Impact Assessment concludes that based on the successful implementation of onsite construction phase controls, no significant impact is foreseen on species and habitats of conservation importance or conservation sites of National or international importance.</p>
<p>13. Are there any areas on or around the location that are used by protected, important or sensitive species of fauna or flora eg. For breeding, nesting, foraging, resting, overwintering, migration which could be affected by the project?</p>	<p>Yes. The site is located c. 530 m from the South Dublin Bay and Rover Tolka SPA and c. 480 m from the South Dublin Bay SAC.</p>	<p>No. The NIS concludes that there will be no adverse effects on the integrity of any Natura 2000 sites.</p>
<p>14. Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be</p>	<p>Yes. The site is located in a defended zone of a 1 in 1000 year coastal/fluvial flood.</p>	<p>No. The site is within a defended zone, the proposed development has been designed to ensure it is not at risk of flooding.</p>



affected by the Project?		
15. Are there any features of high landscape or scenic value on or around the location that could be affected by the Project?	No. The site is not located in an area of high landscape or scenic value.	No.
16. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?	No. The site is not open to the public at present.	No.
17. Are there any transport routes on or around the location that are susceptible to congestion or which cause environmental problems, which could be affected by the Project?	No. The <i>Traffic and Transport Assessment</i> enclosed confirms that traffic flows generated by the proposed development are significantly reduced compared to the existing situation and therefore traffic will be reduced.	No.
18. Is the Project in a location in which it is likely to be highly visible to many people?	No. The proposal will be visible from the local area but due to its limited height (6 storeys), it will be of limited visibility to the wider area.	No.
19. Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?	No. The archaeological assessment carried out in respect of this development confirm no impacts in this regard.	No.
20. Is the Project located in a previously undeveloped area where there will be loss of greenfield land	No. The site is a part commercial, part vacant, brownfield site.	No.
21. Are there existing land uses within or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space,	Yes. The site adjoins existing residential and educational developments and amenity spaces on its boundaries.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these properties will arise.



community facilities, agriculture, forestry, tourism, mining or quarrying that could be affected by the Project?		
22. Are there any plans for future land uses within or around the location that could be affected by the Project?	No. All existing land uses in the site vicinity are well established comprising residential and commercial uses. Whilst some underutilized sites in the area may be brought forward for development, it is considered that the proposal will not impact the development potential of adjacent sites.	No.
23. Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?	Yes. The site is located within a well-established existing urban area.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise.
24. Are there any areas within or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities that could be affected by the Project?	Yes. The subject site adjoins the St Matthew's National School to the west.	No. The subject development is carefully designed to ensure no adverse impacts on the amenity of this use will arise.
25. Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?	No.	No.
26. Are there any areas within or around the location which are already subject to	No.	No.



<p>pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?</p>		
<p>27. Is the Project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?</p>	<p>No</p>	<p>No</p>