NON-TECHNICAL SUMMARY

Introduction

The Non-Technical Summary sets out the main findings of the Environmental Impact Statement (EIS). The format of this non-technical summary reflects the EIS proper, with each topic discussed in the EIS condensed to outline the main findings as required by the 2001 Regulations.

The EIS is set out in two parts, the project description which outlines the main elements of the proposed development, the planning context, the alternatives examined in deciding on a final design and any problems which were encountered in the preparation of the EIS. The second part assesses the effects on the environment, if any, of the proposal and provides a synopsis of the specialist technical reports and a commentary upon significant direct and indirect effects upon the environment, including where relevant, mitigation measures. These effects are assessed under various headings, each given a separate chapter, namely;

- human beings •
- retail impact assessment
- traffic impact assessment •
- landscape and visual appraisal .
- flora & fauna •
- soils and geology
- vater & servicing of the site including foul drainage, surface water and waste •
- air, climate & dust •
- noise & vibration
- cultural heritage and archaeology

The interactions of these effects are also discussed

Project Description

Proposed Development

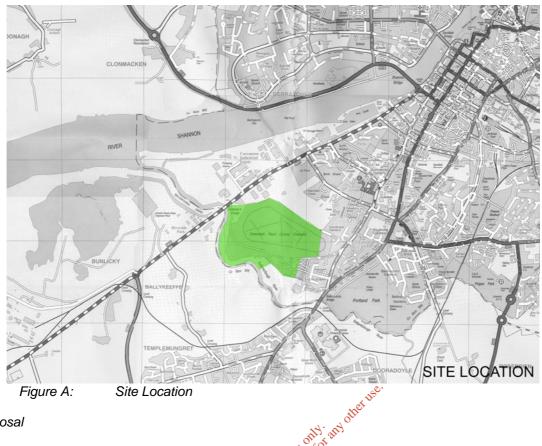
Site Location / Current Use

The proposal consists of the development of the former Greenpark racecourse in the townland of Ballinacurra (Hart), located in the environs of Limerick City. The study area comprises a 48 hectare (approx.) parcel of land which is located between the Dock Road and the South Circular Road to the south west of the city. The location of the site is illustrated on Figure A overleaf.

There is construction currently on site for the installation of infrastructure. Permission was granted to Limerick Race Company PLC (Limerick City Council Planning Reference: P01/130) on 8th July 2002 by An Bord Pleanála for 'the development of lands for infrastructure to include a new roundabout on the N69 (Dock Road), roads, sewers, watermains, other underground services and landscaping (construction of roads and services for the future development of lands)'.

Surrounding Uses

The site is bordered to the east by a number of established and newly constructed residential estates, to the north-west by the N69 Dock road, to the north-east by a number of residences and the Dock Road Industrial Estate, while the Ballynaclogh River runs close to the southern perimeter of the subject lands. The lands to the west and northwest of the site are classified as developed industrial/commercial lands, while those located to the north and east of the site are of a residential nature. To the south of the site, the lands are undeveloped.



Proposal

A Masterplan prepared to guide development is included as part of both planning applications that this EIS accompanies. Two separate planning applications constitute the first two phases of this development; separating the retail elements from the residential elements, however both applications include the recreational amenity area. The inclusion of the amenity areas in both applications is in response to a request by Limerick City Council to incorporate the amenity elements of the overall Masterplan in both applications. For clarify, the components of the entire Masterplan are broken into three areas and each is described in detail below.

Area A - Retail / Commercial Area

The proposed retail development consists of the development of a supermarket with a gross floor area of 4,800sq.m. and two anchor comparison units of 7,000sq.m. each, a further 39no. additional units are also proposed ranging in size from 79sq.m. to 1,295sq.m. amounting to a total of 12,081sq.m. gross floor area for these units. In total there is 30,881sq.m. gross floor area of retail floor space proposed. In addition there is a foodcourt of 3,496sq.m. proposed comprising 8no. individual units ranging in size from 96sq.m. to 275sq.m. The application for the retail component includes 1,862 car parking spaces at basement and surface level; 1691 spaces for customers and 171 spaces for staff.

An application for this development was withdrawn from consideration at Limerick City Council. A chapter relating to the matter of retail impact has been omitted from this revised EIS although an assessment of the impact of this volume of development on traffic does remain in the interests of facilitating the Council's assessment of this development in conjunction with other possible future development volumes.

Area B - Residential Area

In total the lands are capable of providing c. 900 residential units, however the first phase of development provides for 353 units. The residential unit type breakdown is as follows; 70 no. detached houses, 54 no. semi-detached houses, 43 no. terraced houses, 29 no. duplex units, 28 no. apartments below duplex, 17 no. maisonette apartments and 112 no. apartments. In addition as part of phase 1, it is proposed to provide a neighbourhood centre which will include; a retail unit (265sqm gross), café (130sqm gross), doctor / dentist office (140sqm gross) and a crèche facility (540sqm gross). A number

of playgrounds are also provided for in this phase. The application includes parking for approximately 725 car spaces (including basement carparking) for the residential and neighbourhood centre elements to this scheme.

Area C – Amenity

The amenity and recreation lands at Greenpark include a range of passive and active recreation opportunities with approximately 100 ancillary car parking spaces. The formal recreation facilities at Greenpark include four tennis courts, one full size soccer pitch and ten five a side pitches and ancillary changing facilities. A children's playground is also provided. Passive recreation features include open grassed spaces for informal recreation, woodland and riverside walks and viewing/lookout points. The main spatial features of the site are avenue tree planting, woodland planting, feature mounding and the attenuation lagoon. Formal avenue tree planting frames main access routes and provides a clear structure defining different areas of use within the amenity lands. The attenuation lagoon is a focal point on the site. It draws the wetland environment into Greenpark providing opportunities for a more intimate relationship with the water. Some of the spoil from the excavation of the attenuation areas is used to create earth mounds and rolling topography on the site enclosing and sheltering the lagoon.

An estimated 700 persons will be employed in the construction of these phases of the development and a further 400 will be employed in the completed scheme when operational.

Scale of Development / Design Description

Masterplan

The NMA retail masterplan strategy was developed in conjunction with MOLA housing masterplan responding to the planning requirement to look at this important site in its totality and develop the pedestrian linkages to the leisure amenity parkland space. The leisure amenity open space prepared by CSR creates a buffer zone between the public retail use and the private/semi - public housing owner required Pection purpose uses.

Residential

The concept of the Greenpark Housing Development is informed by the notion of creating a place, which refers to its immediate and historical context. This is achieved by making the ordering principle of the layout reflect the alignment of the previous racecourse track at Greenpark Racecourse. A new 'Racecourse Avenue' is suggested, which forms the main access to the various housing clusters and specific functions of public open space, following the alignment of the previous racecourse. Having laid this foundation, which forms the main access routes, were carefully considered routes to the various areas of land providing further access for pedestrians, cyclists and vehicles. It was always clear in the development of access routes through the site that vehicle access may only be achieved from the Dock Road. In order to ascertain cyclist and pedestrian permeability through the site, a variety of north south and east west routes and access points are suggested, anchoring the site and the proposed development within its context. These consider the South Circular Road Access from Log na Capall Phase 1 & 2 and Greenpark Avenue, access from the McInerney Development to the northeast, access from Courtbrack Avenue and adjacent McInerney Developments to the far north and the Dock Road. The layout also suggests future potential access points to Vances' lands to the south.

The housing layout:

Contextually it is clear that the highest density of development should happen along the northern edge and in the centre of the site. A zone of high-density development along the western boundary of the housing development creates a sense of urban enclosure along this new link road. This higher density development will consist of a mix of duplex apartments, maisonette apartments and standard on level apartments with basement carparking. Basement carparking is included to create the opportunity for the high quality of public open space. The underground parking areas have direct access to the apartments above. It is within this central high density development area that we have created the larger areas of public open space. These follow the line of the new 'Racecourse Avenue' and are formed by perimeter buildings in regular rectangular shapes of public open space, yet achieving a variety of specific functions to each area of public open space. This variety of public open space

'squares' face outwards towards the public realm of the 'Racecourese Avenue', which is defined by a pedestrian footpath and a bicycle path. We have also been conscious of maximising direct sunlight into the apartment and duplex units and we have configured and changed the layouts according to its orientation on the site accordingly.

In this high density area of development is the village centre. This is marked with a five storey high apartment tower and suggest functions such as a crèche, a variety of small retail outlet, doctors surgery and dentist and a public square to be served by a coffee shop. This village centre is in the very centre of the high-density development area and has strategically been located at the turn of the proposed 'Racecourse Avenue'. Setback from the street and the proposed apartment buildings has been allowed, in order to ensure privacy, continuity and flow between the various areas of public open space. In designing for privacy the placement and allocation of rooms within the various buildings have been considered. Apart from the 5 storey tower signalling the village centre we have also created 5 storey towers in order articulate a prominent entrance to the housing development, clearly showing the access from the link road to the high density and lower density development areas to the south.

The lower density development area is marked by an alignment of terraced houses along the southern edge of the racecourse avenue. Directly behind the terraces we suggest a street of semi-detached houses and further to the south, the lower density detached house development in cul-de-sac clusters. Each cluster of house type will contain specific areas of public open space, which are linked by pedestrian routes. In this low-density we retained the old parade ring of Greenpark Racecourse as a historical reference and public open space feature.

We have also suggested a variety of different house types ranging from detached, semi-detached and terraced houses and have designed 3 or 4 different types of houses within each of these categories. The design of the pedestrian routes in the lower density area create events within approximately 5 minutes walking distance of each other by specific design consideration in junction treatment and unit layout. The aim is to create an eventful movement route by good place making which will provide what we hope to be a successful connection to existing and surrounding places. We have provided as much choice as possible for pedestrians and cyclists to find their end destination and have suggested a variety of paving and ramped surfaces at junctions (such as junctions tables) in order to control the movement and speed of vehicles through these areas.

General Architectural Comment:

Pyrightor Form We have suggested a reasonably limited hardwearing palette of material choices such as rendered walls, zinc roof and zinc cladding, copper roof and copper cladding, stone wall surfaces, face brick wall surfaces, slate roofs to the lower density houses, timber windows and doors and timber screening around the duplex units staircases. In some of the larger buildings we have attempted to juxtapose the vast horizontal expression by a series of vertical openings. We have been conscious of way the buildings meet the ground by expressing the ground floor treatment on the external façade in a different material than the façade and of plane of façade to the central floors and by clearly expressing the way the building meets the sky by introducing a slight parapet and a different material to the upper floor. We have also been aware of the corner treatment of the buildings by showing a step in the façade and, in most cases, an increase in height at the corners of buildings. Whilst the architecture of the apartment and duplex blocks and similarly the retail areas communicates a contemporary style, we have been slightly more conservative in the approach to the design of the lower density units such as detached, semi detached and terraced houses. We have done this in line with the contextual precedent of this area.

Landscape / Amenity

The main objective of the landscape design is to provide a cohesive and ordered landscape framework in which future development will rest. The landscape will have the overall effect of integrating new built development visually and spatially into the existing open landscape by imposing a new framework of vegetation. A range of landscape spaces and characters will provide an environment that is legible and caters for a broad spectrum of use and experience.

The site is adjacent to the Ballynaclogh River, a rich ecological feature designated as an SAC (Special Area of Conservation). The landscape masterplan aims to build on the ecological value of the Ballynaclogh River by extending native and naturalised planting regimes into the Greenpark site.

The amenity and recreation lands at Greenpark include a range of passive and active recreation opportunities. The formal recreation facilities include four tennis courts, one full size soccer pitch and ten five a side pitches. Passive recreation features include open grassy spaces for informal recreation, woodland and riverside walks and viewing/lookout points. The main spatial features of the site are avenue tree planting, woodland planting, feature mounding and the attenuation lagoon. Formal avenue tree planting frames main access routes and provides a clear structure defining different areas of use within the amenity lands. The attenuation lagoon is a focal point on the site. It draws the wetland environment into Greenpark providing opportunities for a more intimate relationship with the water. Some of the spoil from the excavation of the attenuation areas is used to create earth mounds and rolling topography on the site enclosing and sheltering the lagoon.

The south bank of the lagoon in the amenity area abuts the SAC (Special Area of Conservation) / Ballynaclogh River. It is proposed that this area be natural in character with supplemental planting of approved native species enhancing the ecological value. The planting associated with the attenuation lagoon will also maintain and seek to enhance the ecological diversity on the site. The landscape design has been carefully developed in tandem with an ecologist's advice to ensure that native flora and fauna are not adversely affected by the proposed development but actually prosper from it.

Woodland planting divides the amenity area into smaller more manageable portions whilst acting as windbreaks and acoustic buffers from highway traffic. Woodland will not only create useful microclimates for sporting and passive recreation activities, but also add visual interest and create additional habitat. Insert Masterplan on this page

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Zoning

The site is zoned for General Purposes and Open Space in the Limerick City Development Plan 2004.

Planning History

There have been two previous planning applications on the site. Planning permission was granted in April 2004 for a new roundabout onto the N69 / Dock Road from Greenpark and permission was granted in 8th July 2002 by An Bord Pleanála for infrastructural works.

Planning Policy

The policy documents consulted outline the context for this development and guide the design and principle of development at this site. The documents set out to promote sustainability in developing sites but also to promote Limerick as a growth area through various designations such as 'gateway' in the National Spatial Strategy and 'Hub' in the Mid West Draft Regional Planning Guidelines.

National / Regional Policies

Sustainable Development: A Strategy for Ireland (1997) aims to ensure that the concept of sustainability is prioritised in all economic developments. The National Development Plan 2000-2006 outlines the objectives of the Irish government in reaching a balanced regional development of the country, while concurrently achieving a sustainable growth. One objective is to further develop counter-balances to Dublin. The National Development Plan set the precedent for the National Spatial Strategy. The National Spatial Strategy is a twenty-year framework for balanced social, economic, physical development and population growth between the regions. Limerick - Shannon is designated a 'Gateway', i.e. the Gateway would provide a national-scale-social and economic infrastructure.

The Regional Planning Guidelines for the Mid – West Region were adopted in May 2004. The Mid West Regional Strategy and Regional Planning Guidelines 2004 designate the Limerick / Shannon / Ennis Axis as the region's hub. This axis would be the region's engine of growth acting as a single integrated metropolitan centre. Regional scale social and commercial facilities would be provided to achieve this aim. Another regional document which is applicable to this site is the Limerick Planning, Land Use and Transportation Study; Novever this document is currently being finalised and is SC unavailable for inspection. Consent

Local Policies

The primary goal of the Limerick City Development Board is to 'enhance the lives of all sections of the community through the promotion of balanced and sustainable economic social and cultural development.' The Limerick County Development Board has outlined their vision that Limerick would be an attractive place to live with good services. The current development plan is the Limerick City Development Plan 2004. This Development Plan outlines the specific policies in relation to the roads, retail and settlement structure of the county and zones the site for a mix of general purposes amenities uses.

As the Regional Capital Limerick City and environs must be the focus for choice, competition and innovation and consequently enhancing the retail profile of the City will complement this objective by encouraging new retails and formats that will differentiate Limerick from its competitors. This proposal would be a modern addition to retailing in Limerick and greatly improve the quality and accessibility of retailing in the city and region as a whole.

The residential element is designed to ensure maximum integration and permeability within the housing layout and with the neighbouring lands including the future retail elements. The principal aim of this development is to promote a unique residential development which maximises the opportunities presented by the physical environs of the site and its surroundings. The development is consistent with the stated policies of the City Development Plan on housing development and also accords with national guidance such as the Residential Density Guidelines. In particular the proposal provides for a high quality residential development which will be compatible with the nature of surrounding land uses.

Alternatives Examined

Alternative Locations

The subject site is a strategic undeveloped zoned site in Limerick City's environs. The site is zoned General Purpose and Open Space which allows for a myriad of uses. The fact it is zoned signifies the Planning Authorities intention that the site should be developed. Mixed Use is considered the most appropriate use for the development of this site.

Alternative Design

A number of design alternatives were considered in consultation with the Planning Authority, issues such as servicing, access, parking, bulk and scale were discussed in arriving at the current design.

Alternative Processes

The background studies such as traffic, flora and fauna have been considered in reaching the proposed design, which ensures that any impact on the environment is kept to a minimum while achieving the potential of the site as recognised by its zoning.

Specified Information & Forecasting Methods

In general the compilation of the information necessary for the preparation of the Environment Impact Statement did not present significant difficulties. In certain areas however, such as Traffic, certain assumptions and projections are necessary. Where required, new survey work has been undertaken to complement data that was available from official sources. These statements have been prepared in line with current best practice and the best available information 2114

Effect on the Environment

Human Beings

tion puppose only Possible impacts on human beings are addressed in the chapters relating to noise, traffic, air quality, etc. However, this chapter addresses specifically possible impacts on human beings in terms of COPY population, employment and community

The development is located in the townland of Ballinacurra (Hart), which is located in the District Electoral division of Ballinacurra As which has experienced a population growth of 48.6% between 1996 and 2002. This proposal includes substantial residential development which would be introduced on a phased basis; however applying the average household size in Limerick City to the proposed number of units within the first phase will contain a predicted population of c. 1,000 persons.

The proposal will provide a valuable facility for employment and retail activities. The employment will be provided in two stages, at construction and operation. The development of the latter phases of development will also provide employment. The knock-on effect of developing the site is that surrounding service providers may experience an increase in trade.

The amenity area of the application consists of a substantial area of recreational amenity; consisting of 4 tennis courts, 1 full size soccer pitch, 10 no. 5-a-side soccer pitches, changing facilities, playground, open grassed areas, walks and a landscaped lagoon. These will provide an important amenity area for the proposed residential application as well as the existing population.

Traffic Impact Assessment

This chapter includes an assessment of the traffic element of the masterplan; which is now withdrawn.

The foregoing analysis indicates that, prior to the opening of the Limerick Southern Ring Road Phase 2, the critical traffic signal controlled junctions envisaged on the N69 Dock Road would operate in excess of capacity, without the proposed development in place, during 2008. The expected opening of the Southern Ring Road Phase 2 in circa 2009 would significantly reduce traffic flows on the N69 Dock Road and increase the reserve capacity of these critical traffic signal controlled junctions. With the proposed development in place, these junctions would operate well within practical capacity during 2010, and within, or at, practical capacity in 2020.

With the proposed development in place, the critical approaches to the Dock Road Interchange roundabout would operate in excess of practical capacity. However, the majority of the approaches to the roundabouts would be within practical capacity.

The analysis is based on the manual distribution of the predicted proposed development traffic. The availability of reserve capacity at the traffic signal controlled junctions on the N69 Dock Road, east of the proposed development entrance, would facilitate a redistribution of development generated new trips from the Dock Road Interchange, based on the assigned quickest route for each trip, as appropriate. This would reduce the predicted highest RFC's at the Dock Road Interchange roundabouts.

Landscape and Visual Appraisal

It is inevitable that there will be significant visual impacts associated with any large-scale development of the nature proposed here. The pertinent question is whether the impacts are such that they may be deemed acceptable, in the context of the receiving environment, or can be reduced to an acceptable level of impact through mitigation measures.

A number of factors contribute towards the ability of the site to absorb significant development of this scale with such relatively low incidence of negative visual impact:

- The site is located within an edge of town environment characterised by light industrial and commercial land uses – an environment in which the principle of development is well established.
- The proposed development is in keeping with the characteristics of surrounding land uses.
- The surrounding built environment and landform does much to limit the extent of the visual envelope.
- The retention of existing vegetation and additional strategic planting of screening vegetation as part of the overall developments landscape / amenity open space proposals will do much to ensure the appropriate integration of the proposals with the surrounding environment.

For these reasons it is considered that the development will result in an overall visual impact that is generally acceptable or can be mitigated through landscape planting to an acceptable level in the context of the receiving environment.

Flora & Fauna

The site was surveyed and a detailed account of the flora and fauna encountered was recorded. A small portion of the southern perimeter of the site is located within a designated candidate Special Area of Conservation.

The subject site is not registered for containing any species under the Wildlife (Amendment) Act 2000, the river directly adjacent to it contains species listed under the Flora Protection Order, 1999.

The site is heavily anthropologically influenced through previous horse-racing activities and more recent dumping and soil excavations.

The predicted direct impacts during construction phase are that the raising of ground levels and the relocation of marsh orchid elsewhere within the site will result in a neutral impact to the ditch containing that species, while the proposed wet woodland planting and the habitat provided by the attenuation pond more than compensates for the loss of the drainage ditches within the site. In light of these mitigation measures there will be no resultant significant direct impact associated with the drainage ditches occurring on site.

The low negative local ecological impact to the wet grassland habitat associated with the residential, retail and amenity phases will be somewhat lessened by the proposed habitat creation measures. The availability of open grassed areas in the amenity phase and the freshwater habitat will serve to enhance the existing resting and roosting possibilities for wintering bird species.

The removal of trees outside of the nesting period will negate any direct impact to birds, reducing the loss of the reline and the hedgerow by the power easement to a negative impact low local significance.

The direct impacts to the recolonising bare ground and the earth embankments will remain as of no ecological significance.

The indirect impacts during construction include the control of the construction area will result in negligible impacts to the remaining hedgerow, drainage ditch, treelines and adjacent habitats. Likewise the use of floating silt booms and construction area controls will result in negligible ecological impacts to the cSAC Ballynaclogh River ecosystem. The control of potentially polluting substances during construction will reduce the potential risk to the freshwater habitat to the extent where it will be non significant.

During operational phase the control of potentially polluting substances during operation will reduce the potential risk to the Ballynaclogh River system via the attenuation pond to the extent where it will be non significant. The creation of the pond and wet woodland habitats, and the ecological corridor between the amenity areas and the cSAC will help to enhance the ecological value of the area.

Soils and Geology

Works have commenced on site for infrastructure including access roads and stormwater disposal which were the subject of a previous grant of planning permission. The site slopes from the South Circular Road to Dock Road and is currently partially developed. The soils character for the site is representative of the general area, i.e. alluvium from the tidal estuary.

The predicted impact of the proposal is that stripping of upper solid layer (topsoil) will occur over an extensive area of the site during the construction stage. The stripped area will be covered with commercial units, housing, roads, other paved areas and some landscaping.

Filling of the site and raising of the ground levels will also occur. The FFL of the proposed developments are illustrated on the engineering drawings that were submitted as part of the application package.

Servicing of the Site

Foul Drainage

Limerick City Council has constructed a new foul sewer through the site. It is proposed that all foul sewage from the site will discharge to this sewer via a gravity foul sewer pipe network.

Surface Water

A separate surface water sewer system will be provided for the houses, commercial units, roads and hardstandings. The proposed sewer system will discharge to a lagoon which will form inter-tidal storage wetlands. The lagoon has been designed to accommodate the proposed development and adjoining lands, this lagoon was subject to the infrastructure grant of planning permission and is currently under construction.

Water Supply

The water supply will be from the Limerick City water mains.

Flood Risk

There are extensive embankments on both banks of the River Shannon. The highest flood level recorded in Limerick was 4.16mOD Malin in 1961, with a similar level being recorded at Christmas 1999. The embankments generally at a design level of 5.5mOD Malin.

The minimum design finished floor level is 4.5mOD which takes account of the unlikely co-incidence of weather and river flows which give rise to the threat of flooding for residential properties.

Waste / Construction

Waste materials on site will follow the reduce - reuse - recycle strategy. Machinery with a low inherent potential for the generation of noise or vibration will be used during construction. The timing of site activities likely to create high levels of noise or vibration will be limited to minimise the impact potential.

A dust minimisation plan has been formulated and a number of measures will be introduced during construction to minimise the impacts on the watercourses in the vicinity of the development.

Cultural Heritage and Archaeology

The site was visited by three qualified archaeologists on several occasions and recorded in the proper fashion. A comprehensive desk-top study was undertaken which consulted all available material relating to the area. The assessment and subsequent statement has fulfilled the criteria as set out by the client.

It is suggested that any proposals for the development of the site and buildings take into consideration the areas of archaeological and architectural merit. Several mitigations measures have been suggested, which will alleviate the negative impacts on the cultural heritage. It is the remit of the NMS formerly Dúchas, however, to legally recommend any one or a combination of these mitigation measures and perhaps to make recommendations that have not been suggested here. ction put

red

Air, Climate and Dust

owner This chapter includes an assessment of the traffic element of the masterplan; which is now withdrawn.

The potential impact on the air quality is assessed using dispersion modelling and impact assessment, using the traffic data. Three receptors were modelled in the region of the development; on Courtbrack Avenue, on the Dock Road and adjacent to the proposed site road within the development which is part of the adjacent residential development.

The impact of the development in terms of PM10, CO and Benzene; NO2 and PM2.5 is imperceptible.

Greenhouse gas emissions, as a result of this development, will be imperciable in terms of Ireland's obligations under the Kyoto Protocol.

This EIS includes a Dust Minimisation Plan, which when implemented will ensure that the effect of construction on air quality will be slight.

Noise and Vibration

This chapter includes an assessment of the traffic element of the masterplan; which is now withdrawn.

An environmental noise survey was conducted in order to quantify the existing noise environment. Three survey locations were chosen; within Greenpark Close residential estate, within an existing residential estate to the east of the proposed site and within an existing residential site to the east of the proposed development site and at the entrance to the site from the Dock Road.

The impacts of the potential sources of noise of the retail element of the scheme are found to be not significant. However, a number of mitigation measures are outlined to minimise any potential impacts, where required.

The impacts of the potential sources of noise of the residential element of the scheme are found to be not significant. However, a number of mitigation measures are outlined to minimise any potential impacts, where required.

Interaction of the Foregoing

Each of the above was considered in detail, having regard to both the environment as it currently exists before the development, the likely impacts that a development of this kind would have and the means of reducing the impacts of the development when it is in operation.

Conserved conviction purposes only: any other use.