

JULY 2021

EIA SCREENING IN RESPECT OF PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD) AT FRANKFORT CASTLE, DUNDRUM, DUBLIN 14

1.0 INTRODUCTION

This EIA Screening Assessment has been prepared to aid An Bord Pleanála's determination in respect of the necessity or otherwise for an Environmental Impact Assessment ("EIA") to be carried out and an Environmental Impact Assessment Report ("EIAR") to be prepared in respect of the proposed Strategic Housing Development (SHD) for 115 no. units at Frankfort Castle, Dundrum, Dublin 14.

1.1 Development Introduction

The proposal is located on a c.0.9ha site and will consist of 115 no. residential units comprising 45 no. one bed units and 75 no. two bed units. The proposed units will be accommodated in 4 no. blocks (A-D) ranging in height from 2 to 5 storeys. A childcare facility (80sqm) is also proposed at ground floor level within Block A.

Additional works proposed include the provision of car and cycle parking at surface and basement level, hard and soft landscaping, surface water drainage infrastructure and attenuation tanks, and all associated site development and infrastructure works.

2.0 CONTEXT OF THIS EIA SCREENING

2.1 Overview of EIA Requirements

EIA requirements are governed by Directive 2014/52/EU, amending the previous EIA Directive 2011/92/EU. The primary objective of the EIA Directive is to ensure that projects that are likely to have significant effects on the environment are subjected to an assessment of their likely impacts.

Various types of projects and associated thresholds are defined in the Directive to classify whether a project is or is not likely to have a significant effect. These are set out as Annex I and Annex II. Annex I projects require mandatory EIA. Annex II projects require EIA if significant effects are likely. The latter is established in two ways:

- Classes of project and associated thresholds whereby 'significant effects' are triggered
- Sub-threshold projects that are likely to have "significant effects on the environment" – Annex III sets out criteria whereby significance of effects is assessed.



Member States are given a certain amount of discretion in respect of establishing thresholds / criteria by which Annex II projects will be required to undergo EIA.

It is noted, however, per Article 2(a)(1) of the 2014 EIA Directive, that projects should be subject to EIA if, arising from their nature, size, or location, they are likely to have significant effects on the environment.

Article 1(2) of the Directive defines "project" as:

"the execution of construction works or of other installations or schemes, other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources".

Annex II projects are transposed into the Irish Planning Code by Schedule 5 Part 2 and Schedule 7 of the *Planning and Development Regulations 2001* (as amended). Directive 2014/52/EU was transposed into The *European Union (Planning and Development)* (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) on 1st September 2018.

2.2 **2014 Directive**

The 2014 Directive has redefined EIA as a process, whereby an Environmental Impact Assessment Report is a key informing element (this replaces the previous Environmental Impact Statement – EIS). Among the key changes introduced by the 2014 Directive are the following:

- Additional environmental factors to be considered (e.g. population and human health)
- More stringent screening procedures (e.g. Annex III)
- Maximum timeframes set for responses to scoping requests
- Environmental Impact Statement (EIS) replaced by Environmental Impact Assessment Report (EIAR)
- EIAR must be prepared by competent experts

As noted above, the transposition of the EIA Directive into Irish Planning Codes has been completed and *The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018* (S.I. No. 296 of 2018) transposes the requirements of the 2014 EIA Directive into existing planning consent procedures.



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 115 no. residential units which is significantly 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

The subject proposal comprises urban development within 'other parts of a built-up area' which provides a threshold of 10 hectares in order to trigger a mandatory EIA. The subject site is c. 0.9 ha. which is below the 10 hectare threshold and also below the 2 hectare threshold for a business district, 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)	Construction of more than 500 dwellings	Proposal involves construction of 115 no. dwellings	NO
Part 2 Class 10(b)(iv)	Urban development on area greater than 10 ha in built-up area	Site area is c.0.9 ha.	NO
Part 2 Class 15	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	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;	The subject proposal comprises a proposed residential development located on a brownfield site and will comprise 115 no. residential units arranged in 4 no. Blocks ranging in height from two to five storeys comprising 45 no. one bed units and 70 no. two bed units. Car and cycle parking is provided at surface and basement level. Vehicular access to the site will be from Old Frankfort The site area is c. 0.9 ha. The size and design of the project is not likely to cause significant effects on the environment.
(b) cumulation with other existing and/or approved projects;	The proposed development is located within an established residential area. The assessments undertaken as part of this project have been informed by the site's surrounding context. There are no recent significant permissions for large residential developments within close proximity to the site. Accordingly, there is no real likelihood of significant effects on the environmental arising from cumulation with other existing and/or approved projects."



(c) the use of natural resources, in particular land, soil, water and biodiversity;

The site comprises existing residential lands with large opens space areas. The proposed development will require the removal of some soil from the site to facilitate basement construction, however quantities required for removal are not considered to result in any significant adverse impact.

There will be some removal of trees and vegetation which will be appropriately compensated by the additional tree planting to take place as part of the overall landscaping plan for the development.

A comprehensive landscaping plan has been prepared by Dermot Foley Landscape Architects and provides for a range of new planting and open spaces which will provide the opportunity to support new habitats on the site.

No significant effects arising from the use of land, soil or water are anticipated.

(d) the production of waste;

A Construction & Demolition Waste Management Plan has been prepared by AWN Consultants. That document confirms that construction waste will be disposed of using licensed waste disposal facilities and contractors.

An Operational Waste Management Plan has been prepared by AWN also. During operation, household and commercial waste will be disposed of by licensed waste disposal contractors.

Stormwater Drainage

The development will incorporate the principles of Sustainable Urban Drainage Systems (SuDs). The development is to retain storm water volumes predicted to be experienced during extreme rainfall events by use of a proposed attenuation system.

Green roof technology, permeable paving, tree pits and waterbutts will all be used to serve both attenuation zones of the development. The restricted flows from the attenuation system will then discharge to the existing stormwater network.

Foul Water Strategy

All foul effluent generated from the proposed development from the upper floors of all proposed block apartments and redeveloped Frankfort Castle shall be collected in separate foul pipes and flow under gravity, to the proposed plant room on the ground floor level. From this plant room a foul pump



sump shall be pumped to a stand-off manhole outside of the proposed development boundary before connection via gravity into the existing 225mm diameter uPVC foul sewer on Frankfort Court.

For the basement level, all foul effluent shall be collected in pipe of 150mm in diameter flowing under gravity to a pump station located in the basement to a stand-off manhole at ground level.

Although the proposed building will generate a larger volume of effluent than the existing, the proposed building will incorporate a storm water attenuation system (as referenced above) which will restrict the volume of stormwater entering the public drainage network during periods of extreme rainfall. The overall result will be that while the foul component of the effluent from the new building will be greater than the existing the percentage of storm water will be greatly reduced giving an overall net benefit in terms of reducing the hydraulic pressure placed on the Local Authorities public system.

The production of waste is not likely to cause significant effects on the environment.

(e) pollution and nuisances;

Best practice methods will be utilised during construction to mitigate potential impacts from pollution on the local environment during construction.

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 *Outline Construction and Environmental Management Plan* which accompanies the planning application.

Significant effects are unlikely to arise.

(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; 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 Flood Risk Assessment (FRA) has been prepared by CS Consulting Group and accompanies this planning application. The FRA demonstrates that the site is located within Flood Zone C which are lands which have a 'Low Probability of Flooding'. The overall flood risk is considered low.



	The proposed development has been designed to account for the potential impact of climate change. Proposed surface water design allows for a 10% increase in rainfall intensities. Significant effects are not anticipated.
(g) the risks to human health (for example due to water contamination or air pollution).	Foul water will discharge to the existing public sewer. Surface water will discharge to the existing surface water sewer network and attenuation tank. No impact on air quality is envisaged due to the nature and scale of the project.

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 'Objective A – To protect and / or improve residential amenity'. Residential development is thus 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 site currently accommodates a large garden associated with the existing residential units on the site. The proposal will require the removal of vegetation and material to facilitate block and basement construction, however significant effects are not envisaged.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	
(i) wetlands, riparian areas, river mouths;	Restricted flows of surface water will drain by gravity to the existing surface water network or directly into the proposed attenuation system on site.
(ii) coastal zones and the marine	
environment;	There are no hydrological connections to Natura 2000 sites. There is no pathway for loss or disturbance of important habitats or important species associated with the features of interest of Natura 2000 sites.



(iii) mountain and forest areas;

The proposed development site is not within or directly connected to any mountain or forest areas.

(iv) nature reserves and parks;

The proposed development is not within or directly connected to any nature reserves or parks.

(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;

The site is not located within such an area.

(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;

The site is not located within such an area.

(vii) densely populated areas;

The site is located within a dense residential area. Procedures, as outlined in the enclosed CEMP, 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.

(viii) landscapes and sites of historical, cultural or archaeological significance.

The site is located within an urban, primarily residential area with no specific landscape designations.

A Conservation Report and Heritage Impact Assessment has been prepared in respect of the proposed development by Mesh Architecture.

The current proposals for development have been carefully considered to provide an excellent balance between retaining and repairing all of the property's architectural elements, while making necessary modifications that will allow the house to be retained as part of a development of new apartments.





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 an existing residential site in an established residential area. During the construction phase, the proposal will have a moderate impact in terms of noise, vibration and traffic on the local population. Measures outlined within the enclosed CEMP will ensure that these impacts are further minimised. The existing site comprises large open space areas. An Ecological Impact Assessment (ECIA) has been carried out by Openfield Ecology and confirms that no significant negative effects to biodiversity are predicted arising from the proposed development.
(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 retained at operational stage as a result of retained hedgerows and tress and as a result of proposed landscaping enhancements 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 minimise negative impacts whilst delivering a significant number of residential units on residentially zoned lands.



Questions to be considered per Annex III of	Yes / No / ? .	Is this likely to result in a significant effect? Yes/No/? – Why?
Directive 2014/52/EU	Briefly describe	
1. Will construction, operation or	Yes	No
decommissioning of the Project involve	It will involve the construction of	The construction phase of the project will have some temporary impacts in the immediate
actions, which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc)?	115 no. apartments on an underutilized residential site site.	locality, and there will be long term impacts in terms of land use and visual impact / physical changes in the locality following completion of construction.
		It is considered that the operation of a Construction Management Plan will limit any short term construction impacts. Long term land use and visual impacts are considered to be positive in nature due to the urban character of the local context, the commitment to retain hedgerow boundaries and trees throughout the site and the delivery of a significant number of units on a residentially zoned site.
2. Will construction or operation of the	Yes	No
Project use natural resources such as land,	The proposed development will use	The construction materials will have to be imported. While some of these materials are non-
water, materials or energy, especially any	land and construction materials.	renewable, they are not in short supply. No significant effects on the environment are
resources which are nonrenewable or in short		anticipated.
supply?		
3. Will the Project involve use, storage, transport, handling or production of substances or materials, which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	Yes Some materials used in construction, e.g. concrete, stone, bituminous pavement, etc. could be harmful if released into the environment.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage hazardous materials.
4. Will the Project produce solid wastes during	Yes	No
construction or operation or decommissioning?	Waste will be generated during the construction and operational phases.	The construction process will result in some generation of waste which will be disposed of in accordance with the provisions of the <i>Construction & Demolition Waste Management Plan</i> , prepared by AWN Consulting. It is not anticipated that there will be any significant effects on the environment. Operational phase waste will be domestic in nature. Waste will be disposed of by a licensed waste contractor.



5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air?	Yes Release of air pollutants as a result of construction and vehicular construction traffic.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage the release of pollutants, particularly dust management practices.
6. Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	Yes Noise and vibration will be generated during construction phases.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage noise and vibration during the construction phases. Transport of construction materials will be necessary but will be subject to normal conditions and working hours to protect existing residential amenity.
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 wasters or the sea?	Yes During the construction stage there is potential for polluting matter to enter onto land, water and ground water.	No During construction, standard preventative measures to avoid any impacts on the local ground and/or surface and ground water environment.
8. Will there be any risk of accidents during construction or operation of the Project, which could affect human health or the environment?	Yes During the construction stage there is a potential for accidents that could affect human health or the environment.	No Standard preventative measures are provided as part of the project, which will be carried out in accordance with best practice; and specific controls will be put in place to manage risks.
9. Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	Yes It will involve the construction of 115 no. residential units.	No There will be an increase in population within the area. However, given the existing built-up residential character of the area, it is considered that the proposal is consistent with existing land uses and will not result in significant impacts.



10. Are there any other factors, which should be considered such as consequential development, which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?	No	No There are no significant developments permitted within close proximity to the site. The subject development has been assessed with regard to potential environmental impacts and no significant impacts are likely.
11. Are there any areas on or around the location, which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	No	No
12. Are there any other areas on or around the location, which are important or sensitive for reasons of their ecology, e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?	No	No
13. Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	No	No
14. Are there any inland, coastal, marine or underground waters on or around the location, which could be affected by the project?	No	No
15. Are there any areas or features of high landscape or scenic value on or around the location, which could be affected by the project?	No	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	No The proposed development will enhance permeability locally by providing pedestrian routes through the site.
17. Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes The site is located adjacent to R117. The green line Luas adjoins the western boundary of the site.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage congestion arising from the construction phase. Transport of construction materials will be necessary but will be subject to agreed working hours. A Traffic and Transport Assessment has been carried out by CS Consulting in respect of the proposal and no significant impact is envisaged.
18. Is the project in a location where it is likely to be highly visible to many people?	Yes The construction works will be partially visible to people using Old Frankfort, Frankfort Court and from the green line Luas.	No The visual impact of the construction phase will be temporary and therefore not significant. The proposed design and scale of the development is similar to existing and permitted residential schemes in the wider area and county and therefore is not likely to have a significant environmental impact. The site is not considered to be highly visible in the context of the wider area as it is well screened by existing vegetation.
19. Are there any areas or features of historic or cultural importance on or around the location, which could be affected by the project?	No	No The existing 'Frankfort Castle' is not listed as a protected structure. Notwithstanding that, this structure will be retained and repurposed to accommodate 4 no. units. The retention of this structure will contribute to the distinctiveness of the proposed scheme and reflect the historic use and layout of the site. A conservation report and heritage impact assessment in this regard, prepared by Mesh Architecture, is enclosed within this submission.
20. Is the project located in a previously undeveloped area where there will be loss of greenfield land?	No The site accommodates existing residential uses.	No The site comprises existing residential uses. Notwithstanding that, the present site does also comprise large open space areas. The proposed development ensures that impacts to these areas are minimised. Trees are retained where possible, large areas of open space are proposed and a landscape design plan has been prepared by DFLA which strengthens the green credentials of the site. The enclosed ECIA concludes that the proposed development will not result in significant negative impacts on biodiversity.



21. Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	Yes The site is located in an existing built-up area with predominantly residential land uses.	No There will be temporary impacts to the surrounding area during the construction stage, particularly in terms of visual impact; access; noise and dust. Best practice construction practice and management will ensure no such impacts are significant. Given the existing residential nature of the surrounding area, it is considered that the operational phase will not result in significant impacts.
22. Are there any plans for future land uses on or around the location, which could be affected by the project?	No The project comprises the development of urban land which has been identified as suitable for residential development. The wider area is established in nature and there are no plans for significant development proximate to the site.	No The proposed development will not impact the future development potential of adjacent sites.
23. Are there any areas on or around the location, which are densely populated or built-up, which could be affected by the project?	Yes	No See Item 21 above
24. Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project?	No	No
25. Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	No	No

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TOWN PLANNING CONSULTANTS



26. Are there any areas on or around the	No	No
location, which are already subject to		
pollution or environmental damage e.g. where		
existing legal environmental standards are		
exceeded, which could be affected by the		
project?		
27. Is the project location susceptible to	No	No
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?		



Arising from the above, it is considered that the proposal is not likely to have a significant impact during construction or operational stages.

In summary, it is considered that a mandatory EIA would not be required and that a subthreshold EIA is not triggered as appropriate measures are in place to avoid, reduce or mitigate any likely impacts such that it is not likely to be a significant impact on the environment.

4.0 Conclusion

The subject project does not require mandatory EIA under Annex I. Having regard to Annex II (where EIA may be required) and Annex III (sub-threshold EIA) the subject screening has found the following:

Annex II (PDR as amended, Schedule 5 Part 2)

TYPE / CLASS	SUMMARY	COMMENT	EIA REQUIRED?
Part 2 Class 10(b)(i)	Construction of more than 500 dwellings	Proposal involves construction of 115 no. dwellings	NO
Part 2 Class 10(b)(iv)	Urban development on area greater than 10 ha in built-up area	Site area is c.0.9 ha.	NO
Part 2 Class 15	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	Proposal is not likely to have significant impacts	NO

Therefore, based on general terms (and having regard to the broad scope and purpose of the EIA Directive), it is our opinion that by virtue of its nature, size, and location, the subject project would not be likely to have significant impacts on the environment and thus EIA is not required.