

Delegated Decision Report

Application No:	26/0175	Statutory Period Expires:	22nd May 2026
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Site:	<i>Land To Rear Of 31 - 33 Church Road Newport South Wales</i>		
Proposal:	<i>PARTIAL DEMOLITION/PART CONVERSION OF VACANT BAKERY TO RESIDENTIAL DWELLING TOGETHER WITH ALTERATION WORKS</i>		
Applicant:	<i>C Edwards</i>		
Type:	Full	Ward:	St Julians
Decision:	REFUSED		

1. BACKGROUND

1.1 None.

2. SITE LOCATION AND CONTEXT

2.1 The site is located within the urban boundary and is occupied by a former bakery situated at the rear of 31 to 33 Church Road with pedestrian access from Dean Street. The commercial unit fronting Church Road is currently vacant. The site is largely built out and is surrounded in all directions by neighbouring residential and commercial development. The site does not benefit from any off-street parking.

3. DESCRIPTION OF DEVELOPMENT

3.1 It is proposed to partially demolish the building in order to provide an outside amenity area. The remainder would be converted to residential accommodation. The building being retained would have a footprint of approximately 7.9m x 8.8m. The pitched roof currently over the unit is to be retained. The internal layout shows a kitchen/living area, two bedrooms and a bathroom. The kitchen/living area would be served by three rooflights and two windows in the northern elevation which would be orientated towards the side amenity area and side elevation of no.48 Dean Street. A further window is shown in the southern elevation with a small, shared yard directly adjacent to it. Access to the building would also be gained from a door in this elevation. The bedrooms and bathroom would be served by windows in the eastern elevation orientated towards the amenity area and side boundary of no.34 Duckpool Road.

3.2 The amenity area would wrap around the north and north-east of the building having an area of approximately 50m². The covered walkway leading to Dean Street would be retained. 2no cycle stands and bin storage are shown within the outside amenity area.

4. RELEVANT SITE HISTORY

None.

5. PLANNING POLICY

5.1 THE NATIONAL DEVELOPMENT FRAMEWORK: FUTURE WALES - THE NATIONAL PLAN 2040

Future Wales sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs. Future Wales concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

Policy 1 - Where Wales Will Grow

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking

Policy 9 - Resilient Ecological Networks and Green Infrastructure

5.2 PLANNING POLICY WALES (EDITION 12) 2024

3.3 - Good design is fundamental to creating sustainable places where people want to live,

work and socialise.

3.4 - Meeting the objectives of good design should be the aim of all those involved in the development process and should be applied to all development proposals at all scales.

5.3 NEWPORT LOCAL DEVELOPMENT PLAN (2011-2026)

Policy SP1 Sustainability favours proposals which make a positive contribution to sustainable development.

Policy SP3 Flood Risk ensures development is directed away from flood risk areas.

Policy SP9 Conservation of the Natural, Historic and Built Environment protects habitats and species as well as Newport's listed buildings, conservation areas, historic parks and gardens, scheduled ancient monuments, archaeologically sensitive areas and landscape designated as being of outstanding historic interest.

Policy GP1 General Development Principles – Climate Change states that development should be designed to withstand predicted climate change and reduce the risks and consequences of flooding, minimise energy requirements, reuse/recycle construction material and meet the relevant BREEAM or Code for Sustainable Homes Level.

Policy GP2 General Development Principles – General Amenity states that development will not be permitted where it has a significant adverse effect on local amenity in terms of noise, disturbance, overbearing, light, odours and air quality. Development will not be permitted which is detrimental to the visual amenity. Proposals should seek to design out crime and anti-social behaviour, promote inclusion and provide adequate amenity for future occupiers.

Policy GP4 General Development Principles – Highways and Accessibility states that development should provide appropriate access for pedestrians, cyclists and public transport along with appropriate car parking and cycle storage. Development should not be detrimental to the highway, highway capacity or pedestrian safety and should be designed to enhance sustainable forms of transport and accessibility.

Policy GP7 General Development Principles – Environmental Protection and Public Health states that development will not be permitted which would cause or result in unacceptable harm to health.

Policy H2 Housing Standards promotes high quality design taking into consideration the whole life of the dwelling.

Policy H4 Affordable Housing sets out the affordable housing targets for the four submarket areas within Newport. For new housing sites of fewer than 10 dwellings within the settlement boundary, and fewer than 3 dwellings within the village boundaries, a commuted sum will be sought.

Policy T4 Parking states that development will be expected to provide appropriate levels of parking.

Policy W3 Provision for Waste Management Facilities in Development states that where appropriate, facilities for waste management will be sought on all new development.

5.4 Supplementary Planning Guidance

Parking

Flat Conversions

Wildlife and Development

Planning Obligations

Waste Storage and Collection

6. CONSULTATION RESPONSES

6.1 Natural Resources Wales: **We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.**

Flood Risk

The planning application proposes highly vulnerable development (residential development) The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and TAN15 Defended Zone.

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

Therefore, we have reviewed the FCA undertaken by Enviro Planning, dated December 2025. Our advice to you is that the FCA is incomplete. The advice in paragraph 10.24 of TAN15 is clear 'In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.'

Therefore, in accordance with paragraph 15.4, we advise you to use your powers to request the following information identified:

Up to date climate change figures

The FCA states that the lifetime of development considered is 75 years however, for highly vulnerable development 100 years should be applied as per section 10.28 of TAN15. Therefore, a climate change allowance up to 2126 should be provided

Sources of flood risk

We advise that the River Usk tidal model for Newport should also be used to inform the FCA. Currently the only model used is the coastal Caldicot and Wentlooge model, which does not provide data in close proximity to the site. All sources of flooding should be assessed in an updated FCA.

Ground floor residential

The proposed floorplans show that there will be a bedroom located on the ground floor level. We refer you to paragraph 10.23 of TAN15 which states 'Any redevelopment proposal must be consistent with the acceptability considerations in section 11. In addition, proposals which include residential development must ensure that such uses do not occur at ground floor level'.

Should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we are likely to **object** to the application.

6.2 Local Highways Authority:

Highway recommendation:

No objection subject to conditions.

Highway Comments:

The proposals appear to change an existing bakery to a two-bedroom residential unit.

Cycle parking is proposed but is in a space shared with bins which is not appropriate. Segregation could be addressed by way of condition.

No parking is proposed or existing. The demand for both uses would be similar in terms of SPD requirements. This does not therefore raise any objections.

The footway across the frontage has a crossing (dropped kerbs) which is not appropriate and should be made good. This should be addressed by way of condition.

In summary, there are no highway related objections, subject to conditions.

6.3 Landscape officer: I have no objection however it is unclear what is currently under the roofline and what will be opened up to the sky, and where roofs will be removed (over the walkway and store?) will this impact on what are presumably shared boundaries.

Given the nature of the site and small scale of the proposal I don't think there is scope for planting to meet LDP GP5 vi for an appropriate landscape scheme. The provision of outside amenity space is welcome, however it is difficult to assess the quality. Photos of the site would be helpful.

6.4 SAB Drainage: Having reviewed the submitted information, a SAB application may not be required but if there are any external works exceeding 100square metres then we would encourage the applicant to visit the website for further information, or contact the SAB team

6.5 Ecology officer: I have considered this application in relation to section 7.0, Figure 4 - '*Checklist for protected/priority Species Surveys*' set out in the Wildlife and Development SPG, which sets out the criteria we use for deciding when a bat survey is needed. The nature and location of these buildings and the works proposed to them do not suggest that there is a reasonable likelihood of an impact upon roosting bats, so I would not ask for a bat survey on this occasion. Specifically, the buildings are not close to any suitable foraging habitat, and the dense, urban environment is likely to lead to too much light disturbance for bats. However we can never totally rule out the possibility of bat presence, so we should attach an advisory note alerting the applicant to the fact that there is a low risk that bats may be present and advising them of what to do if bats are found during works. There is very little impact on green infrastructure, or scope for its enhancement, so in this respect the GI Statement is adequate.

6.6 Waste Manager: No response.

6.7 Dwr Cymru – Welsh Water: We can confirm capacity exists within the public sewerage network in order to receive the domestic foul only flows from the proposed development site. We recommend that the existing private drainage on site should be utilised to avoid any new direct connection to the public sewerage system. Notwithstanding this, we would request that if you are minded to grant Planning Consent for the above development that the **Conditions and Advisory Notes** listed below are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets.

Condition No surface water from any increase in the roof area of the building /or impermeable surfaces within its curtilage shall be allowed to drain directly or indirectly to the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

6.8 Environmental Health: No response.

7. PUBLIC REPRESENTATIONS

Neighbour notification letters were sent on 25/03/2026.

7.1 NEIGHBOURS: No responses have been received.

8. ASSESSMENT

8.1 Principle of Development:

Located within the urban boundary there is a presumption in favour of development in principle. However, the site is constrained, surrounded by existing development with no off-street parking provision. Potential impact to neighbouring occupiers and parking are key considerations, as well as the standard of amenity that would be afforded to the future occupiers of the accommodation. Given the site's location within flood zone 3 defended, this will also be a key consideration of any formal application.

8.2 Visual Amenity/ Character and Appearance;

The area has a mixed residential/commercial character, and the proposed residential use is considered to be acceptable in terms of the character of the area.

8.3 When considering visual impact, given that the site is surrounded by existing development and therefore the building's visibility is limited, the proposals are not considered to result in an adverse impact on visual amenity. The partial demolition, alterations to the building and creation of amenity area would be visible from neighbouring gardens but likewise is not considered to result in any harm.

8.4 Residential Amenity:

As previously noted, the site is surrounded by existing development, some of which is in residential use. Given that the proposals are for conversion of the existing single storey building, albeit with some elements being demolished, the proposals are not considered to result in an adverse impact in terms of neighbouring amenity.

- 8.5 In terms of the standard of amenity for the future occupiers of the accommodation, the Council's Flat Conversions Supplementary Planning Guidance (SPG) states that 'a converted flat should offer its occupants reasonable levels of natural light, perceived space, privacy, ventilation, peace and quiet, noise attenuation, outdoor amenity space, parking, cycle storage and bin/recycling storage.' The SPG states that a flat conversion should meet the relevant desired standard for gross internal floor space. For a 2no bedroom converted flat, the SPG states that the floor space should be 58sqm. The proposed flat has an approximate internal floor space of 63sqm and is therefore sufficient in this regard. All rooms would be served by windows having limited outlook given the constrained nature of the site and proximity of the building to neighbouring boundaries which are relatively high. The unit will be "hemmed in" with a close juxtaposition to a commercial unit where the kitchen will have a large window very close to openings in the rear of the commercial unit and looking over a yard accessible to the commercial unit. Whether or not the property would amount to a small starter home, the outlook from the proposed ground floor living spaces would be poor, with inferior and enclosed living conditions for the future occupiers. In the absence of any substantive evidence to the contrary, for example a daylight and sunlight assessment, it is not certain that the amount of daylight and sunlight received by the ground floor windows due to their position and orientation, would be sufficient to prevent gloomy living conditions for the main living spaces. Direct sunlight is likely to be particularly limited, especially in winter months when the sun is lower in the sky, given the proximity of neighbouring development. The outside amenity space would have an area of approximately 50m² which is sufficient to serve the two-bed unit and would accommodate cycle and refuse storage, as well as providing space for drying of clothes, sitting out in etc. However, it is poor quality with an irregular shape and limitations on usability in practice and will offer future residential occupiers a closed, hard surfaced yard with no opportunities for greening and dominated by the high walls and buildings of neighbouring residential and commercial developments. The limited dimensions and narrow shape would in this instance restrict the overall practicality and value of the outdoor space to the future occupiers. The whole space and building would be accessed from a covered alleyway, and the outdoor yard would not provide a meaningful or pleasant space for typical domestic activities such as sitting out and gardening. Hemmed in by neighbouring buildings and high boundary fences/structures it would be unlikely to receive much direct sunlight. Users of the proposed amenity space would therefore experience an oppressively enclosed environment. The proposed outdoor amenity space would be very poor in quality and useability which would be harmful to the living conditions of the future occupiers. The residential dwellings surrounding the site are of a traditional terrace nature with direct frontage onto the street and small enclosed rear gardens and the amenity space serving the proposed unit is of a similar size to neighbouring properties but this does not mitigate objections and the amenity of the proposed unit will be poor for the above reasons (and other reasons discussed below) and is unacceptable.
- 8.6 As previously noted, a window is shown in the southern elevation of the building with a shared yard directly adjacent to it. There is no information regarding the treatment of this window which is unhelpful and there are concerns with regard to the potential impact on the amenity of the occupiers of the accommodation having regard to this relationship and proximity to a yard presumably shared with the neighbouring commercial use. Notwithstanding, if planning permission were forthcoming it may be possible to address this matter by means such as obscure glazing, albeit this does not address noise concerns which are discussed further below.
- 8.7 The proposals include the partial conversion of a former bakery to a residential unit with the remainder of the building being retained for commercial use. The previous bakery use operated very early mornings for baking and the unit has no operating hours restriction. Given the location of the unit within close proximity to commercial units there is potential for the future occupiers to be impacted by noise. Indeed, the plans show a shared courtyard directly adjacent to the southern elevation of the kitchen and in very close proximity to

window and door openings in the rear of the former bakery unit. The application is not accompanied by any information in this regard and in the absence of such information it is not possible to establish whether any noise mitigation measures are required or would feasibly address potential noise impacts or that the proposed unit would provide a suitable standard of accommodation for future occupiers in this regard.

8.8 Air Quality

The site is located within an air quality management buffer. The Council's Air Quality SPG requires proposals to have regard to this and to undertake a simple air quality assessment which will help inform whether any mitigation is required. In this instance the site has a fallback commercial use and having regard to this and the scale of the proposal for a two bed residential unit, on balance it is not considered that the proposals would result in a worsening of air quality.

8.9 Movement:

As previously noted, the site does not benefit from any off street parking. The proposed two bedroom unit results in a parking demand of two spaces when assessed against the Council's Parking SPG. As noted by the Council's Highways officer, the parking demand for the former use and proposed use are similar and therefore no objection is raised. As such the proposals are considered to be acceptable in terms of parking.

8.10 Flooding:

The site is located within Flood Zone 3 (Sea) and TAN15 Defended Zone. The planning application proposes highly vulnerable development (residential development). The application is accompanied by an FCA which NRW have reviewed. They advise that the FCA is incomplete as it does not include up to date climate change figures as is based on a lifetime of development of 75 years, but should be 100 years for highly vulnerable development. NRW also raise concerns with regard to data and modelling used. The advice in paragraph 10.24 of TAN15 is clear 'In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.'

8.11 Notwithstanding, NRW note that the proposed floorplans show that there will be bedrooms located on the ground floor level. They refer to paragraph 10.23 of TAN15 which states 'Any redevelopment proposal must be consistent with the acceptability considerations in section 11. In addition, proposals which include residential development must ensure that such uses do not occur at ground floor level'.

8.12 NRW advise that if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then they object to the application.

8.13 In this instance, given the nature of the proposal which is for self-contained accommodation at ground floor level only, the proposals are contrary to national planning policy and an updated FCA has not been sought as it would not change the nature of the accommodation. The proposal fails to comply with the aims of TAN15 and Policy SP3 of the NLDP 2011-2026 (adopted January 2015) and Planning Policy Wales 12.

8.14 Biodiversity:

The application is accompanied by a Green Infrastructure statement which explains that given the urban nature of the site there is limited opportunity for green infrastructure. In terms of biodiversity enhancement, the applicant proposes to install a bird box at the property and introduce planting within the amenity area. Such enhancement is considered to be proportionate to the proposals if planning permission were forthcoming and would satisfy biodiversity enhancement requirements. The Council's Ecology officer confirms the building has low potential to house bats and no objections are offered on that basis.

8.15 **Waste:**

The plans show that there would be sufficient space for refuse storage within the site within the outside amenity area. The Council's Highways officer has objected to them being in a shared space with cycle storage but given the size of the outside amenity area, segregation would not be an issue.

8.16 **Section 106 Planning Obligation matters**

In 2010 the Community Infrastructure Levy Regulations (2010) came into effect. Reg 122 of these regulations sets out limitations on the use of planning obligations. It sets out three tests that planning obligations need to meet. It states that planning obligations may only constitute a reason for granting planning permission if the obligation is:

a) Necessary to make the development acceptable in planning terms; (the obligations of the Section 106 Agreement are necessary to ensure adequate education provision, secure affordable housing on site, provide sufficient open space and ensure its continued maintenance, monitor air quality, promote local employment benefits, secure appropriate long-term marketing of the retail/ commercial units and to improve accessibility for vehicles and pedestrians to/ from the development to ensure policy compliance.)

b) Directly related to the development; (the obligations of the Section 106 Agreement are directly related to the development.)

and

c) Fairly and reasonably related in scale and kind to the development (the obligations as set out in the Section 106 Agreement, both in terms of scale and kind of obligations being required, are fair and reasonable to ensure the aforementioned contributions for the development of this strategic site).

In accordance with Policy SP13 of the adopted Newport Local Development Plan 2011-2026 and the adopted Planning Obligations Supplementary Planning Guidance, development will be required to help deliver more sustainable communities by providing, or making contributions to, local and regional infrastructure in proportion to its scale and the sustainability of the location. In this case, section 106 planning obligations are required to mitigate the impact of the development in accordance with the table below.

Service Area that requires planning obligation	Purpose of planning obligation	Planning obligation initially sought by Planning Authority	Summary Heads of Terms agreed by applicant(s)	Viability Issues?
Regeneration, Investment and Housing	To provide off site affordable housing	£667	Full heads of terms agreed.	No

HEADS OF TERMS AGREED BY APPLICANT

The applicant has agreed to the full heads of terms.

9. **OTHER CONSIDERATIONS**

9.1 ***Crime and Disorder Act 1998***

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application. It is

considered that there would be no significant or unacceptable increase in crime and disorder as a result of the proposed decision.

9.2 ***Equality Act 2010***

The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership.

9.3 Having due regard to advancing equality involves:

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these differ from the need of other people; and
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

9.4 The above duty has been given due consideration in the determination of this application. It is considered that there would be no significant or unacceptable impact upon persons who share a protected characteristic, over and above any other person, as a result of the proposed decision.

9.5 ***Planning (Wales) Act 2015 (Welsh language)***

Section 31 of the Act clarifies that impacts on the Welsh language may be a consideration when taking decisions on applications for planning permission so far as it is material to the application. This duty has been given due consideration in the determination of this application. It is considered that there would be no material effect upon the use of the Welsh language in Newport as a result of the proposed decision.

9.6 ***Newport's Well-Being Plan 2018-23***

The Wellbeing of Future Generations (Wales) Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. This duty has been considered during the preparation of Newport's Well-Being Plan 2018-23, which was signed off on 1 May 2018. The duty imposed by the Act together with the goals and objectives of Newport's Well-Being Plan 2018-23 have been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the proposed decision.

10. **CONCLUSION**

10.1 The proposals would not result in an adverse impact in terms of the character of the area, design or neighbouring amenity. The proposals do not result in an increased parking demand. Nevertheless, this lack of harm is neutral in the planning balance and limited weight is attached to the potential benefits of the proposed development, namely the proximity to nearby shops and services and provision of a small residential unit in the urban area, this would not outweigh the significant adverse effect to the living conditions of occupiers with regard to outlook, noise and disturbance, daylight and sunlight and private amenity space.

10.2 Given the proximity of the unit to noise sources and close juxtaposition with neighbouring commercial units with unrestricted operating hours there is a high likelihood of noise and disturbance arising to the detriment of the health and wellbeing of future occupiers. Furthermore, the proposals offer poor quality accommodation that will have limited outlook and amenity space that will be hemmed in by existing high boundary features and neighbouring buildings.. No information has been provided that would mitigate such objections.

10.3 Furthermore, the proposal will have a significant adverse effect on interests of acknowledged importance, by reason of the introduction of a highly vulnerable use in a flood risk area confined to the ground floor. This is contrary to Policy SP3 of the NLDP

10.4 The application is refused.

11. DECISION

REFUSED

01 The proposal represents the introduction of a highly vulnerable development contained to ground floor only on a site located within Zone 3 Defended Flood Risk Area, contrary to Planning Policy Wales, Technical Advice Note 15 and Policy SP3 of the Newport Local Development Plan. The proposal is not justified and has failed to demonstrate that the risks and consequences of flooding can be acceptably managed in regard to the relevant tests in TAN 15. The proposal is harmful to the safety and wellbeing of future occupiers and this is contrary to Planning Policy Wales, Technical Advice Note 15 and Policies SP1, SP3, GP2, H2 and GP1 of the Newport Local Development Plan (adopted January 2015).

02 The proposed development will have a significant adverse impact upon interests of acknowledged importance, namely residential amenity and the health and wellbeing of future occupiers by reason of proximity to neighbouring noise sources, lack of outlook, natural light and poor-quality design and layout. This is contrary to Policies GP2, GP6, H2 and GP7 of the Newport Local Development Plan 2011-26 Adopted Plan January 2015. No information has been submitted to mitigate this objection.

03 The proposed development will have a significant adverse impact upon interests of acknowledged importance, namely affordable housing provision. No signed legal agreement has been provided. This is contrary to Policy SP13 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).

NOTE TO APPLICANT

01 This decision relates to plan Nos: Design & Access Statement, Green Infrastructure Statement, existing/proposed elevations, existing/proposed block plans, existing/proposed floor plans, site location plan, Flood Consequence Assessment.

02 The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Policies SP1, SP3, SP9, GP1, GP2, GP4, GP7, H2, H4, T4 and W3 were relevant to the determination of this application.

03 Due to the minor nature of the proposed development (including any demolition) and the location of the proposed development, it is considered that the proposals did not need to be screened under the Environmental Impact Assessment Regulations.