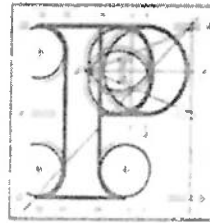


**Our Case Number:** ACP-323575-25

**Your Reference:** Port of Waterford



**An  
Coimisiún  
Pleanála**

Malone O'Regan  
c/o Eimear Sharkey  
3/4 Canada Street  
Waterford  
Co. Waterford  
X91 V52K

**Date:** 24 April 2026

**Re:** Proposed extension of port facilities to support Offshore Renewable Energy ('ORE') development and ancillary works at Port of Waterford, Belview, Co. Kilkenny. ([www.250berth.portofwaterford.com](http://www.250berth.portofwaterford.com))

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above-mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 292(1) of the Planning and Development Act 2000, as amended, hereby requires you to furnish information in relation to effects on the environment of the proposed development. Please see the attached schedule for the Further Information request.

The applicant is requested to submit the requested further information within a period of 3 months from the date of this request. If the applicant requires additional time to respond to this request, an extension of time must be requested in writing prior to the expiration of the initial 3-month period allowed herein (the applicant is referred to section 292(7) of the 2000 Act in this respect). Any such request should include the reasons why an extension of time is required and the proposed time period within which it is proposed to submit the additional information, the applicant is encouraged to contact the Commission as soon as it becomes of the view that further time may be required.

**Teil** (01) 858 8100  
**Glaao Áitiúil** LoCall 1800 275 175  
**Facs** (01) 872 2684  
**Láithreán Gréasáin** [www.pleanala.ie](http://www.pleanala.ie)  
**Ríomhphost** [communications@pleanala.ie](mailto:communications@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

In addition to the request for further information in the attached schedule, the applicant is invited pursuant to section 292(1)(c) of the 2000 Act, to respond to the issues raised in the submissions and observations received by the Commission from members of the public and prescribed bodies, and the reports received from the coastal planning authority which have been furnished to you. For the avoidance of doubt, the same time limit and caveats apply as set out above.

In providing its response to the matters raised in this request for Further Information, the applicant is requested to clearly annotate any proposed amendments to the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and other documentation submitted and cross reference clearly revised/new information across the submitted documentation as appropriate. It is requested that all changes are clearly identified.

The further information and any response to the submissions/observations referred to in the attached schedule should be received by the Commission no later than **5.30pm on the 24th July 2026**. Unless an extension of time has been requested and agreed in advance of this date.

In this regard, please submit three hard and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 292(2)(b) of the Planning and Development Act 2000, as amended, to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email [marine@pleanala.ie](mailto:marine@pleanala.ie) quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,



Honor Caird Marren  
Executive Officer  
Direct Line: 01-8049315

OA16

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
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## **Schedule I - Further Information Request**

### **1. General Matters Arising**

- a) The applicant is requested to provide further updates in relation to any ongoing consenting activities or recent decisions which are relevant to the current proposed development in terms of the cumulative assessment process for the Environmental Impact Assessment (EIA) as well as the in-combination consideration of effects in relation to the Appropriate Assessment (AA) process. In this regard the Commission notes that the Port of Waterford has recently been issued a Dumping at Sea permit (S0012-05) by the EPA and a Maritime Usage Licence (MUL) by MARA (LIC230025) in relation to maintenance dredging, furthermore, there is another MUL application for site investigations still under consideration by MARA for the Port of Waterford as well as other projects and plans within the vicinity. The Applicant is asked to consider all relevant projects and plans in relation to cumulative and in-combination assessments, consider the recent assessments that have been undertaken by other statutory bodies and any relevant mitigation measures imposed to reduce cumulative and/or in-combination effects and update the submitted Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accordingly.
- b) The Applicant is requested to update as appropriate the planning policy context of the proposed development considering the latest provisions of variation no. 6 to the Kilkenny City and County Development Plan (CDP), relating to the incorporation of a settlement plan for Ferrybank/Belview into the CDP as well as any updates in relation to the climate action policy and legislation that has arisen since the lodgement of the application.
- c) The Commission notes that the preliminary rehabilitation plan submitted as Appendix 3-2 of the Environmental Impact Assessment Report (EIAR) appears compliant with the provisions of section 96(2)(d), of the Maritime Area Planning Act 2021, in that it is proposed to reuse the infrastructure within the Maritime Area Consent area for the same or another purpose, however, the application documentation also states that the final rehabilitation plan will be issued by MARA in the event of any future grant of permission. As set out within the

Maritime Area Consent (Condition 5.1 refers) the application for development permission must have a Rehabilitation Schedule within the meaning of Section 95 of the Maritime Area Planning Act, 2021 (as amended) attached. The Applicant is therefore requested to confirm, finalise and submit the proposed terms of the Rehabilitation Schedule required for the works within the maritime area, and provide additional discussion and/or further assessment if required in this regard.

- d) While it is stated that there will be a temporary construction compound on the elevated area north of the railway line the applicant has not provided any details of the specific location, extent, access arrangements, or environmental management measures to be incorporated into this compound. The applicant is requested to provide these details and include any relevant drainage provisions (given proximity to watercourses and designated sites), maintenance of access to third party lands (where required), and provisions to ensure adverse impacts do not arise on proximate protected structures. Applicant should amend all relevant assessments and documentation to include an assessment of potential impacts and mitigation associated with the provision of any temporary construction compound.
- e) As part of this further information request the applicant has been invited to comment on the submissions that have been made by the various prescribed bodies and third-parties. The applicant will note that in certain submissions (including for example the coastal planning authority, Iarnród Eireann Infrastructure and DAU archaeology) reference has been made to the imposition of conditions in the event of favourable consideration. The applicant is requested to consider such conditions and provide amended details/updates and/or clarification as to whether such conditions could be accommodated or issues/impacts raised alternatively addressed.

## **2. National Marine Planning Framework and Ecosystem Services.**

- (a) The planning application has been lodged under Section 291 of the Planning and Development Act, 2000 (as amended) as the proposed development constitutes works on land and within the maritime area. The application documentation

includes discussion of compliance with the National, Regional, and County terrestrial plans as well as the South Coast D-Map, however, it does not contain a review or analysis of compliance with all relevant objectives and policies of the National Marine Planning Framework (NMPF), which is the operative plan for works in the maritime area. The applicant is therefore, requested to submit a review of all relevant objectives and policies within the NMPF (including, Environmental – Ocean Health, Economic – Thriving Maritime Economy, and Social – Engagement with the Sea), particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Underwater Noise Policy 1, and Fisheries Policy 5. The applicant is advised to note the provisions of Section 293(2) of the Planning and Development Act, 2000 (as amended) in this regard which essentially sets out that the Commission cannot favourably consider development which materially contravenes the NMPF.

- (b) The documentation submitted does not provide specific detail, assessment, or review of the range of ecosystem functions and services which could be impacted by the proposed development. The National Marine Planning Framework (NMPF) states that proposals to protect, maintain, restore, and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes. Seafloor and Water Column Integrity Policy 3 of the NMPF also requires proposals to take account of the space required for coastal habitats, for ecosystem functioning and the provision of ecosystem services and to demonstrate that they will, in order of preference, avoid, minimise or mitigate for net loss of coastal habitats. The applicant is therefore requested to submit a synopsis report of the relevant impacts on ecosystem functions and services. In identifying the relevant ecosystem services for assessment, including those services classified as provisioning, regulation and maintenance, and cultural services, the applicant is advised to consider the full range of ecosystem services set out in the report 'Valuing Ireland's Blue Ecosystem Services' (SEMRU of NUI Galway, 2018), as referenced in the NMPF. The applicant should also consider whether the outcome of this ecosystem services assessment requires updates to the EIAR, in relation to ecosystem functions and services, and should additional mitigation measures be required these should be set out.

### 3. Appropriate Assessment

- a) The submitted Appropriate Assessment Screening (AAS) and Natura Impact Statement (NIS) state that the Zone of Influence (Zoi) of the proposed development is based on a source-pathway-receptor (S-P-R) model, and that the zone will vary depending on impact pathway, however, a blanket 15km radius zone appears to have been used to identify European sites for the purposes of Appropriate Assessment screening which is inappropriate. The applicant is therefore requested to submit a revised AAS and NIS using the correct application of the S-P-R model, so that sensitive receptors are properly considered and assessed. The correct application of the S-P-R model should include detailed consideration of marine mammal (seal and cetacean) Qualifying Interests (QIs) and bird Special Conservation Interests (SCIs) of relevant Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) respectively. The proper application of the S-P-R model will necessitate significant amendments and revisions to both the AAS and NIS documentation
- b) The applicant is requested to revise the NIS to include detailed consideration of:
- (i) The potential impacts of the proposed development on marine mammals.  
The proposed development is within the foraging and dispersal range of a number of marine mammal species which are qualifying interests of SACs in the vicinity (including Grey and Harbour seals, Harbour porpoise and Bottlenose Dolphin). Potential impacts on marine mammals have been detailed in the Biodiversity Chapter of the EIAR, with significant impacts identified as a result of underwater noise during construction, however, potential impacts on these species as QIs of European sites do not appear to have been considered in the NIS. The Applicant is therefore requested to revise the NIS to assess potential impacts on marine mammal QIs (seals and cetaceans in addition to otter) of relevant SACs, taking into account their wide foraging and dispersal ranges and marine mammal management units (MMMUs) where relevant. The revised NIS should consider all potential impacts on marine mammal QIs, including construction and operational impacts and take into account the potential noise and collision risk impacts arising from increased vessel traffic.

- (ii) Impacts on fish QI's particularly in relation to River Lamprey arising from permanent and temporary habitat loss and disruption. Of particular note in this regard is the consideration of the impact of the loss of the muddy sand shores habitat found at the site on the juvenile stage of River Lamprey, given the conservation objective of the Lower Suir SAC relating to 'availability of juvenile habitat'. The NIS must be updated to ensure potential impacts on the fish QIs of relevant SACs are comprehensively assessed. If additional survey work is not undertaken in this regard comprehensive justification should be provided as to why the existing information is considered sufficient to enable assessment.
- (iii) The potential for use of the proposed development site by SCIs of SPAs given the proximity to SPAs with SCIs that use the habitats found on site and the potential for these species to use the site as ex-situ habitat for foraging and roosting.
- (iv) All stages of the proposed development – pre-construction surveying or preparatory works, construction, operational and rehabilitation, including the effects of construction and operational lighting on sensitive species and habitats.
- (v) Potential impacts and/or additional mitigation measures which may arise from the deployment of surface marker buoys and moorings which may be necessitated by the proposed development.
- (vi) In-combination effects with other on-going projects and plans including maintenance dredging.

In responding to the items above the applicant should note and address in full the issues raised by the Development Applications Unit (DAU) of the Department of Housing, Local Government and Heritage (DHLGH) in relation to Nature Conservation and in particular their comments on 'Matters Relating to Appropriate Assessment'.

#### **4. Derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations**

(a) Section 7.1.1.1 of the NIS, and section 6.6.1.7 of the EIAR refer to the potential for requiring a derogation licence for the proposed works under Regulation 54 of the Birds and Natural Habitats Regulations, 2011 in relation to otter. Other Annex IV species that may be affected by the proposed development include bats, dolphins, whale and porpoise species due to noise and other activities. If derogation is required, this needs to be secured in advance of any decision issuing from the Commission in relation to the proposed development. Accordingly, the applicant is requested to clarify whether a derogation for such species is required. If this is not required the applicant must provide sufficient information in support of that conclusion and if it is required, evidence of such derogation must be provided as recent Department guidance has clarified that this must be granted prior to any planning decision on a proposed activity.

## **5. Marine Geology, Sediments and Coastal Processes**

- a) In relation to capital dredging it is noted that no dedicated capital-dredge plume simulation is presented in Appendix 8-1 of the submitted EIAR, and that a Dumping at Sea permit (S0012-05) has been recently issued by the EPA as well as a Maritime Usage Licence (MUL) by MARA (LIC230025) in relation to maintenance dredging by the Port of Waterford Company. The applicant is requested to provide commentary on any potential cumulative or in-combination effects that may arise in relation to the newly consented maintenance dredging and proposed capital dredging and specifically assess whether the proposed capital dredging could change the maintenance-dredge plume pathways and that the MUL maintenance programme remains valid.
- b) The application documentation states that treated dredge material will be reused within the proposed development 'if suitable' (Engineering Report, EIAR description and CEMP documents refer). It is noted that table 17-2 of the EIAR states that 7,800 tonnes of dredged material will be required, and the annual supply is stated as being from the 450,000 tonnes 'dredged under the current licence'. The Applicant is requested to submit further detail describing the proposed treatment methodology, (including the location of treatment) of the

dredged material and any potential impacts that could arise. The further detail shall include drawings indicating where treated dredge material will be deposited within the reclamation profile as part of the proposed development, consider leachate quality, long-term seepage through rock armour and interaction with estuarine salinity gradients (which could be addressed by a short residual -risk statement supported by either modelling or conservative assumptions).

## 6. Underwater Noise

- (a) The Underwater Noise chapter refers to noise thresholds for sensitive receptor groups including cetaceans and pinnipeds citing the impact criteria set out in the NPWS (2014) guidance. The thresholds in that guidance are based on Southall et al. 2007, but have been updated in recent years, (Southall et al. 2019 refers). Of relevance here, Harbour porpoise have been assigned to a new Very High Frequency (VHF) hearing group which has significantly lower thresholds for onset of injury (Temporary Threshold Shift (TTS) for impulsive noise is 196 dB re 1  $\mu$ Pa<sub>2s</sub> Peak SPL and Permanent Threshold Shift (PTS) is 202 dB re 1  $\mu$ Pa<sub>2s</sub> Peak SPL). Applying these thresholds to the information in Figure 12-8 of the Underwater Noise Chapter under the peak piling worst case scenario indicates that the PTS range for the VHF hearing group extends out >200m from the proposed works, which is significantly greater than the 15m range identified for cetaceans in Chapter 12 of the submitted EIAR. Accordingly, the assessment in the Underwater Noise Chapter and proposed mitigation measures should be updated to ensure it reflects the latest understanding of marine mammal sensitivity to noise, including Southall et al., 2019. Other application documents which refer to this Chapter should also be updated including the Biodiversity Chapter of the EIAR, the NIS and the CEMP.
- b) The Underwater Noise chapter, in section 12.5, appears to assess potential effects from the proposed development on receptors using the SPL<sub>peak</sub> noise impact threshold only. As noted in recent UK guidance (NRW, 2023)<sup>1</sup>, Southall

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<sup>1</sup> NRW's Position on Assessing the effects of Hearing Injury from Underwater Noise on Marine Mammals. Version 1.0, May 2023. <https://cdn.cyfoethnaturiol.cymru/696759/ps016-nrws-position-on-assessing-the-effects-of-hearing-injury-from-underwater-noise-on-marine-mammals-30.pdf>

*et al.* (2019) recommends the use of dual metrics for impulsive noise: unweighted SPL<sub>peak</sub> and frequency-weighted SEL. Use of both metrics is needed to account for the different aspects of sound exposure and duration. SPL<sub>peak</sub> is a measure of absolute maximum exposure at any one time, whereas SEL is a measure of the sound energy of exposure accumulated over time (e.g. a pile driving sequence). These two metrics are applied under the condition that exceeding either threshold by the specified level is sufficient to result in TTS or PTS onset. The metric predicting the largest range of impact should be used for the impact assessment. Accordingly, the assessment should be updated to take into account both metrics and the largest impact range used with mitigation updated in light of this revised assessment as necessary.

- c) The application documentation does not provide sufficient detail in terms of the proposed piling activities. In this regard the applicant is requested to state the proposed duration of piling activities across the entire campaign, clarify the type of piling required throughout the construction activities (alternative methods are referenced dependent on ground conditions but no detail of these methods or the ground conditions that would necessitate them are provided or assessed), confirm the number of piling events necessitated (200 – 240 piles are referenced in the development description but no further detail is provided), and whether concurrent piling could be carried out (if more than one pile is to be installed concurrently the worst-case scenario should be altered to reflect this). In this regard the applicant is to consider the potential for impacts, if any, over the duration of the entire piling campaign on environmental receptors (including habitats, human beings, and species). Given the potential extent and duration of piling activities, the applicant should clarify whether consideration has been given to any temporal mitigation measures that may be appropriate (i.e. scheduling piling activities to minimise potential impacts on affected species at sensitive times of the year) and, if appropriate, update the relevant sections of the EIAR and NIS as necessary.

d) The NPWS (2014) guidance states that sound sources with the potential to induce TTS in a receiving marine mammal have the potential to cause both disturbance and injury. This guidance has a statutory basis under Regulation 71 of SI No. 477 of 2011 and refers to the “offence to injure” under the Wildlife Act, 1976, noting that TTS “may constitute such an injury”. The applicant is therefore requested to revise and update their assessment and mitigation to take this into account. The Applicant is advised that additional mitigation to reduce noise emissions (e.g. noise abatement systems) may be required where impacts on marine mammals may be experienced beyond the mitigation/monitored zones for the sensitive receptors identified.

## **7. Biodiversity**

- a) The EIAR, in section 6.4.3.1, notes the presence of the ‘muddy estuarine community complex’ at the proposed development site. This community type is part of an Annex 1 habitat, ‘Estuaries’ and ‘Mudflats and sandflats not covered by seawater at low tide’ in the River Barrow and River Nore SAC. Whilst acknowledging the habitat is not part of a QI within the Lower River Suir SAC, the Commission shares the concern expressed by the DAU as to whether impacts on this habitat as (non-designated) Annex 1 habitat has been adequately assessed in the EIAR including in relation to their contribution to the conservation status of these habitats that must be reported to the European Commission under Article 17 of the Habitats Directive. Accordingly, and consistent with the DAU submission, the applicant is requested to provide a robust assessment in relation to the loss of Annex I habitats (i.e. not just as supporting habitat for species but considering the impact on the habitat itself) to ensure the proposed development will not affect the conservation status of these habitats and result in a significant negative effect.
- b) The Commission notes that in Table 6-11, the ‘muddy estuarine community complex’ has been assessed within the ‘Tidal River’ habitat and valued as having ‘Local Importance (Higher Value)’. This appears to run contrary to the NRA 2019 Guidelines that the valuations in this table are based upon, which state that sites containing Annex 1 habitat types should be valued as having

County importance at least (National if the site contains 'viable areas' of the habitat or International if the site contains 'best examples'). Accordingly, in addressing (a) above, the assessment should ensure guidance is followed regarding valuation of this habitat.

- c) Applicant to confirm the date the Badger survey referenced in section 6.2.4.2 of the submitted EIAR was undertaken and provide discussion as to the suitability of the timing of the survey and the validity of the results.
- d) In relation to the proposed biodiversity enhancement area, the applicant is to confirm the proposed timeframe for the provision of the biodiversity measures, in the context of the programme for delivery of the proposed development, how the success or otherwise of the measures will be monitored and reported, and the duration for which the biodiversity management measures will be in place.

## **8 Drainage**

- (a) The proposal to provide permeable paving at the car park north of the railway line is noted, however, the Commission has concerns in relation to potential impacts on groundwater as there has been no assessment of pollutant load from parking areas (hydrocarbons, metals, sediments) and no justification provided for omitting treatment prior to infiltration nor a discussion of potential interaction with the Luffany Stream. The applicant is requested to provide further assessment of this issue that justifies the approach adopted or an alternative approach that ensures protection of ground and surface waters at this location.
- (b) Further to 8(a) above in the context of the submitted Water Framework Directive (WFD) Assessment submitted. The Commission considers that it is not appropriate to screen out the potential for impacts and interactions with the Waterford groundwater body on the basis that *"the site is located on the edge of the GWB and the majority of proposed works do not interact with groundwater"*. This statement indicates that some works do interact with groundwater, and the permeable ground proposed at the car parking area north of the railway line will allow direct connection to ground, it is also noted that a temporary construction

compound may be provided in this area. The applicant is requested to provide further justification which clearly demonstrates and clarifies either a break in the pathway between the proposed development and groundwater or alternatively carry out further assessment within a revised WFD assessment which provides suitable mitigation measures to ensure protection of groundwater from the proposed development during the construction and operational phases.

## 9. Terrestrial Noise and Vibration

- (a) In relation to the terrestrial noise chapter the applicant must provide additional clarification and/or justification in relation to the following:
- (i) Applicant to review tables in appendix 11-3 and provide clarification/justification/further discussion in relation to the following:
- The instances in tables 1-1, 1-2, and 1-3 where only some of the  $L_{\text{night}}(\text{dB})$  readings of '45' have been highlighted by red text (indicating results exhibiting values higher than typical noise nuisance level).
  - The use of noise measurements/comparison locations in table 1-4, week 5, classified as being at night which were taken between 1600 and 1800 hrs and therefore more accurately described as 'evening' results.
  - The lack of commentary available for week 8 results in table 1-4.
  - The use/labelling of location designators other than NM1, NM2, NM3, and NM4 (as shown in Figure 11-5 of the EIAR) in table 1-4, if additional locations have been used these should be mapped and justified in the context of the identified noise monitoring locations.
- (ii) Section 11.12 of the EIAR has not acknowledged any difficulty in compiling the information for the noise section, however, the noise monitoring results make frequent references to noise monitoring equipment/batteries failures. These issues should be acknowledged in the EIAR and a clear statement/justification provided setting out whether any potential concerns arise (in terms of increased uncertainty or accuracy) from such issues in relation to the conclusions reached in the EIAR, and/or whether the number

of data points achieved through monitoring are sufficient to draw the conclusions stated.

- (b) In relation to the findings and assessment contained in chapter 11 (Terrestrial Noise and Vibration) which also inform the findings of chapter 14 (Terrestrial Cultural Heritage), the Commission is concerned that sufficient assessment has not been carried out, nor mitigation incorporated to ensure the structural integrity and protection of the protected structure RPS D136 (Gorteens Old Mill), given its condition and location within such close proximity of proposed piling and other construction activities. While generalised statements are made in relation to this structure, specific citations of relevant guidance have not been set out, nor has sufficient justification been provided as to why specific mitigation measures are not required to ensure the protection of this sensitive structure. Section 11.5.1.2 sets out that an alternative piling method may have to be used ‘..in the event of a requirement, due to ground conditions... to ensure that there will be no vibration effects at the nearest buildings, especially protected structures near the site’. There is no clarification, justification or assessment provided in relation to any alternative piling methods, nor has any appropriate suite of mitigation measures been proposed. The comments of the Conservation Officer of the Coastal Planning Authority are also noted, where they request that a strategy of vibration monitoring be imposed by way of a condition in relation to the protected structure. It is acknowledged that the protected structure lies outside the red line boundary of the proposed development, however, it is in close proximity to the proposed works and accordingly the applicant is required to submit additional discussion, assessment and mitigation as required to demonstrate how the works can be carried out without adversely affecting the integrity of the protected structure.

## **10. Landscape and Visual**

- (a) The Commission notes the submission of the Coastal Planning Authority (CPA) which sets out their opinion that the proposed development will have significant

to profound impacts when viewed from Cheekpoint and Minaun Hill to the southeast and east of the proposed development. It is further noted that this opinion is significantly at odds with the findings of the EIAR in relation to impacts from these locations. The applicant is invited to discuss in further detail the potential visual impacts arising from the proposed development when viewed from Cheekpoint and Minaun Hill and include focused commentary on the availability of views and any additional imagery available of views towards the proposed development from these general locations.

