

# EIAR Addendum Non-Technical Summary

PRESENTED TO

**BPM GP3 Limited**

**Retail Development at lands to the south of  
the existing M1 Retail Park**

July 2023

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## 1 INTRODUCTION

This Environmental Impact Assessment Report (EIAR) Addendum Non-Technical Summary (NTS) has been prepared by Enviroguide Consulting on behalf of BPM GP3 Ltd. (the

Applicant) in support of a planning application for a retail development submitted to Louth County Council (planning application reference 22/954).

On the 9<sup>th</sup> of December 2022 the Applicant submitted a planning application for a retail development on lands south of existing M1 Retail Park 10 no. single storey retail units including a part-licensed anchor retail supermarket store (Unit 1), a DIY/Home store, including a garden centre (Unit 10), 8 no. smaller retail/commercial units, including a cafe and pharmacy (Units 2-8) and 1 no. single storey Drive-Thru Restaurant/Cafe unit, including external seating area (referred to hereafter as the Proposed Development). The planning application was accompanied by an EIAR prepared by Enviroguide Consulting (hereafter referred to as the December 2022 EIAR).

A request for further information was issued by Louth County Council on the 3<sup>rd</sup> of February 2023 (Appendix A). A request for extension was issued to Louth County Council from the Applicant in June 2023.

The EIAR Addendum NTS will present a summary of any material changes to the baseline conditions, impact assessment and conclusions presented in the December 2022 EIAR as a result of the revised design.

## 1.1 Updated further information

This EIAR Addendum presents any modifications or updates to the assessments contained in the December 2022 EIAR. This EIAR Addendum has reviewed the following inputs:

- Updated Site Plan Layout and Elevation Drawings prepared by MCA Architects;
- Updated Landscape Masterplan Drawings prepared by Stephen Diamond Associates;
- Updated Drainage Plan Drawings prepared by Barret Mahony Consulting Engineers (BMCE);
- Archaeological Impact Assessment prepared by James Kyle of Archaeology and Built Heritage;
- Traffic Assessment and updated traffic count data prepared by Barrett Mahony Civil and Structural Consulting Engineers;
- Civil Infrastructure Report prepared by Barret Mahony Consulting Engineers (BMCE); and
- Verified Photomontages and Computer-generated imagery (CGIs) prepared by Digital Dimensions.

## 2 OVERVIEW OF THE PROPOSED DEVELOPMENT

In response to the request for further information received from Louth County Council, the project description has been updated since the previously submitted EIAR.

The changes to the Proposed Development include:

(a) a revised site layout comprising a substantially reduced quantum of retail/commercial development. The proposed development now comprises 3 no. units in total; 1 no. anchor retail supermarket store (Unit 1)(3,945sq.m); 1 no. DIY/Home store (2,800sq.m) and associated garden centre (700sq.m) (Unit 3); and 1 no. coffee shop unit (Unit 2)(210sq.m) with associated external seating;

- (b) the deliveries/service areas associated with the proposed units have been relocated to the south and west of Unit 1 and the east of Unit 3;
- (c) the introduction of a central landscaped plaza featuring external seating, planting and hardscaping and a landscaped walkway on the southern portion of the site where it interfaces with Barrack Lane. Indicative future pedestrian connection points are also shown between the site and Barrack Lane to the south.
- (d) A total of 229 no. car parking spaces are provided to serve the proposed development, this is inclusive of 2 no. click and collect parking spaces, 18 no. accessible spaces and 11 no. parent and child spaces. A total of 58 no. bicycle parking spaces are also proposed on-site.
- (e) revised hard and soft landscaping and signage;
- (f) the provision of 2 no. substations on-site and 2 no. sprinkler tanks and associated pump rooms adjacent to Units 1 and 3; and
- (g) all associated site development works necessary to facilitate the revised proposal.

Figure 2-1 presents the Updated Site Plan Layout.

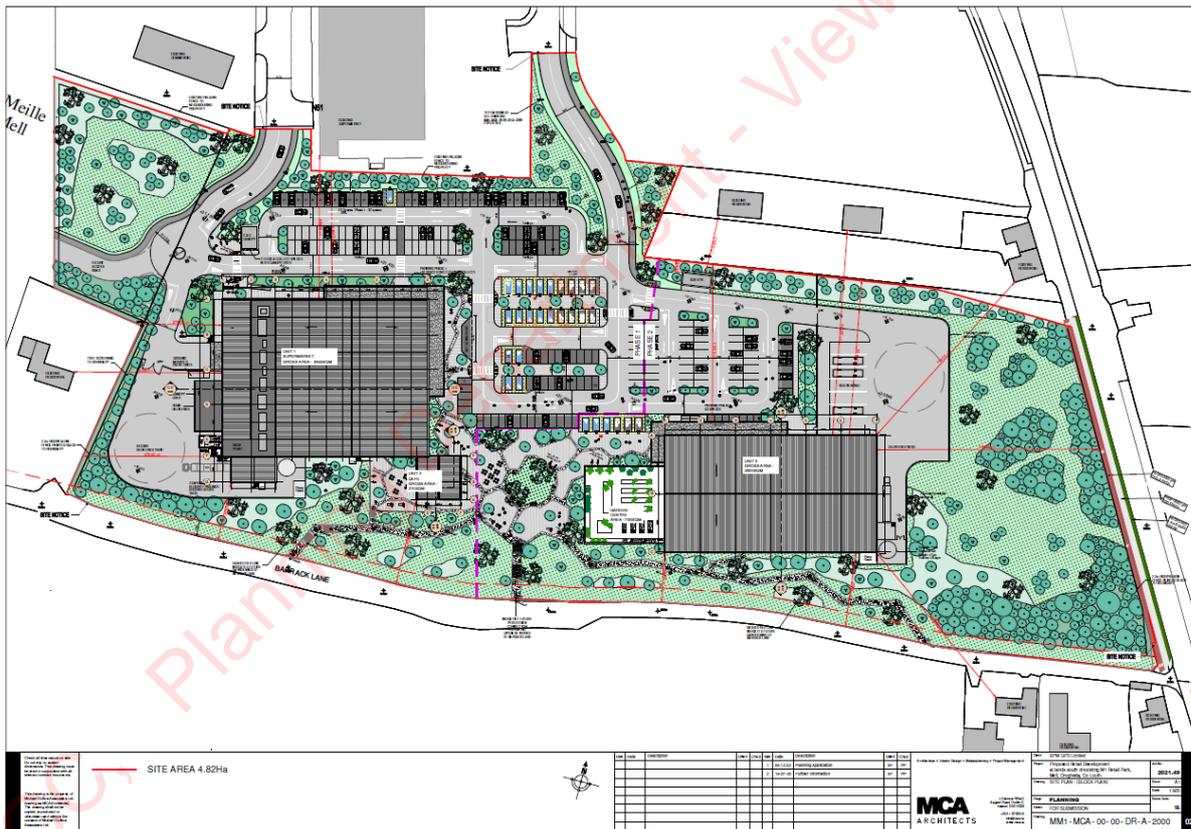


Figure 2-1 Updated Site Layout (Drawing number MM1-MCA-00-00-DR-A-2000, MCA Architects)

### 3 ENVIRONMENTAL IMPACTS

The potential Environmental Impacts of the re-design of the retail development during all phases of the Proposed Development are addressed in the EIAR Addendum under the following headings as prescribed under the EIA Directive:

- Population and Human Health;
- Biodiversity;
- Land and Soils;
- Hydrology and Hydrogeology;
- Air Quality and Climate;
- Noise and Vibration;
- Landscape and Visual Amenity;
- Archaeology and Cultural Heritage; and
- Material Assets: Traffic, Waste and Utilities

Additionally, risk management and interactions between environmental factors have been examined.

### 3.1 Population and Human Health

'Population and Human Health' looks at the potential effects of the Proposed Development on human beings, living, working and visiting in the vicinity of the application site lands to the south of the existing M1 Retail Park.

Taking into account the updated project description, revised site layout and information and reports referenced in Section 1.1 there has been no material change in the baseline scenario in relation to population and human health.

There will be no reduction in the number of staff employed during the construction phase.

The estimation of an overall employment figure of 1 no. worker per 61m<sup>2</sup> gross floor area (GFA) still applies. Based on the further information and change in project description, the revised GFA for the Proposed Development is 7,655m<sup>2</sup>. This results in 125 Operational Phase employees which will not change the previous assessment of a moderate, positive impact on human health.

There will be no change in the significance of the impact assessed in the December 2022 EIAR in relation to population and human health.

### 3.2 Biodiversity

The Biodiversity Chapter describes the biodiversity of the Site of the Proposed Development and surrounding environs, with emphasis on habitats, flora and fauna. It details the methodology of assessment used in each case and provides an assessment of the impacts of the Proposed Development on habitats and species, particularly those protected by national and international legislation, or considered to be of conservation importance, and proposes measures for the mitigation of any potential impacts where appropriate.

Taking into account the updated project description, revised site layout and information and reports referenced in Section 1.1 there has been no material change in the baseline scenario in relation to biodiversity.

Based on the reduction in the number of retail units at the Site there will be an increase in open space at the Site. The updated landscape design includes abundant additional planting and a native woodland to the eastern corner of the Site. This woodland will be dominated by oak, scots pine, birch, ash, holly, hazel, hawthorn (*Crataegus monogyna*), blackthorn (*Prunus*

spinosa) and guelder rose (*Viburnum opulus*). The additional planting at the Site will have a positive, permanent, moderate impact on biodiversity at a local level, providing additional nesting, foraging, resting, commuting and roosting habitat for local fauna and improve habitat connectivity at the Site.

There will be no change in the significance of the impact assessed in the December 2022 EIAR in relation to biodiversity.

### 3.3 Land and Soil

An assessment of the potential impact on the existing land, soils and geological environment was carried out by Enviroguide Consulting.

Taking into account the updated project description, updated redline boundary, revised site layout and information and reports referenced in Section 1.1 there has been no significant change in the baseline scenario in relation to land and soil.

There is no material changes to the impacts taking account of updated information for the following areas.

- Soil quality and contamination;
- Soil structure;
- Excavation of soil and bedrock
- Geological hazards;
- Indirect – excavation and removal of soil
- Indirect – importation of fill materials

The conclusions of the December 2022 EIAR remain that there will be no likely significant residual impacts on land, soil and geology anticipated associated with the proposed development.

### 3.4 Hydrology and Hydrogeology

An assessment of the potential impact on the existing water hydrological and hydrogeological environment was carried out by Enviroguide Consulting for the Proposed Development Site.

The conclusions of the December 2022 EIAR remain that there will be no likely significant residual impacts on land, soil and geology anticipated associated with the proposed development.

### 3.5 Air Quality and Climate

This Chapter examines the potential for the Proposed Development to impact upon air quality and climate within the vicinity of the Proposed Site. This Chapter also describes and assesses the impact of the Proposed Development on local climate and on global climate in a wider context.

Taking into account the updated project description, updated redline boundary, revised site layout and information and reports referenced in Section 1.1 there has been no material change in the baseline scenario in relation to air quality and climate.

There will be no change in the significance of the impact assessed in the December 2022 EIAR in relation to air quality and climate.

### 3.6 Noise and Vibration

This Chapter assesses the potential noise and vibration impacts from the Proposed Development. There are three residential noise sensitive locations (NSL) immediately adjacent to the development site, two of these with multiple residences. The residential locations have been identified using aerial photography and the Eircode database. It is appropriate to assess the noise impacts of the Proposed Development on these three locations, since more distant NSLs will naturally receive lower noise emissions from the site due to distance attenuation etc.

Taking into account the updated project description, updated redline boundary, revised site layout and information and reports referenced in Section 1.1 there has been no material change in the baseline scenario in relation to noise and vibration.

Chapter 9 of the previously submitted EIAR predicted a change in environmental noise levels of 1.2dB or less. A change of less than 3dB in environmental noise levels is generally considered to be imperceptible and therefore, Chapter 9 of the original EIAR concluded that the impact due to changes in the road network would not be significant. As there has been a reduction in the overall "Development flows as % of total flows", the change in decibels is therefore less than originally predicted. Therefore, the significance of impacts due to changes in road network traffic noise is predicted to be not significant, or less, as a result of the revised development.

There will be no change in the significance of the impact assessed in the previously submitted EIAR in relation to noise and vibration.

### 3.7 Landscape and Visual

The purpose of the landscape assessment is to evaluate the existing landscape character of the Site and surroundings, to assess the landscape and visual impact of the Proposed Development and to identify landscape designations and planning policies that may concern the subject site and its environs.

The landscape and visual assessment has been updated to reflect the changes to the Proposed Development, together with the addition of three new viewpoints (represented as Viewpoint O, P and Q).

In terms of the landscape effects, some significant changes will occur on the Site, mainly with the removal of existing vegetation, earth movements and general construction activity to the implementation of the proposed buildings. These changes will be counterbalanced with the implementation of the new green structure and maintenance of some hedgerows (namely on the western limit and the existing sections on the southern limit). These landscape impacts will reduce rapidly with distance from the site boundaries, and intervening hedgerows, open park spaces, and existing buildings will further reduce the impacts to minor to negligible, negative and short term for the Construction Phase. It is concluded that the Proposed Development will, therefore, have a minor, negative and short to medium-term impact on the landscape character of the Site during the Construction Phase. The assessed negative impact

is due to the construction activity already referred. It is not expected that the Operational phase of the Proposed Development will cause any negative impact. Considering the context of the Development Plan zoning, the Proposed Development is a continuation of existing trends in the local area. The potential landscape impacts will be neutral and long-term as a result of the Proposed Development. Considering the predicted evolution from a greenfield area (without any leisure activities or even open to the public) to an area interconnected with the existing logistical context, the recreational and green spaces created, the new physical connections between the Site and the southern area (Barracks Lane) and the visual connections predicted to the Boyne Bridge, it is considered that the landscape impacts in the proximity landscape are beneficial.

Regarding the visual impacts, 17 viewpoints were assessed, chosen by sensitivity of the views through site visits and Viewshed's analysis. As it can be seen by the conclusion on the visual effects, in 47% of these viewpoints the visual impacts from the Proposed Development will be temporary, 18% in the short-term and 35% will be above short-term. Regarding quality, 82% of the viewpoints are considered neutral, with 18% of the viewpoints being neutral to beneficial of beneficial. Finally, 47% of the viewpoints are considered to have an imperceptible impact and 24% minor impact. 24% are considered to have a moderate impact and 6% moderate to significant impact. The visual impacts of the Proposed Development are limited to the viewpoints in closer areas of the Site that do not have a natural or physical barrier in the existing situation – namely the north and east front. The typology of the proposed buildings adapts well to the existing commercial environment.

The landscape strategy for the Proposed Development will mitigate the minor adverse visual impacts caused in the short to medium term.

### **3.8 Archaeology and Cultural Heritage**

An assessment of the baseline Archaeological, Architectural and Cultural Heritage conditions of the surrounding environment for the Proposed Development was completed, in order to determine any significant impacts that may arise as a result of the development and highlight any potential effects this may have on these resources.

An Archaeological Impact Assessment (AIA) has been prepared in response to the request for further information (RFI) made by Louth County Council in relation to planning application Ref. 22/954. The AIA is presented as Appendix B to this EIAR addendum.

The site was visited twice by the author of the AIA, Wednesday 8th February 2023 and again on 7th March 2023. The AIA states the following in relation to the feasibility of geophysical survey and archaeological test trenching on the Site.

*“During the site inspections the author examined the site for the feasibility of geophysical survey and archaeological test trenching. Topographically the land which the proposed site is located on is in stark contrast to the remaining natural, unaltered topography of the lands to the south and west of the proposed site area. Having inspected the site and consulted with geophysical survey specialists it is the opinion of the author that this type of survey is not feasible or prudent as part of any condition which might be associated with any grant of planning for the proposed development. However, should a positive grant of planning be made, it would be prudent to conduct some limited archaeological test trenching close to the southern boundary of the proposed development (Plate 4), as the*

*estimated infilling depth there is 0.2-0.6m above the former ground level, and a recommendation to that end is made below.”*

There is previously imported topsoil/subsoil and builders' rubble occupying the majority of the Site. These deposits negate the use of geophysical survey as a means of ascertaining the presence of archaeology on the subject site. Additionally, those same mass deposits severely impair the ability to archaeologically test trench the subject site. Therefore *“the impact that the proposed development might have on the archaeological resource cannot be accurately gauged at this point in time.*

In conclusion, the archaeological impact assessment has concluded that there is *“not any identified issue which might prevent a successful grant of planning for the proposed development, it is the opinion of the author that an appropriately conditioned grant of planning permission should be made in this instance.”*

### **3.9 Material Assets: Traffic**

This Chapter assesses the traffic and transport impacts of a proposed retail at the M1 Retail Park, Drogheda, Co. Louth (the Proposed Development) on the local road network, as well as identifying proposed mitigation measures to minimise any impacts.

A revised Traffic and Transport Assessment (TTA) has been prepared by Barrett Mahony Consulting Engineers.

The conclusion of the revised TTA states:

- 1. The network analysis within the TTA indicates that all junctions analysed are presently operating within capacity and will continue do so in 2025 with the proposed development in place.*
- 2. It is demonstrated that by 2040, the projected year of opening plus 15 of the proposal, all 3 No. junctions analysed will remain within capacity. The 85% capacity threshold will not be breached, even assuming onerous network growth rates of just less than 22% in the intervening 18 years.*
- 3. It has been assumed that the proposed retail development will be in place by 2025. This is a very conservative assumption, as, in all likelihood, it will be closer to 2026 at the earliest before it is operational. The assumption of it being fully operational by 2025 is done to make the analysis as robust as possible.*

There will be no change in the significance of the impact assessed in the December 2022 EIAR in relation to traffic and transport.

### **3.10 Material Assets: Utilities and Waste**

This Chapter of the EIAR provides an assessment of the potential impacts of the Proposed Development on 'Materials Assets' or the physical resources in the environment, including built services and infrastructure comprising electricity, gas supply, information and communications technology (ICT), surface water/stormwater drainage, water supply, the foul water network and waste management infrastructure.

There will be no change in the significance of the impact assessed in the December 2022 EIA in relation to waste and utilities.

### **3.11 Risk Management**

No updates are considered necessary in respect of Chapter 13: Risk Management.

### **3.12 Interactions**

No updates are considered necessary in respect of Chapter 14: Interactions.

### **3.13 Mitigation and Monitoring Measures**

No updates are considered necessary in respect of Chapter 15: Mitigation and Monitoring



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