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# **Environmental Impact Assessment Report Addendum Document**

**To be read as an Addendum to both Volume 2 (Main Body) and  
Volume 1 (Non-Technical Summary) of the Environmental Impact  
Assessment Report**

**Project No.: C216**

**Client: Hibernia Steel (Manufacturing) Limited**

**Project Name: Proposed Galvanising Facility at  
Mell, Drogheda, Co. Louth**

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Summary of Document Revisions			
Rev No.	Date Revised	Section Revised	Revision Description

## Contents

<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>Further Information in Relation to the Information within the EIAR in respect of the Consideration of Alternative Locations</b>	<b>3</b>
2.1	Project Objectives in respect of Location	3
2.2	Alternative Locations Studied	4
2.3	Key Issues Identified in the Consideration of the Locations Studied	8
2.4	Consultation with Louth County Council on the Proposed Location and Selection of the Application Site	9
<b>3</b>	<b>Study of Further Alternative Locations for the Proposed Development carried out Subsequent to Louth County Council's Request for Further Information</b>	<b>11</b>
3.1	Introduction	11
3.2	Defining a 'Reasonable Alternative' in respect of Alternative Locations	12
3.3	Project Objectives in Respect of Location	12
3.4	Search for Further Alternatives Undertaken	13
3.5	Consideration of Further Alternative Locations Identified	15
3.6	Key Issues Identified in the Consideration of the Locations	15
3.7	Conclusions	17
3.8	Locations Suggested in Submissions / Observations received by Louth County Council on the Planning Application	17
<b>4</b>	<b>Conclusions</b>	<b>24</b>
<b>5</b>	<b>Bibliography</b>	<b>25</b>
	<b>Appendix</b>	

## List of Tables

<b>Table 1</b>	Further information in relation to the information within the EIAR in relation to alternative location 'Lands Adjoining East of Hibernia Steel Premises, Grangegeeth, Co. Meath' (referred to in this Document as alternative location AL1).	<b>5</b>
<b>Table 2</b>	Further information in relation to the information within the EIAR in relation to alternative location 'Lands Adjoining West of Hibernia Steel Premises, Grangegeeth, Co. Meath' (referred to in this Document as alternative location AL2).	<b>6</b>
<b>Table 3</b>	Further information in relation to the information within the EIAR in relation to	<b>7</b>

	alternative location 'Lands at Drogheda Business and Technology Park, Co. Meath' (referred to in this Document as alternative location AL3).	
<b>Table 4</b>	How key issues identified in the consideration of the locations studied associated with each location (alternative locations AL1, AL2 and AL3 and the Application Site (AS)).	9
<b>Table 5</b>	How key issues identified in the consideration of the locations associated with each location (further alternative locations AL4-AL15 and the Application Site (AS)).	17
<b>Table 6</b>	Consideration of specific alternative locations suggested within submissions / observations received by Louth County Council on the Planning Application.	18

## List of Figures

<b>Figure 1</b>	Extract from Meath County Development Plan 2021-2027 Web Mapping Application showing land use zoning, Rural Node boundaries and Flood Zones A and B. The relevant location comprises the premises of existing operational enterprise 'WK Composites' adjoining the east of the Hibernia Steel premises. The Hibernia Steel premises is to centre of image in grey hatching.	5
<b>Figure 2</b>	Extract from Meath County Development Plan 2021-2027 Web Mapping Application showing land use zoning, Rural Node boundaries and Flood Zones A and B. The relevant location comprises the open lands adjoining the west of the Hibernia Steel premises north of the River Devlin. The Hibernia Steel premises is to centre of image in grey hatching.	6
<b>Figure 3</b>	Extract from Meath County Development Plan 2021-2027 Southern Environs of Drogheda Land Use Zoning Map. The relevant location is between the business park access road to the west and the residential areas to the east.	7

## 1 Introduction

1.1 This Document has been prepared on behalf of Boylan Consulting by Steven Peck, BA (Hons), MA, MRTPI, and approved by Cathal Boylan, BEng. (Hons) Engineering, Director at Boylan Consulting. Steven Peck is a Chartered Town Planner with significant experience in EIA projects including large infrastructure and urban development projects. As Director at Boylan Consulting Cathal Boylan has overseen numerous EIA projects, and prior to setting up Boylan Consulting Cathal Boylan worked as a Project Manager with ESB International, on numerous applications for large scale infrastructural projects many of which were supported by the EIA process. Cathal is a Chartered Engineer and is a member of Engineers Ireland.

1.2 This Document comprises an addendum to the Environmental Impact Assessment Report (EIAR) accompanying Planning Application Louth County Council Reg. Ref.: 2360115 ('The Planning Application') ('the EIAR') and is intended to be read together with the EIAR as an addendum to both Volume 2 (Main Body) and Volume 1 (Non-Technical Summary) of the EIAR. This Document provides further information in relation to the consideration of alternative locations for the proposed development, in response to Item 2 of Louth County Council's Request for Further Information in relation to the Planning Application, dated 6<sup>th</sup> July 2023 ('the Request for Further Information').

1.3 Item 2 of Louth County Council's Request for Further Information states:

'2. The EIA Directive requires the mandatory assessment of alternatives that have identified and studied and to compare their environmental impacts against the proposed location. The consideration of the alternatives set out in chapter 3 of the EIAR is considered too narrow and selective. Accordingly, the applicant is requested submit a comprehensive study of reasonable alternatives which are outside the ownership of the applicant'.

1.4 The Response to this Request for Further Information is set out as follows:

**Section 2** of this Document sets out further information in relation to the information within the EIAR in respect of the consideration of alternative locations.

**Section 3** of this Document sets out details of a study of further alternative locations carried out subsequent to Louth County Council's Request for Further Information.

**Section 4** sets out conclusions.

## 2 Further Information in Relation to the Information within the EIAR in respect of the Consideration of Alternative Locations

### 2.1 Project Objectives in respect of Location

2.1.1 It is highlighted for confirmation that the subject project's objectives in respect of location include:

- **Reasonable proximity to the M1 (ROI) / A1 (NI) route, at a suitable location along the route balancing access time to prospective markets in both ROI and NI** – The Applicant advises there are prospective markets in both the Republic of Ireland (ROI) and Northern Ireland (NI), with the majority of the potential market in ROI. A project objective is reasonable proximity to the M1 (ROI) / A1 (NI) route for access to these markets, at a suitable location balancing access time to prospective markets in both ROI and NI. The M1 near Drogheda is the preferred location along the route.
- **Reasonable proximity to Hibernia Steel's existing premises in Grangegeeth, Co. Meath** – Hibernia Steel's existing premises in Grangegeeth, Co. Meath provides steel storage / supply and some steel finishing activities (steel cutting, drilling, shotblasting and painting). There is anticipated to be a degree of movement of goods between the existing premises and the proposed development.
- **Local indigenous enterprise** – In addition it is highlighted that Hibernia Steel is a local indigenous enterprise with its roots in Drogheda and it is an objective to locate in Drogheda or adjacent parts of Louth / Meath e.g. for proximity to existing suppliers / customers in the area.
- **Technically suitable** – E.g. sufficiently large to accommodate the proposed development.
- **Currently available and economically feasible to acquire.**
- **Suitable in respect of environmental considerations.**
- **Good prospect of securing planning permission.**

## 2.2 Alternative Locations Studied

- 2.2.1 The EIAR sets out three alternative locations studied by the Applicant. Further information in relation to the consideration of these three alternatives (referred to in this Document as alternative locations A1, A2 and A3) is set out within this Document.
- 2.2.2 It is considered that the extent of assessment undertaken in respect of these alternative locations as detailed within this Document should be more than sufficient to comply with relevant Guidance at Section 3.4.1 of the Environmental Protection Agency Guidelines on the Information to be Contained in Environmental Impact Assessment Reports. It is highlighted as set out in Section 3.1.2 of this Document that this Guidance sets out *inter alia* that 'It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option. A detailed assessment (or "mini-EIA") of each alternative is not required'.

**Table 1: Further information in relation to the information within the EIAR in relation to alternative location 'Lands Adjoining East of Hibernia Steel Premises, Grangegeeth, Co. Meath' (referred to in this Document as alternative location AL1).**

**Alternative Location 1 (AL1) – Lands Adjoining East of Hibernia Steel Premises, Grangegeeth, Co. Meath.**

*Figure 1: Extract from Meath County Development Plan 2021-2027 Web Mapping Application showing land use zoning, Rural Node boundaries and Flood Zones A and B. The relevant location comprises the premises of existing operational enterprise 'WK Composites' adjoining the east of the Hibernia Steel premises. The Hibernia Steel premises is to centre of image in grey hatching.*



**Comments**

- This location was first investigated at project inception stage before clear design information on the proposed development was known and upon review when preparing this Document is confirmed as too small to accommodate the proposed development.
- This location comprises the premises of an existing operational enterprise. No agreement to acquire the lands could be reached with the land owner (the land owner was not interested in selling the lands).
- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- This location does not benefit from any land use / zoning designation facilitating industrial development of the type / scale proposed. Under the Meath County Development Plan 2021-2027 ('the Meath County Development Plan') the lands are located within the Grangegeeth designated Rural Node which is within / surrounded by 'RA - Rural Area' zoning. It is considered that neither the relevant rural node policy nor the RA zoning facilitates industrial development of the type / scale proposed. It is unclear whether the Meath County Development Plan would support the proposed development at this location. Thus it is unclear whether there is a good prospect of securing planning permission at this location.
- This location is accessed via 'local' classification rural roads, and traffic between this location and the M1 motorway would utilise such roads including passing multiple dwellings along these roads.
- There are no known connections to the Irish Water foul drainage network in this rural area. Any

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requirement for significant water services investment at the Applicant’s expense could harm the viability of the project.

- It is unknown whether the Irish Water water network in this rural area has sufficient capacity to cater for the proposed development. Any requirement for significant water services investment at the Applicant’s expense could harm the viability of the project.

**Table 2: Further information in relation to the information within the EIAR in relation to alternative location ‘Lands Adjoining West of Hibernia Steel Premises, Grangegeeth, Co. Meath’ (referred to in this Document as alternative location AL2).**

**Alternative Location 2 (AL2) – Lands Adjoining West of Hibernia Steel Premises, Grangegeeth, Co. Meath**

**Figure 2: Extract from Meath County Development Plan 2021-2027 Web Mapping Application showing land use zoning, Rural Node boundaries and Flood Zones A and B. The relevant location comprises the open lands adjoining the west of the Hibernia Steel premises north of the River Devlin. The Hibernia Steel premises is to centre of image in grey hatching.**



**Comments**

- No agreement to acquire the lands could be reached with the land owner.
- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- This location does not benefit from any land use / zoning designation facilitating industrial development of the type / scale proposed. Under the Meath County Development Plan 2021-2027 (‘the Meath County Development Plan’) the lands are located within the Grangegeeth designated Rural Node which is within / surrounded by ‘RA - Rural Area’ zoning. It is considered than neither the relevant rural node policy nor the RA zoning facilitates industrial development of the type / scale proposed. It is unclear whether the Meath County Development Plan would support the proposed development at this location. Thus it is unclear whether there is a good prospect of securing planning permission at this location.
- This location is accessed via ‘local’ classification rural roads, and traffic between this location and the M1 motorway would utilise such roads including passing multiple dwellings along these roads.
- There are no known connections to the Irish Water foul drainage network in this rural area. Any

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requirement for significant water services investment at the Applicant's expense could harm the viability of the project.

- It is unknown whether the Irish Water water network in this rural area has sufficient capacity to cater for the proposed development. Any requirement for significant water services investment at the Applicant's expense could harm the viability of the project.
- The Meath County Development Plan 2021-2027 Web Mapping Application<sup>1</sup> indicates that parts of the location are located within Flood Zone A / Flood Zone B.

**Table 3: Further information in relation to the information within the EIAR in relation to alternative location 'Lands at Drogheda Business and Technology Park, Co. Meath' (referred to in this Document as alternative location AL3).**

**Alternative Location 3 (AL3) – Lands at Drogheda Business and Technology Park, Co. Meath**

**Figure 3: Extract from Meath County Development Plan 2021-2027 Southern Environs of Drogheda Land Use Zoning Map. The relevant location is between the business park access road to the west and the residential areas to the east.**



**Comments**

- The site is zoned 'E1 - Strategic Employment Zones (High Technology Uses)' under the Meath County Development Plan 2021-2027 ('the Meath County Development Plan'). It is considered that the proposed development does not meet the description under Section 11.14.6 of the Meath County Development Plan of development facilitated by this zoning and possibly would be contrary to the zoning designation. Thus it is considered that there may not be a good prospect of securing planning permission at this location.
- The Meath County Development Plan Southern Environs of Drogheda Written Statement states that 'Water supply in South Drogheda is served by the East Meath Water Supply Scheme. The main water source is abstraction from the River Boyne at Roughgrange where it is pumped to the Staleen Water Treatment Works and distributed to Drogheda and the East Meath Area following treatment. There is capacity available, however, there are network constraints' and 'Wastewater in the area is discharged to the Drogheda WWTP. Capacity is available but, there are network

<sup>1</sup> <https://meath.maps.arcgis.com/apps/instant/portfolio/index.html?appid=84a669c14a84416c92b3583ffd774e58>

constraints'. Any requirement at this location to upgrade water / wastewater networks at the Applicant's expense could harm the viability of the project.

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## 2.3 Key Issues Identified in the Consideration of the Locations Studied

2.3.1 A number of key issues were identified in the consideration of the locations studied as set out below and Table 4 of this Document sets out which locations the relevant issues were associated with. It is noted also as set out in Table 4 of this Document that none of these issues are associated with the Application Site.

- **Feasibility to acquire** – In the case of AL1 and AL2, no agreement to acquire the lands could be reached with the land owner.
- **Consistency with NPF / EMRA RSES strategic spatial strategy for growth** – It was considered that for AL1 and AL2, National Planning Framework (NPF) / Eastern and Midland Region Regional Spatial and Economic Strategy (EMRA RSES) strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over these locations.
- **Potential Development Plan policy constraints** – In the case of AL1, AL2 and AL3 potential Development Plan policy constraints were identified. (In the case of AL1 and AL2, absence of any land use / zoning designation facilitating industrial development of the type / scale proposed, and in the case of AL3, possible conflict with the zoning designation). A potential requirement under Section 5.12.4 of the Louth County Development Plan 2021-2027 ('the Louth County Development Plan') to agree a Masterplan was identified as a potential constraint on the Application Site (as this may not be within the Applicant's gift), however IDA Ireland advised that it would be developing a Masterplan for the future business park at this location.
- **Transport route between location and M1 motorway** – In the case of AL1 and AL2 the locations are accessed via 'local' classification rural roads, and traffic between the locations and the M1 motorway would utilise such roads including passing multiple dwellings along these roads.
- **Potential infrastructural constraints** – In the case of AL1, AL2 and AL3 potential infrastructural constraints were identified in relation to the availability of adequate water services infrastructure. In the case of the Application Site it was understood that the site would be fully serviced.
- **Potential environmental constraints** – In the case of AL2 the Meath County Development Plan 2021-2027 Web Mapping Application<sup>2</sup> indicates that parts of the location are located within Flood Zone A / Flood Zone B

2.3.2 Further to the foregoing, as a number of the submissions / observations received by Louth County Council in relation to the Planning Application raise objection to the proposed

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<sup>2</sup> See Footnote 1.

development on the basis of proximity to dwellings, it is noted for information that there are more dwellings within the environs (500m radius) of AL3 than within the environs of the Application Site.

*Table 4: How key issues identified in the consideration of the locations studied associated with each location (alternative locations AL1, AL2 and AL3 and the Application Site (AS)).*

Key issues identified in the consideration of the locations (see Section 2.3.1)	Locations				
	AL1	AL2	AL3		AS
Feasibility to acquire	Red	Red	Green		Green
Consistency with NPF / EMRA RSES strategic spatial strategy for growth	Red	Red	Green		Green
Potential Development Plan policy constraints	Red	Red	Red		Green
Transport route between location and M1 motorway	Red	Red	Green		Green
Potential infrastructural constraints	Red	Red	Red		Green
Potential environmental constraints	Green	Yellow	Green		Green

- Issue not associated with location
- Issue associated with location
- Issue associated with part(s) of location

2.3.3 It was considered (and it is still considered) that none of the alternative locations AL1, AL2 or AL3 are a preferable selection to the Application Site.

2.3.4 Furthermore It was considered (and it is still considered) unlikely that that locating the proposed development at any of the alternative locations AL1, AL2 or AL3 would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at these locations with similar design specification / characteristics to the proposed development).

## 2.4 Consultation with Louth County Council on the Proposed Location and Selection of the Application Site

2.4.1 Upon initial appraisal by Boylan Consulting it was considered that the Application Site could likely satisfactorily accommodate the proposed development from an environmental perspective, Furthermore it was noted that:

- Locating the proposed development at the Application Site was considered as consistent with NPF / EMRA RSES strategic spatial strategy for growth, noting in particular NPF policy objectives 2b and 7 and NPF / EMRA RSES Regional Policy Objectives 4.14 and 4.18 for the Drogheda Regional Growth Centre.

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- Locating the proposed development at the Application Site was considered as consistent with the growth strategy for Drogheda set out in the Louth County Development Plan. In particular in this regard was noted that the proposed development was considered as located within the Northern Environs of Drogheda as referenced in the Development Plan, and the Development Plan states that the development of the employment and residential lands in the Northern Environs are a fundamental element of the immediate and long-term growth strategy for the town (Development Plan Section 2.13.2). The Northern Environs was considered to contain two areas of undeveloped lands zoned for employment uses, located within the west and east of the Northern Environs area, respectively, and in view of this, it was considered that it follows that that employment development on the undeveloped lands zoned for employment uses within the west of the Northern Environs – including the application site – is a fundamental element of the immediate growth strategy for Drogheda, particularly as it was considered that the Development Plan indicates (Development Plan Section 5.12.4) there is at present no funding available for completion of the Port Access Northern Cross Route (PANCR) (a road project) as far as the undeveloped lands zoned for employment uses in the east of the Northern Environs, or the water services infrastructure to provide for the release of these lands.
- The location of the proposed development appeared as potentially supported by other key Louth County Development Plan policies including the E1 General Employment zoning designation pertaining to the location and Louth County Development Plan Policy MOV 41 which promotes and facilitates development at urban-related motorway interchanges including Junction 10 of the M1, in accordance with the zoning provisions for Drogheda, subject to the provision of a Traffic and Transport Assessment in the case of large scale development proposals.
- The application site is provided by IDA Ireland and comprises part of lands at this location to be developed as an IDA Ireland business park and it was understood that the site would be fully serviced.
- IDA Ireland advised that it would be developing a Masterplan for the future business park at this location which was considered as likely to meet the potential requirement under Section 5.12.4 of the Louth County Development Plan to agree a Masterplan in respect of the lands.
- It was also noted that the Application Site context included uncompleted access roads and other infrastructure installed on foot of planning permission Reg. Ref.: 071435 / An Bord Pleanála Ref.: PL15.228184 which were intended to serve lands in this area including the Application Site, representing significant prior investment in this area, and it was considered that the proposed development represented an opportunity to utilise some of this infrastructure, and it was considered that these were positive considerations in respect of the location of the proposed development.

2.4.2 In view of the foregoing it was considered that the location of the proposed development at the Application Site was potentially suitable and that the views of Louth County Council should be sought on the proposed development at this location.

- 2.4.3 The European Commission Guidance on the Preparation of the Environmental Impact Assessment Report highlights<sup>3</sup> the benefits of consultation in relation to the consideration of alternatives and in this regard it is highlighted that development at the Application Site was subject of a detailed planning consultation meeting with Louth County Council under Section 247 of the Planning and Development Act 2000 (as amended) in July 2022. Louth County Council's record of the consultation is included in Appendix 2 to the EIAR. It is highlighted that the Louth County Council advised that the lands are zoned 'employment generating lands' and as such the principle of the proposal is acceptable even though the use may be considered "heavy industry". It is noted that Louth County Council did not advise of any need to consider or discount alternative locations in order for the principle of the proposal to be considered acceptable at this location.
- 2.4.4 In view of the foregoing including this consultation feedback received from Louth County Council the Application Site was selected as the proposed development site.
- 2.4.5 Furthermore it was considered unlikely that any alternative locations existed which would both meet project objectives in respect of location and which would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at such locations with similar design specification / characteristics to the proposed development). Thus no further locations were investigated as there was considered to be little practical benefit in doing so, whether from the perspectives of facilitating the realisation of the project or protecting the environment.

### **3 Study of Further Alternative Locations for the Proposed Development carried out Subsequent to Louth County Council's Request for Further Information**

#### **3.1 Introduction**

- 3.1.1 Directive 2014/52/EU requires an EIAR to contain 'A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.'
- 3.1.2 The Environmental Protection Agency Guidelines on the Information to be Contained in Environmental Impact Assessment Reports state at Section 3.4.1 that 'The objective is for the developer to present a representative range of the practicable alternatives considered. The alternatives should be described with 'an indication of the main reasons for selecting the chosen option'. It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option. A detailed assessment (or 'mini-EIA') of each alternative is not required'.

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<sup>3</sup> See pages 53 and 55 of that Guidance.

3.1.3 As Louth County Council has requested further study as to alternative locations a detailed study as to further alternative locations has been carried out which is detailed in the following sections 3.2-3.8 of this Document. It is considered that the study accords with the relevant guidance within Section 3.4.1 of the Environmental Protection Agency Guidelines on the Information to be Contained in Environmental Impact Assessment Reports.

3.1.4 It is also noted that it is noted that the European Commission Guidance on the Preparation of the Environmental Impact Assessment Report highlights<sup>4</sup> the benefits of public consultation in respect of the identification and assessment of alternatives and in this regard as part of this study the submissions / observations received by Louth County Council on the Planning Application have been reviewed and any specific alternative locations suggested have been considered.

### 3.2 Defining a 'Reasonable Alternative' in respect of Alternative Locations

3.2.1 Directive 2014/52/EU states that an EIAR should contain '[...] a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics [...].

3.2.2 In respect of interpreting the phrase 'reasonable alternatives', it is highlighted that the European Commission Guidance on the Preparation of the Environmental Impact Assessment Report states at Page 52 that 'Alternatives have to be able to accomplish the objectives of the Project in a satisfactory manner, and should also be feasible in terms of technical, economic, political and other relevant criteria' and at Page 55 that 'Alternatives have to be 'reasonable', meaning that feasible Project options meet the Project's objectives.' Thus it is considered that reasonable alternatives in respect of location are those which are technically, economically, etc., feasible and which meet the project's objectives.

### 3.3 Project Objectives in Respect of Location

3.3.1 Previous Section 3.2.2 of this Document set out that it is considered that 'reasonable alternatives' in respect of location are those which are technically, economically, etc., feasible and which meet the project's objectives.

3.3.2 As set out in Section 2.1 of this Document the subject project's objectives in respect of location include:

- **Reasonable proximity to the M1 (ROI) / A1 (NI) route, at a suitable location along the route balancing access time to prospective markets in both ROI and NI** – The Applicant advises there are prospective markets in both the Republic of Ireland (ROI) and Northern Ireland (NI), with the majority of the potential market in ROI. A project objective is reasonable proximity to the M1 (ROI) / A1 (NI) route for access to these markets, at a

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<sup>4</sup> See Footnote 3.

suitable location balancing access time to prospective markets in both ROI and NI. The M1 near Drogheda is the preferred location along the route.

- **Reasonable proximity to Hibernia Steel's existing premises in Grangegeeth, Co. Meath** – Hibernia Steel's existing premises in Grangegeeth, Co. Meath provides steel storage / supply and some steel finishing activities (steel cutting, drilling, shotblasting and painting). There is anticipated to be a degree of movement of goods between the existing premises and the proposed development.
- **Local indigenous enterprise** – In addition it is highlighted that Hibernia Steel is a local indigenous enterprise with its roots in Drogheda and it is an objective to locate in Drogheda or adjacent parts of Louth / Meath e.g. for proximity to existing suppliers / customers in the area.
- **Technically suitable** – E.g. sufficiently large to accommodate the proposed development.
- **Currently available and economically feasible to acquire.**
- **Suitable in respect of environmental considerations.**
- **Good prospect of securing planning permission.**

### 3.4 Search for Further Alternatives Undertaken

- 3.4.1 Having regard to the project's objectives for reasonable proximity to the M1 (ROI) / A1 (NI) route and reasonable proximity to Hibernia Steel's existing premises in Grangegeeth, Co. Meath an area of search was defined as illustrated in Figure 4. This comprised areas which are within both a 20-minute drive of two-way access to the M1 motorway and a 20-minute drive of Hibernia Steel's existing premises in Grangegeeth, Co. Meath.
- 3.4.2 Following this, all lands within this area zoned E1 under the Louth County Development Plan or E2 under the Meath County Development Plan 2021-2027 ('the Meath County Development Plan') as the case may be were identified. These are the respective zoning designations considered as offering a good prospect for securing planning permission for the proposed development, which may be considered 'heavy industry' (subject to all other planning policies and material planning considerations which may apply).
- 3.4.3 Following this, a search was carried out for all open<sup>5</sup> lands within these identified zoned areas being of a size approximately equivalent or larger than the Application Site, in order to accommodate the proposed development. Within the resulting areas any lands subject of valid as yet undetermined planning applications or extant (i.e. not lapsed) planning permissions were excluded.
- 3.4.4 In addition to the above, one location (AL10), comprising an area of open lands adjoining the southeast of Hibernia Steel's existing premises in Grangegeeth, Co. Meath which had not previously been considered, was selected for consideration. Consideration had already been

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<sup>5</sup> Lands not occupied by buildings and not appearing as within the curtilages of buildings.

given to the open lands adjoining the west of this premises (AL2) and this was to ensure that consideration had also been given to the open lands to the southeast<sup>6</sup>.

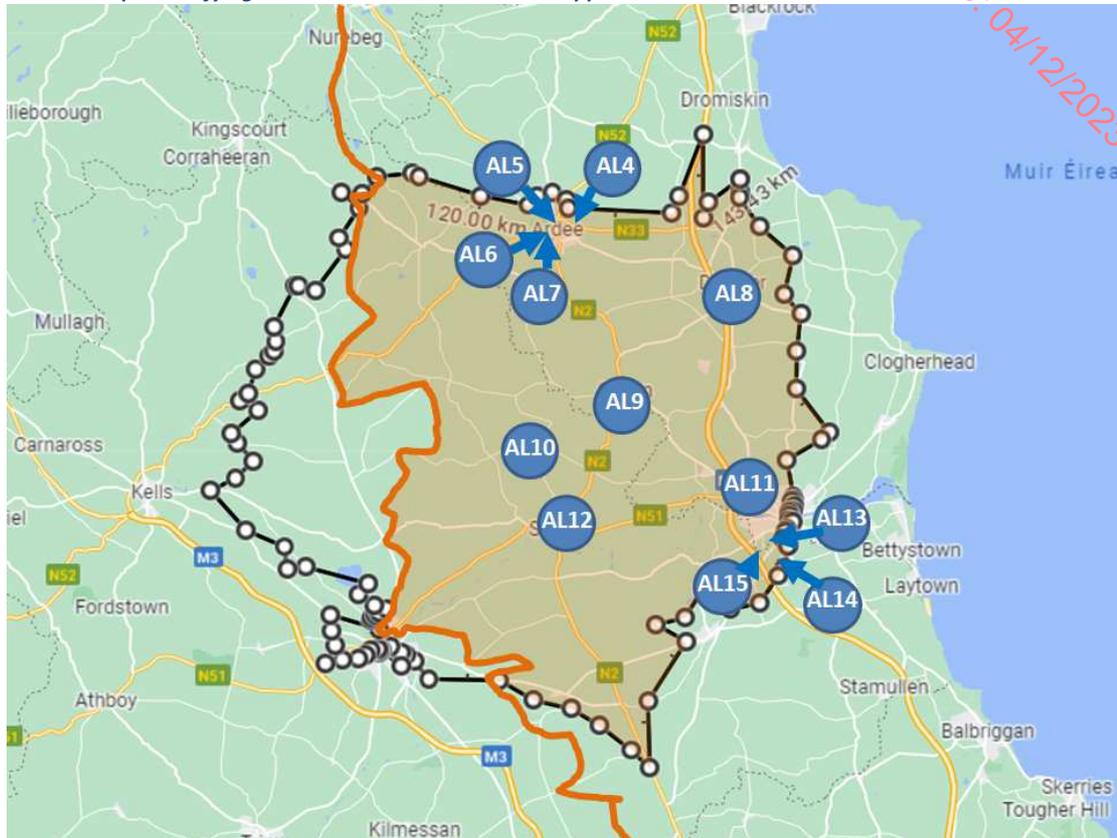
*Figure 4: Annotated Google Maps extract with defined area of search shown orange comprising areas which are within both a 20-minute drive of two-way access to the M1 motorway and a 20-minute drive of Hibernia Steel's existing premises in Grangeeeth, Co. Meath. Drive times calculated using Google Maps.*



- 3.4.5 This resulted in a set of 12 further alternative locations (AL4-AL15) as indicated in Figure 5. Detailed maps identifying the locations are set out in the Appendix to this Document. (Note the numerical order / sequence of the further alternative locations merely denotes most northerly to most southerly and does not indicate e.g. preference / suitability.)
- 3.4.6 It is noted that in all cases, it is unknown as to whether land at these further alternative locations is currently available and economically feasible to acquire. In the event that insufficient land at any of the locations is currently available or it is economically unfeasible to acquire sufficient land, any such location(s) would not meet the project's objective for the location to be currently available and economically feasible to acquire (see Section 2.1 of this Document), and it is considered in that event any such location(s) would not comprise 'reasonable' alternative(s) (see Section 3.2 of this Document).

<sup>6</sup> The premises also adjoins further open lands to the south across the River Devlin, however this location was not considered as it is not considered suitable due to extensive flood risk at this location.

Figure 5: Annotated Google Maps extract indicating the locations of further alternative locations AL4-AL15. Detailed maps identifying the locations are set out in the Appendix to this Document.



### 3.5 Consideration of Further Alternative Locations Identified

3.5.1 As set out in the previous Section 3.4 of this Document 12 further alternative locations (AL4-AL15) have been identified through the search undertaken. The Appendix to this Document sets out detailed maps identifying each of the relevant locations and comments on each location.

3.5.2 It is considered that the extent of assessment undertaken in respect of these alternative locations as detailed within this Document should be more than sufficient to comply with relevant Guidance at Section 3.4.1 of the Environmental Protection Agency Guidelines on the Information to be Contained in Environmental Impact Assessment Reports. It is highlighted as set out in Section 3.1.2 of this Document that this Guidance sets out *inter alia* that 'It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option. A detailed assessment (or "mini-EIA") of each alternative is not required'.

### 3.6 Key Issues Identified in the Consideration of the Locations

3.6.1 A number of key issues have been identified in the consideration of these locations as set out below and Table 5 of this Document sets out which locations the relevant issues were

associated with. It is noted also as set out in Table 5 of this Document that none of these issues are associated with the Application Site.

- **Consistency with NPF / EMRA RSES strategic spatial strategy for growth** – It is considered that for AL4, AL5, AL6, AL7, AL8, AL9, AL10, and AL12, National Planning Framework (NPF) / Eastern and Midland Region Regional Spatial and Economic Strategy (EMRA RSES) strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over these locations.
- **Potential Development Plan policy constraints** – In the case of AL4, AL8, AL10, AL11 and AL13 potential Development Plan policy constraints have been identified e.g. possible need to agree a Masterplan in respect of zoned lands (which may not be within the Applicant's gift). (It is noted there is a Louth County Development Plan masterplanning requirement at the Application Site – IDA Ireland has prepared a concept masterplan for the future business park at this location (a copy of which was included with the Planning Application)).
- **Transport route between location and M1 motorway** – In the case of AL5 and AL10, traffic would pass multiple dwellings lining the route between the location and the M1 motorway. This issue may also be associated with part of AL11. In the case of AL6, AL7, AL9 and AL12, traffic would pass through a town / village centre. In the case of AL13, traffic may pass through residential areas on Matthews Lane South and / or Platin Road to access M1 Junction 8. In the case of AL14, if access is taken from Platin Road, to the north, traffic may pass through residential areas on Platin Road to access M1 Junction 8.
- **Potential infrastructural constraints** – In the case of AL4, AL8, AL9, AL10, AL11, AL12, AL14 and AL15, potential infrastructural constraints have been identified in relation to the availability of adequate water services infrastructure. (In the case of the Application Site, water and wastewater connection for the future IDA Ireland business park will be completed as part of IDA Ireland's plans for the future business park).
- **Potential environmental constraints** – Parts of AL4, AL5, AL9, AL10, AL11 and AL14 were identified as potentially located within Flood Zone A / Flood Zone B. Parts of AL4, AL8, AL10, AL11 and AL12 were identified as potentially constrained by the presence of heritage assets e.g. Recorded Monuments, Protected Structures.
- **Other potential constraints** – Other potential constraints were identified in respect of AL13, AL14 and part of AL11, please refer to the Appendix to this Document.

3.6.2 Further to the foregoing, as a number of the submissions / observations received by Louth County Council in relation to the Planning Application raise objection to the proposed development on the basis of proximity to dwellings, it is noted for information that there are more dwellings within the environs (500m radius) of AL5, AL6, AL7, AL8, AL12, AL13 and AL15 than within the environs of the Application Site. There are also more dwellings within the environs (500 m radius) of parts of AL11 and AL14 than within the environs of the Application Site.

Table 5: How key issues identified in the consideration of the locations associated with each location (further alternative locations AL4-AL15 and the Application Site (AS)).

Key issues identified in the consideration of the locations (see Section 3.6.1)	Locations													AS
	AL 4	AL 5	AL 6	AL 7	AL 8	AL 9	AL 10	AL 11	AL 12	AL 13	AL 14	AL 15		
Consistency with NPF / EMRA RSES strategic spatial strategy for growth	Red	Red	Red	Red	Red	Red	Red	Green	Red	Green	Green	Green	Green	
Potential Development Plan policy constraints	Red	Green	Green	Green	Red	Green	Red	Red	Green	Red	Green	Green	Green	
Transport route between location and M1 motorway	Green	Red	Red	Red	Green	Red	Red	Green	Red	Red	Yellow	Green	Green	
Potential infrastructural constraints	Red	Green	Green	Green	Red	Red	Red	Red	Green	Red	Red	Red	Green	
Potential environmental constraints	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	
Other potential constraints	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Red	Red	Green	Green	

- Issue not associated with location
- Issue associated with location
- Issue associated with part(s) of location

### 3.7 Conclusions

- 3.7.1 It is considered that none of the further alternative locations AL4-AL15 is a preferable selection to the Application Site.
- 3.7.2 Furthermore it is considered unlikely that that locating the proposed development at any of the further alternative locations AL4-AL15 would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at these locations with similar design specification / characteristics to the proposed development).

### 3.8 Locations Suggested in Submissions / Observations received by Louth County Council on the Planning Application

- 3.8.1 It is noted that the European Commission Guidance on the Preparation of the Environmental Impact Assessment Report highlights<sup>7</sup> the benefits of public consultation in respect of the

<sup>7</sup> See Footnote 3.

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identification and assessment of alternatives and in this regard the submissions / observations received by Louth County Council on the Planning Application have been reviewed and any specific alternative locations suggested have been considered as set out in Table 6. In summary, none of these locations are considered as a preferable selection to the Application Site. Furthermore it is considered unlikely that that locating the proposed development at any of these locations would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at these locations with similar design specification / characteristics to the proposed development).

**Table 6: Consideration of specific alternative locations suggested within submissions / observations received by Louth County Council on the Planning Application.**

Submission / observation identifying specific alternative location	Specific alternative location suggested	Comments
Elaine Moore and Barry Mulvany	'the alternative sites mentioned in the report' (P. 4 of submission / observation letter)	<p><b><u>'the alternative sites mentioned in the report'</u></b></p> <p>This is taken as referring to the three alternative locations set out within the EIAR (see also Section 2 of this Document).</p> <p>As highlighted in sections 2.3.3-2.3.4 of this Document, it was considered (and it is still considered) that none of these alternative locations are a preferable selection to the Application Site.</p> <p>Furthermore It was considered (and it is still considered) unlikely that that locating the proposed development at any of the these alternative locations would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at these locations with similar design specification / characteristics to the proposed development).</p>
Kilineer and District Residents Association	<p>'in the dockland areas to the North of the Boyne or at Platin' (Paragraph 27 of submission / observation letter)</p> <p>'alternative locations within the IDA site' (Paragraph 28 of submission / observation letter)</p>	<p><b><u>'dockland areas to the North of the Boyne'</u></b></p> <p>This is considered as likely referring to the E1-zoned lands to the north-east of Drogheda referred to in the Louth County Development Plan 2021-2027 ('the Louth County Development Plan') as lands 'opposite Tom Roes Point ferry terminal'.</p> <p><b>Is this a 'reasonable' alternative location?</b></p> <p>Drive time from this location to the Hibernia Steel's existing premises in Grangegeeth, Co. Meath is in excess of 20 minutes (23 to the nearest part of the zoned area and 24 minutes at shortest to the areas of open lands at this location)<sup>8</sup>. As such it is</p>

<sup>8</sup> It is noted that the Port Access Northern Cross Route (PANCR) (a road project) when completed as far as these lands will likely shorten drive times from Hibernia Steel's existing premises to these lands, however the Louth

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		<p>considered that this location does not meet the project's objectives for reasonable proximity to Hibernia Steel's existing premises (see Section 2.1 of this Document), and as such this location is not considered a 'reasonable' alternative location (see Section 3.2 of this Document).</p> <p>The following is also noted in respect of this location:</p> <ul style="list-style-type: none"> <li>• <b>Feasibility to acquire</b> – It is unknown whether land at the location is currently available and economically feasible to acquire. In the event that insufficient land at the location is currently available or it is economically unfeasible to acquire sufficient land, the location would not meet the project's objective for the location to be currently available and economically feasible to acquire (see Section 2.1 of this Document), and it is considered in that event this would comprise a further reason why the location did not comprise a 'reasonable' alternative (see Section 3.2 of this Document).</li> <li>• <b>Potential Development Plan policy constraints</b> – It is considered that, in respect of any undeveloped parts of these E1-zoned lands, under Section 5.12.4 of the Louth County Development Plan a Masterplan is required to be in place before planning applications for development may come forward. It is unknown whether any Masterplan is in place for the lands or whether one would need to be prepared and agreed with the landowner(s). If there is a Masterplan in place and development did not accord with this, e.g. in respect of land use or phasing, this could harm the prospect of securing planning permission, and thus project viability. If a Masterplan would be required to be prepared, it is unknown whether the Applicant could agree a Masterplan with relevant landowner(s) and Louth County Council. If a Masterplan were required to be prepared and could not be agreed, this could harm the prospect of securing planning permission, and thus project viability.</li> <li>• <b>Transport route between location and M1 motorway</b> – Until such time as the Port Access Northern Cross Route (PANCR) (a road project) is completed as far as these lands (which is considered may be years from now, see Footnote 8), traffic</li> </ul>
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County Development Plan indicates (Louth County Development Plan Section 5.12.4) there is at present no funding available for completion of the PANCR as far as these lands, and it is considered that it may be years before the road is completed as far as the lands).

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		<p>between this site and the M1 motorway would need to pass through a substantial swathe of the Drogheda built-up area.</p> <ul style="list-style-type: none"> <li>• <b>Potential infrastructural constraints</b> – The Louth County Development Plan states at Section 5.12.4 that ‘the release of employment lands opposite Tom Roes Ferry terminal will require the delivery (or partial delivery) of the Port Access Northern Cross Route (PANCR) and water services infrastructure’. The Development Plan subsequently states at Section 5.12.4 that ‘At present there is no funding available for the construction of this road or the water services infrastructure therefore its delivery would have to be developer driven’. Further to this, it is highlighted that the undeveloped parts of this location comprise a site assessed within the Infrastructure Assessment and Land Use Evaluation report at Appendix 2 of the Louth County Development Plan. This assessment includes:           <ul style="list-style-type: none"> <li>○ The nearest sewer is located at entrance to Premier Periclase at the south of site.</li> <li>○ Assessment required depending on scale of development.</li> <li>○ Watermain is located on Termonfeckin Road to North of the site and on Baltray Road to the south. Supply and network subject to scale of development.</li> </ul> <p>Any requirement for significant water services investment at the Applicant’s expense could harm the viability of the project.</p> </li> <li>• <b>Potential environmental constraints</b> – Department of Housing, Local Government and Heritage Historic Environment Viewer website<sup>9</sup> on-line mapping indicates that the location contains six Recorded Monuments and a house and outbuildings listed within the National Inventory of Architectural Heritage, and the Louth County Development Plan Drogheda Zoning and Flood Zones Map indicates that parts of the location are located within Flood Zone A / Flood Zone B.</li> </ul> <p>It is noted that a number of the submissions / observations received by Louth County Council in relation to the Planning Application raise objection to the proposed development on the</p>
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<sup>9</sup> <https://heritagedata.maps.arcgis.com/apps/webappviewer/index.html?id=0c9eb9575b544081b0d296436d8f60f8>

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		<p>basis of proximity to dwellings. In this regard it is noted for information there are more dwellings within the environs (500m radius) of parts of the north and west of this location than within the environs of the Application Site.</p> <p><b>Conclusions</b></p> <p>This location is not considered a ‘reasonable’ alternative location</p> <p>It is considered that this location is not a preferable selection to the Application Site.</p> <p>Furthermore it is considered unlikely that that locating the proposed development at this location would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at this location with similar design specification / characteristics to the proposed development).</p> <p><b><u>‘Platin’</u></b></p> <p>This is considered as likely referring to lands within or adjoining the Platin Cement Works, Plant Co. Meath.</p> <p><b>Is this a ‘reasonable’ alternative location?</b></p> <p>Under the Meath County Development Plan 2021-2027 (‘the Meath County Development Plan’) these lands are zoned ‘RA - Rural Area’ (this is a new designation first introduced under the current Meath County Development Plan). It is considered that this zoning designation does not facilitate industrial development of the type / scale proposed. It is considered that the introduction of a new industrial use at this location would unlikely be supported by the Meath County Development Plan and that this location does not offer a good prospect of securing planning permission. As such it is considered that this location does not meet meet the project’s objectives for a location with a good prospect of securing planning permission (see Section 2.1 of this Document), and as such this location is not considered a ‘reasonable’ alternative location (see Section 3.2 of this Document).</p> <p>The following is also noted in respect of this location:</p> <ul style="list-style-type: none"> <li>• <b>Feasibility to acquire</b> – It is unknown whether land at the location is currently available and economically feasible to acquire. In the event that insufficient land at the location is currently available or it is economically unfeasible to acquire</li> </ul>
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		<p>sufficient land, the location would not meet the project’s objective for the location to be currently available and economically feasible to acquire (see Section 2.1 of this Document), and it is considered in that event this would comprise a further reason why the location did not comprise a ‘reasonable’ alternative (see Section 3.2 of this Document).</p> <ul style="list-style-type: none"> <li>• <b>Consistency with NPF / EMRA RSES strategic spatial strategy for growth</b> – It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.</li> <li>• <b>Potential infrastructural constraints</b> – this is an isolated rural location and on this basis it is considered there is potential for infrastructural constraints in relation to the availability of adequate water services infrastructure. Any requirement for significant water services investment at the Applicant’s expense could harm the viability of the project.</li> <li>• <b>Potential environmental constraints</b> – Department of Housing, Local Government and Heritage Historic Environment Viewer website<sup>10</sup> on-line mapping indicates that there are four Recorded Monuments in proximity (&lt;500m) to the north of the Platin Cement Works.</li> </ul> <p><b>Conclusions</b></p> <p>This location is not considered a ‘reasonable’ alternative location</p> <p>It is considered that this location is not a preferable selection to the Application Site.</p> <p>Furthermore it is considered unlikely that that locating the proposed development at this location would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at this location with similar design specification / characteristics to the proposed development).</p> <p><b><u>‘Alternative locations within the IDA Site’</u></b></p> <p>This is considered as likely referring to all lands within the future IDA Ireland business park at Mell, Drogheda, Co. Louth apart from</p>
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<sup>10</sup> See Footnote 9.

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		<p>the Application Site.</p> <p>The following is highlighted in respect of the location of the proposed development within the future business park:</p> <ul style="list-style-type: none"> <li>• The Application Site location is as provided by IDA Ireland.</li> <li>• Other locations within the future business park would not accord with IDA Ireland's concept masterplan for the business park (a copy of which was included with the Planning Application).</li> <li>• Part of the lands north of the Application Site within the future IDA Ireland business park is subject to a planning application for an office / light industrial development by IDA Ireland.</li> <li>• Siting close to the business park access to / from the R132 road minimises need for traffic to / from the proposed development to travel through the future business park. If traffic to / from the proposed development were to have to travel across the future business park this could harm the character of the future working environment of the business park and its ability to attract further investment.</li> </ul> <p><b>Conclusions</b></p> <p>It is considered that this location is not a preferable selection to the Application Site.</p> <p>Furthermore it is considered unlikely that that locating the proposed development at this location would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at this location with similar design specification / characteristics to the proposed development).</p>
Eilís de Buitléir-Kearney	<p>'the IDA Business Park and Technology Park' (P.5 of submission / observation letter)</p> <p>'the area around Tom Roes Point' (P.5 of submission / observation letter)</p>	<p><b>'The IDA Business Park and Technology Park'</b> – This is considered as likely referring to the IDA Ireland Drogheda Business and Technology Park, Co. Meath. As detailed in Section 2 of this Document, IDA Ireland provided the Applicant with a siting option (AL3) at this location and this has been considered and is considered not to be a preferable selection to the Application Site. Any other sites within this location (if available for acquisition) would be considered not to be a preferable selection to the Application Site for the same reasons.</p> <p><b>'The Area around Tom Roes Point'</b> – This is considered as likely referring to the same location as has been considered within this Table under 'Dockland Areas to the North of the Boyne'</p>

<p>Charles Carroll</p>	<p>‘the vacant serviced lands at Donore Road’ (P.4 of submission / observation O letter)</p> <p>‘adjacent to the applicant’s existing facility at Grangeneeth, Co. Meath’ (P.4 of submission / observation letter)</p> <p>‘alternative sites within the IDA lands’ (P.8 of submission / observation letter)</p>	<p>(suggestion by Kilineer and District Residents Association).</p> <p><b>‘The vacant serviced lands at Donore Road’</b> – As detailed in sections 3.1-3.7 of this Document a search for further alternative locations has been carried out subsequent to Louth County Council’s Request for Further Information. This identified one area of open E1-zoned land large enough to accommodate the proposed development in the Donore Road area (AL13). This location has been considered and is considered not to be a preferable selection to the Application Site. Furthermore it is considered unlikely that that locating the proposed development at this location would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at this location with similar design specification / characteristics to the proposed development).</p> <p><b>‘Adjacent to the applicant’s existing facility at Grangeneeth, Co. Meath’</b> – This is considered as likely referring to all lands adjacent to the Applicant’s existing premises in Grangegeeth, Co. Meath. As previously detailed in this Document, consideration has been given to the open lands adjoining the west of this premises (AL2) and the open lands adjoining the southeast of the premises (AL10). (The premises also adjoins further open lands to the south across the River Devlin, however this location was not considered as it is not considered suitable due to extensive flood risk at this location). Consideration has also been given to lands adjoining the east of the premises (AL1) comprising the premises of an existing operational enterprise. As previously concluded, it is considered that none of these alternative locations are a preferable selection to the Application Site., and furthermore It is considered unlikely that that locating the proposed development at any of these alternative locations would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at these locations with similar design specification / characteristics to the proposed development).</p> <p><b>‘Alternative sites within the IDA Lands’</b> – This is considered as likely referring to all lands within the future IDA Ireland business park at Mell, Drogheda, Co. Louth apart from the Application Site. This has been considered within this Table under ‘Alternative locations within the IDA Site’ (suggestion by Kilineer and District Residents Association).</p>
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## 4 Conclusions

4.1 This Document comprises an addendum to the Environmental Impact Assessment Report accompanying Planning Application Louth County Council Reg. Ref.: 2360115 and provides a

response to Louth County Council's Request for Further Information in relation to the consideration of alternative locations for the proposed development.

- 4.2 The EIAR sets out three alternative locations studied by the Applicant. Further information in relation to the consideration of these three alternatives has been provided.
- 4.3 A detailed study as to further alternative locations has been carried out. As part of this study the submissions / observations received by Louth County Council on the Planning Application have been reviewed and any specific alternative locations suggested have been considered.
- 4.4 It is considered that none of these alternative locations is a preferable selection to the Application Site. Furthermore it is considered unlikely that that locating the proposed development at any of these alternative locations would result in significantly improved performance in EIA terms by comparison with the Application Site (assuming development at these locations with similar design specification / characteristics to the proposed development).

## 5 Bibliography

Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Environmental Protection Agency, May 2022.

Environmental Impact Assessment of Projects: Guidance on the Preparation of the Environmental Impact Assessment Report, European Commission, November 2017.

National Planning Framework, Department of Housing, Planning and Local Government, February 2018.  
Eastern and Midland Regional Spatial and Economic Strategy, Eastern and Midland Regional Assembly, June 2019.

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Meath County Development Plan 2021-2027, Meath County Council, November 2021.

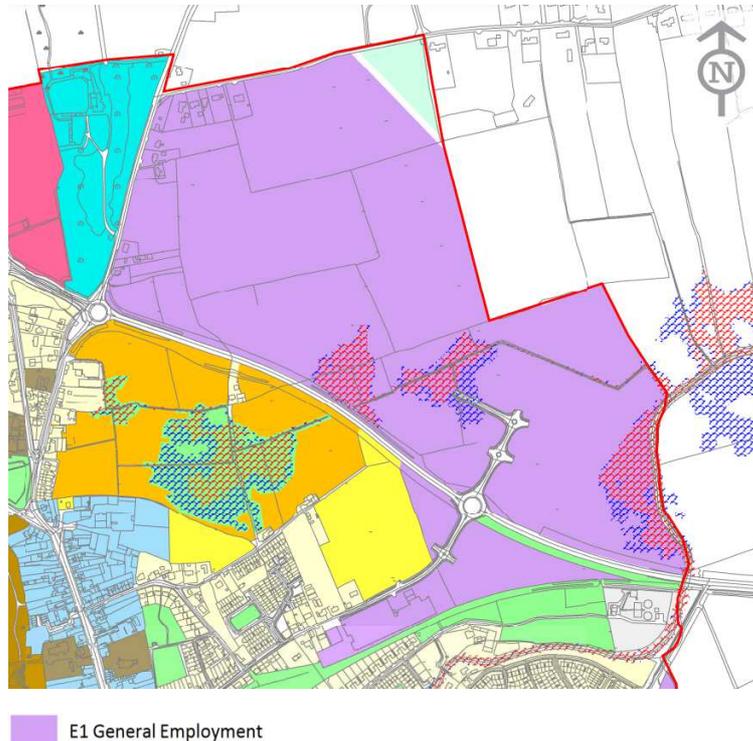
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# Appendix

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### Alternative Location 4 (AL4) – Lands North-East of Ardee, Co. Louth

Figure A1: Extract from Louth County Development Plan 2021-2027 Ardee Zoning and Flood Zones Map. The relevant location comprises all areas of open lands within the E1-zoned area sufficiently large to accommodate the proposed development, apart from part of the northwest of the area, and part of the area adjoining the part-built access road north of the N33 road, which are subject of valid as yet undetermined planning applications / extant (i.e. not lapsed) planning permissions.



#### Comments

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- It is unknown whether a Masterplan is in place for these E1-zoned lands or whether under Section 13.13.1 of the Louth County Development Plan 2021-2027 ('the Louth County Development Plan') one would need to be prepared and agreed with the landowner(s). If there is a Masterplan in place and development did not accord with this, e.g. in respect of land use or phasing, this could harm the prospect of securing planning permission, and thus project viability. If a Masterplan would be required to be prepared, it is unknown whether the Applicant could agree a Masterplan with relevant landowner(s) and Louth County Council. If a Masterplan were required to be prepared and could not be agreed, this could harm the prospect of securing planning permission, and thus project viability.
- The Infrastructure Assessment and Land Use Evaluation report at Appendix 2 of the Louth County Development Plan states in relation to the part of these E1-zoned lands north of the N33 road that the lands are 'serviceable depending on the size of development, water supply in particular'. Any requirement at this location to upgrade water supply at the Applicant's expense could harm the viability of the project.
- Department of Housing, Local Government and Heritage Historic Environment Viewer website on-line mapping indicates there is a Recorded Monument within the location in proximity to the

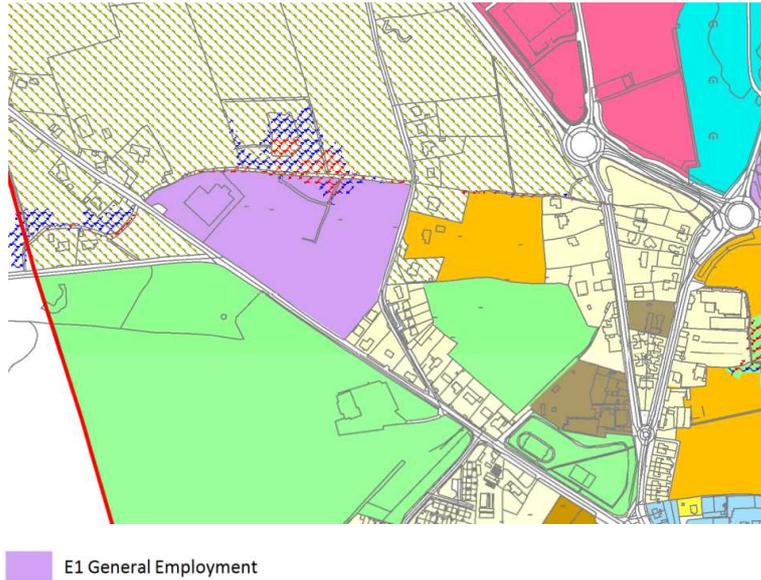
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N33 road.

- The Louth County Development Plan Ardee Zoning and Flood Zones Map indicates that parts of the location are located within Flood Zone A / Flood Zone B.

### Alternative Location 5 (AL5) – Lands North-West of Ardee, Co. Louth

*Figure A2: Extract from Louth County Development Plan 2021-2027 Ardee Zoning and Flood Zones Map. The relevant location comprises all open lands within the E1-zoned area.*



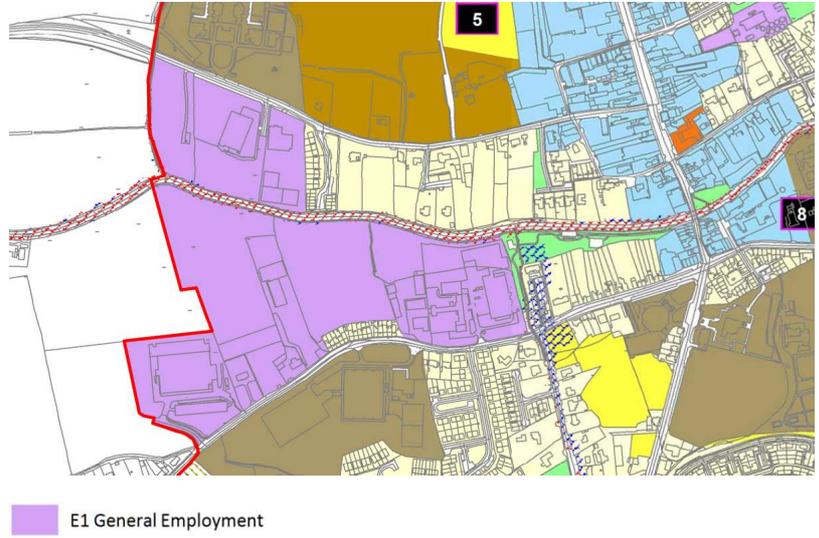
### Comments

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- Traffic between this location and the M1 motorway would pass multiple dwellings on Golf Links Road, the N2 road and the N52 road.
- The Louth County Development Plan Ardee Zoning and Flood Zones Map indicates that part of the location is located within Flood Zone A / Flood Zone B.

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### Alternative Locations 6 and 7 (AL6 and AL7) – Lands West of Ardee, Co. Louth

Figure A3: Extract from Louth County Development Plan 2021-2027 Ardee Zoning and Flood Zones Map. The relevant locations comprise the areas of open lands adjoining the south of the River Dee within the west and centre respectively of the E1-zoned area.

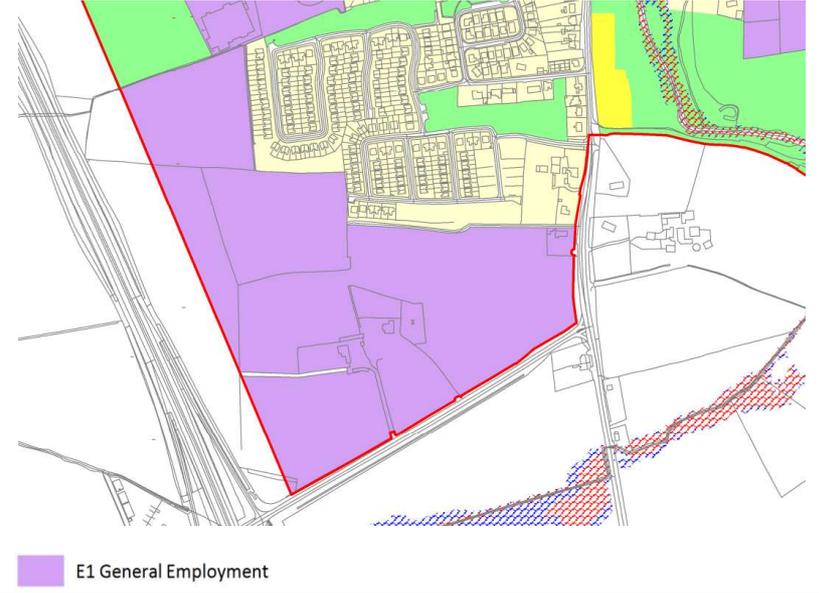


#### Comments

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over these locations.
- Traffic between these locations and the M1 motorway would pass through Ardee town centre.

### Alternative Location 8 (AL8) – Lands South-West of Dunleer, Co. Louth

Figure A4: Extract from Louth County Development Plan 2021-2027 Dunleer Zoning and Flood Zones Map. The relevant location comprises all open lands within the E1-zoned area.



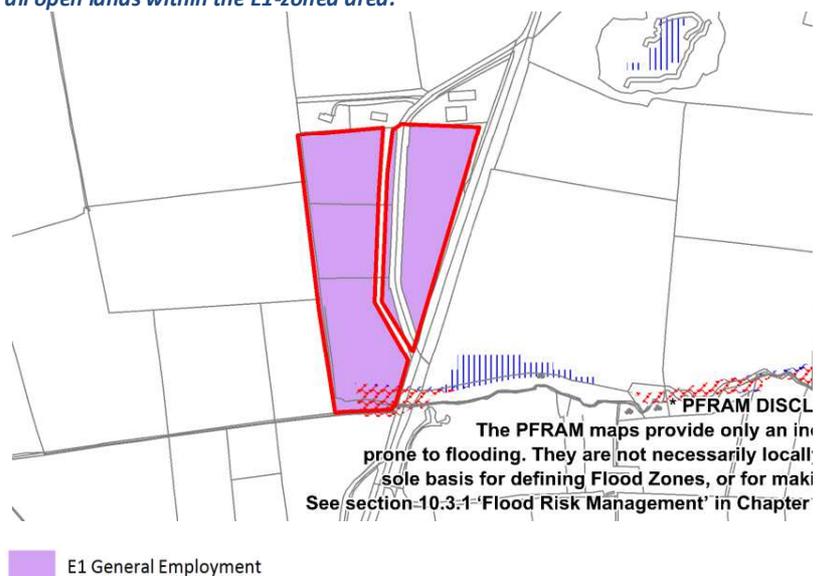
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**Comments**

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- Under Policy SS 51 of the Louth County Development Plan 2021-2027 ('the Louth County Development Plan') a Masterplan is required to be in place for these E1-zoned lands before planning applications may come forward for development on the lands. It is unknown whether a Masterplan is in place or whether one would need to be prepared and agreed with the landowner(s). If there is a Masterplan in place and development did not accord with this, e.g. in respect of land use or phasing, this could harm the prospect of securing planning permission, and thus project viability. If a Masterplan would be required to be prepared, it is unknown whether the Applicant could agree a Masterplan with relevant landowner(s) and Louth County Council. If a Masterplan were required to be prepared and could not be agreed, this could harm the prospect of securing planning permission, and thus project viability.
- The Infrastructure Assessment and Land Use Evaluation report at Appendix 2 of the Louth County Development Plan states in relation to these E1-zoned lands that 'Water Supply the main issue. Adjacent estate required to be taken in charge' and 'Extension of sewer required to connect to a 225mm sewer. Local sewer network capacity check also required'. Any requirement at this location to upgrade water supply / extend sewer network / upgrade local sewer network capacity at the Applicant's expense could harm the viability of the project.
- Department of Housing, Local Government and Heritage Historic Environment Viewer website on-line mapping indicates there is a house and grounds listed within the National Inventory of Architectural Heritage within the location.

**Alternative Location 9 (AL9) – Lands South of Collon, Co. Louth**

*Figure A5: Extract from Louth County Development Plan 2021-2027 Collon Zoning and Flood Zones Map. The relevant location comprises all open lands within the E1-zoned area.*



**Comments**

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise

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locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.

- Traffic between this location and the M1 motorway would pass through Collon village.
- The Louth County Development Plan 2021-2027 ('the Louth County Development Plan') Collon Village Statement states at Section 8.5 in respect of water services that Collon is located within the Ardee, Collon and Drybridge Water Resource Zone, which had capacity, but when peaktimes and headrooms are taken into account, there is a deficiency; and in respect of wastewater services that there was limited capacity in the Collon Waste Water Treatment Plant at the time of writing. The Infrastructure Assessment and Land Use Evaluation report at Appendix 2 of the Louth County Development Plan states in relation to these E1 -zoned lands that there is 'No wastewater network, would have to be developer driven'. Any requirement at this at this location to upgrade water supply / wastewater treatment capacity / provide local wastewater network at the Applicant's expense could harm the viability of the project.
- The Louth County Development Plan Collon Zoning and Flood Zones Map indicates that part of the location is located within Flood Zone A / Flood Zone B.

**Alternative Location 10 (AL10) – Lands Adjoining Southeast of Hibernia Steel Premises, Grangegeeth, Co. Meath**

*Figure A6: Extract from Meath County Development Plan 2021-2027 Web Mapping Application showing land use zoning, Rural Node boundaries and Flood Zones A and B. The relevant location comprises the open lands adjoining the southeast of the Hibernia Steel premises north of the River Devlin. The Hibernia Steel premises is to centre of image in grey hatching.*



**Comments**

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- This location does not benefit from any zoning designation facilitating industrial development of the type / scale proposed. Under the Meath County Development Plan 2021-2027 ('the Meath County Development Plan') the location is zoned 'RA - Rural Area'. It is considered that the RA zoning does not facilitate industrial development of the type / scale proposed. It is unclear whether the Meath County Development Plan would support the proposed development at this

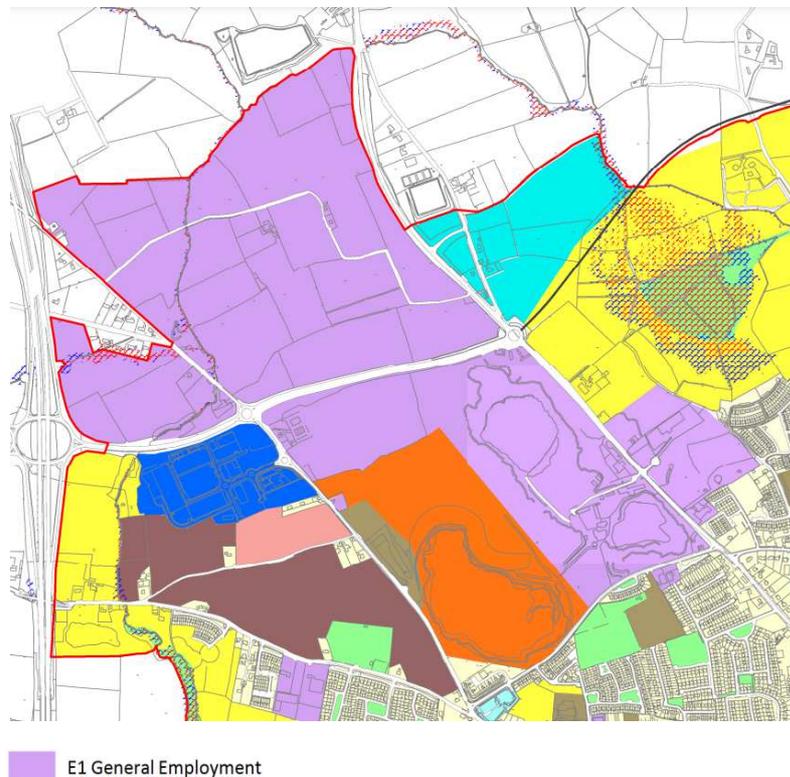
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location. Thus it is unclear whether there is a good prospect of securing planning permission at this location.

- This location is accessed via 'local' classification rural roads, and traffic between this location and the M1 motorway would utilise such roads including passing multiple dwellings along these roads.
- There are no known connections to the Irish Water foul drainage network in this rural area. Any requirement for significant water services investment at the Applicant's expense could harm the viability of the project.
- It is unknown whether the Irish Water water network in this rural area has sufficient capacity to cater for the proposed development. Any requirement for significant water services investment at the Applicant's expense could harm the viability of the project.
- The site is in proximity to a historic graveyard to the east (indicated on Figure A6) which comprises two Recorded Monuments.
- The Meath County Development Plan 2021-2027 Web Mapping Application indicates that parts of the location are located within Flood Zone A / Flood Zone B.

#### Alternative Location 11 (AL11) – Lands North-West of Drogheda, Co. Louth

*Figure A7: Extract from Louth County Development Plan 2021-2027 Drogheda Zoning and Flood Zones Map. The relevant location comprises all areas of open lands within the E1-zoned area sufficiently large to accommodate the proposed development, apart from the Application Site which is located in this area and the lands subject of IDA Ireland's valid as yet undetermined planning application for development north of the Application Site within the future IDA Ireland business park.*



#### Comments

- It is considered that under Section 5.12.4 of the Louth County Development Plan 2021-2027 ('the

Louth County Development Plan') a Masterplan is required to facilitate development on these E1-zoned lands. A concept masterplan has been prepared by IDA Ireland in respect of the future IDA Ireland business park (including the proposed development) within the north of the lands (a copy of which accompanies the Planning Application), however it is unknown whether any Masterplan is in place for other parts of these lands or whether one would need to be prepared and agreed with the landowner(s). If, in respect of such other parts of the lands, there is a Masterplan in place and development did not accord with this, e.g. in respect of land use or phasing, this could harm the prospect of securing planning permission, and thus project viability. If a Masterplan would be required to be prepared, it is unknown whether the Applicant could agree a Masterplan with relevant landowner(s) and Louth County Council. If a Masterplan were required to be prepared and could not be agreed, this could harm the prospect of securing planning permission, and thus project viability.

- Siting at any locations within the future IDA Ireland business park apart from the Application Site would not accord with IDA Ireland's concept masterplan in respect of the future Business Park.
- If access is taken from existing roads within / adjoining the northwest of the lands, depending on the location of the access, traffic between this location and the M1 motorway could pass dwellings along the roads in this area.
- Parts of the southeast of the lands are former quarries which would need restoration which if required at the Applicant's expense would harm project viability.
- The Infrastructure Assessment and Land Use Evaluation report at Appendix 2 of the Louth County Development Plan states in respect of the part of the lands north of the N51 road that:
  - There is no sewer in the vicinity of the site.
  - The nearest Watermain is at the Junction at M1 Retail Park.
  - Network assessment required depending on scale of development

The Report states in respect of the part of the lands south of the N51 road that:

- The nearest sewer is located at the southeast corner of the site.
- Assessment required depending on scale of development.
- Watermain is adjacent to the site. Supply subject to scale of development.
- Network assessment required depending on scale of development.

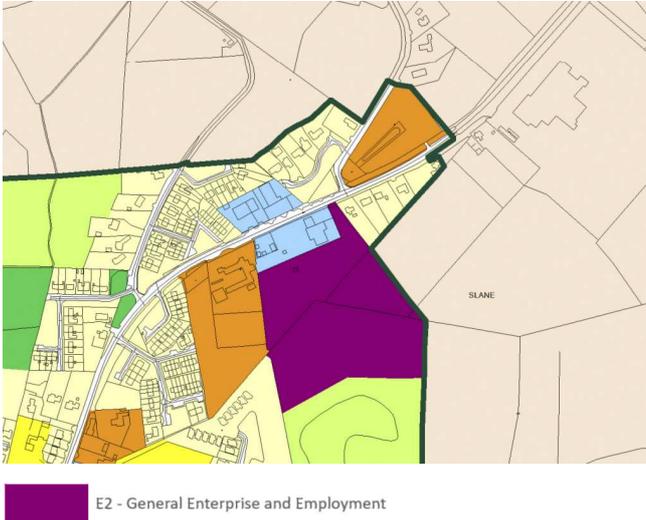
Water and wastewater connection for the future IDA Ireland business park will be completed as part of IDA Ireland's plans for the future business park, however it is unclear whether suitable water / sewer provision exists in other parts of the lands. Any requirement at such other parts of the lands for significant water services investment at the Applicant's expense could harm the viability of the project.

- Department of Housing, Local Government and Heritage Historic Environment Viewer website on-line mapping indicates there are two Recorded Monuments and a farm complex listed within the National Inventory of Architectural Heritage within the west of the location.
- The Louth County Development Plan Drogheda Zoning and Flood Zones Map indicates that parts of the lands are located within Flood Zone A/ Flood Zone B.

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**Alternative Location 12 (AL12) – Lands at Slane, Co. Meath**

*Figure A8: Extract from Meath County Development Plan 2021-2027 Slane Land Use Zoning Map. The relevant location comprises the E2-zoned area.*



**Comments**

- It is considered that NPF / EMRA RSES strategic spatial strategy for growth policy would prioritise locating the proposed development within Drogheda (a designated Regional Growth Centre within the EMRA RSES) over this location.
- Traffic between this location and the M1 motorway would pass through Slane village.
- The Meath County Development Plan 2021-2027 Slane Written Statement states at Section 4.3 that Slane Wastewater Treatment Plant has limited spare capacity and there are no current plans for a Capital expansion. Any requirement at this location to upgrade wastewater treatment capacity at the Applicant's expense could harm the viability of the project.
- Department of Housing, Local Government and Heritage Historic Environment Viewer website on-line mapping indicates there is a Recorded Monument within the location and the location is in proximity to two protected structures to the west.

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**Alternative Location 13 (AL13) – Lands at Donore Road, Drogheda, Co. Louth**

*Figure A9: Extract from Louth County Development Plan 2021-2027 Drogheda Zoning and Flood Zones Map. The relevant location comprises the area of open lands within the E1-zoned area adjoining the residential and open space lands to the north / east.*



**Comments**

- It is unknown whether a Masterplan is in place for these E1-zoned lands or whether under Section 13.13.1 of the Louth County Development Plan 2021-2027 one would need to be prepared and agreed with the landowner(s). If there is a Masterplan in place and development did not accord with this, e.g. in respect of land use or phasing, this could harm the prospect of securing planning permission, and thus project viability. If a Masterplan would be required to be prepared, it is unknown whether the Applicant could agree a MP with relevant landowner(s) and Louth County Council. If a Masterplan were required and could not be agreed, this could harm the prospect of securing planning permission, and thus project viability.
- Traffic between this location and the M1 motorway may pass through residential areas on Matthews Lane South and / or Platin Road to access M1 Junction 8 (note Junction 9 is for traffic to / from north only).
- This location is a cleared previously developed site and any requirement to remediate soils or clear sub-surface structures / infrastructure at the Applicant's expense could harm the viability of the project.

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## Alternative Location 14 (AL14) – Lands South of Drogheda, Co. Meath

Figure A10: Extract from Meath County Development Plan 2021-2027 Southern Environs of Drogheda Land Use Zoning Map. The relevant location comprises all open lands within the E2-zoned area.



 E2 - General Enterprise and Employment

### Comments

- If access is taken from Platin Road, to the north, traffic between this location and the M1 motorway may pass through residential areas on Platin Road to access M1 Junction 8.
- The Meath County Development Plan 2021-2027 Southern Environs of Drogheda Written Statement states that 'Water supply in South Drogheda is served by the East Meath Water Supply Scheme. The main water source is abstraction from the River Boyne at Roughgrange where it is pumped to the Staleen Water Treatment Works and distributed to Drogheda and the East Meath Area following treatment. There is capacity available, however, there are network constraints' and 'Wastewater in the area is discharged to the Drogheda WWTP. Capacity is available but, there are network constraints'. Any requirement at this location to upgrade water / wastewater networks at the Applicant's expense could harm the viability of the project.
- If there is any requirement for the Applicant to fund the construction / part construction of the M1 to former N1 link road (shown in Figure A10 to south of location dotted red) this could harm the viability of the project.
- Part of the location is in proximity to a protected structure to the north.
- The Meath County Development Plan 2021-2027 Web Mapping Application indicates that parts of the location are located within Flood Zone A / Flood Zone B.

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**Alternative Location 15 (AL15) – Lands South-West of Drogheda, Co. Meath**

*Figure A11: Annotated extract from Meath County Development Plan 2021-2027 Southern Environs of Drogheda Land Use Zoning Map. The relevant location comprises the centre and south west part of within the E2-zoned area (other parts of the E2-zoned area are subject of valid as yet undetermined planning applications / extant (i.e. not lapsed) planning permissions or are insufficiently large to accommodate the proposed development).*



**Comments**

- The Meath County Development Plan 2021-2027 Southern Environs of Drogheda Written Statement states that 'Water supply in South Drogheda is served by the East Meath Water Supply Scheme. The main water source is abstraction from the River Boyne at Roughgrange where it is pumped to the Staleen Water Treatment Works and distributed to Drogheda and the East Meath Area following treatment. There is capacity available, however, there are network constraints' and 'Wastewater in the area is discharged to the Drogheda WWTP. Capacity is available but, there are network constraints'. Any requirement at this location to upgrade water / wastewater networks at the Applicant's expense could harm the viability of the project.

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