

**AN BORD PLEANÁLA**

LDG- 070673-24  
ABP- 319281-24

**15 MAR 2024**

Fee: € 220 Type: caid  
Time: 13:04 By: Hand

Elaine Moore & Barry Mulvany  
Drakerath Lane  
Killineer Drogheda  
Co Louth  
A92 Y5F7

Greg & Pauline Clarke  
Drakerath Lane  
Killineer Drogheda  
Co Louth  
A92 F6Y0

The Secretary,  
An Bord Pleanála  
Dublin 1

March 15<sup>th</sup>, 2024

**Re: Third party appeal against the decision of Louth County Council**

**Planning Authority Ref: 2360115 (Louth County Council)**

**Site name: Drogheda North Business Park**

**Applicant name: Hibernia Steel (Manufacturing) Limited**

**Proposed Development:**

Permission for development including: 1) Construction of approx. 5,719 sq.m. gross floor area (GFA) main building, to house hot dip metal galvanising plant, machinery & associated works & containing materials loading & unloading areas, chemicals storage areas & staff welfare facilities. The main building will be in two main sections, both single storey, consisting of a northern section of approx. 2,636 sq.m. GFA & a southern section of approx. 2,404 sq.m. GFA, with maximum heights above finished ground levels of 17.30m & 14.55m, respectively, together with an approx. 679 sq.m. GFA two storey over basement section with a maximum height above finished ground level of 8.90m, adjoining the east of the northern section. The main building will include 4 no. emissions stacks located on the roof of the northern section of the building, each rising to a height of 2.7m above the maximum height of the northern section & 1 no. emission vent located on the western side of the northern section of the building, at a height of 7.2m above finished ground level. 2) Construction of approx. 298 sq.m. GFA two storey office building to be located to north of main building, containing main reception area & general offices. 3) Provision of hardstanding area, processed & unprocessed materials storage areas & HGV/trailer parking spaces. 4) Provision of vehicular & pedestrian entrance. 5) Provision of 110 car parking spaces, including 7 EV charging points & 20 bicycle spaces. 6) Provision of internal access road. 7) Provision of 2 no. weighbridges. 8) Installation of 2 no. LPG tanks, 9) Construction of ESB substation within the main building. 10) Provision of bunded fuel storage area. 11) Provision of stormwater drainage & treatment infrastructure, including permeable paving, attenuation unit, infiltration area, rainwater harvesting tanks & ass. works. 12) Site landscaping works, including raised soil berm on part of the western boundary of the site with a max. ht. of approx. 3m above finished ground level. 13) Firewater retention infrastructure. 14) Provision of site security fencing & entrance walls and gates. 15)

16) Provision of signage. 17) Provision of site lighting. 17) And all ancillary site development works. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be submitted with the application. The proposed development will require an Industrial Emissions (IE) Licence, under the EPA Act 1992, as amended.

To whom it may concern,

We wish to lodge an appeal against the decision of Louth County Council as described above. The decision was made 19 February 2024.

- Confirmation of submission to Louth County Council is included with this appeal.
- Fee of €220 paid upon hand delivery of this appeal.

We are residents of Drakerath Lane, and it is our homes that the proposed development will be overlooking.

We are writing to express our absolute objection to the proposed construction of a hot-dip galvanising facility by Hibernia Steel (Manufacturing) Limited. The location of the land that they intend to use for this heavy industry plant is directly next to our residential family homes.

We are the extremely unfortunate residents who now face the possibility of being "hemmed in" and experiencing a huge deterioration in the quality of our lives by this vast facility.

This is a rural setting and when we (Elaine Moore & Barry Mulvany) bought our house 9 years ago, we were aware that the land surrounding us was designated for light industrial/warehouse buildings which seemed acceptable. Had we known that down the line there was the possibility of a heavy industrial manufacturing plant being built directly opposite and overlooking us we would never have considered buying. We have loved living here and as you can imagine have worked extremely hard to purchase our home and continue to pay our mortgage, not to mention the substantial time and money we have invested in making our home as energy efficient as we can.

Greg & Pauline Clarke have lived in this peaceful rural area for over 38 years, aware that the area was zoned for light industrial/warehouse buildings which was deemed acceptable. However, with Pauline suffering from asthma, the emissions from a heavy industrial facility of this magnitude are an obvious cause for concern. (Pollutant concerns are outlined further down)

#### **As reference**

The planning history for the surrounding lands includes a 2018 permission for development including a light industrial / warehouse building on lands across the access road to the northwest [D] (see Section 3).

When we saw the (first) site notice nestled away in the hedge on the lane we were utterly appalled that this green field site was deemed appropriate for such a heavy industrial manufacturing plant. After viewing the files online, we quickly discovered how vast, in all aspects, this building would be.

Appendix 16 of the planning documents details the visibility of the proposed facility from different vantage points. Examples of vantage points on the planning permission application: R132 Rosehall

roundabout, Hill of Rath roundabout, the new residential area adjacent to Drogheda Institute of Further Education.

In regard to the note on the new residential area adjacent to Drogheda Institute of Further Education, it states the following:

*“open views toward the site are currently achievable from this location, however as residential properties in this area are constructed and associated landscape implemented, views of the subject development will become limited. There are several new housing developments recently constructed or planned in this area which is subject to significant change with strong peri-urban influence. Proposed structure/screen planting around the subject site boundary will in time assist with visual integration and mitigation”*

I would like to highlight the fact that the planning permission application has not taken account of our vantage points. I've included photos from the home of Elaine & Barry, which will allow you to envision what we are facing if this were to go ahead. See Appendix pictures at the end of this letter. Currently it's a woodland area and if this facility is approved, we will be fully encroached upon with potential loss of natural light as the **facility is a monstrous 17.30 meters in height. Also, to note that four of the five emission towers/chimneys are 20meters high.**

The facility will be fully visible to us, something that the planning application fails to take account of, but as noted above they are confident that in time the new housing development will eventually have “limited views”. In this statement alone they are fully aware that this development is not appealing or appropriate to residents, and for reasons that are outside of our understanding, they decided to exclude those that it directly affects.

**To reference Louth Development Plan: Chapter 13 – Development Management Guidelines**  
<https://www.louthcoco.ie/en/publications/development-plans/louth-county-development-plan-2021-2027/chapter-13-web-.pdf>

#### **13.13.1 Business Parks and Industrial Estates**

*“The design and layout of business parks and industrial estates shall create a functional and attractive working environment where building design is of a high quality and pedestrians, cyclists, and motor vehicles can easily navigate around. A Masterplan will be required to be prepared for any expansive areas of undeveloped employment lands to ensure the access and internal roads, services, infrastructure requirements and phasing can be agreed in order to ensure the development of the lands can be appropriately managed and co-ordinated thus avoiding ad-hoc, piecemeal development.”*

#### **13.13.3 Design and Scale**

*“The design and scale of any building shall be appropriate for the intended use. The visual impact of larger buildings shall be reduced by incorporating a suitable mix of finishes and architectural treatment that breaks the building up, particularly on the front elevation. Contemporary building design will be encouraged. Landmark buildings of notable design will be encouraged at strategic locations in settlements or within business/industrial parks. **Where residential areas are adjacent to industrial and business parks or employment lands, consideration shall be given to having reduced heights where these land uses meet so as to minimise the contrast and impact between the two areas. Roof mounted equipment such as extractor fans or antenna shall be designed to integrate into the building and shall be appropriately screened where possible.”***

**To reference Louth Development Plan:**

#### **13.21.17 E1 General Employment**

*Generally Permitted Use Builders Provider/Yard, Business Enterprise Centre, Childcare Facility, Digital Innovation Hub/Coworking Space, Education Facility (Third Level or Training Centre), E- Charging Facility, Energy Installation, Food Processing Facility, High Technology Manufacturing, Hotel/Hostel/Aparthotel, Industry Light, Industry General, Logistics, Offices, Park and Ride Facilities, Port Related Uses, Research and Development, Road Transport Depot, Science and Technology Based Enterprise, Utilities, Vehicle Sales Outlet, Wholesale Warehousing/ Cash and Carry, Warehousing (General).*

*Open for Consideration Abattoir, Coffee Shop/Tea Room, Car Dismantler/Recovery Yard, Data Centres, Garden Centre, Industry Heavy\*, Plant and Tool Hire, Public Services, Recycling Facility (Waste), Service Station, Telecommunications Structures, Vehicle Servicing/Maintenance Garage.*

***\*As deemed appropriate to the specific location.***

*Land uses that are listed as 'Open for Consideration' may be acceptable to the Planning Authority where it is satisfied that the proposed development would be compatible with the overall policy objectives for the zoning category, would not have undesirable effects on the 'generally permitted uses' or conflict with other aspects of the Plan, and would otherwise be consistent with the proper planning and sustainable development of the area.*

A Galvanising plant of this size is not appropriate as it is not compatible with Generally Permitted Uses. Should this development proceed in the location, our homes on Drakerath Lane will be surrounded on three sides, which we believe is contrary to good planning.

This shows how unsuitable the site is for a structure like this. It also will significantly devalue the properties on Drakerath Lane.

Precedence has been set by planning reference Louth Co Council 07 1999 (Terry King Quarry) and An Bord Pleanála decision APB-308555-20 Kildare County Council, (Colm Egan).

#### **Pollutant concerns:**

Another extremely concerning aspect of the hot-dip galvanising facility is the many hazardous chemicals used in the process.

The likes of "Waste Pickling Acid" (liquid) "Zinc & Ammonium Chloride" (liquid), "Waste Stripping Acid" (liquid) "Degreaser" – consisting of ammonium compounds, dimethyl, ethoxylated, chlorides, Phosphonic acid, bisodium hydroxide (liquid), "High Hydrated Lime - Calcium dihydroxide" (solid, resulting in white fumes). Along with others that will be used and stored adjacent to our home.

We are not part of the mains water system so therefore have a private well, which we share with our neighbours. The location of our well is mere meters away from our hedges which border the site. As there was no third party well survey, we have located our well in an attached photograph in relation to the proposed site.

#### 8.4.15 Third Party Wells

A third party well survey was not carried out as part of this assessment. In terms of inferred groundwater flow direction there are no residences downgradient of potentially contaminating site activities. There are no groundwater abstractions proposed at the development site hence there will be no potential impact to third party wells in terms of yield or groundwater levels.

In addition, there is a problem with metals collecting on the ground at hot dip galvanising plants & a huge concern for us is the possibility of seepage of any of the *many* hazardous materials feeding into our water supply and resultant contamination.

Along with our own well, the planning application fails to highlight the presence of two large reservoirs in the area as well as an aquifer. Any potential risks from a galvanising facility, such as a chemical leak could absolutely pose a threat to the local water supply.

Emissions from the towers/chimneys are also cause for concern. They consist of:

- Cooling tower
- Flue gases from boiler
- Flue gases from standby boiler
- Acid Vapours Scrubber
- White Dust Fumes Filter

Our concern here is that we don't know what potential long term affect these emissions will have on our health and that of our seven-year-old daughter. We are obviously hugely concerned that with dust fumes and acid fumes blowing over into our garden and home, that our health will be adversely affected.

Also, to note that from research, the smell produced from galvanising is Sulphur (rotten egg) resulting in another hugely adverse living condition for us.

It states on the planning application that the proposed opening hours of the facility is 6.30am to 8.00pm Monday to Friday and 8.00am to 1.00pm on Saturdays.

The proximity of the plant and the hours of operation mean that we will have almost constant noise pollution six days a week which has the potential to cause stress and anxiety. We are aware that there are two main roads close by which does result in low level of noise but this is nothing in comparison to an almost 6000m<sup>2</sup> heavy industrial facility within meters of our home.

2.4.4 Hours of operation

The proposed opening hours of the facility are 6.30 am to 8.00 pm Monday to Friday and 08.00 am to 01.00 pm on Saturdays.

The processing plant operational hours will be restricted to 07.00 am to 05.00 pm on weekdays. The facility will not be opened on Sundays or bank holidays.

We hope that after you review our concerns and objections that we have raised, that you will conclude that the proposed location is not suitable and that there are more appropriate locations, including the alternative sites mentioned in the report, for a heavy industrial site such as this. There is also a concern that this could set a precedent in the area for more heavy industries in a location that is primarily agricultural and residential and the level of anxiety this application has caused in the neighbourhood is immense.

Thank you for your time in reading this objection and please do not hesitate to contact us if there is any further information that you require from us.

Yours sincerely,

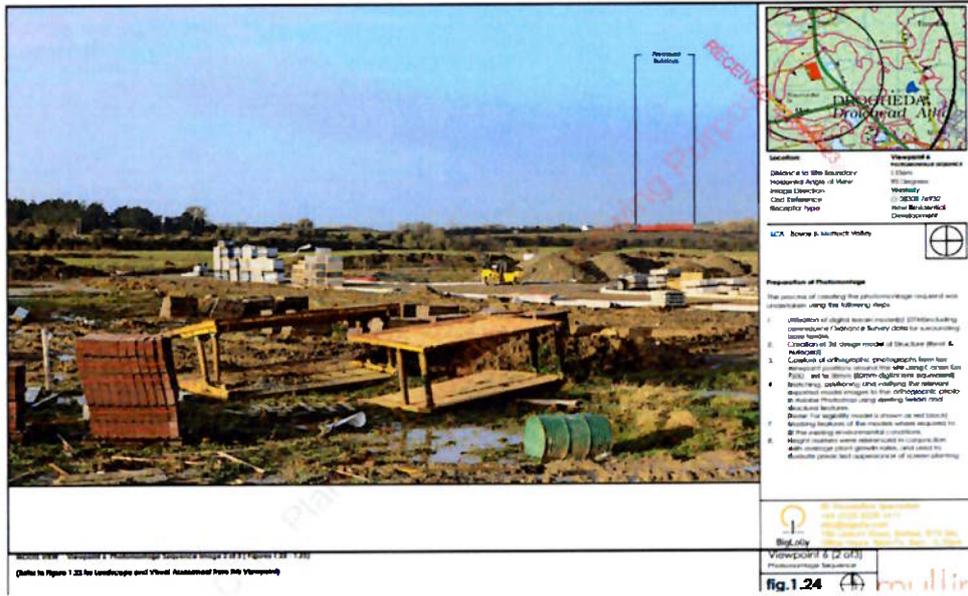


Elaine Moore & Barry Mulvany



Greg & Pauline Clarke

Appendix: Vantage point taken from the application submitted by Hibernia Steel



Please note the box in all the pictures below indicates the proposed building.

Appendix: Vantage point from our daughter's bedroom (arrow signifies the location of our well):



Appendix: Vantage point from bedroom:



Appendix: Vantage point from our family bathroom:



**PLANNING AND DEVELOPMENT REGULATIONS, 2006 (as amended)**

**ACKNOWLEDGEMENT OF RECEIPT OF SUBMISSION OR OBSERVATION  
ON A PLANNING APPLICATION**

**THIS IS AN IMPORTANT DOCUMENT!**

**KEEP THIS DOCUMENT SAFELY. YOU WILL BE REQUIRED TO  
PRODUCE THIS ACKNOWLEDGEMENT TO AN BORD PLEANALA IF  
YOU WISH TO APPEAL THE DECISION OF THE PLANNING  
AUTHORITY.**

**LOUTH COUNTY COUNCIL**

**PLANNING APPLICATION REFERENCE NO. 23/60115**

Hibernia Steel (Manufacturing) Limited., Permission for development including:

- 1) Construction of approx. 5,719 sq.m. gross floor area (GFA) main building, to house hot dip metal galvanising plant, machinery and associated works and containing materials loading and unloading areas, chemicals storage areas, and staff welfare facilities. The main building will be in two main sections, both single storey, consisting of a northern section of approx. 2,636 sq.m. GFA and a southern section of approx. 2,404 sq.m. GFA, with maximum heights above finished ground levels of 17.30m and 14.55m, respectively, together with an approx. 679 sq.m. GFA two storey over basement section with a maximum height above finished ground level of 8.90m, adjoining the east of the northern section. The main building will include 4 no. emissions stacks located on the roof of the northern section of the building, each rising to a height of 2.7m above the maximum height of the northern section, and 1 no. emission vent located on the western side of the northern section of the building, at a height of 7.2m above finished ground level.
- 2) Construction of approx. 298 sq.m. GFA two storey office building to be located to north of main building, containing main reception area and general offices.
- 3) Provision of hardstanding area, processed and unprocessed materials storage areas and HGV/trailer parking spaces.
- 4) Provision of vehicular and pedestrian entrance.
- 5) Provision of 110 car parking spaces, including 7 EV charging points, and 20 bicycle spaces.
- 6) Provision of internal access road.
- 7) Provision of 2 no. weighbridges
- 8) Installation of 2 no. LPG tanks,
- 9) Construction of ESB substation within the main building.
- 10) Provision of bunded fuel storage area.
- 11) Provision of stormwater drainage and treatment infrastructure, including permeable paving, attenuation unit, infiltration area, rainwater harvesting tanks and ass. works.
- 12) Site landscaping works, including raised soil berm on part of the western boundary of the site with a max. ht. of approx. 3m above finished ground level.
- 13) Firewater retention infrastructure.
- 14) Provision of site security fencing and entrance walls and gates.
- 15) Provision of signage.
- 16) Provision of site lighting.
- 17) And all ancillary site development works.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be submitted with the application.

The proposed development will require an Industrial Emissions (IE) Licence, under the EPA Act 1992, as amended at Mell, Drogheda, Co. Louth.

A submission/observation in writing has been received from:

Greg & Pauline Clarke, Drakerath Lane, Killineer Road, Drogheda, County Louth, A92  
F6Y0

on 21<sup>st</sup> June, 2023 in relation to the above application.

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2006 (as amended), and will be taken into account by the Planning Authority in its determination of the Planning Application.

The appropriate fee of €20.00 has been paid.

  
\_\_\_\_\_  
Conor Kerrigan  
Planning Office



DATE: 22/06/2023

Louth CC, Planning Department - View for Purposes Only



## **LOUTH COUNTY COUNCIL**

Town Hall, Crowe Street, Dundalk, County Louth A91 W20C  
Tel: 042/9335457

### **PLANNING AND DEVELOPMENT ACT, 2000 (as amended)**

Date: 21/06/2023

TO: Greg & Pauline Clarke  
Drakerath Lane  
Killineer Road  
Drogheda  
County Louth, A92 F6Y0

### **ACKNOWLEDGEMENT OF SUBMISSION**

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

**Description of Development:** Permission for development including:  
1) Construction of approx. 5,719 sq.m. gross floor area (GFA) main building, to house hot dip metal galvanising plant, machinery and associated works and containing materials loading and unloading areas, chemicals storage areas, and staff welfare facilities. The main building will be in two main sections, both single storey, consisting of a northern section of approx. 2,636 sq.m. GFA and a southern section of approx. 2,404 sq.m. GFA, with maximum heights above finished ground levels of 17.30m and 14.55m, respectively, together with an approx. 679 sq.m. GFA two storey over basement section with a maximum height above finished ground level of 8.90m, adjoining the east of the northern section. The main building will include 4 no. emissions stacks located on the roof of the northern section of the building, each rising to a height of 2.7m above the maximum height of the northern section, and 1 no. emission vent located on the western side of the northern section of the building, at a height of 7.2m above finished ground level. 2) Construction of approx. 298 sq.m. GFA two storey office building to be located to north of main building, containing main reception area and general offices. 3) Provision of hardstanding area, processed and unprocessed materials storage areas and HGV/trailer parking spaces. 4) Provision of vehicular and pedestrian entrance. 5) Provision of 110 car parking spaces, including 7 EV charging points, and 20 bicycle spaces. 6) Provision of internal access road. 7) Provision of 2 no. weighbridges 8) Installation of 2 no. LPG tanks, 9) Construction of ESB substation within the main building. 10) Provision of bunded fuel storage area. 11) Provision of stormwater drainage and treatment infrastructure, including permeable paving, attenuation unit, infiltration area, rainwater harvesting tanks and ass. works. 12) Site landscaping works, including raised soil berm on part of the western boundary of the site with a max. ht. of approx. 3m above finished ground level. 13) Firewater retention infrastructure. 14) Provision of site security fencing and entrance walls and gates. 15) Provision of signage. 16) Provision of site lighting. 17) And all ancillary site development works.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be submitted with the application.

The proposed development will require an Industrial Emissions (IE) Licence, under the EPA Act 1992, as amended

**Location of Development:** Mell, Drogheda, Co. Louth.

**Date Application Received:** 22/05/2023

**Type of Application:** PERMISSION

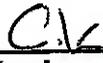
A Chara

I wish to acknowledge receipt of your written submission/observation in relation to the above application.

The Planning Authority will take this submission/observation into consideration before a decision is made on the application. You will be notified of the decision as soon as it is made together with details of your right of appeal to An Bord Pleanala.

The application and all plans, etc. submitted with it are available for inspection at this office from 9 a.m. to 5 p.m. Monday to Friday. Please quote the planning reference number (2360115) in any future correspondence or enquiry.

Mise, le meas

  
\_\_\_\_\_  
**Conor Kerrigan**  
**Planning Office**

Louth CC, Planning Department - Viewing Purposes Only

1

GREG AND PAULLINE CLARKE  
DRAKERATH LANE  
KILLINEER ROAD, DROGHEDA  
CO LOUTH  
A92F6Y0



PLANNING REF No 2360115

SUBJECT: OBJECTION OF PROPOSED CONSTRUCTION OF A HOT-DIP GALVANISING FACILITY IN DROGHEDA NORTH BUSINESS PARK KILLINEER ROAD DROGHEDA CO LOUTH, BY HIBERNIA STEEL (MANUFACTURING) LIMITED

DEAR LOUTH COUNTY COUNCIL

I AM WRITING, ON BEHALF OF MY WIFE PAULLINE AND MYSELF, TO EXPRESS OUR STRONG OBJECTION TO THE PROPOSED CONSTRUCTION AND OPERATION OF A HOT DIP GALVANISING STEEL FACILITY BY HIBERNIA STEEL (MANUFACTURING) LIMITED. WE STRONGLY BELIEVE THAT SUCH A FACILITY SO CLOSE TO OUR HOME WOULD HAVE A DETRIMENTAL EFFECT TO OUR LIVES, LET ALONE THE LOCAL COMMUNITY AND THE ENVIRONMENT.

THIS FACILITY, WHICH IS GOING TO OPERATE SIX DAYS A WEEK, IS TO BE BUILT FIFTY OR SIXTY METRES FROM OUR BACK DOOR. WE HAVE LIVED IN THIS PEACEFULL AREA FOR 38 YEARS, ANY NOISE FROM ROAD TRAFFIC IS VERY FAINT. BUT A FACTORY LIKE THIS ONE WOULD DRASTICALLY CHANGE THAT. THE NOISE FROM SUCH A FACILITY WOULD BE LIFE CHANGING

MY WIFE PAULLINE, WHO IS AN ASTHMA PATIENT, WOULD SUFFER FROM EMISSIONS FROM THIS FACTORY. SHE ATTENDS WHEATON HALL MEDICAL PRACTICE AND THIS FACTORY WOULD MAKE HER CONDITION A LOT

Louth CC, Planning Department - Viewing Purposes Only

WORSE. BEING AN ASTHMA SUFFERER SHE SOMETIMES GETS CHEST INFECTIONS SO THIS FACILITY WOULD BE A GREAT CONCERN TO US.

CONTAMINATION OF OUR WELL WATER, AND THE POSSIBLE CONTAMINATION OF THE RESERVOIR, THAT SUPPLIES WATER TO THE TOWN OF DROGHEDA AND THE NEW HOMES IS OF GREAT CONCERN.

THANK YOU FOR CONSIDERING OUR OBJECTION I BELIEVE THIS PROPOSED HEAVY INDUSTRY SCALE GALVANISING PLANT IS NOT IN THE BEST INTERESTS OF THE RESIDENTS AND THE SURROUNDING AREA. I TRUST THAT THE LOUTH COUNTY COUNCIL PLANNING DEPARTMENT WILL CAREFULLY REVIEW AND ADDRESS THE CONCERNS RAISED

YOUR SINCERELY

Greg Clarke Pauline Clarke

FOOTNOTE:

ALMOST FORTY YEARS AGO, PAULINE AND MYSELF, DECIDED TO BUY THIS HOUSE ON DRAKRATH LANE. WE PUT OUR HARD EARNED MONEY INTO THIS PROPERTY TO MAKE A HOME. OVER THE YEARS WE BUILT AN EXTENSION AND MODERNISED THE OLD PART OF THE HOUSE. IF THIS FACTORY IS BUILT OUR HOME WOULD BE DEVALUED CONSIDERABLY.

Louth CC, Planning Department - Viewing Purposes Only

**LOUTH COUNTY COUNCIL  
PLANNING PAYMENTS RECEIVED**

Payment Method:  Cash  Cheque  Credit Card  Debit Card  
(Please Tick As Appropriate)

Payment Made By: Greg & Pauline Clarke  
(Insert Name & Address) Deerath Lane

Killineel Rd, Drogheda

NOTE: If payment is made by a cheque/card the above name must match that on the cheque/card. Refunds, where relevant, will only be made to the above name).

Contact Name & Phone Number: \_\_\_\_\_

Please receipt the following amounts to the appropriate codes as outlined.

DESCRIPTION	AMOUNT	RECEIPT CODE	AMOUNT PAID
PLANNING APPLICATION FEE	VARIES	PL008	
OBJECTION/SUBMISSION TO PLANNING APPLICATION	€20.00	PL030	€ 20
INSPECTION OF OLD FILE (OVER 7 YEARS OLD)	€47.00	PL005	
PHOTOCOPYING CHARGES	VARIES	PL027	
EXTENSION OF DURATION/APPROPRIATE PERIOD APPLICATION	€62.00	PL011	
APPLICATION FOR DECLARATION OF EXEMPTED DEVP (SECTION 5)	€80.00	PL010	
EXEMPTION CERT PART 5 - SOCIAL & AFFORDABLE S97	€45.00	PL010	
FULL PLANNING SEARCH	€84.00	PL024	
COPY OF PLANNING PERMISSION	€52.50	PL003	
SALE OF WEEKLY PLANNING LIST	€165.00	PL025	
SUNDRY RECEIPTS	VARIES	PL026	
		<b>Total</b>	Louth County Council

An Comhaide Chonradh Lú  
Lú  
21 JUN 2023  
Fuarthas

SIGNED: Muano Kiegan

DATE STAMP

21 JUN 2023  
Customer Services  
Drogheda

RECEIPT NUMBER: L14/0/61557  
Ref Planning/Forms/CSChecklist&Fees011214

# LCC - CUSTOMER SERVICES PLANNING CHECKLIST

## PLANNING APPLICATION

APPLICATION FORM \_\_\_\_\_ SITE NOTICE \_\_\_\_\_

FEE \_\_\_\_\_ CONTACT PHONE NO. \_\_\_\_\_

## OBJECTIONS/SUBMISSIONS(No Fee if it is Second Sub re Sig FI or Part VIII)

LETTER OF OBJECTION/SUBMISSION \_\_\_\_\_ SIGNATURE ON LETTER \_\_\_\_\_

PLANNING REF. NO. ✓ 2360115 (or Development Address if no Ref No. quoted)

NAME & ADDRESS FOR CORRESPONDENCE ON LETTER ✓

FEE £20 CONTACT PHONE NUMBER 086 3220553

## FULL PLANNING SEARCH

LETTER \_\_\_\_\_ MAP SITE OUTLINED IN RED \_\_\_\_\_

FEE \_\_\_\_\_ CONTACT PHONE NO. \_\_\_\_\_

## FURTHER INFORMATION (FI) RESPONSE RECEIVED

COVER LETTER \_\_\_\_\_ DRAWINGS OR OTHER DOCS \_\_\_\_\_

IF FI IS SIGNIFICANT IS THERE A NEWSPAPER & SITE NOTICE \_\_\_\_\_

CONTACT PHONE NO. \_\_\_\_\_

## EXTENSION OF DURATION/APPROPRIATE PERIOD APPLICATION

APPLICATION FORM \_\_\_\_\_ APPLICATION FORM SIGNED \_\_\_\_\_

FEE \_\_\_\_\_ CONTACT PHONE NUMBER \_\_\_\_\_

## SECTION 5 APPLICATION FOR DECLARATION OF EXEMPTED DEVELOPMENT

RELEVANT APPLICATION FORM \_\_\_\_\_ APPLICATION FORM SIGNED \_\_\_\_\_

FEE \_\_\_\_\_ CONTACT PHONE NUMBER \_\_\_\_\_

## EXEMPTION CERTIFICATE - PART 5 (SOCIAL & AFFORDABLE S97)

RELEVANT APPLICATION FORM \_\_\_\_\_ APPLICATION FORM SIGNED \_\_\_\_\_

FEE \_\_\_\_\_ CONTACT PHONE NUMBER \_\_\_\_\_

(NOTE: Tick as appropriate: All documents must be date stamped when received)

Signed: Yuanqiao Kuo Date 21/6/23 ref Planning/Forms/CSChecklist&Fees011214



**LOUTH COUNTY COUNCIL**

Town Hall, Crowe Street, Dundalk, County Louth A91 W20C  
Tel: 042/9335457

**PLANNING AND DEVELOPMENT ACT, 2000 (as amended)**

**Date: 19/06/2023**

**TO:** Elaine Moore & Barry Mulvany  
Drakerath Lane  
Killineer  
Drogheda  
County Louth A92 Y5F7

**ACKNOWLEDGEMENT OF SUBMISSION**

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

**Description of Development:** Permission for development including:  
1) Construction of approx. 5,719 sq.m. gross floor area (GFA) main building, to house hot dip metal galvanising plant, machinery and associated works and containing materials loading and unloading areas, chemicals storage areas, and staff welfare facilities. The main building will be in two main sections, both single storey, consisting of a northern section of approx. 2,636 sq.m. GFA and a southern section of approx. 2,404 sq.m. GFA, with maximum heights above finished ground levels of 17.30m and 14.55m, respectively, together with an approx. 679 sq.m. GFA two storey over basement section with a maximum height above finished ground level of 8.90m, adjoining the east of the northern section. The main building will include 4 no. emissions stacks located on the roof of the northern section of the building, each rising to a height of 2.7m above the maximum height of the northern section, and 1 no. emission vent located on the western side of the northern section of the building, at a height of 7.2m above finished ground level. 2) Construction of approx. 298 sq.m. GFA two storey office building to be located to north of main building, containing main reception area and general offices. 3) Provision of hardstanding area, processed and unprocessed materials storage areas and HGV/trailer parking spaces. 4) Provision of vehicular and pedestrian entrance. 5) Provision of 110 car parking spaces, including 7 EV charging points, and 20 bicycle spaces. 6) Provision of internal access road. 7) Provision of 2 no. weighbridges 8) Installation of 2 no. LPG tanks, 9) Construction of ESB substation within the main building. 10) Provision of bunded fuel storage area. 11) Provision of stormwater drainage and treatment infrastructure, including permeable paving, attenuation unit, infiltration area, rainwater harvesting tanks and ass. works. 12) Site landscaping works, including raised soil berm on part of the western boundary of the site with a max. ht. of approx. 3m above finished ground level. 13) Firewater retention infrastructure. 14) Provision of site security fencing and entrance walls and gates. 15) Provision of signage. 16) Provision of site lighting. 17) And all ancillary site development works.  
An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be submitted with the application.  
The proposed development will require an Industrial Emissions (IE) Licence, under the EPA Act 1992, as amended

**Location of Development:** Mell Drogheda Co. Louth.

**Date Application Received:** 22/05/2023

**Type of Application:** PERMISSION

A Chara

I wish to acknowledge receipt of your written submission/observation in relation to the above application.

The Planning Authority will take this submission/observation into consideration before a decision is made on the application. You will be notified of the decision as soon as it is made together with details of your right of appeal to An Bord Pleanala.

The application and all plans, etc. submitted with it are available for inspection at this office from 9 a.m. to 5 p.m. Monday to Friday. Please quote the planning reference number (2360115) in any future correspondence or enquiry.

Mise, le meas

  
\_\_\_\_\_  
**Conor Kerrigan**  
**Planning Office**

Louth CC, Planning Department - Viewing Purposes Only

**PLANNING AND DEVELOPMENT REGULATIONS, 2006 (as amended)**

**ACKNOWLEDGEMENT OF RECEIPT OF SUBMISSION OR OBSERVATION ON A  
PLANNING APPLICATION**

**THIS IS AN IMPORTANT DOCUMENT!**

**KEEP THIS DOCUMENT SAFELY. YOU WILL BE REQUIRED TO  
PRODUCE THIS ACKNOWLEDGEMENT TO AN BORD PLEANALA IF  
YOU WISH TO APPEAL THE DECISION OF THE PLANNING  
AUTHORITY.**

**LOUTH COUNTY COUNCIL**

**PLANNING APPLICATION REFERENCE NO. 23/60115**

Hibernia Steel (Manufacturing) Limited., Permission for development including:

1) Construction of approx. 5,719 sq.m. gross floor area (GFA) main building, to house hot dip metal galvanising plant, machinery and associated works and containing materials loading and unloading areas, chemicals storage areas, and staff welfare facilities. The main building will be in two main sections, both single storey, consisting of a northern section of approx. 2,636 sq.m. GFA and a southern section of approx. 2,404 sq.m. GFA, with maximum heights above finished ground levels of 17.30m and 14.55m, respectively, together with an approx. 679 sq.m. GFA two storey over basement section with a maximum height above finished ground level of 8.90m, adjoining the east of the northern section. The main building will include 4 no. emissions stacks located on the roof of the northern section of the building, each rising to a height of 2.7m above the maximum height of the northern section, and 1 no. emission vent located on the western side of the northern section of the building, at a height of 7.2m above finished ground level. 2) Construction of approx. 298 sq.m. GFA two storey office building to be located to north of main building, containing main reception area and general offices. 3) Provision of hardstanding area, processed and unprocessed materials storage areas and HGV/trailer parking spaces. 4) Provision of vehicular and pedestrian entrance. 5) Provision of 110 car parking spaces, including 7 EV charging points, and 20 bicycle spaces. 6) Provision of internal access road. 7) Provision of 2 no. weighbridges 8) Installation of 2 no. LPG tanks, 9) Construction of ESB substation within the main building. 10) Provision of bunded fuel storage area. 11) Provision of stormwater drainage and treatment infrastructure, including permeable paving, attenuation unit, infiltration area, rainwater harvesting tanks and ass. works. 12) Site landscaping works, including raised soil berm on part of the western boundary of the site with a max. ht. of approx. 3m above finished ground level. 13) Firewater retention infrastructure. 14) Provision of site security fencing and entrance walls and gates. 15) Provision of signage. 16) Provision of site lighting. 17) And all ancillary site development works.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be submitted with the application.

The proposed development will require an Industrial Emissions (IE) Licence, under the EPA Act 1992, as amended at Mell, Drogheda, Co. Louth.

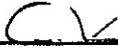
A submission/observation in writing has been received from:

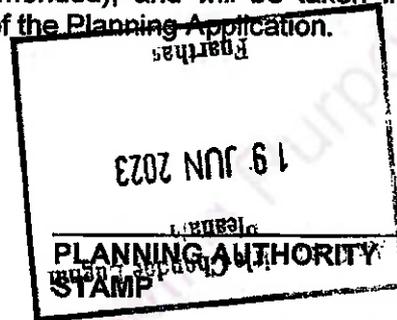
Elaine Moore & Barry Mulvany, Drakerath Lane, Killineer, Drogheda, County Louth A92 Y5F7

on 16<sup>th</sup> June, 2023 in relation to the above application.

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2006 (as amended), and will be taken into account by the Planning Authority in its determination of the Planning Application.

The appropriate fee of €20.00 has been paid.

  
\_\_\_\_\_  
Conor Kerrigan  
Planning Office



DATE: 19/06/2023

Louth CC, Planning Department - View for Purposes Only

Elaine Moore & Barry Mulvany  
Drakerath Lane  
Killineer  
Drogheda  
Co Louth  
A92 Y5F7

June 14<sup>th</sup> 2023

Planning Department,  
Louth County Council  
Town Hall  
Crowe Street  
Dundalk,  
Co Louth, A91 KFW6

**Re: Planning Application: 2360115 (Louth County Council)**

**Site name: Drogheda North Business Park**

**Applicant name: Hibernia Steel (Manufacturing) Limited**

To whom it may concern,

We hope that this letter finds you well.

We are writing to express our absolute objection to the proposed construction of a hot-dip galvanising facility by Hibernia Steel (Manufacturing) Limited. The location of the land that they intend to use for this heavy industry plant is directly next to our residential family home.

We are one of the extremely unfortunate residents who now face the possibility of being "hemmed in" and experiencing a huge deterioration in the quality of our lives by this vast facility.

This is a rural setting and when we bought our house 8 years ago, we were aware that the land surrounding us was designated for light industrial/warehouse buildings which seemed acceptable. Had we known that down the line there was the possibility of a heavy industrial manufacturing plant being built directly opposite and overlooking us we would never have considered buying. We have loved living here and as you can imagine have worked extremely hard to purchase our home and continue to pay our mortgage, not to mention the substantial time and money we have invested in making our home as energy efficient as we can.

As reference

The planning history for the surrounding lands includes a 2018 permission for development including a light industrial / warehouse building on lands across the access road to the northwest [D] (see Section 3).

When we saw the (first) site notice nestled away in the hedge on the lane we were utterly appalled that this green field site was deemed appropriate for such a heavy industrial manufacturing plant. After viewing the files online, we quickly discovered how vast, in all aspects, this building would be.

Appendix 16 of the planning documents details the visibility of the proposed facility from different vantage points. Examples of vantage points on the planning permission application: R132 Rosehall roundabout, Hill of Rath roundabout, the new residential area adjacent to Drogheda Institute of Further Education.

In regard to the note on the new residential area adjacent to Drogheda Institute of Further Education, it states the following:

*“open views toward the site are currently achievable from this location, however as residential properties in this area are constructed and associated landscape implemented, views of the subject development will become limited. There are several new housing developments recently constructed or planned in this area which is subject to significant change with strong peri-urban influence. Proposed structure/screen planting around the subject site boundary will in time assist with visual integration and mitigation”*

I would like to highlight the fact that the planning permission application **has not taken account of our vantage point (or that of our neighbour)**. I've included photos which will allow you to envision what we are facing if this were to go ahead. See Appendix pictures at the end of this letter. Currently it's a woodland area and if this facility is approved, we will be fully encroached upon with potential loss of natural light as the facility is a monstrous 17.30 meters in height. Also, to note that four of the five emission towers/chimneys are 20meters high.

The facility will be fully visible to us, something that the planning application fails to take account of, but as noted above they are confident that in time the new housing development will eventually have “limited views”. In this statement alone they are fully aware that this development is not appealing or appropriate to residents, and for reasons that are outside of our understanding, they decided to exclude those that it directly affects.

To reference Louth County Council development plans (<https://www.louthcoco.ie/en/publications/development-plans/louth-county-development-plan-2021-2027/chapter-13-web-.pdf>) Chapter 13, Section 13.3:

*13.13.3 Design and Scale The design and scale of any building shall be appropriate for the intended use. The visual impact of larger buildings shall be reduced by incorporating a suitable mix of finishes and architectural treatment that breaks the building up, particularly on the front elevation. Contemporary building design will be encouraged. Landmark buildings of notable design will be encouraged at strategic locations in settlements or within business/industrial parks. Where residential areas are adjacent to industrial and business parks or employment lands, consideration shall be given to having reduced heights where these land uses meet so as to minimise the contrast and impact between the two areas. Roof mounted equipment such as extractor fans or antenna shall be designed to integrate into the building and shall be appropriately screened where possible.*

#### **Pollutant concerns:**

Another extremely concerning aspect of the hot-dip galvanising facility is the many hazardous chemicals used in the process.

The likes of “Waste Pickling Acid” (liquid) “Zinc & Ammonium Chloride” (liquid), “Waste Stripping Acid” (liquid) “Degreaser” – consisting of ammonium compounds, dimethyl, ethoxylated, chlorides, Phosphonic acid, bisodium hydroxide (liquid), “High Hydrated Lime - Calcium dihydroxide” (solid, resulting in white fumes). Along with others that will be used and stored adjacent to our home.

We are not part of the mains water system so therefore have a private well, which we share with our neighbours. The location of our well is mere meters away from our hedges which border the site. As there was no third party well survey, we have located our well in an attached photograph in relation to the proposed site.

#### 8.4.15 Third Party Wells

A third party well survey was not carried out as part of this assessment. In terms of inferred groundwater flow direction there are no residences downgradient of potentially contaminating site activities. There are no groundwater abstractions proposed at the development site hence there will be no potential impact to third party wells in terms of yield or groundwater levels.

In addition, there is a problem with metals collecting on the ground at hot dip galvanising plants & a huge concern for us is the possibility of seepage of any of the *many* hazardous materials feeding into our water supply and resultant contamination.

Along with our own well, the planning application fails to highlight the presence of two large reservoirs in the area as well as an aquifer. Any potential risks from a galvanising facility, such as a chemical leak could absolutely pose a threat to the local water supply.

Emissions from the towers/chimneys are also cause for concern. They consist of:

- Cooling tower
- Flue gases from boiler
- Flue gases from standby boiler
- Acid Vapours Scrubber
- White Dust Fumes Filter

Our concern here is that we don't know what potential long term affect these emissions will have on our health and that of our seven-year-old daughter. We are obviously hugely concerned that with dust fumes and acid fumes blowing over into our garden and home, that our health will be adversely affected.

Also, to note that from research, the smell produced from galvanising is Sulphur (rotten egg) resulting in another hugely adverse living condition for us.

It states on the planning application that the proposed opening hours of the facility is 6.30am to 8.00pm Monday to Friday and 8.00am to 1.00pm on Saturdays.

The proximity of the plant and the hours of operation mean that we will have almost constant noise pollution six days a week which has the potential to cause stress and anxiety. We are aware that there are two main roads close by which does result in low level of noise but this is nothing in comparison to an almost 6000m<sup>2</sup> heavy industrial facility within meters of our home.

**2.4.4 Hours of operation**

The proposed opening hours of the facility are 6.30 am to 8.00 pm Monday to Friday and 08.00 am to 01.00 pm on Saturdays.

The processing plant operational hours will be restricted to 07.00 am to 05.00 pm on weekdays. The facility will not be opened on Sundays or bank holidays.

We hope that after you review our concerns and objections that we have raised, that you will conclude that the proposed location is not suitable and that there are more appropriate locations, including the alternative sites mentioned in the report, for a heavy industrial site such as this. There is also a concern that this could set a precedent in the area for more heavy industries in a location that is primarily agricultural and residential and the level of anxiety this application has caused in the neighbourhood is immense.

Thank you for your time in reading this objection and please do not hesitate to contact us if there is any further information that you require from us.

Yours sincerely,

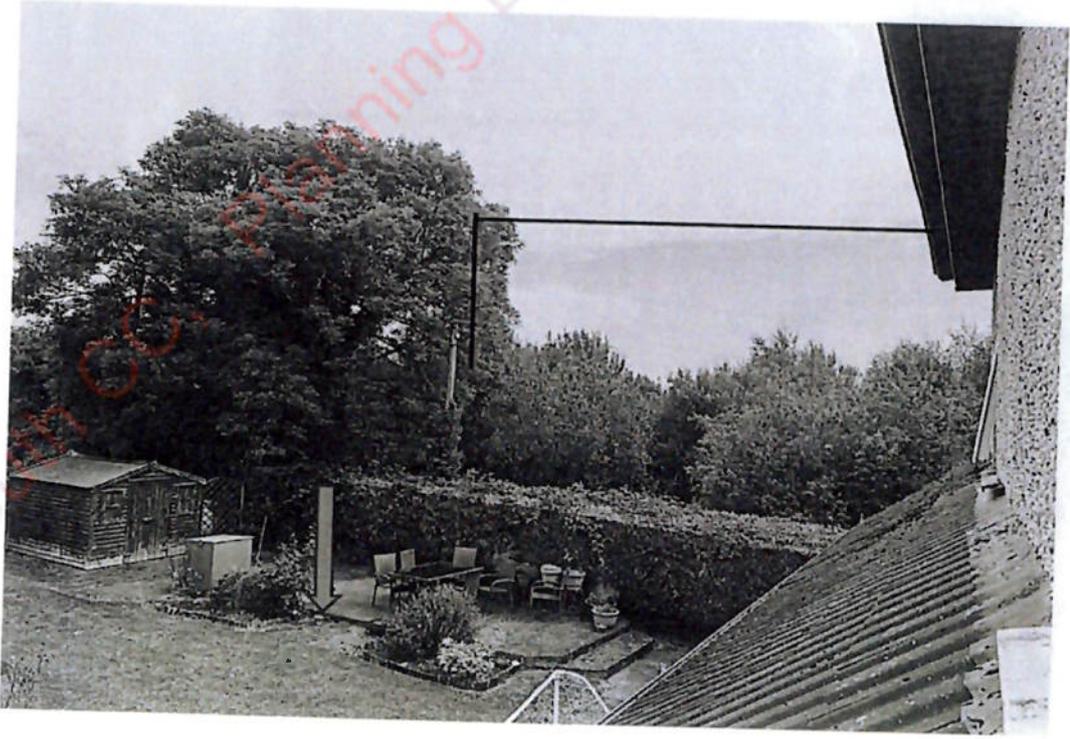
Elaine Moore and Barry Mulvany

Appendix: Vantage point taken from the application submitted by Hibernia Steel



Please note the box in all the pictures below indicates the proposed building.

Appendix: Vantage point from our daughter's bedroom (arrow signifies the location of our well):



Appendix: Vantage point from our bedroom:



Appendix: Vantage point from our family bathroom:



# Submission Details

RECEIVED: 31/01/2024

## Submitter

<b>Name</b>	Barry Mulvany
<b>Address</b>	Drakerath Lane, Killineer Drogheda Co Louth A92Y5F7
<b>Note</b>	<p>Elaine Moore &amp; Barry Mulvany Drakerath Lane Killineer Drogheda Co Louth A92 Y5F7 January 31st 2024 Planning Department, Louth County Council Town Hall Crowe Street Dundalk, Co Louth, A91 KFW6 Re: Objection to further information in relation to Planning Application: 2360115 (Louth County Council) Site name: Drogheda North Business Park Applicant name: Hibernia Steel (Manufacturing) Limited To whom it may concern, We are residents of Drakerath Lane, and it is our home that the proposed development will be overlooking. As this is our second observation a fee is not due. These observations follow in conjunction with our original submission dated 15th June 2023. We are writing to you in relation to Further Environmental Information (FI) received by Louth County Council on the 4th of December 2023 with respect to Planning Application File Number 2360115. Should this development proceed in the location, our home and that of our neighbour will be surrounded on three sides, which we believe is contrary to good planning. This shows how unsuitable the site is for a structure like this. It also will significantly devalue our property. Precedence has been set by planning reference Louth Co Council 07 1999 (Terry King Quarry) and An Bord Pleanála decision APB-308555-20 Kildare County Council, (Colm Egan). As stated in our original submission, we have a private well that sits adjacent to this site and we are, understandably, extremely concerned about the level of risk to the groundwater. The hydrogeological assessment that accompanied the EIAR is insufficient and has failed to assess the potential impact of the proposed heavy industry development on the underlying aquifer and nearby residential properties. Louth County Council requested Hibernia Steel to submit a "comprehensive study of reasonable alternatives which are outside the ownership applicant". From viewing the further information provided by the applicant in December 2023, we do not believe that Hibernia have sufficiently fulfilled this request. Rather than look at realistic alternatives in detail, they have re-examined the same three sites, two of which are not for sale &amp; the other being too small. The area of Tom Roes Point, Drogheda Port, was dismissed by the applicant as it would take around 4minutes longer to get there. We feel that this vague reasoning is not sufficient to deem this alternative site as unacceptable. The applicant has advised that a significant amount of steel will be transported from Grangegeeth to the proposed hot dip facility, this is new information and has not been fully assessed in regard to road infrastructure &amp; traffic management. We hope that after you review our concerns and objections that we have raised, that you will conclude that the proposed location is not suitable, particularly considering the additional points above, and that there are more appropriate locations for a heavy industrial site such as this. We are also still concerned that this could set a precedent in the area for more heavy industries in a location that is primarily agricultural and residential. Thank you for your time in reading this objection and please do not hesitate to contact us if there is any further information that you require from us. Yours sincerely, Elaine Moore and Barry Mulvany</p>

## In relation to application

<b>File Number</b>	2360115
<b>Name</b>	(Manufacturing) Limited Hibernia Steel
<b>Address</b>	Mell Drogheda Co. Louth

Elaine Moore & Barry Mulvany  
Drakerath Lane  
Killineer  
Drogheda  
Co Louth  
A92 Y5F7

January 31<sup>st</sup>2024

Planning Department,  
Louth County Council  
Town Hall  
Crowe Street  
Dundalk,  
Co Louth, A91 KFW6

**Re: Objection to further information in relation to Planning Application: 2360115 (Louth County Council)**

**Site name: Drogheda North Business Park**

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Should this development proceed in the location, our home and that of our neighbour will be surrounded on three sides, which we believe is contrary to good planning. This shows how unsuitable the site is for a structure like this.

It also will significantly devalue our property. *Precedence has been set by planning reference Louth Co Council 07 1999 (Terry King Quarry) and An Bord Pleanála decision APB-308555-20 Kildare County Council, (Colm Egan).*

As stated in our original submission, we have a private well that sits adjacent to this site and we are, understandably, extremely concerned about the level of risk to the groundwater. The hydrogeological assessment that accompanied the EIAR is insufficient and has failed to assess the potential impact of the proposed heavy industry development on the underlying aquifer and nearby residential properties.

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RECEIVED: 31/01/2024

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Yours sincerely,

Elaine Moore and Barry Mulvany