

File With _____

SECTION 131 FORM

Appeal NO: ABP 319281-24

Defer Re O/H

Having considered the contents of the submission dated/received 04/04/2024
from

An Taisce I recommend that section 131 of the Planning and Development Act, 2000
be not be invoked at this stage for the following reason(s): no new material issues

E.O.: Pat B

Date: 26/04/2024

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage.

Section 131 to be invoked – allow 2/4 weeks for reply.

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

Ian Kelly

From: Bord
Sent: Thursday 4 April 2024 11:36
To: Appeals2
Subject: FW: Ref. ABP-319281-24
Attachments: 20240404-ABP-319281.pdf

From: Sean O'Callaghan <socallaghan@antaisce.org>
Sent: Thursday, April 4, 2024 11:30 AM
To: Bord <bord@pleanala.ie>
Subject: Ref. ABP-319281-24

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Please find enclosed a copy of An Taisce's submission on ref. ABP-319281-24.

Is mise le meas,

Seán O'Callaghan
Planning Officer
An Taisce – The National Trust for Ireland



An Taisce

The National Trust for Ireland

5 Foster Place
Dublin 2, Ireland
D02 V0P9

20240404-ABP-319281

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.
D01 V902.

Sent by email to: bord@pleanala.ie

4th April 2024

Ref: ABP-319281-24

App: Hibernia Steel (Manufacturing) Limited

For: 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.

Site: Mell, Drogheda, Co. Louth.

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An Taisce - The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

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Company Limited by Guarantee no. 12469 | Charity CHY4741 | Charity Regulator no. 20006358 | EU Transparency Register no. 473905437651-60

Directors: Stuart McCaul (Chair), Trish O'Connell (Vice Chair), Laura Segura Gutierrez (Hon Secretary), John Conroy (Treasurer)
Olivia Rogers, Rónán O'Brien, Finbarr Murray, Helen Shaw, Terri Morrissey, Sinead Mercier, Phil Doyle

A Chara,

Thank you for referring the above application to An Taisce for comment.

The application site is in an IDA Business Park in an area Zoned EI General Employment in the Louth County Development Plan 2021-2027: "To provide for general enterprise and employment generating activities".

The report from Stephen Peck planning consultant for the applicant outlines the planning history of the site and adjacent lands. In 2008, under Ref. 07/1435, permission was given for road access and layout. In 2010 under 09/245 permission was granted for 12 light industrial starter units. In 2018, under 18/882, permission was granted for a light industrial warehouse building across the access road to the north west.

The plans and elevations represent a significant departure from the business park/ incubator units provided for in the 2009 permission. The main processing building proposed includes four flue stacks 20 metres above finished floor level for flue gas, white fumes from sink kettle exhaust air and exhaust air from the pretreatment area.

Chapter 3 of the EIAR sets out alternative locations considered *"which were studied and an indication of the main reasons for selecting the chosen option"*. Located to the east and west of the applicant's existing facility at Grangegeth, Co. Meath, were ruled out on land acquisition unavailability. The only other location considered was the IDA Drogheda Business and Technology Park in Co. Meath. The consideration rejecting this option was that the High Technology uses zoning of this location *"were less supportive of the proposed development than the E1 General Employment zoning policy at the application site"*.

The proposal represents a significant departure from the nature and scale of development provided for in conjunction with the existing and permitted development of the site. The type of development which would be in line with the description of a location as a "business park" would normally comprise light industrial and warehouse units. The application is for a heavy industrial processing facility with complex emission stack provision.

It is submitted that the EIAR and planning statements accompanying the application have not properly addressed the site suitability of the proposed development for this location, and have not considered other locations suitable for a heavy industrial processing activity with associated emission stack requirements.

Please acknowledge our submission and advise us of any decision made.

Yours sincerely,

Ian Lumley

Heritage Officer

An Taisce – The National Trust for Ireland