

4 EXAMINATION OF ALTERNATIVES

4.1 INTRODUCTION

This Chapter of the EIAR sets out the reasonable alternatives that have been considered for the Proposed Development and provides an indication of the main reasons for the final scheme choice, taking into account the effects on the environment in the context of the characteristics of the site (receiving environment). Article 5(1)(d) of the EIA Directive requires Environmental Impact Assessment Reports (EIAR) to include the following: -

“a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment”.

Paragraph 2 of Annex IV elaborates the requirement, as follows: -

“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.”

Pursuant to Section 3.4.1 of the Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022), the consideration of alternatives also needs to be cognisant of the fact that: -

“...in some instances some of the alternatives described below will not be applicable – e.g. there may be no relevant ‘alternative location’...”

In accordance with EPA Guidelines (EPA, 2022), different types of alternative may be considered at several key phases during the process. As environmental issues emerge during the preparation of the EIAR, alternative designs may need to be considered early on in the process or alternative mitigation options may need to be considered towards the end of the process.

The EPA Guidelines (EPA, 2022) states: -

“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.”

Thus, the reasonable alternatives studied by the project design team and in the context of the associated Regulations, the alternatives of the Proposed Development in this EIAR Chapter as follows: -

- Alternative Locations.
- ‘Do Nothing’ Alternative.
- Alternative Processes.
- Alternative Mitigation Measures.
- Alternative Layouts & Designs.

This chapter has been prepared by Stephen Little, EIAR Manager, with assistance from Niamh Robinson, EIAR Co-ordinator at Stephen Little & Associates. Stephen has over 30 years’ professional experience of town planning in Ireland, is a Corporate Member of both the Irish Planning Institute and the Royal Town Planning Institute and holds a Diploma in EIA Management (UCD). Niamh has in excess of 5 years’ professional experience in the planning field, has a MRUP – Masters in Regional and Urban Planning.

4.2 DEVELOPMENT RATIONALE

The Proposed Development seeks to provide a large scale residential development comprising 1,058no. dwellings and Neighbourhood Centre in line with the 'A2' – New Residential land use and H1 Open Space zoning objective. The nature of the development is actively promoted at this location by Louth County Council through the Louth County Council Development Plan 2021-2027 ("the Development Plan") as well as the Dundalk Local Area Plan 2025-2031 and having regard to other strategic plans and guidance.

4.3 MAIN ALTERNATIVES STUDIED

The main alternatives considered during the development of this project comprise alternative design solutions and layouts for a predominantly residential development at the subject site.

4.3.1 Alternative Locations

Under the Development Plan, the site is subject to the zoning objective 'A2 – New Residential' which seeks:-

"To provide for new residential communities with ancillary community facilities, neighbourhood facilities as considered appropriate."

The Development Plan was prepared by Louth County Council to provide a framework for future development of this new residential community at the subject lands.

Under section 11.14.6 of the Development Plan under Zoning Category 'A2', it is noted that lands zoned A2 are the primary zones for new residential development and these lands may also include other uses that will support the establishment of residential communities. The Development Plan identifies the Mount Avenue lands as one of the primary sites that will assist the Council in achieving its Core Strategy targets.

The Dundalk Local Area Plan 2025-2031 ("the LAP") was adopted on 6 March 2025 and came into effect on 17 April 2025. The LAP provides a framework for future development of this new residential community at the subject lands. The LAP itself was subject to the Strategic Environmental Assessment (SEA) process.

The design of the proposed development on these lands has been guided by the LAP that was adopted by the Council for these lands.

As such it is considered that the site is entirely suitable for the nature of development as proposed in this planning application. It is not considered necessary to consider an alternative site location for the proposed development as a result.

4.3.2 'Do-Nothing' Alternative

In the event of a 'do-nothing' scenario, the site would remain 'as-is' with the undeveloped nature of the site or its former agricultural use retained.

A do-nothing approach would be contrary to the Council's objectives to promote of residential land use at this site, in accordance with national, regional and local planning policy and guidance, including the obligations under the Core Strategy of the adopted statutory Development Plan. It would potentially result in a failure of the housing needs of the County being appropriately met and the site being identified as 'vacant, or idle land'. An opportunity to achieve efficient and compact development which benefits from existing public transport connectivity would also be undermined. A 'do-nothing' approach would be considered inappropriate and unsustainable from a planning and housing perspective.

From an environmental perspective, beyond impact on human health from a failure to deliver sustainable residential development to meet housing and community development needs and further sustainable based on alternatives to travel by private car, a 'do nothing' approach is

otherwise likely to result in a neutral impact on the environment in respect of material assets, land, water, air, climate, cultural heritage, biodiversity and landscape.

4.3.3 Alternative Processes

Alternative processes for the proposed housing, supporting facilities, amenities and infrastructure, at Construction and Operational Stages of the development, are discussed below: -

- **Construction Stage:** The proposed construction works comprise relatively standard building construction processes. As such there are no specific alternative construction processes identified in this EIAR.
- **Operational Stage:** No new, unusual or technically challenging operational techniques are required, as such no alternative operational processes have therefore been considered at this point.

4.3.4 Alternative Mitigation Measures

The mitigation measures as outlined in the various chapters of this EIAR are considered appropriate to the location, nature and extent of the project and its potential impacts. Due to this no alternative mitigation measures have been considered.

4.3.5 Alternative Layouts & Designs

This section provides an overview of how the proposed development has evolved to date by way of consideration of alternative designs and how the final scheme within the planning application made to Louth County Council has been reached.

Various design and layout options were considered as the proposals progressed and key considerations and amendments to the design were incorporated. A number of minor amendments have been made throughout the design and consultation process including:

- Overall changes in unit type mix and an increase in total number of dwellings from 1,014no. units to 1,058no. units.
- Redesign of Neighbourhood Centre including relocation of non-residential uses and reconfiguration of Apartment Blocks 3 & 4.
- Introduction of a Habitat Woodland located south-west of Link Road 4.

The above list of amendments caused no significant or fundamental change to the overall design and layout of the site and therefore do not require a detailed environmental assessment. However, having regard to the environmental issues pertaining to the lands one main alternative to the layout is discussed below in section 4.3.5.1.

This EIAR provides reasonable evidence that the proposed development can be accommodated at this location without predicted risk of likely significant adverse impact on the environment, subject to implementation of the identified mitigation measures at construction and operational stages.

No specific further alternatives in respect of the nature, design and layout of the proposed development have been identified in the recommended EIAR mitigation measures.

4.3.5.1 Section 247 meeting- March 2025

A section 247 meeting was held with Louth County Council on 26 March 2025. The proposed layout shown at the Section 247 Pre-Planning meeting can be seen Figure 4.3 below. The proposal consisted of 1,014no. units in total (comprising a mix of 760no. houses, 120no. duplexes and 134no. apartments) and a Neighbourhood Centre (comprising a community/medical use, childcare facility

and retail/café/restaurant uses). On a site of 39.71Ha (net developable area 29.73), achieving a net density of c. 35no. units per Ha.



Figure 4.1: Site Layout Plan at Section 247 meeting held on 26 March 2025

The proposed layout shown in Figure 4.1 was broadly welcomed by LCC. The key feedback from LCC is provided as follows: -

- Further details required in respect of phasing.
- A Site Specific Flood Risk Assessment will be required.
- LCC Transport Department are not in favour of parallel parking along the main arterial route

Table 4.1 below provides a comparative environmental effect as between the Preferred Option (subject of this application for development consent) and that proposal from March 2025.

Environmental Factor	Headings Under which the Environmental Factors were Assessed	Topic	Comparative Effect of Preferred Option
Population and Human Health		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Biodiversity		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Land, Soil & Geology		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Water	Surface Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Waste Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Water Supply	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Flood Risk	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Climate	Air Quality	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Climate Change	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Sunlight / Daylight	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Air	Noise and Vibration	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Material Assets	Traffic and Transport	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Waste	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Utilities	Construction Phase	<u>Neutral, imperceptible and permanent</u>

		Operational Phase	No perceived additional adverse effects during construction / operational phase.
Landscape and Visual	Visual Impact	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Cultural Heritage	Archaeological & Architectural	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction/operational phase.

Table 4.1: Environmental Effects of the Final Proposed Development compared to Section 247 Pre-Planning Meeting Layout.

4.3.5.2 LRD Meeting Layout

A LRD Meeting was held with DLRC on the 12 June 2025. This meeting inform the Design Team's proposals for the subject site and in turn the Final Proposed Development.

The proposed layout shown at the LRD Meeting can be seen Figure 4.2 below. The proposal consisted of 1,041no. units in total comprising a mix of 757no. houses, 150no. duplexes and 134no. apartments. On a site of 40.18Ha (net developable area 29.47), achieving a net density of c. 36.4no. units per Ha.



Figure 4.2: Site Layout Plan at Stage 2 LRD meeting held on 12 June 2025

The proposed layout shown in Figure 4.2 was broadly welcomed by LCC. The key feedback from LCC is provided as follows: -

- Road Safety Audit required
- Public Lighting proposals to be provided
- Details regarding retaining walls for housing on levels
- Considered that additional visitor car parking spaces may be required

Environmental Factor	Headings Under which the Environmental Factors were Assessed	Topic	Comparative Effect of Preferred Option
Population and Human Health		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Biodiversity		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Land, Soil & Geology		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Water	Surface Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Waste Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Water Supply	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Flood Risk	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Climate	Air Quality	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Climate Change	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Sunlight / Daylight	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Air	Noise and Vibration	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Material Assets	Traffic and Transport	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Waste	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
	Utilities	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Landscape and Visual	Visual Impact	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / operational phase.
Cultural Heritage	Archaeological & Architectural	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u>

			No perceived additional adverse effects during construction/operational phase.
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Table 4.2: Environmental Effects of the Final Proposed Development compared to LRD Meeting Layout.

4.3.5.3 Final Proposed Development

The development as now proposed is considered to have arrived at an optimal solution in respect of making efficient use of zoned, serviceable lands and achieving the recommended residential density across the site whilst also addressing the potential impacts on the environment relating to residential, visual, natural and environmental amenities and infrastructure. The proposed development has also taken on board all comments and recommendations of the LRD Opinion issued by LCC.

The Proposed Development subject of this planning application will generally comprise of 1,058no. dwellings in total comprising a mix of 765no. houses, 150o. duplexes and 143no. apartments. The proposed Neighbourhood Centre accommodates community/medical use, a two-storey childcare facility and retail/café/restaurant uses. On a site of net 28.94Ha achieving a density of 36.6no. units per hectare.

Please refer to Chapter 3: Description of Proposed Development of this EIAR for a further detailed description of the Proposed Development. The final design presents the most effective utilisation of this significant site, fulfils LCC objectives and ensures the optimum provision of much-needed housing while delivering residentially led, mixed use development of the highest quality.



Figure 4.3: Layout of the Proposed Development as submitted with this LRD planning application.

To summarise it is considered that the final layout: -

- Advances the strategic and statutory objectives applicable to these lands and the wider area.
- Optimises development space within the overall site, in an efficient and sustainable manner.
- Enables extensive economic development through both employment created at Construction and Operational Phases, and also under development of a childcare facility and other non-residential uses on site.
- Avoids the necessity to utilise in a non-sustainable manner other greenfield lands.

- Affords excellent play opportunities and open space provision for the Proposed Development and to members of the public.
- Encourages the use of public transport and provides pedestrian and cycle links throughout to minimise car usage within the scheme.
- Avoids significant environmental impacts.

The final iteration of the Proposed Development is not considered to give rise to any significant adverse environmental impacts. Mitigation measures to be implemented at construction and operation stages of the project are summarised in Chapter 19: Summary of Mitigation Measures of the EIAR.