

Patrick J Hayes

Rathcline  
The Reisk  
Killurin,  
Enniscorthy  
Co Wexford  
053 28956

The Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate  
Co Wexford,

6 May 05

Your Ref: Reg No 742  
Reenard Pig Farms Ltd,  
The Deeps, Kilpatrick  
Killurin,  
Co Wexford.

|   |
|---|
| Environmental Protection<br>Agency<br>IPC Licensing<br>- 6 MAY 2005<br>Received<br>Initials <u>CK</u> |
|---|

Dear Sirs

Further to your phone call of the 5<sup>th</sup> May, where it was pointed out that a page was missing from my submission, I enclose a copy of the complete document and extra photographs as requested.

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For inspection purposes only.

Yours sincerely,



Patrick Hayes.

**EPA**

MAIN FILE ☒

PUBLIC FILE ☐

EVALUATION FILE ☐

DATE 9/5/05

- Page replaced  
(CK)

Patrick J Hayes  
Surveyor

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|---|
| RECEIVED  |
| Time 11:47  |
| 04 MAY 2005   |
| Signature <i>J. Murphy</i><br>Environmental Protection Agency, HQ.<br>P.O. Box 3000, Johnstown Castle Estate,<br>Co. Wexford. |

Rathcline  
The Reisk,  
Killurin,  
Enniscorthy,  
Co Wexford

The Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate,  
Co Wexford.

2nd May 05

Your Ref: Reg No 742  
Reynard Pig Farms Ltd.  
The Deeps, Kilpatrick  
Killurin  
Co Wexford

EPA

MAIN FILE ☒

PUBLIC FILE ☒

EVALUATION FILE ☒

Dear Sir,

DATE 4/5/05

|  |
|--|
| RECEIVED   |
| Time   |
| 04 MAY 2005  |
| Signature<br>Environmental Protection Agency, HQ.<br>P.O. Box 3000, Johnstown Castle Estate,<br>Co. Wexford. |

I wish to submit the following submission that the application for a review of their licence by Messrs Reynard Pig Farms Ltd be refused on the following grounds.

HYDROGEOLOGICAL REPORT ON PIG FARM LOCATED AT THE  
DEEPS KILPATRICK KILLURIN

Location, Physiography.

The Kilpatrick site lies some eight Kilometres north west of Wexford town on a large meander of the Slaney River, which runs close to the western boundary of the site. The topography in the vicinity of the site is flat with reed beds at close to sea level rising to a height of 65 meters above sea level. The Slaney valley is an area designated a Special Area of Conservation and protected by the County Wexford Development Plan 2001.

The Kilpatrick site lies on a large meander in the Slaney River which is deeply entrenched into its present valley. The River Slaney valley is a major topographic feature in County Wexford and is for the most part rock lined and cut to a lower sea level than exists at present. The Killurin meander can be described as an incised meander which developed as the course of the River changed in response to changes in sea level. The land as a result rises up from the river to a height of 65 meters as stated before.

The sand/gravel deposit at Killurin/ Kilpatrick is an elongated mound with its long axis parallel with the general valley direction. The pig farm site is situated on this

deposit. Quarry operations for the extraction of sand/gravel were carried out both to the north and south of the pig farm site in the past.

## GEOLOGY AND HYDROGEOLOGY.

The geological structure of the site is made up of two separate layers. The unconsolidated upper layer and the underlying solid bedrock. The upper layer consists of glacial outwash deposits ie sand/gravel. The bedrock is made up of slates and grits. The killurin area is underlain by slates and grits of Lower Palaeozoic age which belongs to a major group of rocks that traverse County Wexford in a north east, south west direction from Duncannon in the south to Courtown in the north. These rocks are exposed on both banks of the river to the north and south of the site. In these exposures the slates and grits are seen to dip steeply at varying directions reflecting their tectonic deformation and their position in the regional synclinal features that dominates the geological structure of this part of County Wexford.

The Slaney River occupies a deep trench in the bedrock surface with the rock base of the valley some meters below modern day sea level. This deep trench was eroded by the river following the course of the present day Slaney but one which cut it's profile to a much lower sea level than exists today. The exit from this rock lined valley must have become blocked at some stage during the Ice Age with the result that the deep trench became infilled with alluvial deposits. Subsequently the blockage, somewhere near Ferrycarrig, was breached and the Slaney re-established its profile by cutting through the infill material. This sequence of events has resulted in large deposits of sand/gravel being preserved in the meanders of the river. It also resulted in the River Slaney being tidal up to Enniscorthy.

In 1984 a detailed report was prepared for Wexford County Council by a Mr Kevin T. Cullen M.Sc. Consulting Hydrogeologist on the adjoining Land Fill site, where three boreholes were sunk. They indicated that a cross section of the present river occupies a small proportion of a much wider river valley cut into the rock surface at Killurin with the remainder of the valley occupied by sand/gravel deposits, reed beds and mudflats. They also indicated that the water table is close to the surface and that the flow is towards the Slaney River. This has been burnout by the many enforcement notices served by the E.P.A on the Land Fill site at Killurin. These indicate that persistent leachate has occurred over the years.

It is very obvious that due to the geological nature of this area, which as can be seen is a valley where the underlying rock is sloping down to the river which is at the lowest point, with an upper covering layer of gravel/sand, and where the drainage is towards and into the river that this was a most unsuitable location for a Land Fill site,

An environmental disaster, as has been proven to be the case. Likewise such a site is unacceptable for a pig farm, especially an industrial unit as envisaged by Reenard Pig Farms. This site would be totally unsuitable for any industry which involves the use of pollutants in the manufacturing process as are involved in the manufacture of Methane Gas and where there is a great risk of discharge of these pollutants.

Due to the fact that this valley is at sea level, climatic conditions can arise where in still air conditions very strong odours from the pig farm can and do persist for long periods. See photo A & B. These photographs show the river under these conditions. The pig farm can just be seen. These odours are most unpleasant and can and do

affect outdoor activities. To increase the size of the farm will lead to an increase in these odours. With this increase and the addition of the obnoxious odours from the Anaerobic Digester as envisaged by Reenard Pig Farms would create a health hazard in the area and a no go area. See 3.2.2 Potential problems. Page 17 of the E.P.A Publication No 16. - Feasibility Study for Centralised Anaerobic Digestion for Treatment of Various Wastes and Wastewaters in Sensitive Catchment Areas. Also the reception area was not as recommended in 3.8 page 33. Where it is recommended that the reception area be in a dedicated building which is maintained under negative pressure to prevent external release of odour, dust, aerosol, or ammonia. The ventilated air must be treated to remove odorous compounds and reduce potential pathogen transfer. This was not provided for in the proposed plan, which showed an outdoor hopper set into the ground thus adding to the odour problem. In my objection to the application for Planning Permission, I pointed out the danger to both the environment and the ecology and the visual damage that would be done to the area. The adjoining Land Fill site is proof of this. Photo C1 & C2 shows the commanding position of the farm on the river, where it is proposed to erect four very large storage tanks, reaching a height of approx 20 meters in height and having an estimated total capacity of 6,641,526 Litres of effluent. No consideration was given to the impact that this would have on the area or for the dangers it would impose on the area.

During a visual inspection of the site it was noticed that a large lagoon still exists which in the past was used for the storage of pig slurry. This was of earthen construction. Several other lagoons were I have been advised filled in. I have been advised that when they were emptied the matter was spread out over the surrounding ground several centimetres in thickness and then covered with topsoil. The resulting area now supports little or no plant life other than Docks and other weeds. The seepage is into the gravel/sand layer which is unsuitable for the spreading of this type of material and then into the water table where it flows into the River Slaney. A protected river. It is my professional opinion that the works as envisage by Reenard Pig farms which are of an industrial engineering nature for the manufacture of gas, electricity and compost, extensive engineering and structural works would have to be put into place to support the complex as designed and also to protect the environment. The cost of these works would render the project uneconomic. None of these works were envisaged or included in their failed planning application. It is my opinion that the proposed works would put at great risk not only the environment in this area which is of great importance, especially to the wild life such as fish, water fowl, etc but also to those forms of life that are not readily seen, such as the Lampreys which live in the mud flats and would be readily killed off by any discharge into the river.

## Planning

A planning application was lodged for this Installation on 13 January 2005 with Wexford County Council.

Planning Number 20050055

I lodged an objection, citing the reasons that I felt were not acceptable. I enclose a copy of my objection.

The County Council gave their decision, to refuse permission on the 4 March 2005.

Copy enclosed.

### Breeding Unit

It is proposed to increase the capacity of the Breeding Unit to 1700 pigs. This is an attempt to breed pigs on an industrial scale which is out of the question in this area and shows no concern or regard for the environment or the health or welfare of the people who live in the surrounding area. Photo D & E shows the Breeding Unit and its proximity to the surrounding homes. This proposal is not acceptable. People are entitled to live in a healthy environment, to enjoy their homes and not have to endure the noise, and odours from this unit.

### Conclusion

I think this was a very ill conceived and badly thought out proposal on the part of Reenard Pig Farms Ltd. It gave no thought as to the suitability of the site for such a development. No thought how they would contain any spillage or discharge that might occur taking into account the site conditions and especially the geology of the area. Its impact on the River Slaney and the environment. Its impact on this scenic area. None whatsoever for the local people living in the area. I feel that this review must be refused.

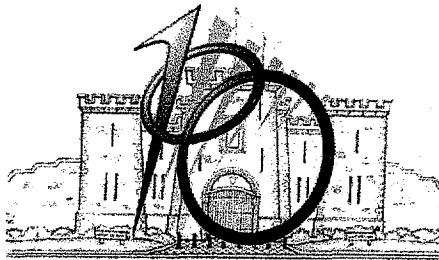
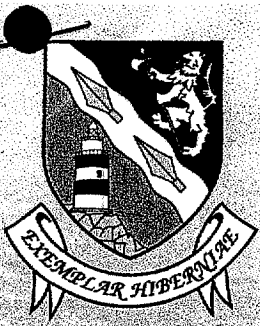
Yours sincerely,



Patrick Hayes

Attachments  
Photographs  
Objection to Planning  
Planning Decision.





Rialtas Áitiúil  
Local Government

8 March 2005

Patrick Hayes,  
Rathcline  
The Reisk  
Killurin  
Enniscorthy  
Co Wexford

Comhairle Chontae  
Loch Garman

Wexford County Council  
County Hall  
Wexford

Tel 053 76500  
Fax 053 43406  
email postmaster@wexfordcoco.ie

**PLANNING AND DEVELOPMENT ACT 2000**

**Planning Reg. No:** 20050055

**Applicant:** NRGE LTD

**Proposed:** CONSTRUCT A FOUR SPAN SHED, FIVE OVERGROUND STORAGE TANKS, ONE UNDERGROUND STORAGE TANK, A PRIMARY DIGESTER WITH GAS PURIFICATION SYSTEM, AN INTEGRATED GAS STORAGE SYSTEM ON EXISTING PIG MANURE STORAGE TANK, AND ASSOCIATED SITE WORKS TO PROCESS PIG MANURE AND OTHER ORGANIC MATERIAL TO PRODUCE RENEWABLE ENERGY AND FERTILIZER

**Location:** DEEPS, KILPATRICK

A Chara,

I refer to recent correspondence in the above matter and now enclose for your information, a copy of the decision of the *Planning Authority* on the above application which was notified to the applicant on 4 March 2005.

You will see from the enclosed explanatory notes on appeal procedures, that the following people have the right to appeal against this decision, within four weeks of the date of decision:

- (a) the applicant
- (b) any person who has made written submissions to the Planning Authority in connection with this planning application
- (c) any person who has an interest in land adjoining the site and who has been granted leave to appeal by An Bord Pleanala.

The explanatory notes attached give full details to the making of an appeal to *An Bord Pleanala*. Please note that in the event of you lodging an appeal, you must forward a copy of the acknowledgement and receipt issued by Wexford County Council together with the appeal to *An Bord Pleanala*.

If you wish to enquire whether or not an appeal has been made, please contact *An Bord Pleanala* directly at telephone no. (01) 8588100.

M. Coleman.

100 Years of Community Service

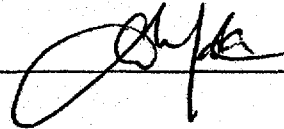
**WEXFORD COUNTY COUNCIL PLANNING AUTHORITY**

**PLANNING AND DEVELOPMENT ACT 2000**

**NOTIFICATION OF DECISION ON PLANNING APPLICATION**

The Decision of Wexford County Council on the application described in the Schedule to this Notice is as shown therein. Please read the notes supplied with this Notice.

Signed on behalf of Wexford County Council



Date 4 March 2005

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**SCHEDULE**

**PARTICULARS OF PLANNING APPLICATION**

PLANNING REG. NO.: 20050055

DATE OF APPLICATION: 13 January 2005

APPLICANT: NRGE LTD  
Mooresfort  
Lattin  
Co Tipperary

TYPE OF APPLICATION: PERMISSION

PROPOSED DEVELOPMENT: CONSTRUCT A FOUR SPAN SHED, FIVE OVERGROUND STORAGE TANKS, ONE UNDERGROUND STORAGE TANK, A PRIMARY DIGESTER WITH GAS PURIFICATION SYSTEM, AN INTEGRATED GAS STORAGE SYSTEM ON EXISTING PIG MANURE STORAGE TANK, AND ASSOCIATED SITE WORKS TO PROCESS PIG MANURE AND OTHER ORGANIC MATERIAL TO PRODUCE RENEWABLE ENERGY AND FERTILIZER

LOCATION: DEEPS, KILPATRICK

DECISION: REFUSED for reasons listed hereinafter.

DATE OF DECISION: 4 March 2005

**REASONS FOR REFUSAL**

1. By virtue of the inadequate information submitted regarding the nature and scale of the proposed development, ground levels and landscaping, it has not been demonstrated that the proposed development would not have a significantly detrimental visual impact on a designated sensitive landscape and scenic route. As such the proposed development would be contrary to section 8.5.6 to 8.5.9 and 8.5.15 of the County Wexford Development Plan 2001 and to the proper planning and sustainable development of the area.
2. By virtue of the inadequate information submitted regarding the nature and scale of the proposed development and the means by which potentially significant detrimental impacts on public health would be addressed, it has not been demonstrated that the proposed development would not be prejudicial to public health, the amenities of the area and the proper planning and sustainable development of the area.
3. By virtue of the inadequate information submitted regarding the nature and scale of the proposed development, the control of effluent water discharge, contingency plans for emergencies and the nature of the other organic matter to be used, it has not been demonstrated that the proposed development would not have significantly detrimental impacts on the River Slaney candidate Special Area of Conservation. As such the proposed development would be contrary to section 8.3 of the County Wexford Development Plan 2001 and to the proper planning and sustainable development of the area.
4. By virtue of the inadequate information submitted regarding the nature and scale of the proposed development, and the type and extent of additional traffic which may be generated, it has not been demonstrated that the proposed development would not create traffic hazards and that it would not be appropriate at this site having regard to the design and capacity of the road network in the vicinity.

**END OF SCHEDULE**

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**Patrick.J.Hayes**

**Surveyor.**

Rathcline,  
The Reisk,  
Killurin, Enniscorthy,  
Co Wexford.  
Phone 053 28956

Notice of Objection to Planning

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The Chief Planning Officer  
Planning Department,  
Wexford County Council.  
Co Wexford.

7<sup>th</sup> February 05

Planning Number. 20050055

Submitted on 13 January 2005 by Mr Michael McEniry on behalf of  
NRGE. Mooresfort, Lattin. Co Tipperary.

Site Location. Pig farm at the Deeps, Kilpatrick, Co Wexford.

Proposal. To build 1 Shed. 5 over ground Storage Tanks, 1 Under ground  
Storage Tank, 1 Digester, 1 Secondary Digester with integrated Gas Holder,  
Associated site works.

Dear Sir,

I would like to bring to your notice my objection to the above proposal for the  
following reasons.

The plans submitted are totally inadequate and supply little or no information  
which is vital to make an informed opinion on the merits of this development.  
No information has been provided to indicate the day to day working capacity of  
the farm, the number of pigs that are on site at any one time. No indication is  
given as to what the requirement would be to cater for this number. No indication  
is given as to the output of the proposed instillation. All of this information is vital  
and must be provided. The plans provide only limited information, no scale is  
indicated and what is provided is not drawn to a recognised scale. One could be  
forgiven for coming to the conclusion that this is done to cause confusion. None of  
the plans show a proper elevation that would indicate the height and mass of the  
proposed instillation and it's relationship to the other buildings on site, it's impact,  
size and relationship to the surrounding area. This is not acceptable.

The plans indicate the position of four tanks. No indication is given as to the  
location of the fifth tank which is underground nor it's dimensions. The dimensions  
of only one size of tank are given along with those of the Digester. This indicates  
that two of the tanks are 18.100 meters or 59.385 ft high, with a diameter of

12,500 meters or 41.01 ft. The working capacity of each tank is therefor 446,959 gallons or 2,024,853 Litres.

It would appear from the site plan that the two smaller tanks have a diameter of 10.00 meters, with an assumed height of 18.100 meters this would give a working capacity for each tank of 286,088 gallons or 1,295,910 Litres.

The dimensions of the digester would seem to indicate a working capacity of 252,209 gallons or 1,155,634 Litres.

All of this adds up to a total of 1,718,303 gallons approx or 7,797,159 Litres approx.

As the dimensions and location of the underground tank are not shown the capacity of this tank are not included in the calculations. I think it would be fair to assume that the total capacity of the proposed development may be in excess of 2 million gallons or 9 million and 92 thousand Litres. I would suggest that this is way beyond the requirements of the present farm and would lead to the importation of large amounts of manure etc to feed a plant of this size. What is proposed is to build a massive industrial complex for the production of methane gas and manure products and destroy one of the most precious and fragile areas of County Wexford. An area that is designated an area of outstanding beauty and complexity that must be preserved at all costs. The proposal to erect massive tanks of the size indicated on the plans, show that no consideration was given to this matter and it therefor must be opposed at all costs.

It appears that no consideration has been given as what the situation would be if one of the storage tanks split. This could discharge 446,959 gallons or 2,024,853 Litres of slurry which would lead to serious pollution of the River Slaney and the surrounding area. As a considerable amount of gas would be produced, what safety requirements are to be put in place if an explosion took place? There is no indication on the plans that any consideration has been given to this matter or to the safety of the people who live in the surrounding area. If such an event should take place, it would devastate the surrounding area and could lead to fatalities. This is not acceptable

To conclude as a Surveyor (retired) I am amazed at the total lack of information provided and lack of consideration giving to the welfare of the surrounding area, and especially to the people who reside there. From my experience this can only suggests to me that there is an alternative agenda at work here especially when one takes into account the size of the proposed complex.

Yours sincerely,

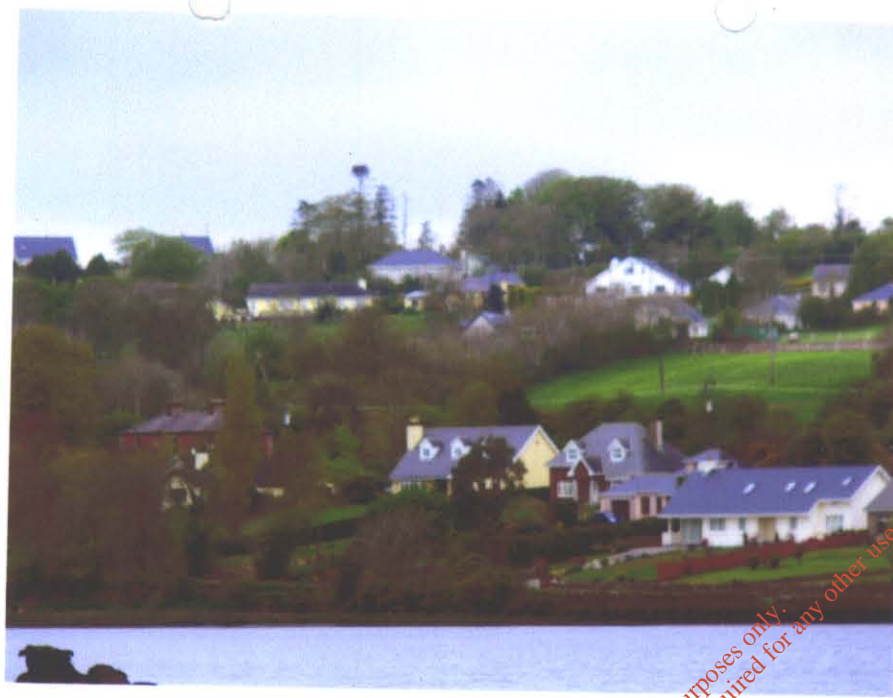
Patrick Hayes



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E/



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NOTE PIG BREEDING UNIT IS  
ACROSS RIVER FROM  
PIG FARM.

D/  
BREEDING  
UNIT

