

Comhairle Chontae Uíbh Fhailí

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## Offaly County Council

Aras an Chontae,  
Charleville Road,  
Tullamore,  
Co. Offaly.



Ms Marie Buckley

EPA

Office of Climate, Licensing and Resource Use

PO Box 3000

Johnstown Castle Estate

Co. Wexford

5<sup>th</sup> April 2011

Re: IPPC Licence Application, Skeagh Farms Ltd, Derryarkin, Rhode, Co. Offaly

Ref: jc/mm/1115

Dear Ms Buckley,

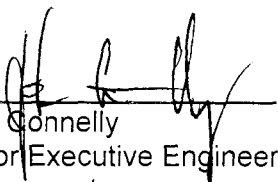
I refer to your notification of April 1st, 2011. Offaly County Council wish to make the following observations on the submitted EIS.

1. The EIS is dated April 2007 and refers throughout to SI 318 of 2006, which regulations are revoked. Water quality data referenced refers back to 2003. The EIS should be revisited and revised by the applicant.
2. Under European Communities (Good Agricultural Practice for the Protection of Waters) Regulations, 2010, the local authorities are charged with carrying out farm inspections for the purpose of these regulations (Art 30(2)). Furthermore, Article 30(3) states that 'a local authority shall aim to develop co-ordination arrangements with other public bodies with a view to promoting consistency of approach in inspection procedures and administrative efficiencies between public bodies...'.  
*Consent is conditional on approval of the proposed EIS. For inspection purposes only. Consent is conditional on approval of the proposed EIS.*

In this context, it is the opinion of this Council that Nutrient Management Plans, which relate to farms on which manure from intensive farming activities is recovered should be approved by the Agency and should be supplied to the relevant local authority either by the Agency or the licensee.

We request, therefore, that a requirement to make such Nutrient Management Plans available to the relevant Local Authority be included as a condition of the licence, if granted.

Yours Sincerely

  
John Connelly  
Senior Executive Engineer  
Environment

