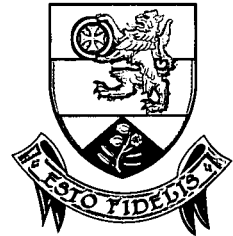


Offaly County Council

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

Comhairle Chontae Uíbh Fhailí

Áras an Chontae, Bóthar Charleville,
An Tulach Mhór, Contae Uíbh Fhailí.



T: 057 9346800 F: 057 9346868 / www.offaly.ie / customerservices@offalycoco.ie

Patrick Doyle
Programme Officer
Environmental Licensing Programme
Environmental Protection Agency
Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford

Environmental Protection
Agency

22 DEC 2015

21st December 2015

Your Ref: Reg.No. PO614-02

RE: Notification under Section 87(1E)(a) of the EPA Act 1992, as amended.

Dear Madam,

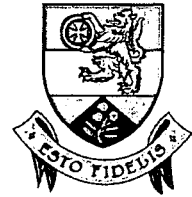
I wish to refer to your letter of 20th November 2015 in connection with the above.

Offaly County Council consider that licence application reference number PO614-02 is not contrary to planning permission PL2/15/2. Please see attached comments from Offaly County Council Environment and Water Section on the licence application.

Yours faithfully,


Administrative Officer
Planning

To: Jean Ryan
Planning Ref: Environmental Impact Statement –
Rosderra Farms (Bracknagh Pig Farm)
Date: 3rd December 2015



Application by Rosderra Farms, Carrick Road, Edenderry, Co. Offaly to the Environmental Protection Agency for the review of their licence at their pig farm at Ardra, Bracknagh, Co. Offaly.

Comments in relation to the Environmental Impact Statement with respect to the licence renewal are as follows:-

1. Soils and Geology

Impact No. 1: Potential impacts (to include hydraulic loading, chemical loading and soil structure damage) to soil from landspreading of pig manure – this will affect the customer farmlands.

Mitigation No. 1: the EIS document states that the customer farmland areas are eminently suitable for grass/crop rotation and environmentally suitable for the application of organic fertilisers at levels permitted by and in accordance with the requirements of European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014.

2. Ground Water

Impact No. 1: The main potential threat to groundwater in the vicinity of the pig farm site is due to the storage of a relatively large volume of animal manures on the farm.

Mitigation No. 1: Mitigation measures will include

- (a) Proposed structures to be constructed in accordance with Department of Agriculture, Food and the Marine Standards for the construction of farm buildings (proposed structures under PL2/15/002 Planning Application).

- (b) Provision of leak detection systems underneath all proposed manure storage tanks and regular inspection of associated inspection points
- (c) Provision of a substantial amount of excess slurry storage capacity (expected manure production = 11,310m³, available capacity = 18,000m³)
- (d) Collection of all soiled water in manure storage tanks
- (e) Flood risk assessment – to alleviate any risk for flooding of buildings and underground storage tanks, it is proposed that the replacement buildings (proposed under PL2/15/002 Planning Application) will have finished floor levels approx. 1.8m above existing floor levels (of buildings which are to be demolished) and proposed floor levels shall therefore be constructed approx. 1.3m – 0.7m above estimated 1 in 100 year and 1 in 1000 year flood levels.
- (f) Movement of animals on slatted passageway with manure storage tank underneath.
- (g) Provision of a collection tank and concrete area at the slurry fill points to collect any spill/leaks that may occur.
- (h) Provision of a stormwater attenuation tank to mediate storm water discharge from the farm.
- (i) All overground storage tanks (except water storage tanks) will be bunded.
- (j) The application of organic fertilisers on customer farmlands will be in accordance with the requirements of European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014.

3. Surface Water

Impact No. 1: Flood risk associated with the site

Mitigation No. 1:

- (a) To alleviate any risk for flooding of buildings and underground storage tanks, it is proposed that the replacement buildings (proposed under PL2/15/002 Planning Application) will have finished floor levels approx. 1.8m above existing floor levels (of buildings which are to be demolished) and proposed floor levels shall therefore be constructed

approx. 1.3m – 0.7m above estimated 1 in 100 year and 1 in 1000 year flood levels. The EIS states that the flood risk to the proposed development is considered to be low.

- (b) Site specific stormwater attenuation is proposed for the facility to include a storm water attenuation tank with a flow control device. There is a single storm water discharge point from the site which will be inspected on a weekly basis and sampled on a quarterly basis.
- (c) Soiled water will be collected in manure storage tanks.
- (d) The application of organic fertilisers on customer farmlands will be in accordance with the requirements of European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014.

4. Air

Impact No. 1: Section 7.4 of the E.I.S states that agricultural odour issues may be associated with the site.

Mitigation No. 1: the site is non urban based and the farrowing/weaner houses will be continuously washed, disinfected and rested between batches. All houses are to be stocked at optimum levels and adequately ventilated, ensuring minimal odour issues. The licensee has committed to advising their customers to adhere to recommended set back distances from odour sensitive dwellings during land spreading.

5. Climate

Section 7.5 of the E.I.S states that the proposed development will have no significant adverse effect on the climate in the area.

6. Noise

Section 7.7 of the E.I.S states that noise from the development will not create a disturbance or annoyance to anyone.

There are no further observations with respect to the Environmental Impact Statement associated with the licence review for Rosderra Farms (Bracknagh Pig Farm) however a list of the customers who remove the pig manure from the site and a map showing their lands on which it is spread would prove beneficial to the Environment Section of Offaly County Council to ensure that all customers are complying with the requirements of European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014.

Report By:

Claire Hughes.

Claire Hughes, A.E.,
Env & Water Services

S.P.
21/12/15

For inspection purposes only.
Consent of copyright owner required for any other use.