

## UNSOLICITED FURTHER INFORMATION

APPLICANT: Dutche (Shoe)

PLANNING REF. NO: 18140803

PLANNER: David Coffey

1. Date of receipt of Planning Application

10/1/14

2. Date of receipt of Unsolicited Further Information

23/10/14

3. Decision due date

4/1/14

Signature: [Signature]

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4. Does the Unsolicited Further Information impact on any item on the validation check list.

Yes/No

5. Does the planner deem that the unsolicited further Information should be accepted.

Yes/No

6. Does the Unsolicited FI require referral

Yes/No

Signature: [Signature]

7. I-Plan updated for accepted Unsolicited Further Information.

Yes/No

8. Copy Unsolicited FI to scanning

Yes/No

9. Unsolicited FI Referrals

Yes/No

10. Unaccepted Unsol FI returned with cover letter & scanned

Yes/No/N/A

Signature: \_\_\_\_\_

# **Murty Hanly & Associates Ltd.**

**Consulting Engineers & Project Managers**

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**RECEIVED  
PLANNING DEPT.**

**23 OCT 2014**

POST  
REFERENCE NO.

**22<sup>nd</sup> October 2014**

Planning Department,  
Buvinda House,  
Dublin Road,  
Navan,  
County Meath

## **UNSOLICITED FURTHER INFORMATION**

**RE: Planning Application ref LBI4803 of 10/9/14 for**

- (i) Intensification of livestock slaughtering activities at the existing meat plant;**
- (ii) Demolition and removal of existing offices as required under Condition No 3 of planning permission SA/140210;**
- (iii) Construction of 210m<sup>2</sup> of new offices, staff welfare and storage facilities at the location of the demountable structure referred to in (ii) above;**
- (iv) Change of use of an existing farmhouse from residential use to office use (153m<sup>2</sup>);**
- (v) Construction of 112m<sup>2</sup> of additional lairage facilities;**
- (vi) Construction of a 18m<sup>2</sup> green offal processing room abutting the main factory building;**
- (vii) Construction of an external gantry to support a stomach press (20m<sup>2</sup>);**
- (viii) Construction of a 4m<sup>2</sup> pumphouse;**
- (ix) Addition of 5 no. new ancillary car parking spaces.**

Dear Sirs

We refer to the application for permission, which was submitted to Meath County Council on 10<sup>th</sup> September 2014.

We note from the Council's on-line planning system, that four submissions have been received in respect of this application.

We also note that no complaints have ever been made by any of the individuals who have made submissions either directly to the plant or to any regulatory body, other than at the time of planning applications being made.

We would like to draw your attention to the fact that the submission made by Frank Burke & Associates on 10 October 2014 was submitted subsequent to a meeting, which Dunbia was asked to attend by the two individuals on whose behalf this submission has been made. At this meeting these individuals asked Dunbia to purchase their houses at an exorbitantly inflated rate in exchange for them not making a submission in respect of Dunbia's application.

Notwithstanding the above fact, I have been asked on behalf of my client, Dunbia, to clarify certain queries raised in all four of the submissions made in respect of this application (including the submission made by Frank Burke & Associates), for your convenience. In all cases, the queries raised relate to details which are set out in the planning application and the accompanying Environmental Impact Statement. I have dealt with each query raised / comment made, in turn, under various headings below.

At the outset, I should say that Dunbia have requested that the sentence in the submission made by Frank Burke & Associates on 10 October 2014 that '*Dunbia are part of industry that have a very poor profile, as a result of events over the years, the most recent been (sic) the "horsemeat" scandal*' is redacted, as a matter of priority, from the scanned copy of the submission, which is currently available on the Council's webpage. This statement is potentially defamatory in nature and we are surprised that a submission would contain such an inaccurate, inappropriate and inflammatory statement. Dunbia has never been affected by or implicated in the equine DNA issue in any way whatsoever. The implication in the above-mentioned submission that this may be the case is extremely damaging to Dunbia's established business reputation as a leader in the meat industry when it comes to the quality of its meat products. Dunbia's food safety and quality management systems are developed in line with industry best practice and stringent customer requirements. All of Dunbia's sites are independently audited and verified to recognised industry standards each year. Dunbia holds many accreditations such as Bord Bia and have recently gained membership of 'Origin Green', Ireland's national sustainability programme.

## Roads

In response to the queries raised and comments made in relation to roads, I would like to confirm the following points:

1. The Traffic Chapter of the Environmental Impact Statement (EIS) at Paragraphs 12.123 to 12.152 confirms that the proposed traffic increase has no adverse impact on road serviceability, capacity or safety of the relevant existing roads / junctions.
2. The EIS demonstrates full compliance with objective 'ED POL 19' of the Meath County Development Plan 2013 – 2019.
3. The existing HGV movements, which are permitted by existing planning consents, have not been the subject of any complaint from local residents in the past. The potential adverse impact on local residents from the proposed increase in traffic levels is assessed in the EIS as being 'minor to moderate' in nature.
4. Any traffic generated by the plant's existing activities has been captured by the baseline traffic survey presented in Chapter 12 of the EIS. The traffic levels reported in the EIS are determined by a 24hour traffic survey. Contrary to what is asserted in one of the submissions, the available traffic survey data indicates that there is, on average, just one trip to and from the plant per employee per day (please refer to summary details presented in Table 12-3 and the detailed data breakdown set out in Appendix 12.4 of the EIS).
5. Details of the visual survey of the public roads are presented as Appendix A to the traffic chapter of the EIS (see Appendix 12A). Given that the applicant does not own the public roads, it is considered unnecessary and inappropriate at this stage in the process for an applicant to undertake a detailed structural survey of public roads in the ownership of the Council.

### Capacity of Existing Road Junctions

The traffic assessment in Chapter 12 of the EIS indicates that the existing and proposed development will not have any adverse impact on the capacity of existing road junctions. It is not expected that the proposed development will have any impact on the existing service level. As regards comparison of service levels on roads around the plant with those in other areas of the County, it should be recognised that the level of service along the local road network is often constrained by its alignment and/or the speed limit. In my opinion, users of existing road networks have no entitlement to expect an established level of service to be maintained by a Local Authority over a specific road. If that was the case, development of any kind would be inhibited, as all development has the potential to adversely impact service level (however minimal). Any perceived loss of service must be balanced against the rural enterprise objectives of the Meath County Development Plan.

### Traffic Safety

It is claimed that HGV traffic along the local road network is a traffic hazard. No basis is given for this assertion in the submissions. As set out in the EIS, all HGV traffic travelling to and from the plant will use the N2 / L1013 / R150 roads and the southern approach to the plant along Windmill Lane. We would emphasise the fact that all traffic associated with Dunbia is currently directed South on Windmill road (we attach a photograph of the existing signage in relation to turning and recommended speed, for your information. Appendix 1)

No HGVS will use the stretch of Windmill Lane to the north of the plant. With this, in mind, no traffic movements have been assessed along the north of Windmill road as no impacts will arise as result of proposed development. An EIA is not required to have regard to non-existent impacts, such as these.

Dunbia's technical advisors are of the opinion that the splay lines at the site entrance and along the L1013 are appropriate to the design speed along Windmill Road (please refer to Section 12 of the EIS). The design speed of 85km along this section of road, which has been suggested in some of the submissions, is excessive. Equally, the assertion that the splaylines are inappropriate is inconsistent with the assertion that the local roads are of 'poor alignment'.

### Maintenance of Public Roads

Some concerns have been voiced with respect to the existing pavement quality along Windmill Road.

The Applicant is a long established rural enterprise, supporting valuable rural employment, which has operated for many years by using the existing road network, including Windmill Road, without causing any apparent disamenity to neighbours, given their lack of complaints in relation to roads to date. In Chapter 11 of the EIS (entitled 'Material Assets') it is acknowledged that, in the absence of mitigation, there could be a potential impact on the road pavement surface. Pavement quality can be improved by a road maintenance programme and planning authorities may apply a levy where they consider it necessary to do so or where it is provided for under the County Development Plan.

### Traffic Generation

Some of the submissions assert that the background traffic survey data does not relate to the day on which the maximum allowable 'kill' rate was concerned. We would point out that the difference between the 186 and 200 cattle processed in a single day in terms of traffic



generation is marginal – it is perhaps 1 or 2 extra vehicle trips per day. The effect of 1 or 2 additional trips on the existing baseline (or future service) levels is minimal and immaterial. It is envisaged that there will be no increase in night-time deliveries beyond the existing levels at the plant.

#### No adverse traffic-related noise impact

The EIS (at Paragraphs 8.61 and 8.77) indicates that noise impact from additional daytime traffic at residences is, in a worst case scenario, barely perceptible. Contrary to the assertions in the submissions in relation to noise, we would point out that for noise impact assessment purposes, impacts have been assessed at the nearest sensitive receptors (i.e. residences). Monitoring locations / sensitive receptors selected for assessment are the same as those agreed with the EPA under terms of the IED licence. The EIS noise impact assessment presents results of existing night time surveys at 4 No. closest sensitive receptors. More specifically, we would like to draw your attention to the fact that the sensitive receptors 'RA2' and 'RA3' in Figure 8.1 of the noise chapter (Chapter 8) of the EIS correspond to the sensitive receptors 'DR15' and 'DR17' in Figure 7.3 of the air quality chapter (Chapter 7) of the EIS. In any event, the EPA's IED Licence sets the relevant noise emission thresholds for the plant. Predicted changes in noise levels arising from the proposed development are discussed in Chapter 7 of the EIS. The EIS explains that the large attenuation distance between the plant and residences results in little or no adverse noise impact.

#### Water Supply

In response to the queries raised and comments made in relation to water supply, I would like to confirm the following points:

1. Information on abstracted water quality and treatment processes is presented in Section 2 of the EIS (entitled 'Existing Site Infrastructure - Water Supply').
2. The projected increase in water demand associated with the proposed development includes an allowance for increased human consumption (please refer to paragraph 2.166 of the EIS).
3. The EIS includes provision for water storage tanks / rainwater harvesting from storage lagoons to relieve any potential for any future pressure on water supply (please refer to Chapters 2 and 6 of the EIS). The harvested 'grey water' will supplement the existing supply from the groundwater well and will be used in place of treated potable water for wash down of yards and lairage areas.
4. Some submissions refer to local wells. If any particular wells lie outside the zone of influence or contribution of the proposed development, there is no requirement or need to assess the impact of the proposed development on these wells.

Information on water supply, including impact on nearby private domestic supply wells and water quality, is presented in Appendix 6C of the EIS.

#### Wastewater Treatment

In response to the queries raised and comments made in relation to wastewater treatment, I would like to confirm the following points:

1. Wastewater and Sludge disposal arrangements have been agreed and implemented after detailed and intensive discussions with the EPA. These arrangements are regulated by the

EPA who is the competent authority for this matter under the IED licensing regime. The arrangements are operating to the specification agreed with the EPA.

2. Wastewater and Sludge disposal is addressed by way of a Nutrient Management Plan which is regularly revised and updated to take account of changing circumstances. All updates and revisions to this plan are subject to oversight and approval by the EPA under the terms of the IED licence.
3. The disposal of wastewaters to municipal wastewater treatment plants is the subject of commercial arrangements with the operators. It is expected that there will be sufficient capacity provided in plants operating in the Greater Dublin / North-East region for the foreseeable future. In the highly unlikely event that the position changes and alternative waste management solutions are required, these can be explored by the applicant.
4. The application and associated EIS estimate that the increase in wastewater production will generate 2-3 additional movements of 25m<sup>3</sup> tankers in and out of the site per day. The implications of the resultant increase in traffic are presented and discussed in Section 12 of the EIS and relevant data on existing / expected future waste movements is provided in Appendix 12-3 to the EIS.
5. The lined on site lagoons have the capacity to handle the expected increase in wastewater generated by the proposed intensification of activities. The operation of lagoons is subject to oversight by the EPA. Relevant details on emergency storage capacity and management of the lagoons is provided in Chapter 2 of the EIS. More specifically, para 2.180 of the EIS states that the lined on-site lagoons will provide 4-5 weeks of emergency storage for wastewaters generated at the site (as required / agreed with the EPA under the terms of the existing IED licence). Emissions and discharges from the water treatment plants are subject to environmental licensing and oversight from the EPA.

#### *Surface Water Run-off*

6. There will be no change in the surface water run-off to the drainage ditch to the south-west of the plant, as all proposed development areas are currently paved and drained. Some minor changes which have been proposed to surface water run-off and drainage infrastructure are referred to in Chapters 2 and 6 of the EIS. We would point out that the EIS determines that the cumulative impact of the changes to surface water run-off and the drainage regimes are not significant.

#### **Landspreading**

In response to the queries raised and comments made in relation to landspreading, we would like to mention that the spreading of organic wastes on land is controlled by a Nutrient Management Plan which is agreed and assessed by the EPA under the terms of the IED licence. The plan will be updated to address the management of increased waste quantities produced and will be agreed / approved by the EPA. That said, Dunbia has undertaken, and has abided by its undertaking, provided to certain local residents (one of whom has also made a submission in respect of this and the previous planning application) that it would not spread organic waste on the lands within Dunbia's control, which surround the plant.

#### **No Odour Impact**

In response to the queries raised and comments made in relation to perceived odour impact, we would point out that as there are no emissions of polluting / volatile gases from the plant, it was considered that there was no requirement for a baseline survey in respect of a wide range of potential atmospheric pollutants. Given that an EIS is only required to address

significant environmental impacts (and not non-existent ones), it is considered that a description of baseline air quality based on published data is sufficient for the purposes of the odour impact assessment undertaken. Odour impacts have been assessed on a qualitative basis.

### **No visual Impact**

In response to the comments made in relation to perceived visual impact, we would emphasise that there will be minimal change / no significant change to the plant layout or to its visual appearance as a result of the proposed development. This is explained and discussed in Chapter 9 of the EIS. Conditioned landscaping works will be implemented in due course, in the appropriate season to a high standard as part of the overall works plan for the plant.

### **General**

While it is recognised that the increase in throughput capacity at the plant will not, of itself, induce greater cattle production it will facilitate it and throughput at the plant will ultimately be contingent on market conditions. Increased capacity will promote greater efficiency and competition in the meat sector, which would be expected to be of advantage to farmers. The increased throughput would also benefit the road infrastructure, in that, it will reduce the necessary travel distance to more remote plants. It is unacceptable for some of the individuals who made submissions to seek to denigrate the value of any paid employment, whether to a particular individual or to wider society.

We trust that the above information provides useful clarification on the points raised in the submissions made on our client's application and EIS. As you will note, no new information has been provided, rather, we have drawn attention to the locations at which the relevant information can be found in the EIS. It may well be that the individuals who have made submissions did not review the EIS and, as a result, are (incorrectly) of the view that certain pieces of information were not provided, which, in turn, prompted them to raise their various queries.

We respectfully request that you take the above clarifying information into account in determining our client's application for the proposed development.

Yours Sincerely,



Murty P. Hanly (Agent for applicant)

## APPENDIX 1



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