



### Submission

Submitter:	Ms Carmel Lynch
Submission Title:	Submission
Submission Reference No.:	S005420
Submission Received:	27 March 2019

### Application

Applicant:	Mr. Shane Reynolds
Reg. No.:	P1104-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Dublin North East  
Environmental Health Service  
Co. Clinic  
Navan  
Co. Meath

Phone: 046 9098754  
E-Mail: carmela.lynnch@hse.ie

26<sup>th</sup> March 2019

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

**Our Ref: 0910**  
**Type of consultation: Environmental Licences**  
**Planning Authority: Environmental Protection Agency**  
**Reference Number: P1104-01**  
**Proposal: Mr Shane Reynolds proposes to construct 4 no. poultry houses (for chicken production), 1 no. office, 1 no. generator store and 1 no. general purpose store along with ancillary structures (to include gas storage tanks, soiled water tanks, meal storage bins etc.) and associated works on a greenfield site at Monkstown, Navan, Co. Meath**

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above proposal. If you have any queries regarding this report, the initial contact is Ms Elish O'Reilly, Principal Environmental Health Officer, Environmental Health Service, Co. Clinic, Navan, Co Meath who will refer your query to the appropriate person.

The following HSE departments were made aware of the consultation request for the proposed development on 25<sup>th</sup> February 2019:

- HSE Environmental Health Service
- HSE Emergency Planning
- HSE Estates
- HSE Health Protection

#### Environmental Health Report

- The Environmental Health Service response to the proposal is in the attached consultation report.

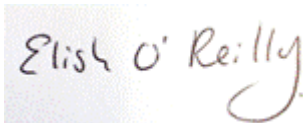
- The report is based on an assessment of documentation submitted to the Environmental Health Service on 21<sup>st</sup> February 2019.
- A site visit was conducted on 14<sup>th</sup> March 2019.
- All commitments to future actions, including mitigation and further testing, have been taken as read and all data results have been accepted as accurate.
- No additional investigations/measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the HSE.
- We have made observations and submissions under the following specific areas:

Soil and Subsoil Geology  
Surface Water  
Climate  
Alternatives considered

Groundwater  
Air  
Noise

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Elish O'Reilly, Principal Environmental Health Officer, Co. Clinic, Navan, Co. Meath.

Yours Sincerely,



Elish O'Reilly  
Principal Environmental Health Officer

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Ms Elish O'Reilly  
Principal Environmental Health Officer  
County Clinic  
Navan  
Co. Meath

19<sup>th</sup> March 2019

Our Ref: 0910

**HSE EIS SUBMISSION REPORT**  
**Environmental Health Service Consultation Report**  
(as a Statutory Consultee (Planning and Development Acts 2000,  
& Regs made thereunder).

**Report to:** **Environmental Protection Agency**

Type of consultation: EIS ☒ Scoping ☐ Screening (constraints) ☐

Other (please specify)

Planning Authority: **Meath County Council**

Reference Number: **P1104-01**

Applicant: **Mr. Shane Reynolds**

**Proposed Development:**

The applicant proposes to construct 4 No. Poultry Houses (for chicken production), 1 No. office, 1 No. Generator Store and 1 No. General Purpose Store along with all ancillary structures (to include gas storage tanks, soiled water tanks, meal storage bins, etc.) and associated works on a greenfield site at Monkstown, , Navan, Co. Meath.

The applicant is applying for an Industrial Emissions Licence as the proposed development will be an intensive agriculture operation involving the rearing of poultry in installations where the capacity exceeds 40,000 places.

## General Introduction

This report only comments on Environmental Health Impacts of the proposed development as outlined in the documents submitted by the applicant and the adequacy of the planning application from an Environmental Health viewpoint. I have made observations and submissions on the following specific areas:

### (i) **Description of the Project**

The applicant proposes to construct 4 poultry houses, each with a floor area of 2400m<sup>2</sup> along with other ancillary facilities on the site. It is proposed to house up to 50,000 birds in each building.

The buildings will be mechanically ventilated and have artificial lighting. An automatic feeding system will be installed. Water will be supplied to the birds through a button nipple drinking system which should ensure that bedding remains as dry as possible. The EIS advises that the buildings will be constructed and operated in line with the requirements outlined in the Best Available Techniques (BAT) for the poultry sector.

Day old chicks will be transported to the farm and housed on a solid impervious concrete floor covered in wood shavings or chopped straw. Birds will be removed from the farm after 5-6 weeks, the building will be cleaned and disinfected before the arrival of a new batch of chicks.

The EIS states that all manure produced on the farm shall be utilised on agricultural lands farmed by the applicant's family. The EIS also advises that arrangements have been made with a mushroom composter yard to accept manure when land spreading is not possible.

### (ii) **Assessment of Later Consents Required**

The application documents advise that no later consents are required.

### (iii) **Alternatives Considered**

The EIS advises that consideration was given to alternative sites, layout/design and processes. The alternatives were unsatisfactory or not appropriate. The EIS outlines reasons why other alternative processes i.e. free range or layer farming would not be suitable/viable at this location.

### iv. **Description of the Physical Environment**

The proposed development will be located on a greenfield site close to the applicant's existing dwelling and farmyard at Monktown, Navan, Co. Meath. The site will be accessed via an internal farm roadway to be developed within the landholding. The surrounding landscape is typically rural in character, dominated by a patchwork of agricultural fields interspersed with one off dwellings or groupings of same and agricultural buildings.

### v. **Public Consultation**

The EIS does not refer to any consultation carried out with members of the public.

A site notice was displayed on the public roadway and application details were published in a National newspaper.

## Environmental Health Impacts

### 1. **Soil and Subsoil Geology**

Site: The EIS states that the bedrock geology of the site is Loughshinny Formation, which consists of Dark micrite & calcarenite, shale and Mullaghfin Formation, which consists of Pale grey limestone. Glacial drift deposits cover the bedrock with sediments of varying types and thickness. These till deposits have a major influence on soil type and aquifer vulnerability as the thick clay soils provide aquifers with protection from surface pollution.

The EIS advises that the proposed development will require minimal excavation works and any excavated material will be used as part of site amelioration works on or around the site or farm.

Customer Farmlands: The EIS states that the farmland to be used for land spreading of manure covers a significantly larger area than the proposed site. The EIS further states that topographic features, solid geology and soil geology will be more varied and are deemed to be beyond the scope and requirement of the EIS.

The EIS advises that the application of fertilisers to customer farmland areas is governed by the requirements of SI 31 of 2014 European Union (Good Agricultural Practice for Protection of Waters) Regulations. It is proposed that all manure from the poultry farm will be allocated for use in accordance with these Regulations. The EIS outlines control measures to minimise the impact on soil from hydraulic loading, chemical loading and soil structure damage.

Some of these restrictions are outlined in the report, as follows, the requirement not to spread on steep slopes so as there is no surface runoff, the requirement not to spread on, or within 15m of exposed bedrock and/or other vulnerable features, not to apply excess fertilisers, not to spread on waterlogged, frozen, snow covered ground, not to apply excess fertilisers.

The EIS advises that restricting land spreading should protect soils from chemical and hydraulic loading and other physical damage.

### 2. **Ground Water**

Site and Immediate Area: The EIS states that a locally important aquifer underlies the site and is overlain by a low permeability overburden. The EIS states that ground water sources in the area are afforded considerable protection due to the nature of the overlying soils. The aquifer vulnerability is classified as low to moderate.

The EIS advises that the main threat to ground water from intensive agriculture is storage of large volumes of animal manures. The manure from this development will be a dry product and will be removed off site at the end of each batch.

The applicant proposes to install underground soiled water storage tanks. Soiled water from this tank will be applied on the applicant's lands.

Customer Farmlands: The EIS states that manure will be spread on customer farmlands in accordance with requirements of SI 31 of 2014 European Union (Good Agricultural Practice for Protection of Waters) Regulations. The EIS outlines these restrictions on land spreading.

The EIS advises that compliance with these regulations together with proper manure management on site and on customer farmlands will ensure the groundwater resources in the relevant areas will be protected.

### 3. **Surface Water**

The proposed site is located in the River Nanny catchment area. The EIS advises the reader to refer to Appendix No. 10 for details on local river water quality.

#### Site and Immediate area:

The EIS proposes that all roof water and uncontaminated storm water will discharge through a swale drainage system and soak pit to the local water course.

It is proposed to drain all soiled water from hardstanding areas to a dedicated soiled water tank. The EIS advises that all liquid fuels, disinfectants and chemicals will be stored in appropriately bunded areas.

#### Customer Farmlands:

The EIS states that manure will be spread on customer farmlands in accordance with requirements of SI 31 of 2014 European Union (Good Agricultural Practice for Protection of Waters) Regulations. The EIS outlines these restrictions on land spreading.

The EIS advises that adherence to these restrictions and proper manure management will result in little or no impact on surface water in this area.

### 4. **Air**

The EIS states that the proposed poultry farm is located in an entirely agricultural hinterland where typical levels of farm odour are to be found and expected. Odour associated with poultry farming enterprises may arise from day to day operations on the farm and from manure spreading.

The EIS advises that well maintained and properly ventilated poultry farms with modern manure management will result in a “practically odour free” environment beyond the confines of the site. Odour emissions will be associated with removal of manure from the site.

The EIS states that the closest dwelling is 150m from the proposed development and prevailing winds should blow any odour away from this dwelling.

The EIS states that the poultry farm is located in a sparsely populated rural environment and will not cause any nuisance.

The EIS states that manure will be spread on customer lands in accordance SI 31 of 2014 European Union (Good Agricultural Practice for Protection of Waters) Regulations. Manure shall be ploughed/incorporated into the soil as soon as practicable after application.

The EIS advises that odour nuisance will be minimised by using correct application rates, even application, spreading at the correct times under suitable conditions and strict adherence to cordons sanitaires and Codes of Good Practice for Manure Spreading.

The applicant will recommend to all customer farmers that farm manure should not be applied to lands adjacent to neighbouring dwellings/potential odour sensitive locations and not within 100m of an isolated dwelling or 200m from a potential odour sensitive area or group.

## **5. Climate**

The EIS has outlined climate information which may be useful in predicting likely impacts that farm operations and manure spreading will have on local residents. The prevailing wind direction is important for odour movements and rainfall is a major consideration for the manure spreading.

The EIS advises that the applicant will ensure that manure is allocated for use only at times that is acceptable to inhabitants of the catchment.

The EIS states that land spreading of manure shall take place in accordance with SI 31 of 2014 European Union (Good Agricultural Practice for Protection of Waters) Regulations. Weather and ground conditions at the time of spreading should ensure that emissions are kept to an absolute minimum.

The EIS states that the development will have no significant effect on climate.

## **6. Noise**

The EIS advises that peak noise periods on poultry farms occur during the normal working day and are associated with feed deliveries. It goes on to state that any bird noise will be undetectable outside the boundary due to high insulation standards.

There will be a noise emission from the operation of ventilation systems, feed augers, blowers on delivery trucks etc. The EIS does state that earthen berms will assist in reducing noise emissions from the farm.

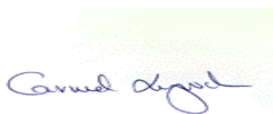
The results of a number of noise surveys from intensive pig farms were submitted as part of this EIS. These surveys do not relate directly to the proposed development. The sound pressure levels for ventilation fans and feed deliveries were submitted but there was no assessment or discussion of these noise levels.

The EIS does state that noise emissions should not exceed the EPA's day, evening and night time limits and based on experience from similar farms, noise complaints are not expected.



## Conclusions

1. The noise section of this report did not establish baseline noise data for the site and did not outline predicted noise emissions from the proposed farm. The EIS advises that noise emissions from the farm should not be perceptible at nearby residences and should comply with EPA noise limits. The setting of an absolute noise emission level at a site boundary may not protect local residents from a noise nuisance. The impact this development may have on the local noise environment should be predicted and assessed. Noise levels should be monitored when the farm is in operation.
2. The EIS failed to assess the impact that water demand from the proposed development may have on ground water conditions in the vicinity of the site. The EIS did not identify any alternative water sources for the development or remedial measures which may be required if the development has a negative impact on groundwater supply in the local area.
3. General waste management (aside from manure management procedures) was not addressed in any great detail in the EIS. The applicant should ensure that the principles of the EU's waste management hierarchy are implemented on the farm.
4. Dead birds should be suitably stored and removed from the site regularly and particularly during periods of hot weather to prevent a nuisance arising.
5. The EIS states that manure will be managed in line with SI 31 of 2014 European Union (Good Agricultural Practice for Protection of Waters) Regulations. The applicant should also comply with the Department of Agriculture's new Code of Good Practice for Poultry Farmers in relation to dead birds and poultry litter. In particular the applicant should ensure that all dead birds are removed from housing and are not incorporated into manure for land spreading and manure should be properly ploughed into the ground within 24 hours.
6. The EIS included a brief section on the climate and concluded that the proposed farm will have no significant effect on the climate in the area. Meath County Council have outlined specific actions in the Meath Climate Action Strategy to ensure a move to a low carbon, climate resilient and environmentally sustainable economy. The EIS failed to take any cognisance of this strategy.
7. The EIS does not detail any public complaints procedure. A procedure should be implemented to ensure that any complaints are investigated and addressed in a timely manner.



**Carmel Lynch**  
**Environmental Health Officer**

**\*All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms Elish O'Reilly, Principal Environmental Health Officer, Co. Clinic, Navan, Co. Meath.**