



Objection

Objector:	Mr Peter Sweetman
Organisation Name:	Wild Ireland Defense Ltd.
Objector Address:	ROSSPORT SOUTH BALLINA CO MAYO, BALLINA, Co. Mayo.
Objection Title:	Objection #OS005694 - 3rd party objection for Reg No:[P1086-01]
Objection Reference No.:	OS005694
Objection Received:	29 August 2019
Objector Type:	3rd Party
Oral Hearing Requested?	No

Application

Applicant:	Mr. Patrick Greenan
Reg. No.:	P1086-01

See below for Objection details.

Attachments are displayed on the following page(s).

PETER SWEETMAN & ASSOCIATES
ROSSPORT SOUTH
BALLINA
COUNTY MAYO
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Environmental Protection Agency
Johnstown Castle Estate
County Wexford

Objection to PD - Reg No. P1086-01

Licence Application by Mr. Patrick Greenan, Kilmore East, Rockcorry, Monaghan.

To whom it concerns,

I hereby object to the PD in this application issued to Mr. Patrick Greenan on or about 14 August 2019 to increase the capacity of intensive poultry rearing units at Kilmore East, Rockcorry, Co. Monaghan from below 40,000 birds to 190,000 birds. I believe that this PD was granted contrary to EU law including the Habitats Directive, EIA Directive, Water Framework Directive, Industrial Emissions Directive and Waste Framework Directive.

In my opinion this objection must be considered in the context of the cumulative effects and impacts of a nearby licence application by Mrs Gillian Harte at Milltown, Rockcorry, Monaghan to build 2 new poultry units having the capacity to house 104,000 birds, for which a PD was issued on 11 July 2019 under Reg No. P1075-01.

Given the close proximity of these poultry enterprises to one another and the possibility that poultry litter and/or washwater from both will be spread on the same or proximate lands, I believe that the Agency must consider the impacts of both together and that this objection should also be considered by the Agency as an objection to Reg No. P1075-01 as well as an objection to Reg No. P1086-01.

My objection is on the following grounds, which apply equally to both licence applications Reg No. P1086-01 and Reg No. P1075-01.

1. The Inspector did not seek a copy of the SCAIL model of air emissions. Only summary results were provided by the developer and no modelling of the effects of air emissions from land-spreading was done. I believe that the limited modelling results summarised by the developer in the AA Screening report suggests that the proposed development will give rise to significant effects on habitats and species in the Kilrooskey Lough Cluster SAC 001786. The absence of modelling of air emissions for the landspreading cannot result in a conclusion that there will be no significant effects from spreading of wash water and poultry litter on land.

2. The lands where poultry litter is to be spread have not been identified. The location /capacity of poultry litter storage has not been identified/quantified.
3. No proper AA Screening has been done. The results of the purported screening suggests that there are significant impacts to habitats and species and a full Appropriate Assessment should be conducted.
4. The Agency has made this PD without knowing the whereabouts lands for spreading poultry litter or without making a condition that poultry litter should not be spread on any lands.
5. The cumulative impacts and effects of this poultry enterprise with other intensive agriculture enterprises and landsreading of emissions from intensive agriculture has not been properly considered.
6. The effect of landsreading on surfacewater and groundwater has not been properly considered or at all. There are no emission limit values for discharges to waters affected by landsreading.
7. The suitability of lands for the spreading of washwater has not been assessed.
8. Existing surface water quality is poor. There is no capacity for further contamination from agricultural activities.
9. The applicant's fit and proper person status has not been properly assessed.

On the basis of the foregoing I respectfully submit that neither licence application Reg No. P1086-01 nor Reg No. P1075-01 should be granted a licence by the Agency.

Yours faithfully



Peter Sweetman
And on behalf of
Wild Ireland Defence Ltd.