



Submission

Submitter:	Elish O'Reilly
Submission Title:	received by post
Submission Reference No.:	S005852
Submission Received:	21 October 2019

Application

Applicant:	Mr Ivan Reynolds
Reg. No.:	P0917-02

See below for Submission details.

Attachments are displayed on the following page(s).

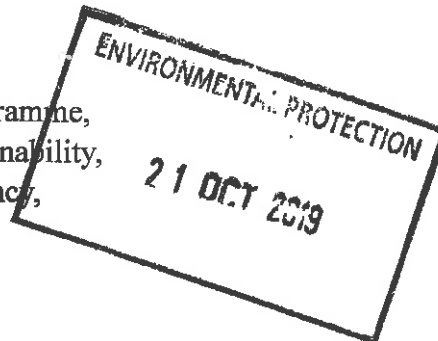
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Environmental Health,
County Clinic,
Navan,
Co. Meath
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15/10/2019

Environmental Licencing Programme,
Office of Environmental Sustainability,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford



ID Number: 1010

Re: P0917-02

Proposed Development: Poultry farm at Gerrardstown, Garlow Cross, 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 any of these reports, the initial contact is Ms. Elish O'Reilly, Principal Environmental Health Officer 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 19-09-2019

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Pat Bennett

Environmental Health Report

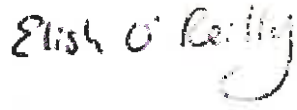
The EH service response to the proposal is in the attached consultation report.

- The assessment is based (solely) on an assessment of documentation submitted to this office on 19/09/2019 by Mr Ivan Reynolds, Gerrardstown, Garlow Cross, Navan, Co. Meath
- A site visit was conducted on 9th October 2019.
- Environmental Health were not included at the Screening / Scoping stage of this application
- 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:

Land/Soil	Groundwater
Surface Water	Air
Climate	Noise
Population/Employment/Human Health	

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Elish O'Reilly.

Yours Sincerely,



Elish O'Reilly
Principal Environmental Health Officer

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Environmental Health,
County Clinic,
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Co. Meath
Phone: 469098753
E-Mail: carmela.lynch@hse.ie

15/10/2019

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

ID Number: 1010

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

Report to: Ms Elish O'Reilly

Type of consultation: EIS ☒ Scoping ☐ Screening (constraints) ☐ Other (please specify) __

Planning Authority: Environmental Protection Agency

Reference Number: P0917-02

Applicant: Mr Ivan Reynolds, Gerrardstown, Garlow Cross, Navan, Co. Meath

Proposed Development: Poultry Farm

General Introduction

This report only comments on Environmental Health (EH) Impacts of the proposed development as outlined in this EIS and the adequacy of the EIAR from an EH viewpoint. We have made observations and submissions on the following specific EH areas;

i. Assessment of Principle & Description of the Project:

The EIAR relates to an application seeking planning permission to construct a free range hen house and a barn type poultry house for the housing of hens, along with ancillary structures. The applicant proposes to construct the poultry houses alongside the existing poultry layer house.

The existing poultry house operates an enriched cage system where birds are kept indoors at all times, birds are provided with a nest box for laying eggs, perching space and a scratching area. The proposed development will have 2 poultry houses, one of which will be a free range egg production unit which will allow birds continuous access to the outdoors during daylight hours, the other poultry house will be operated as a barn egg production unit which provides birds with similar facilities as the free range birds but they do not have access to the outdoors. The proposed poultry houses will be pre-fabricated steel constructions on concrete bases and will be thermally insulated with computer controlled ventilation systems and artificial lighting. A button nipple drinking system will be used in the houses as this drinking system should ensure that manure remains as dry as possible. Birds will be fed through automatic feeding systems. Feed will be supplied from specialist companies and will be nutritionally tailored for birds.

The EIAR advises that birds for this farm will be brought from specialised pullet rearing farms at point of lay (c. 16 weeks of age). The birds would remain on the farm for the laying cycle (c. 56 - 60 weeks on average) and are removed at c. 72 - 76 weeks of age. The applicant advises the houses will operate an all in - all out system to maintain a single age profile and to maintain the health status of the birds. The EIAR states that the house will be carefully cleaned down between flocks and will be operated on a rotational basis with each house being cleared out and re-stocked every 4-6 months. This staggered operation should ensure consistent egg production and spread out traffic movements associated with bringing birds to and from the site.

The EIAR states that all organic manure produced on the farm will be spread on lands owned by the applicant and his family and that sufficient manure storage facilities with up to 6 months storage capacity will be provided.

The applicant will manage and operate the existing and proposed farming enterprises. All eggs produced on the site will be sent to Greenfield Foods Facility, Mullandava, Smithboro, Co. Monaghan.

The EIAR advises that the proposed development will be constructed in accordance with SI No. 311 of 2010, EC (Welfare of farmed Animals) Regulations 2010 and in line with current consumer/industry requirements regarding egg production.

It is understood that this proposed development replaces the development of an enriched cage poultry house which was previously approved by Meath County Council and there will be no overall increase in the approved number of birds on the farm.

ii. Assessment of Later Consents Required: (IPPC, Waste, Seveso etc)

The applicant requires an EPA licence, the enterprise is classed as "Activity Class 6.1 (a) 'The rearing of poultry in installations where the capacity exceeds 40,000 places.'" The EIAR does not outline any further consents required for the operation of the proposed development.

iii. Assessment of Public Consultation & Non Technical Summary:

A public site notice was displayed along the roadside of the proposed development.

The EIAR did not include any evidence of public consultation carried out by the applicant regarding the proposed development.

A non-technical summary was included in the application documents.

iv. Assessment of Consideration of Alternatives:

The EIAR advises that the applicant considered some alternative locations, layouts/design and sizes for the proposed development, none of these alternatives were considered feasible.

The EIAR stated that the applicant did consider alternative processes i.e. turkey, broiler, duck meat production, the report advises that these systems would pose an unacceptable bio-security risk to the existing poultry operation and were not considered viable alternatives.

v. Assessment of Description of Physical Environment:

The site of the proposed development is located on agricultural land adjacent to the existing poultry farm operated by the applicant. The application site is approximately 2.9 hectares and is located in the rural townland of Gerrardstown 6km from Navan and 4km from Kentstown. The EIAR advises that the land use surrounding the site is predominantly agricultural and the main habitats occurring locally include improved agricultural grassland, tillage lands and/or hardcore.

Environmental Health Impacts

1. Land/Soil

Site: The EIAR states that the proposed site is located south east of Navan in a relatively flat topographical area, the bedrock geology of the site is referred to as the Balrickard Formation which consists of coarse sandstone and shale rock types. Glacial drift deposits cover the bedrock with sediments of varying types and thickness. The EIAR advises that these deposits influence soil type and aquifer vulnerability as the thick clay soil provide aquifers with protection from surface pollution. The EIAR describes the various types of deposits and soil type associated with the proposed site.

The EIAR 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 EIAR states that the farmland to be used for land spreading of manure covers a significantly larger area than the proposed site. The EIAR 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 this report. The EIAR states that the customer farmland areas are "eminently suitable for grass/crop production, and environmentally safe for the application of organic fertilisers at the levels permitted by, and in accordance with the requirements of S.I. 605 of 2017, as amended".

The EIAR advises that all manure from the proposed farm will be allocated in accordance with SI 605 of 2017 (EC (Good Agricultural Practice for Protection of Waters) Regulations 2017) and that the maximum rate of hydraulic loading will be 12.4t/ha. The EIAR advises that soils have sufficient infiltration capacity to allow for adequate percolation. The EIAR states that environmentally sensitive areas will be removed and an adequate buffer zone will be applied to these areas, there will be no spreading on steep hillsides to minimise run-off. These environmentally sensitive areas are not identified in the report or attached appendices.

It is understood from the EIAR that all manure from the proposed poultry farm will be spread on the applicant's family farmlands. The EIAR advises that all details of landspreading operations will be maintained on site for inspection.

The EIAR states that customer farmers will be advised that land spreading should not take place from 15 October to 15 January and when ground conditions are unsuitable and land is water logged.

2. Groundwater

Site and Immediate Area: The EIAR advises that the aquifer beneath the site is classed as poor and is generally unproductive except for local zones. The EIAR states that any ground water sources in the area are well protected due to the nature of the overlying soils. The applicant has advised that he has not encountered any rock while carrying out on-site excavations and also advises that there will be no underground manure storage tanks.

The EIAR outlines a number of mitigation measures which will be implemented to ensure that the proposed development does not have a negative impact on groundwater i.e. buildings will be constructed to Department of Agriculture standards, manure will be removed from the houses weekly, a dedicated soiled water tank will be provided at each house which will collect soiled waters from washing down houses and a 6 month manure storage capacity will be provided.

Customer Farmlands: The EIAR states that all manure from the farm will be allocated and applied on customer lands in accordance with SI 605 of 2017 and these measures will protect the underlying groundwater resources.

The EIAR describes the restrictions outlined in the above legislation which are applicable to all farmers when spreading fertiliser.

The EIAR 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 EIAR advises that the application site lies within the Nanny-Delvin Hydrometric Area and Catchment, the Nanny (Meath) Sub-Catchment and Sub-Basin. There are a number of watercourses within and close to the application site, including a drain di-secting the site. Clean surface water from the application site will be directed into local drains. The River Nanny flows along the southern site boundary. The ecological status of the River Nanny and its tributaries have been classed as poor. The Water Framework Directive requires all water bodies to achieve a good status by 2021.

The EIAR outlines measures for the protection and improvement of water quality in Ireland under the EU Water Framework Directive (200/60/EC).

The EIAR states that roof water from the proposed farm will discharge to the local water course/storm water drainage system via existing EPA Licenced emission points. The EIAR advises that these discharge points will be inspected every week.

The EIAR advises that all soiled water will be collected and drained to a dedicated soiled water storage tank to ensure that soiled water does not contaminate the clean storm water drainage system. The EIAR further states that all potentially polluting liquids will be stored in appropriately bunded areas.

The EIAR states that all organic fertiliser produced on the proposed farm will be allocated for use in accordance with the Nitrates Directive SI 605 of 2017. The EIAR describes the restrictions outlined in the above legislation which are applicable to all farmers when spreading fertiliser.

This section of the EIAR concludes by stating that good manure management on site and on the customer farmlands will result in little or no impact on the surface water in this area.

4. Air

The EIAR advises that odour from poultry farms may arise from the farm itself or during manure spreading. The report states that the proposed farm is located in an agricultural area where farm odours are to be expected from daily farming practice.

The EIAR 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 report states that the closest third party dwelling is located 300m south of the proposed development and advises that the prevailing wind should blow odours away from this dwelling. The report goes on to state that the area is sparsely populated and an odour nuisance is unlikely to arise as a result of proposed farm operations.

The EIAR states that customer farmers will be advised of good practices when applying organic fertilisers to their lands which should reduce excessive application of manure on land and prevent odour nuisance arising. The applicant intends to recommend to all customer farmers that fertiliser should not be spread on lands adjacent to neighbouring dwellings/potential odour sensitive locations and set back distances from these receptors will be recommended.

5. Climate

The EIAR briefly 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 manure spreading. The EIAR advises that the applicant will ensure that manure is allocated for use only at times that is acceptable to the inhabitants of the catchment and the regulatory authorities.

The report advises that non-ruminant livestock such as poultry/pigs have different digestive systems to ruminants (cattle/sheep) and therefore produce lower levels of methane gas. The EIAR states that fertiliser will be applied in line with requirements of SI 605 of 2017 and that as a result of these measures the proposed development will have no significant effect on climate in the area.

6. Noise

The EIAR states that noise emissions will be associated with the operation of ventilation systems, feed augers, blowers on feed delivery trucks etc. The applicant proposes to use state of the art buildings with high insulation properties which should minimise noise emissions from the poultry houses. The report advises that the proposed development is located in a sparsely populated area and the development should not give rise to a noise nuisance. The EIAR also states that there have been no noise complaints associated with the existing poultry farm.

The applicant did not submit any information regarding background noise levels in the area but did state that noise levels in a rural area are between 45-50dB, the EIAR states that on site activities should not give rise to noise levels above EPA guideline limits. Similarly the EIAR advises that construction noise should be within "maximum criteria for construction activities".

7. Population/Employment/Human Health

The EIAR outlined the beneficial effects for employment in the area and how material assets may be affected by the development. The EIAR advised that the potential effects on the local environment and tourism industry will be minimised.

The report states the applicant intends to comply with any requirements outlined in planning conditions or EPA licence conditions which should ensure that there is no adverse environmental impact in the vicinity of the development.

The EIAR advises that the location, nature and extent of the proposed development would not have the potential to have a trans-boundary impact.

8. Pest Control

The EIAR advises that a comprehensive fly and rodent control programme will be implemented on site in line with Bord Bia Requirements.

9. Environmental Management Programme

Details of an Environmental Management Programme are outlined in the EIAR which include an organic fertiliser management programme and environmental monitoring programme.

Conclusions

1. The EIAR states that the proposed development is located in a sparsely populated rural area with the nearest residence located 300m from the proposed poultry farm. It was noted that there are several houses located along the country roads in close proximity to the proposed development (less than 1 km). The applicant proposes to construct a free range poultry house, details of the location of range areas for these birds were not provided in the EIAR. The impact that this free range poultry farming may have on nearby local residents was not assessed.
2. There was no information provided on environmental monitoring to establish background levels for noise, air and ground water quality in the EIAR. General statements were made regarding typical background noise levels, ground water quality and odour levels in a rural area. Baseline environmental monitoring should be carried out prior to commencement of works on site. The setting of absolute limits at boundaries particularly for noise/odour in a rural area may not be sufficient to protect local residents from a nuisance. In the event that a complaint is made, a thorough investigation can be carried out to establish whether or not there has been significant deviation from baseline levels to cause a nuisance.
3. The applicant should implement a public complaints procedure at the proposed poultry farm to ensure that complaints can be addressed in a timely manner.
4. The EIAR advised that sensitive environmental areas should be identified and appropriately sized buffer zones applied to prevent any issues arising. Details of the exact location of these areas were not provided in the EIAR. The location of these sensitive areas should be indicated on plan with appropriately sized buffer zones. These plans should be submitted to the EPA for agreement to ensure that fertiliser is not applied to environmentally sensitive areas.

* 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, County Clinic, Navan, Co. Meath.



Carmel Lynch
Environmental Health Officer

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