



Submission

Submitter:	Miss Elish O'Reilly
Organisation Name:	HSE
Submission Title:	HSE Sub. Report
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Application

Applicant:	Longfield Poultry Unlimited Company
Reg. No.:	P1159-01

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

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

5th October 2021

Re: Review of Industrial Emissions Licence

Class and Nature of Activity: The principal activity is 6.1 (a)– *'The rearing of poultry in installations where the capacity exceeds 40 000 places.'*

Applicant: Longfield Poultry Company

Location of Facility: Fletcherstown, Wilkinstown, Navan

EPA Reference No: P1159-01

EHIS Ref No: 1936

Dear Sir/Madam,

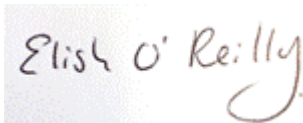
Details of the review of the licence were circulated to the following Health Service Stakeholders on 1st September 2021:

- Emergency Planning – Brendan Lawlor
- Assistant National Director for Health Protection – Kevin Kelleher / Helen Mulcahy
- CHO – Des O'Flynn
- Estates – Helen Maher

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

If you have any queries regarding the report the initial contact is Ms. Elish O'Reilly, Principal Environmental Health Officer, County Clinic, Navan, Co. Meath.

Yours Sincerely,

A handwritten signature in black ink that reads "Elish O'Reilly". The signature is written in a cursive style with a large, looping 'y' at the end.

Elish O'Reilly
Principal Environmental Health Officer

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Re: Review of Industrial Emissions Licence

EPA Reference No: P1159-01

EHIS Ref No: 1936

Description of project

An application is being made by Longfield Poultry for a revised IE Licence in respect of its poultry farm at Fletcherstown, Wilkinstown, Navan, Co. Meath. Planning permission was obtained from Meath Co. Council to construct 2 No. poultry houses, permitting an overall capacity on the farm of 112,000 places, an increase of 72,000 places. The existing poultry farm operates as a free range poultry/broiler farm with capacity for 40,000 places under an existing IE Licence.

The new development is to be located to the rear of the existing poultry houses, on an independent range area, and set back c. 0.5-0.75 km from the adjoining/closest public road. The proposed poultry houses will be c. 120.44 and 126.84m by 22.9m internally with an overall height of c. 7.5 m. The type of house proposed is a simple closed building of concrete/steel/prefabricated panel construction, thermally insulated with a forced computer controlled ventilation system and artificial lighting.

Birds are housed on a solid floor, with litter (wood shavings/chopped straw) spread over the entire floor area. Automated feeding and drinking systems are proposed in line with Best Available Techniques (BAT) requirements. A button nipple drinking system will be used to ensure that the manure/litter remains as dry as possible.

The stock will be brought from the hatchery as day olds, and will remain in the houses until c. 8 weeks of age when they are transported to Manor Farm for processing. The development will operate in an 'all in - all out'

basis to maintain a single age profile, and to maintain the health status of the birds, within each house. The production system proposed is based on a c. 10 week cycle with approximately 5 cycles per annum. As this is a Free Range Poultry Farm the birds will be allowed access to an outside range area totalling 11.2Ha, at a stocking rate of 10,000 birds/ha.

Site Location

The proposed development is located in the townland of Fletcherstown, within the applicant's landholding and close to the existing poultry farming activities. The development site has an overall area of c. 8.49 hectares. There is a total of c. 24.43 hectares owned/farmed by the applicant at this location, including the site of the existing and proposed developments. Access to the site will be via an existing farm access road that services the adjacent poultry farm, and this is located just off a local, third class road. The site is 881m west of Wilkinstown and 9.4km north of Navan.

The land-use surrounding the site is predominantly agricultural, consisting of intensively farmed agricultural grasslands and tillage lands. The northern, western and southern site boundaries consist of hedgerows, whilst the eastern site boundary consists of a hedgerow that grows along the banks of the Yellow River. The site is located c. 5 Km from the closest Natura 2000 site -The River Boyne and River Blackwater SAC / SPA. The GSI Groundwater Vulnerability map indicates the area is classed as 'Moderate' vulnerability and the area is underlain by a 'Poor Aquifer - Bedrock which is Generally Unproductive'.

The closest inhabited third party noise sensitive location, is located > c. 450 m from the proposed development

Public Consultation

I could not locate any evidence of public consultation with regard to this development in the documents submitted by the applicant.

Noise

The applicant states in the EIAR that "*Extensive experience with the applicants' existing poultry farm and a large number of other existing sites, together with the significant distance to third party dwellings would suggest that the proposed development is not likely to have any adverse noise impact*". The nearest noise sensitive location has been identified at c. 450 m from the proposed development.

It is stated that "noise generated in the proposed/existing development will not exceed legal limits at any noise sensitive location. The typical noise limits that the applicant states they will comply with are:

- "Daytime dB LAr, T (30 minutes) 55,
- Evening dB LAr, T (30 minutes) 50,
- Night-time dB LAeq, T (30 minutes) 45"

I could not locate results of any noise monitoring carried out to establish the existing baseline noise environment. It is this department's opinion that adherence to a specified noise limit does not always protect sensitive receptors from noise nuisance. It is the significance of the change in the noise environment that is the critical issue and this is what we recommend should be assessed by the applicant and presented in the EIAR.

The applicant has identified four significant operational noise emission sources associated with the proposed development.

Poultry House Livestock (Poultry) Emissions

It is stated in the EIAR that "Given the relative inaudibility of livestock noise, livestock noise emissions are expected to be inaudible at the site boundary".

Feed Delivery Truck Events

Delivery truck noise is estimated to occur 2-3 hours per week.

Information presented in the EIAR states that the noise level at a distance of 3m from a feed truck during a typical delivery is of the order of 87dB LAeq,30min. "Given the distance of the proposed development from any sensitive receptor, the predicted noise emission level of delivery truck activity is c45dB LAeq at the nearest noise sensitive locations during a typical delivery event".

Poultry House Ventilation Fans

Automatic feeding and ventilation systems will operate in the poultry houses on a 24 hour basis. The ventilation fans will be located on the roof of each building. Noise level data received from the unit manufacturer for selected fans for a similar, previous assessment have sound power levels ranging between 78 - 85dB(A) Lw. It is stated that "The predicted noise emission levels of these fans are c 45dB LAeq,T at the nearest noise sensitive locations".

Emergency Generator

The applicant recommends selection of a low noise generator (i.e. 185dB(A) at 3m) in order to minimise any potential nuisance to the adjacent noise sensitive locations in the event of a local power outage. It is acknowledged that the generator will only operate in the event of a power outage.

The noise chapter in the EIAR concludes there will be "*no significant noise impact that would be expected from the proposed poultry farm development on any of the identified nearby noise sensitive receptors*". It is difficult to establish if this statement is true in the absence of baseline noise monitoring results at the sensitive receptors.

It is stated there have been no noise complaints associated with the applicant's families existing poultry farm. I did not review this proposal at planning stage. The planners report from Meath County Council makes no mention of concerns regarding noise from the proposal.

With regard to construction noise the predicted noise emission levels at the nearest noise sensitive receptors during the construction phases were outlined in a table on page 34 of the EIAR. All plant noise levels are derived from BS 5228: Part 1. Results show the construction noise levels at the nearest residential dwellings are predicted to be well within the maximum criterion of 65dB LAeq for construction activities during daytime and Saturday periods. Numerous mitigation measures to reduce construction noise are also outlined on page 35 of the EIAR.

Water

It is stated the existing water supply is from an on farm well located on the applicants landholding but outside the development or range areas. I was unable to identify this well on the site maps provided in the EIAR.

It is stated that groundwater use will increase from the current usage of 1800m³/y to 5000m³/y as a result of the proposed development. I could not locate any other details of the well regarding its depth, construction or well head protection or yields.

I could also not locate any proposals in the EIAR for reusing water on the site for wash-down purposes.

Surface Water

The Yellow River flows along the eastern boundary of the application site, whilst there is also a tributary of this stream flowing along the northern site boundary. The Yellow River is a tributary of the River Boyne and the confluence of these two watercourses is 6.9km downstream of the application site, at Tatestown. The EPA have not defined the ecological status of the Yellow River at points upstream or downstream of the application site. However, the River Boyne at its confluence has been classed as poor ecological status.

It is stated that clean surface water will be discharged into the Yellow River following attenuation in a swale drainage system fitted with a hydro brake which will limit storm water discharge to greenfield run-off rates. The swale will provide attenuation and will also act as a biological filter of surface water prior to discharge. The only discharge from the site to surface waters will be the discharge of rainwater from roofs and clean yards. There will be no process discharge to surface water and it is stated there will be minimal risk of accidental leakage or spillage of polluting liquid on the site.

A Stormwater Attenuation Calculation Report was prepared by Hydrec Environmental Consulting and is included in Appendix 7. The results of flood risk screening predicted some fluvial flooding from the Yellow River to the east of the site however these flood extents are not mapped to encroach onto the development site itself.

Surface water protection mitigation measures for the construction phase of the development are outlined on page 54 of EIA.

Manure

The poultry manure from the proposed facility will be removed off site by an authorised contractor, McCartney Contractors, on behalf of the applicants. Evidence of same was provided in Appendix 5 of the EIA. The estimated cumulative manure production as a result of the proposed development will be a total of c. 1120 tonnes / annum, an increase of c. 720 tonnes from the c. 400 tons/annum produced by the existing enterprise. Manure will be removed c. 5 times per annum at the end of each batch.

The applicants' will implement and manage an 'Organic Fertiliser Management Programme' for the allocation of organic fertiliser in each particular year. It is stated that this is to ensure that the allocation of

fertiliser to a registered specialist contractor for use is in accordance with the requirements of S.I. 605 of 2017. The applicant will also maintain records of all organic fertiliser transfers off the farm.

It is stated in the EIAR that *“At present all organic fertiliser is destined for compost production, and/or be supplied to customer farmers for use as organic fertiliser in accordance with S.I. 605 of 2017, as amended, should the demand arise”*. The EHS are aware of some ambiguity regarding the inspection and regulation of the final disposal of organic fertiliser by specialist contractors. To ensure the safe disposal of organic fertiliser by customer farmer’s information should be provided to the EPA well in advance of any slurry transportation so that potential landbanks can be risk assessed and evaluated for suitability.

The proposed poultry farm is to operate as a free range facility. The applicant has submitted calculations of pages 48 and 49 of the EIAR outlining nitrogen and phosphorous calculations for the proposed range area.

Soiled Water

Soiled water from the proposed development will be collected in dedicated, concrete soiled water collection tank, located underground, centrally between the houses. The proposed soiled water tank will have a capacity of 120 m³ whilst the existing poultry farm site has a soiled water tank of 90m³ capacity.

This soiled water will then be applied to farmland in the ownership of the applicant in line with S.I. 605 of 2017. The applicant has provided landspreading maps and evidence of the required nutrient content of the lands to ensure the application of soiled water will comply with the nitrates regulations

It is stated the soiled water storage tanks are to be monitored and recorded as required for remaining storage capacity. The EHS recommends that all soiled water storage tanks are also fitted with leak detection facilities as a preventative measure.

Waste

Dead animals and animal tissues will be generated on the proposed facility and is estimated to be less than one tonne per month. These carcasses will be stored in a covered sealed, leak proof container on site,

and will be regularly removed at 1-2 week intervals by College proteins to an authorised Animal By-products plant. Evidence of same is included in Appendix No 6.

Hazardous waste in the form of spent fluorescent lighting tubes will be generated on the site. The annual quantity of this will be minimal. It is proposed to accumulate the used fluorescent tubes in a specialised storage area in the site pending periodic disposal at the Meath Co. Co. civic amenity centre. Alternatively these tubes may be returned to the supplier.

General wastes such as packaging, paper, disposable clothing etc are estimated to be 2t/annum. It is stated these will be collected regularly by a local contractor and delivered to the landfill facility. The EHS recommends that separate storage facilities are provided on site to permit the segregation and recycling of general waste in line with the waste hierarchy.

Odour

It is stated in the EIAR that *"the odour associated with a site of the existing and/or proposed capacity does not and will not cause significant annoyance and will not interfere with amenity outside the boundary of the site"*. It is further stated that the existing farm has not experienced any noise/odour complaints to date and the proposed development is >450m from any third party dwelling.

The applicant states there are no processes proposed which will constantly or regularly release odorous emissions from the site at nuisance levels. They claim *"fugitive odour emissions at the site will not be significant and will be limited to times at which birds/manure are being removed from the site"* This is estimated to be for a short period in every cycle approximately 5 times per annum.

Met data for the area was provided in appendix 4 of the EIAR however there was no assessment of the impact of the prevailing weather conditions on odour from the facility. I could not locate details of local topography, any results of odour modelling nor an assessment of predicted odour impacts as a result of the operation of the facility in the EIAR.

A number of management practices will be implemented on site so as to minimise potential odour emissions from the existing and proposed developments. These include the

- Proper storage of all wastes on site, and regular removal of same.
- Twice daily flock inspections to remove any fatalities from the houses, and stored in proper sealed and covered storage bins.
- Thorough cleaning out of poultry houses, to minimise odour and maintain high health status. Regular cleaning of outside areas.
- Immediate removal of manure off site, wherever possible.
- Transport of manure off site to take place in properly designed and covered trailers.
- Proper stocking rate within the houses.
- Proper management of temperature and humidity controls.

There are no proposals for odour monitoring at the poultry rearing installation. The applicant does not outline any criteria to establish if an environmental nuisance is occurring or outline any procedure for receiving and investigating an odour complaint.

Rodent Control

It is stated that a rodent control programme in line with Bord Bia and Department of Agriculture, Food and The Marine requirements will be implemented on site. Detailed records regarding bait point location, frequency of baiting and products used are to be maintained on site. The applicant states that the proper storage and disposal of all wastes, proper storage of all feedstuffs and maintaining the houses and external areas in a clean and tidy manner will prevent other wastes being attracted to the site.

Complaints

I could not locate any proposals for how complaints were to be dealt with regarding the facility should they arise. The EHS has no record of any incidents or complaints associated with this farm.

Conclusions:

1. It is the opinion of the EHS that to accurately assess the impact of noise from the proposed development the applicant should assess the significance of the change in the noise environment as a result of the operation of the proposed facility at the sensitive receptor identified. In order to assess the change the existing noise environment must first be established. The EHS recommends current and up-to-date baseline noise monitoring is carried out at the nearest sensitive receptor. As the facility is to operate on a 24 hour period, baseline night time noise levels should also be monitored.

The EHS considers that the methodology in 'BS4142 Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas' would be appropriate for predicting the impacts from noise of this proposal and assessing the likelihood of complaints and nuisance from noise impacts of the proposal.

2. It is recommended that details of the onsite well are provided, including its location, depth, well head protection and average yields to ensure it is capable of servicing the proposed development. It is also recommended that the applicant implement water conservation measures for the facility and submits proposals to collect rainwater/grey water which could be reused for washing purposes.
3. The EHS recommends that all soiled water storage tanks are also fitted with leak detection facilities.
4. The EHS recommends that separate storage facilities are provided on site to permit the segregation and recycling of general waste in line with the waste hierarchy.
5. The impact of odour from the development on the surrounding area should be properly assessed. An odour management monitoring plan should be proactively implemented by the applicant. In addition a formal complaints procedure should be implemented to resolve any possible issues concerning odour complaints.

6. A formal complaints procedure shall be implemented to resolve any possible issues or community concerns in relation to traffic, noise, odour or other nuisance complaints.

Lisa Maguire

Lisa Maguire
Environmental Health Officer

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