



### Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE
Submission Title:	P1164-01
Submission Reference No.:	S010164
Submission Received:	08 December 2021

### Application

Applicant:	Mr. Aidan Brady
Reg. No.:	P1164-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Health Service Executive

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**Date:** 7<sup>th</sup> December 2021

**Our reference:** 2022

**Report to:** Environmental Licensing Programme  
Office of Environmental Sustainability  
Environmental Protection Agency  
Johnstown Castle Estate  
Co. Wexford

**EPA reference:** P1164-01


**Type of Consultation:** Industrial Emissions

**Applicant:** Mr. Aidan Brady, Tullyunshin, Tullyco, Cootehill, Cavan

Dear Sir/Madam

Please find enclosed the HSE consultation reports in relation to the above licence application. If you have any queries regarding any of these reports the initial contact is Ms Claire O'Dwyer, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

  
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Claire O'Dwyer  
Principal Environmental Health Officer



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**Nature of Activity:**

Classes and Nature of Activity in accordance with the EPA Act 1992 as amended			
Class of Activity	Main Activity	EPA Act Sector (where applicable)	Class of Activity Description
6.1 (a)	Yes	Intensive Agriculture	The rearing of poultry in installations where the capacity exceeds 40,000 places.

### Introduction

The following HSE departments were notified of the consultation request for the licence application on 26<sup>th</sup> October 2021

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Helen Mulcahy
- CHO – John Hayes

This report only comments on Environmental Health impacts of the licence application

**Site Location:**

The proposed development is to be completed in a greenfield site at Tullyunshin, Tullyco, Cootehill, Co. Cavan and it is accessed via a local third class road. It is 12.6km east of Cavan town. The site comprises an overall area of c. 1.3 hectares owned by the applicant's family with a total of c. 46.37 hectares farmed at, or close to, this location.

The closest third party dwelling is located 100-125m northeast of the proposed development.

**Water Supply:**

The proposed water supply will be from the Mountain Lodge water scheme. This group water scheme is monitored by Cavan County Council. The estimated water use will be 4,550m<sup>3</sup> per annum. The Geological Survey of Ireland has classified the aquifer to the site and the surrounding area as poor and generally unproductive except for Local Zones with a vulnerability rating of Moderate to High.

The proposed development, will operate on a dry manure basis, whereby the manure will be removed from the houses after each batch and transported off site, there is minimal risk to ground water supplies in the area of the site.

The EIAR did not provide adequate information on local ground water supplies in the area. The applicant should consult the Geological Survey of Ireland (GSI) well database ([www.gsi.ie](http://www.gsi.ie)) in order to identify local wells that may exist. In addition to this the applicant should carry out a door to door well survey of dwellings in close proximity (300m of site boundary) as the GSI well database is not exhaustive in terms of the locations of all wells in an area (as the database relies on the submission of data by drillers and the public, etc.). This is to ensure water supplies are protected both from the operation of the proposed development and to ensure compliance with Part 4 of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017.

**Soiled Water:**

A soiled water collection tank with a 90 m<sup>3</sup> capacity will be located on site. Estimated maximum soiled water production will be c. 161 m<sup>3</sup>/annum, upon completion of the proposed development. This soiled water will then be applied to farmland in accordance with the Nitrates Regulations.

It is recommended that the applicant is made aware that the following applies to all poultry manure and soiled water storage structures whether or not on the site of the unit:

- A minimum of six months storage capacity dedicated to the unit is required.
- All construction work should be certified by a chartered engineer as having been constructed according to S108 or S123 as appropriate, (DAFF, 1987 and 1994).
- Where the poultry manure storage structures are constructed to another design specification, then both the design specification and the subsequent construction work should be certified by a chartered engineer as being suitable for the task and comparable to the Department of Agriculture, Food and Forestry specifications.
- All storage tanks should be inspected by a chartered engineer and certified as structurally sound for the purpose they were intended subsequent to construction and at appropriate intervals thereafter.
- Leak detection facilities based on inspection chambers and perimeter wall and under floor drains should be provided as appropriate.

It is further recommended that the applicant is advised of Batneec Guidance Note Section 4.6 Spreading of Poultry Manure and the conditions therein.

It is recommended that the applicant install High Level Monitors to the proposed soiled water tanks in order to minimise the risk of unintentional overflow. It is further recommended that the applicant monitor and empty the soiled water tanks before they reach their capacity again to avoid any unintentional overflow.

It is recommended, given the significant increase in production and the size of the surrounding land on which soiled water can be spread, that the applicant monitors ground nutrients on his lands via a Nutrient Management Plan (NMP).

That the Nutrient Management Plan (NMP) is maintained by the applicant on site for the management of soiled-water arising at the facility and should include:

- Calculation of the quantity of manure and the amount of nutrients available from manure including any manure or other wastes imported.
- The results of soil fertility and drainage tests on existing or proposed land spreading areas.
- A representative soil sample, to a depth of 10cm, should normally be taken biennially from every 2 to 4 hectares and at least one per farm. However, where soil types are similar and cropping and treatments of the lands were the same during the previous 5 years or more, a composite sample from an area up to 12 hectares is acceptable.
- An assessment of the relationships between manure application rates, cropping routine, crop nutrient requirements and existing soil nutrient status on all land spreading areas.
- Ordinance Survey Maps to a scale of 1:10,560 showing the location of the said land spreading areas and all environmentally sensitive features on the lands or in their vicinity; including *inter alia* dwellings houses and sensitive buildings, drains, streams, watercourses and other sources of water supply.
- Agreements between 'importers' and 'exporters' of all animal manures or other wastes are required.

The Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

#### **Storm/Surface Water:**

The application site lies within the Erne Hydrometric Area and Catchment, the Laragh SubCatchment and Sub-Basin. The EIAR states that adverse effect on surface water from the proposed development should be nil, as there will be no process discharge to surface water and minimal risk of accidental leakage or spillage of polluting liquid on the site. The EIAR states that the only discharge from the site to surface waters will be the discharge of rainwater from roofs and clean yards to field drainage. These drains flow towards the adjacent watercourse a tributary of the Laragh River.

Regardless of the ecological status of the surrounding water courses it is vital that the applicant take all due care in ensuring that there is no discharge of contaminated waters from the proposed development particularly during loading and cleaning.

It is recommended that the applicant is advised to take all due care to ensure that soiled water does not contaminate the clean surface water particularly when loading or cleaning is in progress.

It is recommended that the license stipulate that all discharge points must be labeled and identified on site for the purpose of monitoring and sampling including grid references.

**It is recommended that the baseline conditions of the groundwater are established in the neighborhood of the site and of the land spreading areas. Periodic water quality monitoring of relevant parameters as per license. Where appropriate test wells should be provided at the site of the poultry unit.**

**It is recommended that a condition of the license stipulate that a surface water quality monitoring scheme is put in place and that the baseline conditions of the groundwater are established in the neighborhood of the site and of the land spreading areas. That periodic water quality monitoring is established of the relevant parameters and that relevant records are maintained by the applicant for inspection.**

**Manure:**

The estimated total manure production upon completion of the proposed development will be c. 800- 900 tonne / annum. The EIAR states that all the poultry manure from the farm will be removed off site by an authorised contractor, CLR Co-op, on behalf of the applicant.

**The Applicant shall be requested to conform to legal provision of article 23 (4) of S.L 31 of 2014 in respect of "an occupier of a holding shall provide such information as is requested relating to the movement of organic fertilisers on or off the holding". It should be a requirement of any permission granted that all such information is provided to Cavan County Council well in advance of any slurry transportation so that potential landbanks can be risk assessed and evaluated for suitability.**

**Waste:**

The EIAR states that a regular inspections will be carried out within the poultry house to remove the carcasses of any dead birds. Any dead birds will be accumulated in a sealed leak proof container on site for collection by College Proteins at 1 - 2 week intervals for transport to an authorised Animal By-products facility at Nobber, Co. Meath.

**It is recommended that the applicant ensure that there is adequate storage for dead birds and that all other waste products are disposed of at Cavan Co. Co. civic amenity center or returned to the supplier for recycling in a timely manner or removed by a licensed waste collector and that there is no accumulation of waste on site.**

**Odour:**

The EIAR states that Emissions to air from the site will be small and will not cause significant annoyance and will not interfere with amenity outside the boundary of the site. It also states that odour emissions from the site may be increased at times when birds and/or manure is being removed from the site, however this will only occur for a short period in every cycle.

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In addition section 4(3)(6) of the EIAR outlines a number of management practices that will be implemented so as to minimise potential odour emissions from the existing and proposed developments. These practices are welcomed by the EHS.

The Environmental Health Service has not received any odour complaints regarding this facility.

Due to the relative close proximity of a third party dwelling to the proposed development the EHS recommends that the applicant be advised to monitor odour from the installation on a continuous basis. The EPA's published report entitled Odour Impacts and Odour Emission Control Measures for Intensive Agriculture should be referenced. The EHS also recommends that any odour management plans include a robust complaints procedure whereby any complaints from the local population are recorded and appropriately investigated.

**Noise:**

The EHS is satisfied that noise generated from the proposed development will not cause a nuisance. The site is located in a rural environment and there is a significant distance to third party dwellings which would suggest that the proposed development is not likely to have any adverse noise impact. The EHS has not received any noise complaints regarding this facility.

There would not be any source of significant vibration on the site.

**Pest Control:**

The EIAR states that a rodent control programme will be developed to cover the proposed development. The programme as implemented on site will be in line with Bord Bia and Department of Agriculture, Food and The Marine requirements. Detailed records regarding bait point location, frequency of baiting and products used are to be maintained on site.

The procedure for pest control for the proposed development is a vital element of the management of this development. The developer should set bait at various strategic locations around the new house and maintain a weekly check and associated records. A map outlining the locations and numbers of baiting stations should be drawn up. A "Baiting Checklist" should be kept, recording details of Bait Station number, comments, actions and dates. Recorded checks should be carried out on a weekly basis and ameliorative action taken when/if necessary.

**Conclusion:**

Other than the observations stated above, the Environmental Health Service have no further concerns at this time regarding this proposed development.



Thomas Mangan  
Environmental Health Officer