



### Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE
Submission Title:	P1176-01
Submission Reference No.:	S010314
Submission Received:	12 May 2022

### Application

Applicant:	Mr. Killian Smith
Reg. No.:	P1176-01

See below for Submission details.

Attachments are displayed on the following page(s).



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Service  
The Arcade  
Main Street  
Cavan  
Co. Cavan  
H12 N251

Tel: 049 4373418

Fax: 049 4373427

EPA Environmental Licensing Programme  
Office of Environmental Sustainability  
Environmental Protection Agency  
Johnstown Castle Estate  
Co. Wexford

3<sup>rd</sup> May 2022

**Re: Industrial Emissions Licence No: P1176-01**  
**Mr. Killian Smith, Clonloaghan, Kilcogy, Co. Cavan.**

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the scoping of the above proposal. The following HSE departments were notified of the consultation request for this development on 29<sup>th</sup> March 2022.

- Emergency Planning – Kay Kennington
- Estates – Helen Maher/Stephen Murphy
- National Clinical Director for Health Protection
- CHO – John Hayes

This report only comments on Environmental Health impacts of the scoping request. If you have any queries regarding this report the contact is Claire O'Dwyer, Principal Environmental Health Officer at [claire.o'dwyer@hse.ie](mailto:claire.o'dwyer@hse.ie)

Yours sincerely,

A handwritten signature in blue ink that reads "Claire O'Dwyer".

---

Principal Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Service  
The Arcade  
Main Street  
Cavan  
Co. Cavan  
H12 N251

Tel: 049 4373418

Fax: 049 4373427

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

**Date:** 3<sup>rd</sup> May 2022

**Our Reference:** 2299

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

**EPA Reference:** P1176-01

**Type of Consultation:** Industrial Emissions

**Applicant:** Mr. Killian Smith

**Nature of Activity:** Activity Class 6.1 (a), "The rearing of poultry in an installation, where the capacity exceeds 40,000 places."

**Introduction**

It is proposed to construct 2 No. poultry houses together with all ancillary structures, including meal bins and soiled water tanks and ancillary site works adjacent to an existing poultry farm at Clonloaghan, Kilcogy, Co. Cavan. The existing poultry house has capacity for c. 39,000 birds and does not currently have an E.P.A. Licence. Planning permission has been obtained from Cavan Co. Co. permitting an overall capacity on the farm of 130,000 places. At this juncture the applicant is seeking a licence to increase numbers to 100,000 birds.

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

### **Site Location**

The site is 2.27 hectares and it is located in a rural area, in the townland of Clonloaghan, 2.2 km north-east of Kilcogy and 5.3 km south-west of Kilnaleck. The site is accessed via an existing access road that is located just off a local, third-class road. The R394 is located c. 3.5 km from the farm and the N55 a further c. 1 km from the farm.

The main land-use surrounding the application site is agriculture, with the dominant habitat being improved agricultural grasslands. The site boundaries consist of treelines / hedgerows. The Killydream Stream is 200 m west of the application site. Water in this stream flows in a north-westerly direction until its confluence with the River Erne at a point approximately 4.3 km north-west (4.6 km downstream) of the site. The site does not lie within or adjacent to any site that is designated for nature conservation purposes. The closest Natura 2000 site - Lough Sheelin SPA is located c. 3.7 km from the site.

The closest third party dwelling to the proposed development is located c. 170 m south of the existing development (c. 200 m from the proposed development), and there are no further such dwellings within 250 m of the proposed development.

### **Water Supply**

Water is to be sourced from the on-farm well. It is estimated water use will be c. 6,000 - 6,500 m<sup>3</sup> per annum, increasing from c. 1,800 - 2,000 m<sup>3</sup> currently. **I could not locate details of the existing well in the EIAR. It is recommended the applicant highlights the location of the well on a site layout plan and provides details of its depth, construction and well head protection. Evidence should also be provided of the existing wells capacity to cater for the new proposed development.**

### **Surface Water**

It is stated in the EIAR that the only discharge from the site to surface waters will be the discharge of rainwater from roofs and clean yards. This clean surface water will be directed to local drains, which lead to the Killydream Stream which is 200 m west of the application site.

It should be noted that the EPA have defined the ecological status of the Killydream Stream and its tributaries at points close to the application site as moderate. Under the requirements of the Water Framework Directive, this is unsatisfactory and good status must be achieved in these waterbodies within a specified time frame.

**There appear to be no proposals by the applicant to sample surface water discharge from the site. It is recommended that periodical sampling of surface water discharge is undertaken to verify no contamination is occurring.**

**I could not locate any proposals for rainwater harvesting or recycling water in the operational management plan for the site. In light of the current climate crisis it is recommended that the applicant should explore options to reuse grey water for washing purposes on site.**

### **Soiled Water**

It is stated in the EIAR there is to be separation of clean and dirty water systems. Also the poultry houses will be physically cleaned of litter and blown down so as to minimise the amount of washing/water needed.

Estimated soiled water production from the proposed development will be c. 225 m<sup>3</sup>/annum. Soiled water collection tanks with a combined 115.9 m<sup>3</sup> capacity will be located on site. **It is recommended that all soiled water storage tanks are fitted with high level monitors to prevent overflowing.**

It is stated that all soiled water will be applied to farmland of 14 Ha to be used for grazing/silage production in accordance with S.I. 605 of 2017, as amended. A map is included in Appendix 8 indicating the location and extent of farmland available for soiled water however it is of poor visual quality and I am unable to verify its size or if adequate buffer zones for landspreading have been implemented.

Page 14 of the EIAR outlines the evidence of compliance with S.I. 605. *"The stocking rate for 2020 is projected to be c. 51 kg Organic N/ha. The application of c. 225 m<sup>3</sup> of soiled water from the proposed expanded development with an estimated N content of 1 Kg Organic N/ha will increase this stocking rate to by c. 16 Kg Organic N/ha to 67 Kg organic N/ha well inside the 170 Kg Organic N/ha limit."* **I could not locate details of soil analysis tests in the information submitted by the applicant. It is recommended that any nutrient management plan takes into account existing soils conditions, particularly soil fertility and drainage, on lands to which soiled water is to be spread.**

### **Poultry Litter**

The estimated manure production upon completion of the proposed development will be a total of c. 1,100 - 1,200 tonne / annum and it is proposed that manure will be removed c. 7/8 times per annum at the end of each batch. The poultry manure will be removed off site by an authorised contractor, CLR Co-op Ltd. Evidence was provided of registration with the Department of Agriculture for the transport of Animal By-products.

It is stated that this poultry manure is not considered a waste product and is to be utilised in the production of mushroom compost. A number of mushroom compost yards have been identified by the authorised contractor in their letter in Appendix 5 of the EIAR.

It is stated the applicant will implement and manage a programme for the allocation of organic fertiliser in each particular year and will continuously record all organic fertiliser transfers off the farm.

**The disposal of organic waste from this facility has the potential to cause harmful emissions to groundwater and surface water if not adequately controlled. An agreement between 'importers' and 'exporters' of all animal manures is required and all animal waste from the farm must be fully traceable.**

### **Waste**

Dead animals and animal tissues 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.

General wastes such as packaging, paper, disposable clothing etc. will be collected regularly by a local contractor and delivered to the landfill facility. **It is recommended that facilities are provided at the farm to facilitate the segregated storage and recycling of general waste products.**

### **Odour**

It is stated in the EIAR that there are no processes proposed which will constantly or regularly release odorous emissions from the site at nuisance levels. *"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".*

No manure is to be stored on the site and it is stated that odour emissions will be reduced by the use of automated feeding and ventilation systems. The applicant proposed to implement a strict washing routine so as to prevent the built up of odour within the houses and take measures to avoid overstocking.

### **Noise**

It is stated that noise generated in the proposed development will not exceed legal limits at any noise sensitive location. The applicant cites the following noise limits will be complied with:

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

The applicant cites “*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 Environmental Health Department has not received any noise complaints regarding the operation of this facility to date.

It should be noted that no further evidence was provided by the applicant regarding the control of noise from the proposed poultry farm. No baseline noise monitoring was carried out by the applicant to establish the existing noise environment. A noise impact assessment of individual noise source emissions associated with the operation of the poultry farm on sensitive receptors was not carried out. **It is recommended that the change in the noise environment as a result of the 24/7 operation of the poultry farm should be quantified and assessed as part of the EIA process.**

### **Pest Control**

It is stated a rodent control programme in line with Bord Bia and Department of Agriculture, Food and The Marine requirements will be developed. Detailed records regarding bait point location, frequency of baiting and products used are to be maintained on site.

Housekeeping to ensure 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 further control rodents.

### **Traffic**

It is stated that the operational traffic associated with the proposed development will result in an average of 50 movements / batch or c. 8 per week, increasing from c. 2.75 - 3 loads/week currently.

Traffic movements associated with inspections, vet, catchers, and traffic associated with washing and cleaning the houses etc have not been included in this assessment, however it is stated they will remain relatively unchanged from the existing operation, as the majority of these traffic movements will occur regardless of scale.

It is stated that traffic movements associated with the proposed development will not adversely impact on the local road network which will be more than adequate to accommodate same.

Should you have any queries in relation to this report please contact me at  
[lisa.maguire@hse.ie](mailto:lisa.maguire@hse.ie)

*Lisa Maguire*

---

**Lisa Maguire**  
**Environmental Health Officer**