



Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	HSE
Submission Title:	HSE Submission
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Application

Applicant:	Mr Michael Noel O'Connor
Reg. No.:	P1042-02

See below for Submission details.

Attachments are displayed on the following page(s).



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**HSE Submission Report
Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made
thereunder)**

Date: 09/05/2024

Application for: Industrial Emissions License Application P1042-02

Class and Nature of Activity: A revised licence in respect of intensive poultry farm at Rathcahill West, Templeglantine Newcastle West, Co Limerick increase number of birds from 74,000 to 108,000 birds.

Applicant: Mr Michael Noel O'Connor

Location of Facility: Rathcahill West, Templeglantine, Newcastle West, Co Limerick

EPA Ref. No: P1042-02

EHIS Ref: 3843

The following HSE Departments were notified of the consultation request for the Planning on the 3rd of April 2024:

- Emergency Planning
- Estates
- Director of National Health Protection
- CHO

If you have any queries regarding this report please contact Mr. Andrew Curtin, Principal Environmental Health Officer in the first instance.

Yours Sincerely

Andrew Curtin

Principal Environmental Health Officer

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Introduction

The Environmental Health Service has not received any complaints in respect of the applicants existing poultry facility.

In respect of this planning application, the areas reviewed were those of concern to Environmental Health which are:

- Air including odour and noise
- Surface and groundwater
- Waste water, poultry litter and waste management

Denise Ryan Environmental Health Officer monitored the site of the proposed development to assist in the preparation of this report.

Introduction

The application refers to Michael Noel O Connors Farm that was granted planning permission for the construction of two poultry houses in 2010 followed by the installation of a low pressure ventilation system in 2013; this application and seeks to increase the number of birds processed by 25% from 74,000 to 108,000 in 2024.

Planning Reference Number	Planning Authority	Date of Planning Decision (Final)	Brief Description
1042	Limerick CCC	09.12.2010	Construction of 2 poultry house, entrance and associated site works
11457	Limerick CCC	18.07.2011	Construction of 2 poultry houses (20,000 each) and entrance from public road
12283	Limerick CCC	15.08.2012	Construction of a broiler unit (EIS submitted)
13366	Limerick CCC	13.08.2013	Amendment of condition No.17 of Planning Ref 12283 to allow installation of a low pressure ventilation system

Michael Noel O Connors Farm intensive poultry farm has an Industrial Emissions License 1042-01 first applied for on 05 July 2026 which was determined on 03.01.2019.

Michael Noel O Connors Farm is now applying for an Industrial Emissions to operate a farm with a maximum stocking number of 108,000 birds.

As this activity falls within the category 6.1(a) of Schedule 1 of the EPA Act 1992 (as amended) an Industrial Emissions licence is required. This report only comments on Environmental Health Impacts of the licence application.

The Non-Technical Summary accompanying the licence application describes the main activities carried out on site which are associated with the raising of poultry which include.

- Transport of day old chicks to the farm
- Feeding and rearing of birds.
- General animal husbandry practices.
- Transport of feed to the farm
- Transport of birds from site to factory at c. 35 – 42 days of age.
- Removal of litter from the houses.
- Transport of Litter off site.
- Washing of houses between each batch, for flock health and performance reasons.
- Bedding of houses with straw/shavings in preparation for the next crop.
- Maintenance of buildings and equipment.
- Recording and monitoring of internal house environment and bird performance and mortality.

Odour

The results of the Odour Prediction Modelling are shown is predicted that odour levels will be substantially below the odour detection level for 98% of the time at the nearest houses to the poultry facility.

The Environmental Health Service notes that an Odour Management Plan has been submitted as part of the planning application and further notes **the mitigation** measures outlined in 'Mitigation Measures'.

It is recommended that these measures are included as **conditions** of planning if granted. This is in order to minimise the impact of odour from the facility on the nearest sensitive receptors and is a public health protection measure.

Noise levels at the existing poultry facility are low and noise sources at the operation are primarily internal with no expected changes to the external ambient noise environment.

The noise survey indicated that 'typical sound sources include feed system and motors associated with the [existing poultry] house'. The results are included in the application range from 51.2 dBLAeq(daytime)to 36.9 dBLAeq (night time) at Location 1 and 49.3 dB/Aeq td8 time) and 40.1dBL,, (night time) at Location 3.

Both of these locations are residential dwellings. The Environmental Health Service notes that these levels are within the EPA guidance levels of 55 dBL Aeq (daytime) and 45 dBAeq (night time) at the nearest noise sensitive receptors.

Surface and Groundwater

The Environmental Health Service has considered any potential risk of contamination of surface and groundwater and makes the following comments:

Wash water will be collected in the soiled water collection tanks and will be used for land spreading. Manure generated on site will be removed off site by an authorised contractor six to seven times per year.

Waste water, poultry litter and waste management

Soiled wash water from the site will be diverted to and collected in an underground soiled water collection tank which will be located in front of the proposed poultry house. It is estimated that the volume of wash water generated would be 6 to 12 m³ per batch of broilers (estimated 6-7 batches per year). Wash water will be used for land spreading on the applicant's land. Compliance with Section 4.6 'Spreading Poultry Manure' of the EPA's 'Batneec Guidance Note for the Poultry Production Sector' is included as a condition of planning.

It is recommended that high level **monitors are** installed on the **proposed** washwater **tank to reduce** the risk of **accidental overflow**.

This **is recommended for the protection of** nearby watercourses and in the interest of the protection of public health.

The Environmental Health Service recommends that the **waste** water storage tank **is inspected** annually to check for structural integrity.

The primary source of non-hazardous waste produced at the proposed facility is poultry litter, fallen birds and a small quantity of domestic waste. The Environmental Health Service was unable to locate details of the name of the licenced contractor responsible for the removal of poultry carcasses or reference to facilities for the onsite storage of poultry casualties. It is recommended that containers for the storage of broiler casualties have sufficient capacity and that the containers are of steel construction and are water, pest and topple proof.

It is recommended that poultry litter is not removed during periods of heavy rain. This is to reduce the potential contamination of storm water (and ultimately surface and groundwater) and is in the interest of the protection of public health.

Due to the increase in the number of birds it is recommended that the applicant monitors ground nutrients on his lands by way of a Nutrient Management Plan which should be updated annually.

Conclusion

In respect of this planning application, the Environmental Health Service recommends that-

- The odour mitigation measures outlined in 'Mitigation Measures' are included as conditions of planning if granted.
- Any potentially significant impacts arising from noise during the construction phase are assessed.
- Further information is obtained regarding the abstraction well, particularly in respect of water quality and measures used to protect the well from contamination.
- The abstraction well is not used for both a drinking water supply for the domestic dwelling and for **activities** related to poultry rearing.
- High level monitors are installed on the proposed washwater tank to reduce the risk of accidental overflow.
- The waste water storage tank is inspected annually to check for structural **integrity**.
- Containers for the storage of broiler casualties **have** sufficient **capacity and** that the containers are of steel construction and are water, pest and topple proof.
- High level monitors are installed on the **proposed** washwater tank to reduce the risk of accidental overflow.
- Waste water storage tank **is inspected annually to check** for structural integrity.



Denise Ryan
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Newcastle West, Co. Limerick



Eve Smith
Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to:**

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