



Submission

| | |
|---------------------------|---------------------|
| Submitter: | Miss Claire O'Dwyer |
| Organisation Name: | HSE |
| Submission Title: | P1057-02 |
| Submission Reference No.: | S011621 |
| Submission Received: | 10 June 2024 |

Application

| | |
|------------|-------------------|
| Applicant: | Mr. Niall McKenna |
| Reg. No.: | P1057-02 |

See below for Submission details.

Attachments are displayed on the following page(s).



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

Tel: 049 4373418
Fax: 049 4373427

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

Date: 10/06/2024

Application for: Industrial Emissions License Application P1057-02

Report To:

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

Class and Nature of Activity:

Applicant: Mr. Niall McKenna, Knockballyroney, Scotstown, Co. Monaghan

Location of Facility: Knockballyroney, Scotstown, Co. Monaghan

EPA Ref. No: P1057-02

EHIS Ref: 3853

The following HSE Departments were notified of the consultation request for the Planning on the 5th of April 2024:

- Emergency Planning
- Estates
- Director of National Health Protection
- CHO 1

Introduction

The National 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

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.

Application:

The site in question is located in a rural area within the townland of Knockballyrone. Access to the farm is and will be via an existing entrance that is just off a local, third class road. The site is 4.2km north of Scotstown and 4.7 km northwest of Tydavnet. Land-use surrounding the site is predominantly agricultural and the main habitat is improved agricultural grassland.

Other habitats represented locally include areas of wet grassland, scrub, small areas of coniferous woodlands, hedgerows, treelines and water courses. Currently, the main habitats within/adjacent to, the application site are buildings and artificial surfaces (the recently constructed poultry house and associated hard core surfaces) and improved grasslands. Where they exist, the site boundaries consist of hedgerows / treelines.

This Licence is up for review in relation to the proposed increase in bird numbers from 84,000 to 100,000 places, and any associated revisions to the site boundary, additional monitoring/emission points.

- 1 No. poultry house (in lieu of 1 No. poultry house previously approved under planning Ref. 14/346), 1 No. General Purpose storage Shed, and, an extension to 1 No. existing poultry house, together, with all ancillary structures (to include meal bins and soiled water/ancillary storage tanks) and site works (to include new/upgraded site entrance, and the demolition of 3 No. existing mushroom tunnels) associated with the above development on, or adjacent to an existing poultry farm at Knockballyrone, Scotstown, Co. Monaghan.
- The proposed poultry house developments (essentially extensions to existing and proposed houses) will increase the capacity of the existing house and previously approved house from 42,000 to 50,000 birds each resulting in an

overall increase in bird numbers on the farm of 16,000 (from 84,000 to 100,000 birds). The farm currently operates as 1 poultry house with ancillary structures, with capacity for c. 42,000 birds, and is licensed under E.P.A. Licence No. P1057-01 (which also provides for the approved house yet to be completed). The currently proposed developments will be completed in lieu of the 2nd poultry house approved under planning ref. 14/346, extended under planning ref. 19/9017, resulting in an increase in the proposed/approved bird numbers from 84,000 (as currently approved under E.P.A. Licence No. P1057-01), to 100,000 birds.

Planning/Site History:

The subject site is an existing development site comprising a mix of poultry housing (1 house currently completed and operational), mushroom tunnels and ancillary structures/facilities.

The existing farmyard area, has previously been granted permission for 2 No. poultry houses under planning permission 14/346 and 19/9017, (only one of which has been completed to date). Site Location Maps are contained in Appendix No. 1 within the EIAR.

The existing E.P.A. Licence (P1057-01) was granted to the farm on 18/12/2020. A Copy of same is contained in Appendix No. 7. An E.P.A. licence/licence review. Planning permission was previously applied for this development under Planning Ref. 23/57, however same was refused on the grounds of inadequate information pertaining to the separation, collection and management of soiled water arising from the development. This EIAR and accompanying application has been revised to address the issues raised and contains information in relation to the above.

Odour:

The National 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.

Management of operations on the site to prevent significant pulse releases of odour at times when the effect might be perceptible beyond the site boundary should ensure minimal impact on air in the vicinity of the site.

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.

During Demolition & Construction :

It is vital that there is no deterioration in water quality in the watercourses in the vicinity of the development. This will protect both habitats and species that are sensitive to pollution. Therefore, strict controls of erosion, sediment generation and other pollutants associated with the construction process to be implemented.

No development works to take place near to any watercourse. Surface water run-off from the site (during construction) should be routed to the watercourses via suitably designed and sited settlement areas/filter channels.

Fuels, oils, greases and hydraulic fluids will be stored in bunded areas well away from drains. Refuelling of machinery, etc., to be carried out in bunded areas.

Stockpile areas for sands and gravel will be kept to a minimum size, well away from the drains. There will be no disturbance to the banks or habitats along local watercourses.

There will be an amount of waste material from site development works. Same is to be completed in line with the Construction and Demolition Waste Management Plan.

Soil and stone which will be used within the site/landholding. Its use will not lead to the loss or damage of any natural or semi-natural habitats elsewhere and will not be spread close to any local watercourse. All waste material will be segregated, stored and disposed of in accordance with the Construction and Demolition Waste management plan and the E.P.A. Licence requirements.

Surface and Groundwater

The National 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 National 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 National Environmental Health Service recommends that licensed contractor responsible for the removal of poultry carcasses or reference to facilities for the onsite storage of poultry casualties and all records are maintained regarding disposal. 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.**

Pest/Vector Control

Reference could not be found in the EIAR to the issue of Pest/Vector Control. On a day to day basis the facility should operate a vector control plan to limit/eliminate the potential proliferation of disease vectors such as rodents, flies, and other potential vectors. The NEHS recommends an Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of measures to control vectors in all stages of their life cycle.

Climate/Energy

The National Environmental Health Service (EHS) recommends that clean water from roofs and yards is collected/harvested in attenuation tanks for example, to maximise water efficiency and limit potential discharges that may cause flooding in the local area. This is in the context of climate change where the frequency and intensity of precipitation is expected to increase as global temperatures increase. Consideration should be given going forward to renewable energy sources. Renewable energy is energy produced from sources like the sun and wind that are naturally replenished and do not run out. Renewable energy can be used for electricity generation, space and water heating and cooling, and transportation.

Conclusion

In respect of this planning application, the National 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.
- It is recommended that a formal complaints procedure should be outlined to resolve any possible issues or community concern in relation to traffic, dust, water, noise, odour or nuisance complaints.

Providing the development is kept as per the specifications detailed and operated and maintained as per Department of Agriculture, Food and Marine Guidance, the NEHS is of the opinion that there is adequate protection of Public and Environmental Health in the license conditions.



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



**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

10th June 2024

**Re: Industrial Emissions License Application P1057-02
Mr. Niall McKenna, Knockballyroney, Scotstown, Co. Monaghan**

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above license application

If you have any queries regarding this report the contact is Claire O'Dwyer, Principal Environmental Health Officer at claire.odwyer@hse.ie

Yours sincerely

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

**Claire O'Dwyer
Principal Environmental Health Officer**