

Office of Licensing, Climate and Resource Use,  
Environmental Protection Agency,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Co. Wexford

18<sup>th</sup> October 2021

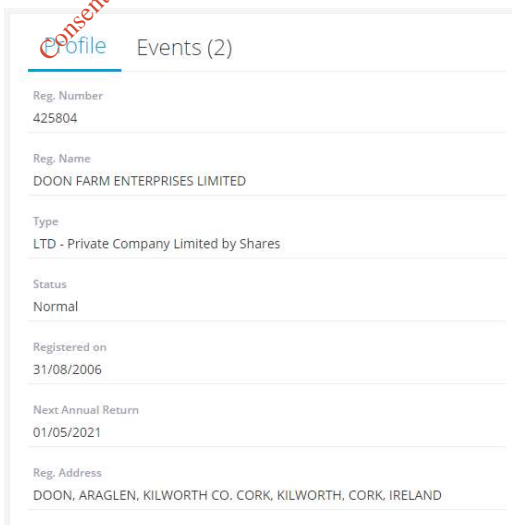
**Re: Doon Farm Enterprises Ltd. ~ Licence Application P1024-02**

Dear Sir/Madam,

I refer to previous Agency correspondence of 21<sup>st</sup> and 22<sup>nd</sup> April 2020. Please find the response to the issues raised outlined below;

1. It is noted that the site location address varies throughout the application form and supporting documentation, varying between Counties Tipperary and Cork. You are required to:
  - a) Clarify the exact legal address at which the activity is located; and

Please see below an extract from the Companies Registration office. Geographically the site is located in Tipperary, however the postal address of the site is detailed as per below.



Profile Events (2)

Reg. Number	425804
Reg. Name	DOON FARM ENTERPRISES LIMITED
Type	LTD - Private Company Limited by Shares
Status	Normal
Registered on	31/08/2006
Next Annual Return	01/05/2021
Reg. Address	DOON, ARAGLEN, KILWORTH CO. CORK, KILWORTH, CORK, IRELAND

- b) Confirm that the documents used in support of this application relate to the Tipperary address and that any references to the site's location being in Cork are incorrect.

Please refer to response to point a.

2. It is noted that a number of planning permissions have been granted for the site of the activity since the licence application was submitted to the EPA on 03 April 2017. In relation to the planning permissions granted at the site where the licensable activity is and will be carried out, provide the following documentation:

a) A full planning history for the site;

Please refer to **Planning application search below.**

<u>File Number</u>	<u>Decision Code</u>	<u>Applicant Name</u>	<u>Development Address</u>	<u>Development Description</u>	<u>Local Authority Name</u>
<a href="#">071368</a>	CONDITIONAL	PJ & Charlie Ryan	Doon Araglen Kilworth Co Cork	construction of 1 no. loose dry sow house, 1 no. farrowing house, 1 no. stage two weanar pig house,...	Tipperary County Council
<a href="#">19601471</a>	CONDITIONAL	Doon Farm Enterprises Limited	Doon Araglin Co. Tipperary	construction of pig house with underground slatted effluent tank and all associated site works...	Tipperary County Council
<a href="#">96574</a>	CONDITIONAL	Charles Ryan	Doon, Araglin, Kilworth, Co. Cork,	construction of pig accommodation for 250 sow integrated unit,...	Tipperary County Council
<a href="#">11349</a>	CONDITIONAL	P J and Charlie Ryan	Doon Araglin Kilworth Co Cork	construct a new dry-sow house in accordance with the requirements of Welfare Regulations as per SI N...	Tipperary County Council

b) For all planning permissions granted since Planning Permission 07/1368, relating to the site, provide written confirmation from the planning authority as to whether or not an EIA was required, by or under the Planning and Development Act 2000, as amended;

**Correspondence requested from Tipperary Co. Co. and enclosed.**

- c) A copy of Tipperary County Council's final decision or grant of planning permission associated with planning application reference 19/601471;

Please find attached.

- d) A copy of Tipperary County Council's planning inspector's report (planner's report) associated with planning application reference 19/601471;

Please find attached

- e) Confirm the current status of the development works as permitted by all planning permissions granted for the site. In addition:

- Where the development works have been completed, confirm whether the associated infrastructure is operational; and
- Where the development works have not yet been completed, provide a proposed development schedule for construction works on site.

Developments completed (House B) not yet operational.

3. Having regard to the capacity for animals outlined in the application (as per your response received 23 October 2018), and to the planning permissions granted for the site, provide the following:

- a) Clarify the authorised capacity at the site of the activity, in terms of animal numbers permitted by the Planning Authority;

The authorised capacity for the site is 500 sows with all progeny reared to market weight (i.e. an integrated farm) as detailed in planning ref: 07/1368.

- b) Having regard to point 3a) above (animal numbers permitted by planning permissions), clarify the capacity to which this licence application is being made, in terms of animal numbers by animal type, (include all animal categories);

The operational capacity for which a licence is sought is 500 sows (400 dry sows & 100 farrowing) (incl. served gilts) with all progeny reared to market weight (i.e. an integrated farm) as detailed in planning ref: 07/1368. In addition to same there will be;

- 80-100 Maiden gilts
- 2500 Weaners (<30Kg)
- 3,500 Production pigs (Finishers and Weaners >30 Kg)

The required space is provided throughout the rearing cycle to accommodate the necessary washing, resting and hygiene routines.

- c) Clarify the animal capacity used to determine the figures and calculations provided with the application; and

The operational capacity of the farm (i.e. sows) is limited by the parent permission (07/1368) albeit that there may be slight variations in numbers of weaners and production pigs depending on the productivity of the sow herd and mortality thereafter. Same is limited by the capacity figures as detailed. Additional infrastructure capacity is needed for the operation of the farm, and the facilitation of hygiene and resting programmes as the farm can not operate with all places occupied all of the time.

- d) Having regard to points a) (*animal numbers authorised by planning permissions*) and b) (*animal numbers applied for in licence application*) above, and in the case that the figures/calculations that have been previously provided are based on a different capacity to your answer in b) above, provide updated figures/calculations based on the revised stocking rate for which the application is being made. For example, revised figures/calculations may need to be submitted for resources used, wastes generated, organic fertiliser produced and storage facilities, emissions etc.

The animal numbers authorised by way of planning permission and the animal numbers applied for (as detailed in point b above) in this application are consistent.

The majority of the data submitted is correct, however the slurry production data needs to be corrected.

Estimated slurry production = c. 400 sows (where sows do not include served gilts) \*0.398 m<sup>3</sup>/hd/week\*52 = 8,278m<sup>3</sup>/annum. (8,112m<sup>3</sup> as detailed in original E.I.S. as submitted with the application, and c. 8,500 as detailed in the Non Technical Summary of the licence application.)

4. It is noted that the source of water for the activity is an offsite well. However, the site layout plan, received in your response received 18 April 2018, includes a grid reference for a well, which appears to be an incorrect grid reference.

- a) For clarity, provide a revised grid reference for this well, or remove the reference to it from the site layout map.

Updated Site Map enclosed. Water supply well(s) is/are off-site (outside site boundary)

5. In relation to the proposed / existing storm water collection system;
- Provide a description and map outlining the surface water pathway between the storm water discharge point and the local watercourse;
  - Identify any mitigation measures which are or will be installed prior to the storm water discharge point;
  - If a soakaway is or will be installed, provide a description of same; and
  - Update the site plan as per points a) to c) above.

Please refer to updated site plan. Storm water is to be directed to 3 No. soak aways, and not to surface water drainage.

- SW -1 197233,106545
- SW-2 197164,106579
- SW-3 197177,106655

6. In relation to the site office referred to in the application:
- Confirm the location of the site office, and specify whether it is within the site boundary;
  - Confirm if sanitary facilities are or will be provided;
  - Confirm, where applicable, the type of system that is or will be provided for the treatment of sanitary effluent arising onsite and the location of same; and
  - Where applicable, submit a revised site plan that clearly depicts the location of any existing or proposed office and associated sanitary facilities within the installation boundary.

Please refer to updated site plan. The main farm office is off-site to the south east of the site boundary, however there are sanitary facilities (septic tank) located on site, as per the revised site plan.

7. It is noted that the documentation regarding BAT (Best Available Techniques) has not been fully completed.
- Provide clarifications on the BAT conclusions from the Commission Implementing Decision (CID) document for the Intensive Rearing of Poultry or Pigs (2010/75/EU, Feb 2017) clearly identifying the specific techniques that will used for each BAT.

The majority of structures on-site have been completed prior to the issuing of the CID in 2017. Additional measures may have to be completed in respect of houses A and B, and same are currently under review, with the provision of additional external covered storage being considered.

8. Regarding Raw Materials, Intermediates and Products to be used on-site (in particular disinfectants, detergents, water sanitation chemicals, gas and diesel):
- Provide the hazard statement, amounts stored, and amounts used annually; and
  - Provide details of the storage facilities.

The only products to be used on the farm are Hydrated lime and Hyperox (for foot dips). Please see attached details in respect of same.

9. In relation to the removal of animal carcasses from the site, provide the following:
- Provide details of the current contractor who removes animal carcasses from the site, including relevant authorisation they hold to transport materials under the Animal By-Product Regulations, as amended.

Please refer to enclosed correspondence.

10. In relation to proposed vermin/pest control at the installation, provide the following:
- Provide details regarding any storage of any waste associated with vermin/pest control; and
  - Provide details of any proposed transporter of vermin/pest control waste.

Pest control products are only purchased on an as needed basis. As pest control is routinely carried out and products are used in order of purchase there is not out of date / waste pest control products. If same were to arise same would be stored in original/sealed containers and disposed of at Civic Amenity Center hazardous waste collection days and/or by specialized haulier.

11. In relation to organic fertiliser produced by the activity:

- a) Having regard to item 3 above, clarify the maximum quantity of organic fertiliser that will be generated by the activity per annum based upon the maximum number of pigs which will be accommodated.

Please refer to point 3d above

- b) Clarify the total organic fertiliser storage capacity that will be on site upon completion of the any proposed development or on foot of any approved planning permissions (include both total capacity and capacity minus the freeboard);

Please refer to slurry storage capacity table enclosed.

- c) Confirm whether 26-weeks storage capacity is or will be available onsite and/or offsite;

26 weeks storage capacity is available on site.

- d) In relation to any organic fertiliser produced by the existing activity, provide a copy of the Record 3 form (as required under Article 23 of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 as amended, for the previous year (i.e. 2019);

Please refer to enclosed record. Certain information redacted due to GDPR.

- e) With reference to the 'Coded Table of Slurry Spreading Lands' provided as part of the application:

- A revised table should be submitted if the previously received information is now outdated;
- Provide the county in which each of the land parcels is located;
- Provide details of the import capacity in m<sup>3</sup> of each of the lands identified.

- f) Provide details including the total area of land (in hectares) available for the receipt of organic fertiliser. The total import capacity available should also be provided and at least equal the maximum quantity of organic fertiliser generated per annum by the activity; and

- g) Confirm that the lands have a capacity to accept the organic fertiliser generated and include a brief description of how import capacities were calculated.

**The previous fertilizer plan was completed to demonstrate that there was sufficient capacity in the local area for the organic fertiliser produced in the Licensable activity. The preparation and maintenance of customer farmer fertiliser plans is a matter for the customer farmers concerned, and not the applicant, as provided for by S.I. 605 of 2017 as amended.**

**This capacity of the applicant's customer list is more appropriately verified by the record 3, which demonstrates actual usage by the customer farmers and is more applicable than a revised projection. The current customer farmers are located in Counties Tipperary and Cork.**

12. Provide an assessment of the impact of odour emissions from the activity and the impact of odour emissions on local residents. The assessment of odour emissions should be supported by use of a model to predict odour concentrations at the sensitive receptors in the vicinity of the installation. The assessment should, as appropriate, identify odour reduction/mitigation measures.

Odour contour maps are available in the EPA published report entitled *Odour Impacts and Odour Emission Control Measures for Intensive Agriculture*, located [Here](#) on the EPA website.

**Odour Impact Assessment to be completed and Submitted under separate cover.**

13. The application states that a back-up generator will be present on-site on an impermeable concrete base and will not be moved.

- a) Confirm the location of the back-up generator on-site and its bunding arrangements.

**Please refer to updated site plan. Same is located off-site as per the revised plan.**

14. A screening for Appropriate Assessment was undertaken on 21 April 2020 and the Agency determined that an Appropriate Assessment of the activity is required. Screening undertaken by the Agency, using SCAIL Agriculture, has shown that ammonia in air emissions from the activity have the potential to contribute to elevated ammonia levels and nitrogen deposition at European sites.

- a) You are thereby required to submit a Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of Regulations 2011 as amended).

You are furthermore advised to refer to the document 'Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities' issued in 2009 by the Department of Environment, Heritage and Local Government, and revised in 2010. This document is available on the National Parks & Wildlife Survive website at: [http://www.npws.ie/sites/default/files/publications/pdf/NPWS\\_2009\\_AA\\_Guidance.pdf](http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf)

- b) Please note that a screening tool 'Simple Calculation of Atmospheric Impact Limits' (SCAIL) is available at: <http://www.scail.ceh.ac.uk>. Submit the following details that are required in order to carry out the SCAIL assessment (including all input parameters) for both animal housing and organic fertiliser storage facilities.





CLW Environmental Planners Ltd.

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- For each animal house include building/stack heights (m), ventilation details, number of fans, fan(s) location, fan(s) diameter, fan(s) flowrate ( $\text{m}^3/\text{s}$ ); housing floor area ( $\text{m}^2$ ), livestock number by animal type for all animals (e.g. farrowing sow, production pig etc.) and flooring type (e.g. fully slatted floors etc.).

Please refer to enclosed NIS.

In addition to the above, please also provide an updated non-technical summary to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

No revisions are required to the non-technical summary.

If you require any additional information please contact this office.

Yours Sincerely,

*Paraic Fay*

Paraic Fay B.Agr.Sc.