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Mr. Paraic Fay

On behalf of Longfield Poultry Unlimited Company

12 April 2023

Reg. No.: P1159-01

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from Longfield Poultry Unlimited Company for an installation located at Fletcherstown, Wilkinstown, Navan, County Meath.

Dear Mr. Fay,

I refer to the application for a licence received by the EPA on 20 August 2021.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. Planning Permissions:

- a) The number of bird places outlined in the application (112,000) is greater than the number authorised by the planning permissions granted for the site (72,000 bird places permitted by planning ref. KA/201448 in addition to the existing 38,000 bird places permitted by planning ref. NA/800543 and NA/130205 which is a total of 110,000 bird places). You are advised that the Agency cannot agree to 112,000 bird places unless the planning authority provides supporting written confirmation; and
- b) With regards to planning permission KA/201448:
 - i. Confirm the current status of the development works;
 - ii. Where the development works have been completed in one or both proposed poultry houses, confirm whether the associated infrastructure is operational in either or both houses and if operational the associated maximum animal numbers per poultry house; and
 - iii. Where the development works have not yet been completed, provide a proposed development schedule for construction works on site.

- c) With regards to planning permissions NA/800543 and NA/130205, 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; and
- d) With regards to the two storage sheds permitted by planning permissions NA/800543 and NA/130205:
 - i. Update the site plan to outline clearly the locations of these storage sheds;
 - ii. Confirm the existing and proposed use(s) for each shed; and
 - iii. Confirm that there is no organic fertiliser (i.e. used bedding/litter) to be stored within these storage sheds.

2. Capacity:

The documentation provided as part of the application contains conflicting information regarding on-site capacity.

Clarify the following:

- a) There are conflicting figures given throughout the application documentation for the capacity of the existing two poultry houses (between 38,000 and 40,000 bird places). However, as per point 1 above, 38,000 bird places only are permitted by planning ref. NA/800543 and NA/130205 for the existing activity (19,000 bird places per poultry house).
 - i. Confirm the built capacity of the two existing poultry houses; and
 - ii. Confirm the maximum bird numbers stocked in the two existing poultry houses.
- b) The maximum of 115,000 birds outlined in the Environmental Impact Assessment Report (EIAR) conflicts with both the planning permissions granted for the site as per point 1 above and the maximum capacities of the houses outlined in the application. Provide clarification on this;
- c) Taking account of points 1, 2(a) and 2(b) above, complete the following table to provide a breakdown of the maximum capacity of birds per house referencing the house numbers as outlined in the site plan;

House No.	Capacity	Useable floor area (m ²)

- d) In the case that the figures/calculations that have been previously provided in the application are based on a different capacity to your response to point 2(c) 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.

3. Ammonia:

- a) Provide a map showing the location and distance from the installation boundary to the closest sensitive receptors. The map should also highlight which sensitive receptors are family dwellings, and which are third party dwellings;
- b) As background levels are already exceeded for ammonia and nitrogen at sensitive receptors within the zone of influence, detailed modelling of emissions including in-combination effects is required. Where the applicant feels detailed modelling is not required, a full detailed justification is required as part of the application. Refer to the EPA's document "*Assessment of the impact of ammonia and nitrogen on Natura 2000 sites from Intensive Agriculture Installations*"¹ in your response;
- c) Provide the fan heights for each house;
- d) Confirm the date that each of the existing houses was first stocked and the corresponding bird numbers, providing documented evidence to support this in the form of dated receipts from the processor of receipt of broilers for slaughter from this farm;
- e) Update the Natura Impact Assessment (NIS) to include the fan heights for the relevant buildings and if necessary, update the bird numbers assigned to the background; and
- f) An erroneous reference to Janestown Bog BAC is made in the NIS. Update the NIS accordingly.

4. Stormwater drainage:

- a) Move SW-3 to a location upstream of the swale, as the swale can be considered a discharge to ground; and
- b) Update the site plan accordingly.

5. Organic Fertiliser

- a) Wash water: The application proposes two wash water storage tanks on-site (capacity 210 m³) and a proposed annual volume of 200 m³ but also states that a storage capacity of 26 weeks is not provided on-site. Clarify this conflicting information by providing the following information:
 - i. Confirm the capacity of each tank (total capacity minus the freeboard);

¹ [Assessment-of-Impact-of-Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations-2023.pdf \(epa.ie\)](#)

- ii. Clarify how the 26 weeks' storage capacity requirement will be met; and
- iii. If the storage capacity is to be supplemented by off-site storage, identify the type, capacity and location of the off-site storage.

In order to assist you in compiling this information, a table has been provided. Complete Table 1 in full.

Table 1:

Wash water	Proposed Activity
Number of wash water tanks	
Capacity of each wash water tank (m ³) (total capacity minus the freeboard)	
Type, location and total capacity of off-site storage (m ³) (total capacity minus the freeboard)	
Number of weeks of wash water storage available	

- b) Poultry Litter: Conflicting information has been provided in the application on how poultry litter will be managed. Attachment 7.6.2(a) "Landspreading Controls" of the application form lists a "New Manure store" whereas the EIAR states that a contractor removes the poultry litter. The Site Operation Report provided as part of the application refers to both use as a fertiliser or alternatively for compost in the mushroom industry.
- i. Confirm how poultry litter from the proposed activity will be managed;
 - ii. Confirm if a poultry litter/ manure store is currently on-site or proposed;
 - iii. As per point 1(d) above, confirm the current and proposed use of the two storage sheds permitted by planning permissions NA/800543 and NA/130205;
 - iv. Update the site plan to include and clearly label the storage sheds and the existing and proposed wash water tanks;
 - v. Confirm that there will be no landspreading of organic fertiliser (poultry litter or wash water) from the activity within the site boundary;
 - vi. The map in appendix 8 of the EIAR submitted with the application appears to include land within the proposed boundary;
 - Submit a new map demonstrating the area available for spreading of wash water which excludes the area within the proposed boundary i.e. the site of the proposed houses, the existing range area and the proposed range area;

- Provide the updated land area (in hectares) available for wash water spreading based on the new map; and
 - Provide updated calculations for nutrient application based on the new map.
- vii. Provide an updated letter from the contractor who will remove the poultry litter from the installation. This letter should include the following:
- The correct DAFM registration details for the contractor;
 - The destination/use of the poultry litter;
 - Confirmation if the contractor will remove all poultry litter from the installation; and
 - Assurance that the transport of poultry litter will be in accordance with the Animal By-product Regulations.

6. Fuel tanks:

- a) Provide details of the capacity, location, bunding and protection of any existing/proposed fuel storage facilities onsite (including gas and diesel); and
- b) Attachment 4.6.1 “Water and Energy Usage” of the application form estimates a proposed annual gas usage of 140 m³. Confirm that this is accurate.

7. Generator:

Provide details of the storage location of the back-up generator on-site and provide details of the associated bunding and protections.

8. Water Supply:

Attachment 4.6.1 “Water and Energy Usage” of the application form states that the total supply of water for the activity will be 5,000 m³ from groundwater abstraction. With regards to the water supply for the installation, provide the following:

- a) Clarify the proposed sources of water to be used for the activity and the quantity of water usage expected per annum from each source;
- b) Clarify the location(s) on the site plan, including the grid reference of any existing/proposed groundwater well(s); and
- c) Provide the name of the Group Water Scheme, if applicable.

9. Environmental Management Techniques:

The Attachment 9.1 “Environmental Management Techniques” uploaded with the application form only contains page one. Submit all pages of this attachment and confirm that no other application documentation has been omitted.

10. Site plan:

The text on the site plan is illegible. Provide updated site plan(s) clearly outlining the following:

- a) The full site boundary outlined in red;
- b) All infrastructure located within the site boundary clearly identifiable with legible labels and legend;
 - i. existing and proposed poultry houses uniquely identified;
 - ii. existing and proposed washwater tanks;
 - iii. the wash water drainage system lines;
 - iv. stormwater discharge points;
 - v. the stormwater drainage system lines;
 - vi. fuel storage;
 - vii. generator;
 - viii. well;
 - ix. storage sheds;
 - x. hardstanding areas; and
 - xi. litter/manure store if applicable.
- c) The existing and proposed range areas (in hectares); and
- d) Any other clarifications included in this request for further information (outlined above) that affects the site plan.

In the case where drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIA where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within *4 weeks* of the date of this notice, in order to allow the Agency to process and determine your application.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries, please contact licensing@epa.ie.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)](#).

Please direct any queries to licensing@epa.ie.

Yours faithfully,

Linda Cahill
Environmental Licensing Programme
Office of Environmental Sustainability
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