

Michael Monagle
C/O Curtin Agricultural Consultants Ltd
12 The Paddocks
Kells Road
Kilkenny
F.A.O. Con Curtin

BY REGISTERED POST

16/10/2014

Re: 14/05815
Construction of pig fattening house and associated feed mixing room and pig walkway at Annakisha Pig Farm
At: Annakisha North, Doneraile, Co.Cork,

Dear Sir/Madam,

I refer to your planning application which was lodged with the Planning Authority on the 27/08/2014.

It is considered that the information submitted with the application is not yet sufficient to enable the Planning Authority to make a decision in this case. Therefore, to enable the Planning Authority give further consideration to your application, you are requested to submit **six copies** of the following further information:-

A) Please clarify/justify the figures reported for the total annual output of Pig Manure & Soiled water i.e. 12,000m³, reported in Figure 6 page 16 of attached EIS with reference to the current values for Integrated unit/sow place stated in Table 1, Schedule 2 of GAP Regulations SI 31/2014, giving a minimum figure of 13,855m³ based on lower feed ratio of 2.0:1 i.e. 0.312m³ x 854 sows x 52 weeks. There are similar apparent discrepancies in Figure 4 page 9 of the EIS for existing pig manure & soiled water production.

B) Please clarify/ justify with reference to Irish Regulations; the reported nutrient content [Nitrogen 50,400kgs & Phosphorus 9,600kgs] of slurry produced in the unit as stated in Figure 6, page 16 of the EIS with reference to the current values for Integrated unit/sow place stated in Table 6, Schedule 2 of GAP Regulations SI 31/2014, giving a figure of 74,298Kg N/ year [87x854] & 14,518kg P/ year [17x854] as opposed to the reported values in the EIS above. There are similar apparent discrepancies in Figure 4 page 9 of the EIS for existing pig manure & soiled water production.

C) The applicant states at Section 7.2.4, Slurry Extraction, page 38 of the EIS that, ' The increased production of pig manure will result in an increased frequency of slurry pumping. On average, in the proposed development, slurry will be pumped 4-6 times per day but the frequency will increase during the grass growing season.'

Please clarify if slurry is pumped in the pig unit other than during export to third party spread lands and please request the applicant to specify the type of crop produced on third party spread lands. Given that the applicant states on page 32 of the EIS that: 'the pig farm will not deliver pig manure from the site from 15th October to 12th January' each year, please clarify the operational requirements for this number of pumping / agitation events in the unit.

D) Please clarify the location of the nearest dwelling on map scale 1/25000 and aerial photos scale 1/10000 as the existing text in the EIS states dwelling labelled H1 is the nearest dwelling, while maps & aerial photos appear to show H4 as the nearest dwelling.

E) The applicant states that the 'roof area of the pig farm will increase by approximately 1653m² plus 350m² allowed for concrete apron, resulting in an increase of 10% approximately'. Please submit calculations & empirical data for the management and control of storm water generated in the pig unit with details showing the dimensions & capacity of the existing storm water holding/rain harvesting/attenuation tank and details of rain water harvesting practices in the unit.

F) The EIS states at section 5.2, Description of Potential Impacts, page 31 that 'the volume of ground water usage will increase by approximately 3000m³ (23%)'. Please submit existing maximum & minimum groundwater levels recorded in the two bored wells on site. Please submit locations of adjoining bored wells within 500m of the pig unit and any available monitoring data.

G) The EIS states at Section 1.5.3 page 12 that, 'the pig manure is transported from the pig farm by farmer's slurry tankers and using local contractors slurry tankers' and that the daily traffic movements for pig manure removal will increase from 10 per day to 13.3 movements per day (ref Table 7 page 40).

Given that the typical slurry tanker has a capacity of approximately 10m³ this will give total volume of pig manure exported /removed at 12,600m³ & 16,758m³ respectively. These figures are substantially larger than existing & proposed volumes of pig manure & soiled water reported in Figure 4 and Figure 6 of the EIS and will require significant additional spreadlands area to recycle & reuse nutrients contained in pig manure produced in the pig unit.

Please clarify the type & capacity of slurry tankers used to remove pig manure from the pig unit and to submit names & addresses of spreadland holdings with map scale 1/50,000 showing location of 'Receptor' land parcels vis-a-vis Natura Sites i.e. Blackwater River (Cork/Waterford) cSAC. Please show on a map scale 1/50,000 the type of crop i.e. grassland or cereal type produced on the recipient spreadland holdings.

H) The applicant states in section 6: Air, page 34, that 'there have been no complaints since Michael Monagle took over the farm in 1994'. Please confirm that there has been no odour, noise, traffic movements or road soiling complaints received by the pig unit or relevant regulatory agency during the last 10 years. Please submit details of ongoing cooperation with adjacent dwellings with regards to existing or proposed odour & noise mitigation measures

and any details of odour or noise studies/assessment at the boundary of adjacent sensory receptors within 500m of the pig unit.

I) Section 1.6.1 of the EIS states that the proposed fattening house will reduce the need for inter –farm movements. Table 7 in chapter 8 of the EIS appears to contradict this, stating that pig transport levels are to remain the same. You should provide clarification in relation to this point.

J) In order to allow the Planning Authority to complete this assessment, the applicants are requested to submit a Natura Impact Statement (10 copies) which shall provide detailed information in relation to the following:

1. Measures to be undertaken to protect water quality during the construction phase - The applicants are requested to submit a method statement which shall be prepared having regard to CIRIA Guideline C648 Control of Water Pollution from construction sites, and which shall include details of silt fences and a map identifying watercourse buffers, the locations of bunded areas, areas identified for the stockpiling of material etc.
2. Information relating to the environmental procedures to be adopted at the site post construction to ensure appropriate management of risks associated with accidental release of contaminated water/slurry at the site;
3. The NIS should incorporate information to demonstrate that the extension is designed to provide for sufficient storage capacity for soiled waters, surface waters and slurry to ensure that the development does not pose a risk to water quality ;
4. Detailed information in relation to the proposals for the management of pig slurry which shall demonstrate that sufficient spreadlands are available to the applicants which can be used without interfering with the achievement of the Conservation Objectives that apply to the Blackwater River SAC.

The Natura Impact Statement should be prepared by a suitably qualified person/persons who has expertise in the area of freshwater ecology and water quality, as well as experience in preparing Natura Impact Statements.

Please note that in accordance with Art. 240 of the Planning & Development Regulations, the applicant shall, not more than 2 weeks before submitting the NIS, publish notice of the intention to submit the NIS in at least one newspaper approved under Art. 18(2).

2No. copies of the newspaper notice should be submitted with your response.

This request for further information is without prejudice to any decision the Council may take, either to refuse permission or to grant permission, with or without conditions. Please note that your application shall be declared to be withdrawn if all of the further information as required above is not submitted **within 6 months** of the date of this letter.

Please further note that where the Planning Authority considers that the further information request has not been fully complied with and requires clarification, the 4 weeks for making a decision (or 8 weeks in the case of an application accompanied by an EIS), does not begin

until this clarification has been provided and the request for further information has been fully complied with.

Further consideration of your application is deferred pending receipt of the information requested.

Any response to this letter should clearly state that it is a response to a request for further information in connection with **14/05815** and be addressed to: - **Planning Department North, County Hall, Carrigrohane Road, Cork.**

Yours faithfully,



Peter Varian
Senior Staff Officer