



CLW Environmental Planners Ltd.

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Office of Environmental Sustainability,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

21st October 2024

Re: Liam O’Neill P1212-01

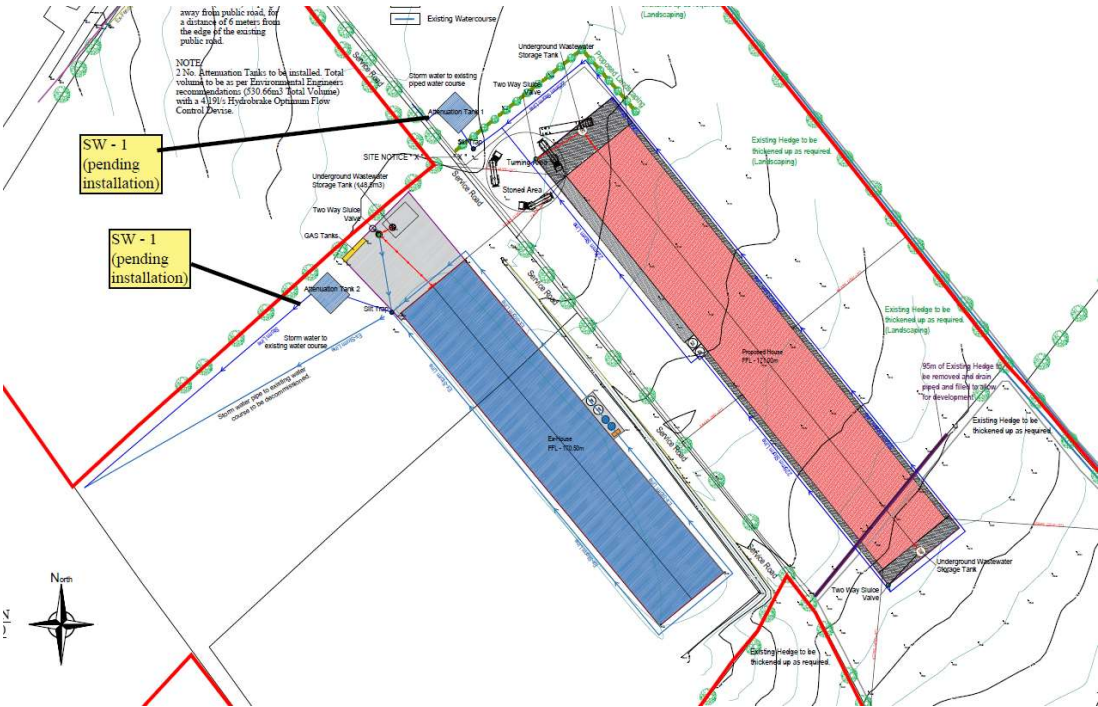
Dear Sir/Madam,

I refer to previous Agency correspondence of 16th October last. Please find detailed below the response to the issues raised.

1. Storm water

With regards to stormwater management, the site plan provided does not clearly outline the storm water drainage system and the associated infrastructure. Provide a revised site plan to clarify:

- a. Confirm and clearly label (individually labelled) the location of all stormwater discharge monitoring points.**



- b. The site plan provided does not have continuous lines outlining proposed storm water drainage system. Provide a map outlining the surface water pathway(s) between the storm water discharge points and the local land drains/watercourses; and

Please refer to enclosed Map.

- c. Clarify how clean storm water from concrete aprons is kept separate from wash water.

There is a two way sluice proposed at each concrete apron to facilitate the separation of clean and dirty water. Same will allow the diversion of soiled water to the soiled water tanks and clean water to the storm water outfall, as/and when applicable/appropriate. Soiled water drainage is highlighted in red on the attached site plan. Each sluice has two outfalls shown, red to soiled water tank, and blue to storm water network.

2. Wash water

With regards to wash water tanks, the information provided is inconsistent based on the following:

- The site plan refers to wash water (soiled water) tanks to the front and rear of the proposed new broiler house. Conflicting information is provided in the EIAR which states wash water tanks will be located at the front of the houses.

It is intended that the soiled water tanks will be located at the front of the house only.

- These tanks appear to be undersized relative to the size of the proposed broiler house. **The tank at the proposed house is smaller, but overall a minimum 26 weeks storage capacity is to be provided on site. The applicant may consider a larger tank at the time of construction.**

- Two-way sluice valves are indicated on site map plan. There is no reference to these in the EIAR or application documents.

Two-way sluice systems are detailed on the planning drawings, drawings included in the EIAR and site plan accompanying this application.

- There is no connection indicated on the site plan between the two-way sluice valve and other channels other than a line back to the underground waste water tank.

Please refer to site plan enclosed, a connection to the storm water line is detailed on the site plan for house 1 (highlighted green on the site plan attached) and has been included for house 2.

Provide a revised site layout map to clarify:

- a. How many wash water tanks are proposed in total. Clearly label and number (individually) all wash water tanks on a revised site plan and state their volume.

2 No. wash water tanks proposed Ref: A and B as per site plan. Proposed volume as per site plan.

- b. The connection between wash water tanks. Update the site plan as necessary clearly showing the wash water drainage system lines.

There are no connections between the wash water tanks. Soiled water drainage shown on site plan in red.

- c. The proposed use of the two-way sluice valves and update application documentation accordingly.

Same are as detailed on the site plan, submitted with the planning application, E.I.A.R. and licence application and form part of the surface water drainage network and are routine practice for such developments .

In written format, provide the following:

- a. The capacity of the underground waste water storage tanks for the proposed broiler house.

15.9 m³

- b. Calculations to show that, in the absence of these tanks being connected to the large underground storage tank adjacent to the existing poultry house, there is 28 weeks storage for the proposed poultry house.

The regulations require 26 weeks storage not 28 weeks. Also it is not required that each individual house have 26 weeks storage, the regulations require that the farm have 26 weeks storage. This has been demonstrated in the application. It is at the discretion of the applicant to provide additional facilities over and above the 26 week minimum if he deems it warranted.

3. Water supply

Conflicting information has been provided regarding water sources in the EIAR submitted, which refers to a farm well and Attachment 4.6.1 - Water and Energy Usage which refers to public supply. With regards to the water supply for the installation, provide the following:

- a. Clarify the total expected annual water usage for the activity,

5000 m³

- b. Clarify the proposed sources of water to be used for the activity and the quantity of water usage expected per annum from each source;

Currently the water supply is from the local Kilkitt water supply. A well may be installed in the future but there is none currently.

- c. Clarify the location(s) on the site map, of any existing/proposed groundwater well(s).

N/A

4. Nutrient Deposition Rates

Note that the Agency has recalculated the nutrient deposition quantities for the free-range areas associated with this application based on Table 6 of the Nitrate Regulations (S.I. No. 605/2017).

In this instance (and notwithstanding that both calculation methods show the activity compliant with the 170 kg organic N/Ha limit) I would not concur that table 6 is the appropriate data to use. Table 6 does not contain reference data for free range broiler production and specifically does not allow for a significant reduction in the number of cycles per annum. The proposed free range production system is limited to c. 5 cycles/annum unlike the conventional broiler system at closer to 7.5.

The figures as presented are based on data contained in S.I. 113 of 2022 (not SI 605/2017 as referred to) and are appropriate for use in this instance. This issue has previously been addressed with the Agency in respect of other licence applications, whereby soil samples were taken from the range area of 2 No. existing houses operating under similar management criteria for in excess of c. 10 years. The results obtained demonstrated a very low Soil P (significantly deficient Soil P Level), and based on the results obtained it is safe to say that the lands were being depleted of P due to the crop/silage removal, and thus supporting the position adopted (if not demonstrating that the calculation method adopted still overestimates P returns to the grassland area.)

Notwithstanding the above the management system can be revised to remove additional cuts of silage off the range area were it to be determined that soil P levels were increasing, above target level (index 3).

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

NO revisions required.

The logo for CLW Environmental Planners Ltd. features a stylized graphic on the left consisting of overlapping squares in shades of blue and green, intersected by a vertical black line. To the right of this graphic is a solid black horizontal bar containing the company name in white serif font.

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

If you require any additional information please contact this office.

Yours Sincerely,

Paraic Fay

Paraic Fay B.Agr.Sc.