



An
Bord
Pleanála

Inspector's Addendum Report ABP-308004-21

Development	Single storey extension to existing abattoir.
Location	Boheradurrow and Meenwaun, Banagher, Co. Offaly.
Planning Authority	Offaly County Council
Planning Authority Reg. Ref.	19325
Applicant(s)	Desmond Kampff and Gwen Worthington.
Type of Application	Permission
Planning Authority Decision	Grant permission
Type of Appeal	Third Party
Appellant(s)	Desmond Kampff and Gwen Worthington.
Observer(s)	none
Inspector	Stephen Kay

1.0 Introduction

- 1.1. This report relates to a third party appeal lodged by Desmond Kampff and Gwen Worthington against a notification of decision to grant permission issued by Offaly County Council for a development described as a single storey extension to an existing abattoir at Boheradurrow and Meenwaun, Banagher, Co. Offaly.
- 1.2. My initial report dated 24th January, 2022 recommended a grant of permission subject to conditions. By order dated 10th February, 2022, the Board decided to defer consideration of the case and to request further information from the applicant.
- 1.3. The content of the request for further information, first party response received and associated third party submissions, together with my assessment of the issue is set out in the following sections.

2.0 Request for Further Information

The applicant was requested to submit the following information:

Potential climate change impacts are considered to be wider than the direct impacts addressed in the Environmental Impact Assessment Report, and to include indirect upstream impacts arising from potential increase in national herd size arising from the increased processing capacity proposed and the potential for additional exports to the Chinese market, and indirect downstream impacts arising from the transportation of the end product to the export market and the disposal of waste / by product material from the development. These indirect impacts on climate are not possible to quantify on the basis of the information presented but could make the achievement of the overall emissions reduction targets / the agriculture sector more difficult. You are therefore required to assess the indirect climate change impacts of the proposed development.

3.0 Responses Received

3.1. First Party Response to s.132 Notice

The following is a summary of the main issues raised in the first party response to the request for further information:

- Appendix 6 of the response sets out a detailed response on the issue of indirect effects prepared by Katestone Environmental Limited. The main points raised in this report can be summarised as follows:
 - An estimation of the emissions from the farm process, the transportation of animals to and from the plant and transport of by products are presented in the report.
 - Stated that Teagasc estimates that the GHG emissions from beef production associated with the proposed abattoir would be 67.16 kt CO₂ per annum.
 - Total GHG emissions associated with transport (up to the transport of end product to distribution centres) is estimated at 3.536 Kt CO₂ per annum.
 - Total GHG emissions associated with by-products associated with the development are estimated at 1.125 kt CO₂ per annum.
 - Overall total GHG emissions associated with the development estimated at 72.9 kt CO₂ per annum (breakdown provided in Table 9 of Katestone report).
 - The breakdown of the predicted GHG emissions associated with the development as a percentage of national GHG emissions is presented in Table 10 and indicates that, in 2024, the development would equate to approximately 0.33 percent of national agricultural emissions and 0.12 percent of total emissions.
 - That the total emissions from the development represent a total of 0.77 percent of the proposed emission reduction target for national emissions and 3.0 percent of the proposed reduction target for

agricultural emissions as per the With Additional Measures targets set by the EPA in 2020.

- On the basis of the above that neither the total emissions from the development or the emissions as a percentage of reduction targets are significant.
- That the national herd is increasing by 1.5 percent per annum to a total of 7,314,400 in 2020 (as against 6,493,000 in 2011). The proposed development will require c.36,000 animals per year but the national herd is increasing by c.110,000 every year.
- That live cattle exports for the year 2020 were 263,861 (details provided at Appendix 2 of the submission). Regarding exports, Banagher Chilling are not proposing to apply for a non-EU licence and Ireland has no trade agreement with China (see Appendix 4).
- That the yearly slaughter rate at licenced DAFM plants in 2020 was 1,798,682 animals and therefore the 36,000 animals proposed at the current facility would constitute a very small percentage of the national total.
- That the 36,000 animals per annum is as per the DAFM EU licence application made by Banagher Chilling. A copy of the licence application is included at Appendix 5 of the submission.
- That the plant will export frozen meat to the EU market.
- That the plant will be self sufficient in terms of water and waste water treatment.

3.2. Third Party Responses

The first party submission in response to the s.132 notice was circulated to the third party appellants and the Planning Authority for comments. The following is a summary of the main points raised in the submission received from the third party appellants:

- Still consider that the potential environmental impacts of the development would be negative in terms of their impact at a local and national level as well as on Irelands global climate commitments.
- That the approach regarding herd size is invalid as it does not take into account that the size of the national herd will have to fall to meet Irelands climate change commitments.
- That the agriculture sector comprises 37.1 percent (in 2020) of Irelands GHG emissions and Ireland has committed to reducing emissions by 22-30 percent from 2005 levels by 2030.
- That the requirement of 36,000 cattle per annum represents approximately a third of the current increase in herd numbers per annum. A reliance on a continuance of the herd increase would make their business non-viable in the future.
- That there is no basis to the 'conservative assumption' that the majority of supply farms would be located within 25km of the site, and it is submitted that the area within 25km would not be able to support an additional 25,000 cattle.
- That the EPA have significant concerns regarding the increase in cattle numbers and the impact on water quality and biodiversity.
- Regarding the herd size, it is noted that while the net figure has been an increase, that this is largely concentrated in the dairy sector and there has been a fall of numbers in the beef herd.
- That there are other factors that point towards a further likely fall in the beef herd size in the future such as the Governments Beef Exceptional Aid Measure and a general lack of profitability in the sector and the climate crisis.
- That the response indicates a change in focus by the applicant away from the Chinese / non-EU market.
- That the appended Teagasc report (with the response of the applicant) does not fully answer indirect impacts in terms of the demand for Irish beef in the EU market.

- Regarding downstream impacts, submitted that the conservative assumptions regarding trip numbers and location of supplier farms are grossly understated.
- That no quantification of staff transport to and from the site is provided which would be potentially significant.
- That there remain concerns regarding the developments impact on water quality and the response does not provide any further information on this issue.
- In conclusion, the conclusions reached by the first party regarding the non significance of the development in climate impact terms are not accepted and do not take account of the fact that emissions will have to fall to meet national climate targets.

3.3. Planning Authority Response

The following is a summary of the main issues raised in the submission received from the Planning Authority:

- That due to the national herd size increasing by 1.5 percent per annum, the proposed development will not lead to any increase in herd size.
- That the proposed development would comprise a very small percentage of the yearly slaughter rate at DAFM licenced facilities.
- That the applicant is not applying for a non-EU licence and there is no trade agreement in place that would enable exports to China.
- That the development would be self sufficient in water and waste water services / facilities.
- That the greenhouse gas emissions associated with the development as a proportion of total agricultural emissions in 2024 and 2039 are considered not significant.
- That the proposed development would have minimal effect on Ireland achieving proposed GHG emissions reduction targets.

4.0 Assessment

- 4.1. Section 8.4 of my initial report identified a number of concerns regarding the potential climate change impacts arising from the proposed development and highlighted the fact that the assessment as presented focussed on the on site climate change implications of the development. As set out in my initial report, I consider that these on site climate impacts are not significant in terms of their likely impact on climate.
- 4.2. In addition, as discussed at section 7.2 and 8.4 of my initial report, and concluded at paragraph 8.4.19 of that report, I do not consider that it is feasible to consider the site specific upstream indirect effects on the environment arising from potential additional cattle numbers that would act to service the proposed development. The issue of the cumulative climate related impacts of any such increase in herd size is however of relevance and was in my opinion lacking detail in the initial application before the Board.
- 4.3. I note the clarification provided by the first party in their submission with regard to the likely market for animals slaughtered at the facility, and specifically the fact that they state that it is not their intention that the development would serve the Chinese export market. Indeed, as highlighted in the first party response, there is currently no trade agreement with China in place for such exports , albeit that this could change in the future. On the basis of this confirmation regarding end market, the potential indirect climate change impacts arising from downstream deliveries / transport are therefore potentially significantly less than those that were envisaged as possible in my initial assessment.
- 4.4. With regard to the potential indirect effect of the proposed development on climate due to implications for the national herd size, I note the information provided by the first party which indicates that the national herd is increasing by approximately 110,000 animals per annum. The appellants contend that not all of these animals are beef cattle, and there is a basis to the argument that is made in this regard, however it is evident that the national herd is increasing a significantly faster rate than the capacity of the proposed plant. On the basis of the information presented, I consider that there is a strong basis that the herd numbers are increasing such that the additional processing capacity is warranted, rather than the situation being that

the proposed development would lead to a type of 'inducted demand' resulting in further rises in herd numbers.

- 4.5. The information presented by the first party calculates that the estimated overall total GHG emissions associated with the development would be 72.9 kt CO₂ per annum (breakdown provided in Table 9 of Katestone report) and indicates that, in 2024, the development would equate to 0.33 percent of national agricultural emissions and 0.12 percent of total emissions. This assessment includes provision for indirect impacts in the form of animals feeding the plant (36,000 per annum), the transport implications of these animals reaching the plant, the downstream transport impacts, and the disposal of by products. This calculation also includes the on site impacts as set out in the original application / EIAR. The appellants have queried the basis of these calculations on a number of grounds including the assumption that the bulk of animals would be sourced from within a 25km radius of the site and that the number of trips is an underestimation. No alternative basis for calculations of input trips is presented by the appellants and it should be noted that it is not necessarily the case that all of the additional 36,000 cattle would have to be accommodated within the 25km radius of the site as implied by the third party. Clearly existing herds within this radius of the site could serve the development rather than having to be transported to alternative abattoir sites.
- 4.6. The appellants contend that reference to an increasing national herd size is not valid as it does not take into account that the size of the national herd will have to fall to meet Irelands climate change commitments. However, as discussed at Paragraph 7.2 and 8.4.56 of my initial report, pending the agreement of emissions ceilings for the agriculture sector that will be required to give effect to the 5 yearly budgets and the 22 – 30 percent reduction in emissions from the agriculture sector relative to 2018 levels required under the Climate Action Plan 2021, I do not consider that it is possible to determine how emission reductions in the agriculture sector will be achieved or to accurately determine the degree to which the proposed development would or would not be consistent with these emissions ceilings. For this reason, it is not in my opinion a clear basis on which to conclude that the development is contrary to national climate change policy.
- 4.7. In paragraph 8.4.57 of my initial report I stated that on *'the basis of the capacity at the proposed facility being a minimum of 36,000 animals (140 units per day 5 days a*

week by 52 weeks), the proposed development could potentially add approximately 10.7 percent to the number of cattle slaughtered in 2021 (338,000 source Agriland.ie)' and that therefore.....'in a worst case scenario these have the potential to be significant and negative and to make the achievement of the overall emissions reduction targets in the agriculture sector more difficult'. On the basis of the revised figures submitted by the first party as part of their response to the s.132 notice, it would appear that my original figure of 338,000 is a significant underestimation of the number of cattle slaughtered per annum. Specifically, on the basis of the first party submission and supporting information, the annual slaughter rate at licenced DAFM plants in 2020 was 1,798,682 animals and therefore the 36,000 animals proposed at the current facility would constitute a very small percentage of the national total (approximately 2 percent). The potential climate change impacts arising from the proposed development is therefore likely not as significant as I indicated at paragraph 8.4.57 of my initial report.

- 4.8. In conclusion, on the basis of the information presented, and specifically that regarding the intended end market for the abattoir, the plant capacity (36,000) relative to the numbers of animals slaughtered per annum and the increase in herd size per annum, and the calculations with regard to indirect climate change impacts presented, I consider that the proposed development would not be likely to have a significant negative environmental impact in terms of climate.

5.0 Conclusion

- 5.1. Having regard to the above, I consider that the response of the first party comprises a satisfactory assessment of both the likely significant direct and indirect effects of the proposed development in terms of climate. On the basis of the information presented I do not consider that there is a basis to alter my original recommendation and it is therefore recommended that permission would be granted subject to conditions.


Stephen Kay
Planning Inspector

13th May, 2022

