



An
Bord
Pleanála

Inspector's Report

ABP-311130-21

Development	Construction of a two-storey factory development to existing poultry rearing and processing facility. The application relates to a development which comprises an activity that holds an IED licence from the EPA.
Location	Corlattallan, Emyvale, Co. Monaghan.
Planning Authority	Monaghan County Council
Planning Authority Reg. Ref.	213
Applicants	Silverhill Foods Unlimited Company
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellants	Inland Fisheries Ireland
Date of Site Inspection	9 th December 2021
Inspector	Dolores McCague

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1.0 Site Location and Description

- 1.1.1. The site is located at Corlattallan, Emyvale, Co. Monaghan, on the northern outskirts of the settlement on either side of the N2. The part to the east of the N2 comprises agricultural land and a developed site where the existing Silverhill Foods factory is located. To the west of the N2 it comprises agricultural land.
- 1.1.2. This is a drumlin landscape and the lands within the site are undulating. In the south-western corner, the site falls towards two small lakes which are outside the site. West of the N2, the land is above road level and slope upwards to the north west. The road gradient is upwards north from the town
- 1.1.3. Corlattan Stream, which rises to the west is a depositing lowland river and is the receiving water for treated effluent.
- 1.1.4. The site is occupied by an existing factory comprised of several buildings and other structures including waste treatment and sludge storage facilities, and by a poultry rearing operation comprised of several buildings and other features including slurry storage facilities. The activities are combined on the site and have shared facilities.
- 1.1.5. The site is licensed by the EPA (licence register number P0422-03, recently reviewed, which limits the number of birds (ducklings) housed at the installation to 100,000 and limits the slaughter of ducks at the installation to a carcass production capacity of 50 tonnes per day).
- 1.1.6. It is stated in the application that the EPA licence permits a maximum stocking rate of 435,000 ducks and that the poultry rearing on site previously accommodated 435,000 units.
- 1.1.7. The site is given as 37.93ha.

2.0 Proposed Development

- 2.1.1. The proposed development consists of the:
 - (1) Construction of a part single storey / part two storey development, incorporating chilling, plucking and processing areas, offices, plant rooms, lairage, loading and unloading areas, canteen, hygiene facilities and single storey conveyor linkage to existing factory facility.

- (2) Single storey skip storage and plant room (36m x 9m).
- (3) Construction of 2 x underground water storage tanks.
- (4) Single storey extension to side of existing storage shed for use as offal processing facility.
- (5) Provision of additional car parking spaces, security fencing and access roads.
- (6) Connection to existing on-site mains foul sewer, water, and drainage services.
- (7) Partial removal of existing concrete yard areas and associated structures.
- (8) Installation of solar panels to roof structures.
- (9) Construction of underground attenuation drainage system.
- (10) Completion of all associated site structures and ancillary site works including a treated effluent wastewater drip irrigation system encompassing 8 plots of land spread over c 15 hectares with a total disposal volume of up to 480m³ per day.

The application relates to a development which comprises an activity that holds an IED licence from the EPA.

2.1.2. The extension to existing buildings to incorporate a new offal processing facility and all associated site works will take place to the rear of the existing plant on brownfield lands. The duck rearing houses which occupied the part of the site proposed for development have been demolished and concrete hardstanding areas remain.

2.1.3. The application was accompanied by:

- Environmental Report to Support Planning Application, by Rowan Engineering Consultants Ltd, including responses to issues raised during pre-planning meetings.
- Roof Mounted PV Panel General Detail.
- Traffic & Transport Assessment (TTA) by O'Reilly Stuart (ORS).

3.0 Planning Authority Decision

3.1. Decision

3.1.1. Planning authority decided to grant permission subject to 26 conditions, including:

- 1) Development contribution.

- 2) Use to be confined to the uses specified on plans and documentation lodged with the planning application and submitted 7th January 2021 and 22nd June 2021.
- 3) Site appearance and wheelwash.
- 4) a) No pet food processing shall take place on site until the activity is licenced by the EPA.
b) The development/facility hereby approved shall be operated in accordance with the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017.
c) All organic fertiliser generated by the development hereby approved shall be conveyed through properly constructed channels to the proposed storage facilities and shall not discharge or be allowed to discharge to any stream, river, watercourse, groundwater body or public road.
d) All organic fertiliser generated by the proposed development shall be disposed of in accordance with the details submitted to the planning authority on 22/06/2021 and in accordance with the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017.
e) The applicant to submit a copy of record 3 forms for the off-site movement of duck slurry no later than 31st December each year.
f) The applicant to submit a copy of record 3 forms for the off-site movement of process sludge no later than 31st December each year.
g) The applicant to notify Monaghan County Council's environment section 1 week prior to the off-site movement of process sludge. Notification to detail land bank location and means of application.
h) Landbanks at Kilbern and Dernalosset, as identified in the information submitted on 22/06/21, shall be omitted for the purposes of land spreading process sludge arising from the development. Alternative proposed suitable land banks to be submitted for the written agreement of the planning authority prior to the commencement of development.

- i) There shall be no change in poultry type, or increase in the numbers of poultry being accommodated at this site, unless otherwise agreed in writing with the planning authority.
 - j) re. construction and demolition waste.
 - k) re. waste oils.
 - l) re. hazardous wastes.
 - m) re. recyclable waste.
 - n) The applicant shall immediately inform the planning authority & Inland Fisheries Board of any accidental spillage of wastewater, organic fertiliser, fuel, machine oil or any other substance which may threaten the quality of any watercourse or groundwater body.
 - o) notification of construction spillage.
 - p) Organic fertiliser shall be taken offsite by the contractor/hauler as stated in the planning application. The contractor must be registered with the Department of Agriculture Food and Marine and the organic fertiliser shall be utilized in accordance with the requirements of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017. Any changes in contractor shall be agreed in writing with the planning authority.
 - q) Revised letters of intention to be submitted from contractors removing dead birds and manure.
 - r) Prior to the commencement of development on this site, an Environmental Management Plan to be submitted for the written agreement of the planning authority, which will clearly outline associated risks and proposed measures and actions, related to malfunction of shut off of the drip distribution system.
- 5) Prior to the commencement of development the developer shall contact Irish Water regarding the provision of water and sewerage services necessary to enable the proposed development and to confirm acceptability of the proposed development with regard to source/ network infrastructure.
- 6) a) works in accordance with drawings.

- b) recommendations of stage1/2 Road Safety audit to be implemented in full and in accordance with the letter of Michael Hetheron Arch & Eng Services titled Roads Audit dated 22nd June 2021.
 - c) no works or modifications are permitted to be undertaken to the existing development entrance from the N2.
 - d) prior to and during construction any pumping of groundwater, surface water or any other potentially polluting discharges or any other effluent, under the relevant Water Pollution Acts, the applicant must apply for a licence from the Local Authority.
 - e) re. consent for any works on the public road.
 - f) no discharge of surface water onto the public road.
 - g) All surface water management/SUDs works to comply with Monaghan County Council Technical Guidance Document (WSTGD 2008) and Monaghan County Council Storm Water Technical Guidance Document 2017.
 - h) The Local Authority shall be notified at least ten days in advance of the commencement of any proposed drainage works. The Local Authority reserves the right to inspect drainage works during construction to ensure compliance. Pipelines and manholes are to be inspected and tested as required by the Local Authority. The Local Authority shall be afforded the opportunity to attend the pipeline testing and should be given three working days notice of same.
 - i) re. cleansing of surface water drains on completion.
- 7) a) Approved attenuation/SUDs system to be installed in association with the proposed development. The attenuation system shall be installed strictly in accordance with manufacturers/suppliers specification and recommended installation details. Developer shall provide and install approved flow control device on storm outflow from this development, downstream of attenuation system, which will limit the storm run-off flow to the permitted outflow rate. Details of SUDs/ attenuation specification requirements and installation to be agreed with Monaghan County Council.

b) Prior to and during construction any pumping of groundwater, surface water or any other potentially polluting discharges or any other effluent, under the relevant Water Pollution Acts, the applicant is obliged to apply for a licence from the Local Authority.

8) a) re. car park.

b) re. car park.

c) re. car park.

d) before the structure(s) hereby permitted are first utilised, the new yard and car parking areas shall be laid out and thereafter be kept free from obstruction at all times.

9) re. advertising.

10) in accordance with the plans and documents submitted.

3.2. Planning Authority Reports

3.3. Planning Reports

3.3.1. There are two planning reports on the file. The first recommending a further information request, which issued, includes:

The application site extends across 37 hectares which includes all of the established commercial operations associated with the duck processing company. The proposed development of a new factory, extension to existing buildings to incorporate a new offal processing facility and all associated site works will take place to the rear of the existing plant on brownfield lands. The duck rearing houses once occupied these lands but they have been demolished and removed from the site and concrete hardstanding areas only remain.

The topography of the lands is relatively flat to the rear of the existing factory and ground levels fall significantly to the north and east. These areas of the site currently contain tanks and a settling pond. An internal access laneway provides access to these lower lying areas of the site where the proposed offal processing plant is located.

The site is located within the development limit of the Tier 4 village of Emyvale. Within such development limits, the development plan states that planning permission will be granted for appropriate development proposals which are in keeping with the size and character of the settlement, which can be accessed and serviced satisfactorily, and which are appropriate in terms of use. The use of the site is well established. As a result of this established use coupled with the location of the site on the edge of the settlement, the principle of the proposed expansion is acceptable.

Existing:

- The existing complex operates on site as follows:
- Day old chicks are transported from the hatchery in Bragan to the duck rearing units. Two duck rearing farms are managed by Silverhill along with 23 contract growers located in a number of counties.
- Bird numbers on the application site are currently permitted at 96,000 birds whereas in the past the farm housed 435,000 birds.
- At 42 days old the ducks are slaughtered in the processing plant and are produced in both cooked and raw duck products with circa 3.5 million ducks processed per year.
- Feathers are washed at the onsite feather plant, sorted and sold or made into products for selling. All waste feathers are sent off site for disposal.

The proposed development comprises:

- New factory building to incorporate chilling, plucking and processing areas, offices, plant rooms, lairage, loading and unloading areas, canteen, hygiene facilities and single storey conveyor linkage to existing factory.
- Factory dimensions 76m x 54m x 11.5m high (max) – total floor area 5224sqm. External finish olive green cladding and solar panels on the two storey element.
- Single storey skip storage and plant room (36m x 9m).
- 2 x underground water storage tanks (one located within the proposed factory building).

- Single storey extension to side of existing shed and change of use of this building to offal processing plant. Dimensions of extension 20m x 23m x 9.6m high.
- Total floor area to be used for offal processing use 881 sq m.
- Provision of 60 additional car parking spaces, security fencing and access road network.
- Two external gantry to skip house and chill area from proposed factory which extend for 12m at heights of 4.6m and 7.5m from the factory finished floor level (ffl).
- A conveyor line inward and outward from the existing factory to proposed factory chill room which extends for 77m at 4m wide.
- External fire escape stairwell.
- New internal access roads, footpaths, security fencing and retaining walls.

The proposed offal processing plant will convert the raw material for use in the pet industry or other similar industries. This process will involve cooking the offal and then separating the solid material and the fat. The building in which this process will take place was previously built for the processing of duck waste using anaerobic digestion. Permission is now being sought to change the use of this building and extend it. Continuous dry rendering will process circa 18 tonnes per day of duck by-products, resulting in 5t/day of rendered oil and circa 3t/day of render solids. The outcome of the process will be a solid material, a fat liquid and effluent. No third party offal will be brought on site and this process will work in tandem with the processing plant.

The building design is acceptable in principle.

Environmental Issues:

The wastewater generated on site is pumped to an existing waste water treatment plant on site where the effluent is treated and discharged to a local watercourse. Current discharges are c230m³ per day which will increase with expansion to 480m³ per day. Duck slurry from the plant is diverted to the slurry

storage lagoon storage area and is used in land spreading and, as per EPA licence, this is undertaken in accordance with nutrient management plans.

It is proposed to install a new drip distribution system which would use land adjacent on which treated water would be piped to the fields and dispersed in the soil matrix using a network of distributor pipes. The design flow rate is 480m³ per day. There is also permission from IW to discharge to Emyvale WWTP a maximum of 230m³ during the hours of 20.00 and 7.00 with no shock loading to the public sewer at any time; and a requirement from IW to provide two days effluent storage at the premises in order to control the release of effluent to Emyvale WWTP.

The proposed offal/pet food processing plant will generate a volume of c150m³ per week. It is stated that the existing WWTP has sufficient capacity to treat this effluent, however it is unclear if these figures have been included in the combined total effluent figures provided for the entire development being proposed.

Citing reports and submissions.

AA – there is reasonable certainty that the proposed development will have no direct, indirect or cumulative impacts on the conservation status of the Natura 2000 network.

EIA – schedule 5 part 2(7) food industry ‘installations for the manufacture of vegetable and animal oils and fats where the capacity for processing raw materials would exceed 40 tonnes per day’. The proposed development will process c 18 tonnes per day: 5t/day fat, 3t/day solids. Assessing the development against the criteria in Schedule 7, it is unlikely to have significant effects on the environment. EIA is not required.

3.4. Other Technical Reports

3.5. Environment Section, 25/02/2021 – discrepancies in the application re. conditions in EPA proposed licence P0422-03 – the application details a maximum stocking rate of 435,000 ducks, the licence 100,000. Licence (3.24) a minimum of 15 days storage for treated effluent, not shown on drawings. Licence (5.8) in the case that the discharge to drip irrigation is deemed unsuitable, the effluent must be diverted to lagoons. These lagoons are not detailed in the application. The applicant has

proposed a back-up plan in case of drip distribution failure and less than 15 dilutions in the Coratallan stream, this involves the discharge of effluent to Emyvale WWTP at off peak times. The proposed licence states that only domestic waste be discharged to the public sewer.

Mountain Water 10 – high status water body and one of a few in the country. It is currently a blue dot catchment which will involve research and monitoring programmes in order to assess and determine the reason for its high quality and compare with similar catchments. A team established by EPA will begin work in this waterbody. The application lists townlands in this water body which will be used for the application of sewage sludge from Silver Hill Foods to land. Details are lacking. Exact landbanks and methods of application will be required in order to assess suitability. The proposed pet food processing plant will change the effluent and in turn the sludge characteristics. It is important that an assessment of proposed processes effluent loadings and nutrient characteristics are submitted also.

Mountain Water 20 – good status water body and one which the local authority are tasked with protecting and improving. Townlands in this water body will be used for the application of sewage sludge. Exact locations and proposed effluent characteristics will be required in order to properly assess landbanks.

Mountain Water 40 - water body in an at risk category and a tributary of the Ulster Blackwater which the local authority are tasked with improving. The proposed drip irrigation system poses a threat to the improvement of this waterbody. Without evidence of hydrogeological assessments it is difficult to determine the potential for its success. Attention is given to the EPA Pollution Impact Potential Mapping (PIP) in terms of vulnerabilities and susceptibilities. The site proposed for the drip distribution system lies in vulnerabilities classified as high and moderate in terms of near surface phosphate susceptibility. This means that the land is a high run off risk in terms of phosphorus and other parameters which would be unsuitable.

Emy Lake – this lake is currently in an at risk category and a tributary of the Ulster Blackwater which the local authority are tasked with improving. The lake is also a water supply. Surface waters from the facility flow towards the supply. Contamination of the surface watercourse was observed by Environment section staff in 2019 which resulted in the EPA issuing direction in this regard.

Due to the existing and proposed exports of duck slurry and sludge into the Mountain Water catchment and the waterbody risks, the cumulative impact on nutrient imports on water quality status throughout are to be addressed.

8.15.3 of the licence states that as a minimum the discharge of treated effluent shall be carried out in accordance with the requirements of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017, as amended. This regulates against the discharge of any organic fertiliser over the winter months and soiled water during periods when the ground is waterlogged, snow covered or frozen. If the EPA consider the effluent discharge as an organic fertiliser or a soiled water, this would significantly limit its use.

Further information:

Maps of landbanks and associated herd numbers, method of application and how WFD targets will not be adversely impacted; reference to PIP mapping.

To assess cumulative impact of both sludge and duck slurry application in both sensitive and at-risk waterbodies, maps of landbanks and herd numbers (1:500) and details of proposed methods of application, and how WFD targets will not be adversely impacted; reference to PIP mapping.

Details of storage facilities.

Details of lagoon storage.

Details of slurry storage during 26 weeks closed period.

Details of how it is intended to comply with the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017, as amended.

No. of birds to be grown.

Maximum and minimum loading rates.

Written confirmation re. discharge to Emyvale WWTP.

3.6. Environmental Health – 16/02/2021 – no objection.

3.7. Roads Section – 12/02/2021 – the applicant has not submitted updated drawings incorporating the 7 recommendations in the RSA. Concerning the TTA, it is noted that paragraph 4.3 table 4.4 junction modelling highlights a warning with level of service (LOS) for stream B-AC for the future years 2027 and 2037. Appendix B

Junctions 9 modelling data further highlights that stream B-AC has a level of service warning for 2022, 2027 and 2037. No discussion or justification has been provided for the LOS warnings.

Concerning the TII submission that the analysis does not constitute a TTA in accordance with the TII Traffic and Transport Assessment guidelines 2014 and a TTA in accordance with the guidelines should be carried out.

Further information:

- a) Submit revised drawings incorporation RSA recommendations.
- b) Liaise with the LA prior to submitting a revised TTA.

3.8. Water Services Section – 18/01/2021 – no objection.

3.9. Chief Fire Officer – 04/02/2021 – conditions.

3.10. **Further Information Request**

3.10.1. A further information (FI) request issued 3rd March 2021, which included:

1 Gyosynthetic Report.

2 To assess environmental impact:

- a) Landbanks
- b) Storage facilities (15 days)
- c) Existing and proposed capacity of lagoons.
- d) How the applicant intends to comply with the European Union (Good Agricultural Practice for the Protection of Waters Regulations) 2017 as amended in relation to drip irrigation as a means of soiled water application as per 9.22 of the licence.

Section 18 (2) of the regulation states that:

Organic fertilisers or soiled water shall not be applied to land in any of the following circumstances – (a) the land is waterlogged, (b) flooded or likely to flood, (c) the land is snow covered or frozen, (d) heavy rain is forecast within 48 hours or (e) the ground slopes steeply and there is a risk of water pollution having regard to factors such as surface water runoff pathways, the presence

of land drains, the absence of hedgerows to mitigate surface flow, soil condition and ground cover.

The applicant to assess the landbanks for drip irrigation in this regard and provide details on how compliance with best practice will be achieved in application of soiled water every 15 days, taking account of distribution rates and volumes. Applicant also requested to assess and provide details of how the proposed areas for drip irrigation comply with section 18(2)(e) above. Details of inclines to be submitted.

Number of birds to be grown at this development.

Maximum and minimum loading rates, effluent characteristics including changes in sludge characteristics from the addition of the pet food production process. Include primary product waste and products used in wash down and cleaning attributed to the new process. Submit written confirmation from the licensing section of the EPA that the proposal to discharge up to 21m³ of effluent per hour between the hours of 20.00 and 7.00 daily (with a total maximum discharge of 230m³ in this period) to Emyvale WWTP is acceptable to the EPA and permitted under proposed EPA licence P0422-03.

3 Drawings which incorporate stage 1 Road Safety Audit.

4 Re. car parking spaces.

5 Response to submissions.

3.11. Further Information Response

3.11.1. A further information (FI) response was received 22/06/2021, which includes:

- 1) Gyosynthec Report.
- 2) Landbanks – report from Rowan Engineering Consultants.
- 3) Revised RSA report and drawings.
- 4) Carparking for 198 spaces based on TRICs survey carparking requirement for 145 spaces.
- 5) Responses to submissions.

3.11.2. Drainage - The response from Michael Hetheron Architectural & Engineering Services Ltd includes runoff calculations and attenuation design for three catchments

at the factory site and proposed attenuation at three locations, of 1748m³ for catchment 1, 900m³ for catchment 2, and 1103m³ for catchment 3.

Main facility – 2000m³ – 363m³ (permissible discharge) 1637m³ to be stored on site. The existing lagoon 1000m³ and 637m³ in the carpark,

The existing lagoon has capacity of 2660m³ approx, which will suffice for the 1000m³ excess for the facility.

Offal processing unit and collection area – total catchment area 10,886sqm, 818m³ stored on site. The lagoon has capacity, 2660m³ which will suffice for the 1000m³ excess from the main facility and 818m³ from the offal processing area.

Lower Poultry units and grow houses collection areas – total catchment area 13,337 sqm: 1035m³ stored on site: swale volume 520m³ additional attenuation of 513m³ subject to infiltration rates.

3.11.3. Rowan Consultants re.:

Slurry management.

Treated Wastewater disposal.

Appropriate assessment.

Further details of the proposed pet food plant.

Slurry management:

The existing EPA licence on the farm permits a maximum stocking rate of 435,000 ducks. Over recent years Silver Hill have initiated a programme of contract rearers, similar to the model adopted in other areas of farming and in particular chicken rearing. The principal benefit is bio-security. Bird numbers on the farm have been reduced and are now anticipated to be c22% of that currently permitted (c96,000 birds). This will have a significant impact on the volume of organic manure to be produced on the farm. Organic fertiliser is also more distributed. The management of the remaining ducks, it must be remembered that the farming practices are already authorised at a much higher capacity and in effect Silver Hill are looking to scale back the authorised level of activity in this regard. All organic fertiliser from this farm is collected and stored in accordance with the requirements of SI. 605 of 2017 as amended. The material is all allocated (documented) and made available to customer farmers to utilise as an organic fertiliser source, to off-set expensive chemical substitutes.

Once the organic fertiliser leaves the farm the requirements of SI 607 of 2017 are quite prescriptive and descriptive. All organic fertiliser must be recorded and signed for, and a copy of all records submitted to DAFM at year end. These records must include the farmers name, herd number, nutrient content of the organic fertiliser, volume, and be signed by the importer and exporter. DAFM then use this information in addition to the customer farmers on-farm livestock details to assess compliance with of SI 607 of 2017, as amended. Where breaches are identified automatic penalties will issue.

Silver Hill maintain their record of slurry dispatched from the farm on a continuous basis. GDPR restrictions – the applicant is restricted in their distribution of these records. Silver Hill are in a position to provide the herd number of the importing farmer and the amount received for the last number of years to Monaghan Co Co. This information will allow Monaghan Co Co. to liaise with DAFM to receive the most up to date information (incl. maps, stock numbers and N and P details) on the customer farmers, while allowing the applicant to comply with GDPR requirements. Given in particular that the farming activity will reduce as a result of this application it is felt that this approach is both pragmatic and proportionate, and in compliance with legislation. The customer farmers that have used organic fertiliser in recent years are the most likely to use same forthwith.

Wastewater disposal – drip irrigation back up

All process/dirty water is piped to the wastewater treatment plant on site for biological treatment and is discharged to a local watercourse in compliance with the EPA IE licence.

The site plans to phase out this discharge to the Corlattalon stream and a new drip irrigation system would use land adjacent to the site in up to 9 or 10 plots, each with an area of 15 ha. Treated water would be piped to the fields and dispersed in the soil matrix using a network of distributor pipes. The design flow rate would be 3l/m²/day of 480m³/day.

The existing WWTO is licensed to discharge 480m³/day with current flows in the region of 220m³ – 280m³/day.

Silver Hill have also gained permission from IW to discharge to the town sewer at a maximum discharge limit of 21m³/hour between the hours of 20.00 and 7.00 daily with a total maximum discharge of 230m³ in this period, and no shock loading.

Options:

- normal operations – options A (i) and A (ii) – discharge to drip irrigation and / or IW sewer up to specified limits.
- drip irrigation under service - options A (ii) – effluent held in on site tank and then discharged to sewer at allowed times and rates.
- drip irrigation under service and sewer capacity used – option B – discharge to sewer and tankering the balance as needed.
- In the unlikely event that drip irrigation and sewer connection are not available at the same time – option C – all effluent tankered off site for appropriate disposal.

The proposed drip irrigation is detailed.

AA – does not need to proceed to stage 2.

Pet Food Plant – currently offal and carcasses are sent off site as a waste. The option of converting this material into a raw material for use in the pet food industry or similar industries is being examined. The process will involve cooking the offal and separating the solid material and the fat. It is proposed to develop the large building at the environmental site previously built for the processing of duck waste using anaerobic digestion, for the new use. The process involves high temperatures continuous dry rendering and will process c 18 tonnes per day. This is significantly under the 40t/day threshold that warrants EIAR under Schedule 5 of the P&D Regs. The plant includes a thermal oxidiser. Odour control will be by a two stage chemical scrubber that will treat 15,000 m³/hr of air. The outcome of modelling, undertaken for the EPA licence review predicted that the level of odour would comply with the EPA odour exposure criterion relevant to this type of facility.

Effluent of in the region of 150m³ per week or less than 1m³/hr will discharge to the WWTP. The WWTP has sufficient treatment capacity based on hydraulics and effluent strengths, to treat this effluent, an assessment has been conducted to confirm same.

The process will not increase noise levels at nearest noise sensitive locations.

Responses to the itemised queries are given in tabular form. The existing effluent discharge is c230m³/day. Proposed 480m³/day. Discharge of treated effluent to

surface water will be discontinued. A licence review is ongoing. A full review of surface water drainage system has been undertaken and measures including interceptors and attenuation have been designed. The site will now have 3 stormwater discharges only. Greenfield runoff rate is achieved through attenuation. Mitigation includes separation of clean and dirty water systems, interceptors, etc. Landbanks – NMPs based on best practice and in line with SHD (Silver Hill Duck) policies.

Landbanks for sewage sludge – sewage sludge is not (?) generated on the site. NMPs based on best practice and in line with SHD policies. All NMPs are submitted to EPA for review and approval per their requirements. These sludges are disposed of via a NWCPO registered contractor. Contractors for disposal of sewage sludge and duck slurry are detailed.

Habitat protection issues – EPA have advised that they have screened out the facility. The Ecological Impact Assessment (EcLA) done as part of the licence review concluded that there was no hydrological link with Sliabh Beagh SPA.

The WWTP is licensed to discharge 480m³/day with current flows in the region of 230m³/day. The current licence also assumes that c200m³/day would be discharged to sewer.

It is anticipated that when the site processes c120,000 ducks a week the waste and wash water will increase to 480m³/day. The drip irrigation system is sized to accept current licence flow rates of up to 480m³/day. This, coupled with the allowance for discharge to sewer recently approved by Irish Water for 230m³/day (at off peak times), gives the site considerable flexibility in terms of future effluent disposal options.

Duck slurry – in 2019 c25,000 m³ of slurry was removed from the site to 81 farmers sites.

In 2019 500 tonnes of sludge was produced as a result of physical and biological treatment of waste water generated at the facility, transported off site and used in landspreading.

74.7ha of available landbanks have been reviewed annually since 2017 and deemed suitable for the application of the organic material; capacity c1190m³/MT of WWTP

sludge during 2019 and 2020, (688m³/MT) significantly above the max of 500m³/MT WWTP sludge to be generated by the facility for both years.

Natura sites of relevance:

Slieve Beagh SPA 004167 6.59km

Slieve Beagh-Mullaghfad SPA UK 9020302 9.3km

Slieve Beagh SAC UK 0016622 11.1km

Lough Neagh and Lough Beg SPA UK9020091 ~70km downstream.

There is no connectivity to closest SPA site. Hydrological connectivity to Lough Neagh is approx. 70km distance and therefore significant effects arising can be ruled out.

The EPA have undertaken their own review and concluded that the development of the site, as associated with the licence review, an appropriate assessment is not required.

Habitats Directive Screening Statement, Whitehill Environmental – growing farm area - there are no direct emissions to surface water from the growing farm area. An adequate rainwater collection system is in place and is inspected every three months. Yard washings are however directed to the surface water system. The yards are washed bi-monthly approx. and the surface water management plan dictates that the yards are thoroughly swept prior to washing to eliminate contamination of the surface water system. All other liquids generated or utilised in the growing area are directed to the slurry lagoon area for storage prior to disposal to land as a fertiliser.

Processing Facility – this generates in the region of 200 cubic metres of process effluent per day. This volume is generated through both factory itself and the feather plant. The effluent is treated to comply with the EPA emission limit values (ELVs). Other surface water discharges from the processing facility take place at four discharge points around the site. Under the proposals for the site, the number of surface water discharge locations will be reduced to 3. A combination of appropriately sized, operated and maintained interceptors and/or attenuation systems will help maintain the quality of the run-off. A surface water management plan is now in place to ensure that no contaminated surface water goes into the surrounding surface water network.

The existing WWTP is licensed to discharge 480m³ /day with current flows in the region of 220m³ to 280 m³/day. Silver Hill have also gained permission to discharge to the town sewer system. There is a requirement to provide two days effluent storage at the premises and also for additional storage capacity for storm conditions (230m³x 2 =460m³ storage volume).

A new drip irrigation system would use land adjacent in 9 – 10 plots, each with an area of 15ha. The design flow rate would be 3l/m²/day of c480m³/day. This gives adequate capacity in the existing wastewater treatment plant. If the Processing Plant reaches maximum capacity of 120,000 ducks a week, this will be a 60% increase from current numbers and it is reasonable to envisage a 60% increase in waste and wash water volumes (400m³/day).

There is one emission point to the sewer SE1, located on the main road outside the plant. It facilitates the handling of sewage from the main office/administration building adjacent to the main processing plant. It is connected to the sewer at the main road outside the plant and has a normal daily flow of approx. 0.6m³ per day. Emissions to air are fugitive emissions from the growing facility (feed, gases from respiration/digestion (CO₂, methane etc), gases from storage and decomposition of faeces (ammonia, methane, hydrogen sulphide, odour etc).

The boiler is gas fired and has a heat output of 1.75MW. A smaller 1.34MW oil fired boiler is also used.

There are minor atmospheric emissions from a propane fuelled water heater, hot air emissions from the ovens in the cooking plant, steam emissions from the heat shrink tunnel and the feather drying process.

Slurry is diverted to the slurry lagoon storage area for removal off-site.

Currently there are no proposals for living ducks to be kept on the site, therefore ammonia / nitrogen emissions from live stock on the site will not arise.

This application does not need to proceed to stage II of the appropriate assessment process.

3.11.4. Rowan Consultants response to items 1-5:

Geosynthec report attached as appendix A to the response;

3.11.5. Geosynthec Report:

Includes:

Conceptual Site Model – CSM:

The aspects to be considered are:

Source Characterisation – what are the constituents of potential concern (COPCs) in the discharge and what is the expected rate of discharge.

Pathway analysis – what pathway will the treated effluent take following discharge, to what extent will the COPCs attenuate, is there a potential pathway linking the source to a local receptor.

Receptor Identification - Who or what could potentially be affected.

The flow rate of treated effluent discharging from the waste water treatment is typically in the range 150-300m³/day with an average of approx. 230m³/day

Monitoring of effluent samples during the period January – May 2017 is given in a summary table focusing on those parameters for which Groundwater Threshold Values (GTVs) are specified in the Groundwater Regulations. The discharge is not expected to contain substances that are considered hazardous in groundwater

Parameter	GTV*	Range of Weekly Averages (Jan-May 2017)	Average over period (Jan-May 2017)
Ammoniacal Nitrogen (mg/l)	0.065-0.175	0.04-0.6	0.15
Total Phosphorus	0.035**	0.6-1.1 mg/l	0.84 mg/l
Nitrogen (mg/l)	37.5	0.2-6mg/l	1.2mg/l

* SI No 9 of 2010 as amended

** GTV is for Molybdate Reactive Phosphorus (MRP)

From the perspective of compliance with the Groundwater Regulations, the key parameters to consider in relation to the proposed indirect discharge are ammoniacal nitrogen (total ammonia) and MRP.

With regard to ammoniacal nitrogen, the GTV of 0.65 mg/l is applicable when considering potential impacts on surface water bodies from groundwater inputs,

whereas the GTV of 1.75mg/l is applicable when considering whether the ability of groundwater in the GWB to support human uses has been significantly impaired.

With regard to phosphorus, the GTV is for MRP rather than total phosphorus. The GTV for MRP of 0,035 mg/l is applicable when considering potential impacts on surface water bodies from groundwater inputs.

It is recognised that pathogenic micro-organisms may be present in the treated effluent. Although there is no applicable GTV for pathogens, the potential for pathogens to be present in the treated effluent has been considered in the assessment.

Pathways: Treated effluent may be drawn into the root zone of plants growing in the topsoil and emitted as water vapour to the atmosphere via the process of transpiration. The proportion of the treated effluent that is not drawn into the root zone of plants can be expected to migrate vertically down through the unsaturated zone soils to the water table, which, based on available data lies close to the interface between the glacial till and the underlying bedrock. There it is expected to discharge to the underlying limestone aquifer. The rate of migration can be expected to be relatively slow, given the predominantly silty nature of the till; travel time may be of the order of one year. Lateral flow of groundwater within the glacial till is expected to be limited and has been ignored.

Groundwater in the bedrock aquifer flows generally towards the south-east.

Potential Receptors: Users of groundwater. Mountain Water is not considered due to the small contribution of groundwater relative to the flow rate in the river.

Conclusions – based on the CSM: Any impact on the bedrock aquifer as a result of the proposed discharge in terms of increases in COPC concentrations is expected to be minor. Exceedence of GVTs for the key COPCs is not expected at any point within the aquifer.

The discharge is not expected to have a significant impact on groundwater quality in the three abstraction wells currently used by Silver Hill Foods; however, on-going chlorination of the water prior to use is advised as a precautionary measure.

The discharge is not expected to have any impact on local surface waters, provided application rates are monitored and controlled.

Attachments:

Hydrogeological Assessment of Proposed Drip Irrigation System

Appendix A Borehole log

Appendix B Geological Survey Maps

Appendix C Report of Percolation Tests

Aquifer Vulnerability Assessment NMP 2021 Rowan for 6 holdings.

Copy of Industrial Emissions Licence – P0422-03

Copy of Wastewater Connection Offer to IW network (based on a high level desk top analysis); and correspondence including a topographical survey (contour survey) by Rowan Consultants.

3.12. Further Planning Authority Reports

3.13. Roads Section – 02/07/2021 – conditions.

3.14. Environment Section – 14/07/2021:

The assessment of groundwater vulnerabilities is adequate and addresses the response matrix for landspreading of organic fertiliser all landbanks highlighted as at risk to groundwater should be excluded as part of this application. No assessment has been carried out however in relation to pollution runoff potential as per the EPA pollution impact potential mapping. No information on application method of sludge to land has been submitted. Submitted information does not adequately address 2.2.

Following on-site inspection and assessment of near surface phosphate susceptibility and pollution impact potential mapping, consideration has been given to methods of application of sludge and the potential impact on the receiving waterbodies for each landbank.

An assessment is made of each submitted landbank of which 4 are detailed:

Identified lands at Killybern in Mountain Water 020 catchment, a blue dot catchment – ponding of liquid sludge was noted on inspection. The application method by umbilical system and landspreading did not appear to be uniform or conform to good landspreading practice. Lands are identified as ‘rank 2’ for near surface phosphate susceptibility. Landbanks should be omitted.

Identified lands at Dernalosset in Lisvargy 10, a tributary of Ulster Blackwater River, no assigned status. Pollution impact potential high and near surface phosphate susceptibility for this landbank are high. Restore and protect – due to the risk to the tributary from sludge application is high. Landbanks should be omitted.

Identified lands at Killybressal in Lisvargy 10, a tributary of Ulster Blackwater River, no assigned status. Pollution impact potential and near surface phosphate susceptibility for this landbank are high. Restore and protect – the risk to the tributary is deemed high. Sludge application only by means of trailing shoe.

Identified lands at Dundian in in Lisvargy 10, a tributary of Ulster Blackwater River, no assigned status. Pollution impact potential and near surface phosphate susceptibility for this landbank are high. Restore and protect –.sludge application only by means of injection.

Storage facilities – the submitted information is incorrect, but capacities have been demonstrated.

Licence P0422-03 has been granted since this request for additional information. In reference to the drip irrigation system, the licensee now refers to the discharge of treated effluent. Schedule C6 of P0422-03 refers to the Code of Practice for Drip Irrigation of Treated Effluent. The submitted additional information has assessed the criteria separately for drip irrigation.

In relation to wet and waterlogged land, flooded land or land likely to flood, the mitigation proposed is additional assessment to follow as part of the pilot scheme.

In relation to snow covered or frozen land, the mitigation proposed is by means of a Drip Irrigation Environmental Management Plan, which will be established prior to commencement of the pilot scheme. This Environmental Management Plan is necessary at planning stage.

In relation to steeply sloping ground where there is risk to water pollution having regard to factors such as surface water runoff pathways, presence of land drains, the absence of hedgerows to mitigate surface flow, soil-condition and ground cover, the applicant states that the topographical survey completed will be included as part of the bidding for the irrigation system. There are no specific site layout plans to demonstrate the location of pipes or pump sumps.

The submitted information in response to 2.4 does not adequately address or demonstrate compliance with the EU Good Agricultural Practice for Protection of Waters) Regulations 2017. A Compliance Management Plan should be completed in order to demonstrate compliance with these regulations.

- e) Capacity for 100,000 birds.
- f) An estimate of BOD and COD loadings for the extra effluent to be discharged have been submitted. There has been no estimate for heavy metals, ammonia, suspended solids, phosphates or pH. It is assumed that the extra loadings will be examined under the license application process associated with this extension to the facility. It is recommended that no production take place until the pet production plant comes under the scope of an EPA licence.
- g) No permission to discharge to Emyvale WWTP.

The additional information lacks the required detail in terms of assessments of landbanks and effluent characteristics.

Apart from the omission of landbanks there are no objections to the application. Conditions.

3.15. Planning report – 19/07/2021 – includes:

The submitted environmental report states that WWTP sludge and duck slurry are managed separately on the site. Sludge is collected and spread on local farms in accordance with a Fertiliser Management Plan which is submitted on an annual basis to the EPA for approval. The 2021 landbanks for the sludge are assessed in Appendix B of the submitted environmental report.

Organic Fertiliser from the site is collected and stored in accordance with the requirements of SI 605 2017, after this, the material is documented and made available to customer farmers to utilise as organic fertiliser. Silverhill are not responsible for the preparation of nutrient management plans (NMP's) required for recovery and as such mapping is not provided for this.

All organic fertiliser must be recorded and signed for and a copy of all records submitted to the DAFM at the end of the year. The records require that the farmers name, herd number, the nutrient content of the organic fertiliser and the volume

recovered must be signed by the importer and exporter. DAFM are responsible for assessing compliance with SI 605 of 2017.

The response states that Silverhill maintain a record of slurry dispatched from the farm on a continuous basis; that due to GDPR regulations these records cannot be provided for the public file, however these records have been reviewed and verified by the Environment Section of Monaghan County Council. Silverhill can provide details of the herd numbers of the importing farmer and the amount received for the last number of years to the EPA. This information can be accessed by the local authority to receive the most up to date information on landbanks, stock number and nutrient levels while ensuring that Silverhill remain GDPR compliant. It is stated that as the farming activity will reduce as a result of this planning application, this approach is practical.

15 days effluent storage from ducks in the growing unit can be provided. The existing slurry lagoon can be retrofitted and subdivided to allow for use as slurry storage in one segment and treated effluent storage in the other. The balance tanks in the WWTP offer c 1.8 days retention at max. flow rates of approximately 880m³. The discharge connection with IW (230m³) per day can also be used in the future to provide additional capacity (details provided in appendix D).

2(c) – the EPA have approved the use of the drip irrigation system (according to Rowan Consultants) per final determination of the licence outlined in appendix C.

2(b) System redundancy capacity, if the drip irrigation system is temporarily off-line, would provide up to 15 days storage. The drip feed irrigation system can be set up on a sector or field basis so that one area can remain unused and allowed to soak for a period of time, while the rest remains active. The monitoring system proposed for the pilot drip feed system will be refined as required for the permanent system.

2 (d) the definition of soiled water in the EU Good Agricultural Practice for Protection of Waters) Regulations 2017 is quoted. It is the assertion of Silverhill that the water to be dispersed to ground, via the proposed drip irrigation system, does not fall under the definition of soiled water in the regulations. Effluent produced on the site is subject to primary and secondary treatment in the on-site wastewater treatment plant and consistently meets the emissions limit values in the site's IE licence. It is proposed that the EPA 2011 Guidance on the Authorisation of Discharges to

Groundwater which was prepared to satisfy the requirements of the European Communities Environmental Objectives (Groundwater) Regulations 2010 (SI No 9 of 2010) is more appropriate. Notwithstanding this, item 2 of the FI request would be addressed under Regulation 4 of the Groundwater Regulations (SI No 9 of 2010). The purpose of the pilot scheme is to establish appropriate application rates to ensure pollution does not occur and to assess risks to nearby receptors by source/pathway/receptor linkage risk assessment. A table has been provided, which identifies scenarios when organic fertiliser or soiled water should not be applied and appropriate mitigation measures.

Silverhill has discussed monitoring options with the supplier of the drip feed system, including the use of probe technology to detect and alert instances of underground water build up.

2(e) Silverhill has capacity to rear 100,000 ducks in the 8 growing units (P0422-03), currently there are no ducks reared on the site. The capacity is kept as a reserve.

2(f) the volume of effluent to be generated on the site will be in the region of 90m³ per week, or less than 1m³ per hour additional flow to the WWTP. This would arise from daily washdowns and 8 hour day operations. The effluent would have a strength of 10,000 COD and c6,000 BOD. The WWTP has enough capacity, both hydraulically and in terms of food mass ratio. The current average is 260m³ per day compared with a licence limit of 480m³.

2(g) the discharge connection has been agreed with IW (260m³), Appendix D, this was included in the licence review application.

Item 3 – revised layout submitted.

Item 4 – county development plan requirement for 190 parking spaces; traffic counts were conducted, 53 cars in over a 12 hour period. No increase in staff proposed. The 151 spaces proposed, an increase of 86, is sufficient. Other responses per TTA are quoted.

Item 5 – response to IFI submission – this was primarily concerned with the WWTP, the response provides an overview of the WWTP on site, including the various stages of treatment of waste water from the processing and feather plant.

Storm water is treated by two drainage systems – surface water and foul sewer. The proposed drip feed irrigation system and connection to the Emyvale WWTP will be used for foul water. Attachment G of the submission contains the drainage drawings.

There are two discharge locations: SW1 draining main process area and car park, via interceptor and attenuation tank to the local stream on the northern boundary flowing to the Ulster Blackwater River; SW2 draining pet food plants and environmental management area, via interceptor and existing lagoon to the local stream on the northern boundary flowing to the Ulster Blackwater River.

All attenuation systems for each of the 3 catchment areas and their associated discharge locations have been designed for the 100 year return period plus 10% increase for climate change. Hydrobrakes are proposed which will limit discharge rates to between 2.2l/s and 4.2l/s.

TII submission response – a TTA has been carried out in conformity with TII's Traffic and Transport Assessment Guidelines; attached as Attachment F.

- 3.15.1. Report recommends that permission be granted in accordance with 10 conditions, which decision issued.

3.16. **Prescribed Bodies**

Inland Fisheries Ireland (IFI) – 10th February 2021 -

includes:

Wastewater Treatment

- It is proposed to treat wastewater in the existing wastewater treatment plant (WWTP). The applicant states that there is sufficient capacity. The documents do not contain this detail. The wastewater from the proposed development is likely to have a high organic and nutrient loading and to contain organic compounds (Sec 4.1.1.b of the EPA BAT Guidance Note for the Disposal or Recycling of Animal Carcasses and Animal Waste).
- This detail should be sought from the applicant to allow a full assessment.

- The EPA Inspector's report addendum 1 and 2 of the IPPC licence review (P0422-03) states that the proposed Pet Food facility has not been assessed in the licence review. IFI consider the application premature.

Wastewater Disposal – drip irrigation

- IFI have concerns regarding proposed drip irrigation. In their experience this method of disposal can be problematic as there are many factors influencing its success, most notably the weather and ground conditions. They have grave reservations about the suitability of the lands proposed for drip irrigation, due to their close proximity to a number of streams and lakes: Corlatallon Stream, Back Lough and Conns Lough. They note that the Proposed Determination for the current licence review includes the requirement for a six month pilot drip irrigation project. It states that drip irrigation must be carried out, at minimum, in accordance with the Good Agricultural Practice for the Protection of Waters Regulations 2017 (SI 605 of 2017).

Wastewater Disposal – drip irrigation back up

- The applicants state they propose to phase out the discharge of treated wastewater to the Corlattalon Stream and that they have received permission from IW to discharge the treated effluent to the town sewer. This is at variance with the Proposed Determination for the current licence review which states that discharge to Emyvale WWTP is only for sanitary wastewater from the facility. The options for disposal of treated wastewater is to the Corlattalon Stream when there is a 1 in 15 dilution available and otherwise discharge is by the proposed drip irrigation.
- The EPA inspector, in the assessment of the current licence, states that the discharge of treated effluent to Emyvale WWTP could not be licensed due to the lack of assimilative capacity at low flows.
- The applicant includes a third option for the disposal of treated wastewater if drip irrigation or sewer connection is not available, to tanker the effluent off-site for appropriate disposal. No further details regarding this option are provided. These details are necessary to fully assess.

Duck slurry & WWTP sludge

- The application contains information regarding the management of both duck slurry and WWTP sludge.

The WWTP sludge is to be landspread on available landbanks in a number of river catchments north of the facility. These catchments include a number of tributaries of the Ulster Blackwater and the upper reaches of the Mountain Water River. The Ecological status of the Ulster Blackwater tributaries is currently unassigned. The Ecological status of the Mountain Water River in the upper reaches is high (Mountain Water_010) and good (Mountain Water_020). Without knowing the exact locations of these landbanks IFI would urge caution regarding the spreading of WWTP sludge in areas in high status waterbodies.

Duck slurry from the facility is to be landspread in accordance with GAP regulations. Without knowing the exact locations of these spreadlands IFI would urge caution regarding the suitability of lands for landspreading given the nutrient value and dry matter content of duck slurry, which necessitates careful management to ensure it does not have a negative impact on ground and surface waters.

Surface water management

The applicant proposes to reduce the number of surface water discharges to three.

The Proposed Determination for the current licence review lists 4 surface water discharge points on site. IFI noted during a site visit in 2020 that the concrete yards at units 8 to 11 were in poor condition and the upgrading of these yards does not appear to be included in the documents. The surface water from the area is discharged to a watercourse, which flows into Conns Lough and from there to Emy Lough. It is important to ensure that surface water management does not have a impact negatively on the aquatic habitat.

- The watercourses on and in the vicinity of the site are tributaries of the Ulster Blackwater River, the Mountain River and Emy Lough. The Corlattan Stream flows into the Ulster Blackwater River at the townland of Killyearagh. Lands to the south and west of the facility are in the catchment of Back Lough and Conns Lake, which flow into the Mountain Water River and Emy Lough. These watercourses contain valuable fisheries habitats and support a variety of fish species and other aquatic fauna.
- The ecological status of these watercourses range from: poor in the case of Mountain River_040 to currently un-assigned as in the case of the Ulster Blackwater tributaries, while the status of Emy Lough is moderate. It is imperative to ensure that

the proposed development does not impact negatively on the current ecological status or impede the achievement of good status, in all of these watercourses, in accordance with the Water Framework Directive.

- Given the lack of detail, IFI objects to this application. Insufficient information to ensure that the proposed development will impact negatively on fisheries habitats.

3.17. Transport Infrastructure Ireland (TII) - 28/01/2021 – insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the National road network in the vicinity of the site.

TII notes the traffic analysis submitted in support of the application. The analysis does not constitute a TTA in accordance with the TII Traffic and Transport Assessment guidelines 2014 and a TTA in accordance with the guidelines should be carried out.

3.18. **Third Party Observations**

None.

4.0 **Planning History**

17/204 - Permission to construct an extension to the rear of existing factory to include 1) additional cooking areas, 2) internal modifications to existing factory, 3) retaining walls and all ancillary site works; withdrawn.

14/145 - a) to demolish 1) existing single storey office building consisting of 162m², 2) portion of existing feather plant building consisting of 227m², 3) existing control building consisting of 35m², and 4) existing skip house building and lairage building consisting of 214m²; b) to construct 1) new two storey over basement centre of excellence office building and connection to existing facility 2) extension to rear of existing feather plant consisting of 196.92m² including 2 no. loading docks and underground feather holding tank, 3) new skip house building and lairage building 4) new car parking area to include palisade 2.2m high fencing surrounding car park, 5) removal of existing weigh bridge and re-location of weigh bridge 6) placement of new façade consisting of architectural panel over existing buildings along public road, 7)

two no. lift barriers and entrance gates, 8) sewage holding tanks and pumping station with connection to mains supply along public road, c) removal of temporary accommodation units d) and complete all ancillary site works; granted.

06/329 - to erect: 1) three number duck houses and associated hardstanding yard area, 2) new entrance onto existing company private access road, 3) upgrading of existing rising main and connection into existing company foul sewer network and storm water collection network and all associated site development and drainage works; granted.

05/750 - erect three number duck houses and associated hardstanding yard area, new entrance onto existing company private access road, upgrading of existing rising main and connection into existing company foul sewer network and storm water collection network and all associated site development and drainage works; granted.

03/674 - erect an effluent treatment plant and anaerobic digester plant consisting of a main processing and storage building, a chemical store and polymer makeup building, 500 cubic metre effluent day tank, 100 cubic metre underground anaerobic digester feed tank and ancillary biogas handling facility, 100 cubic metre underground polymer mixing tank, process cooling tank, 145 cubic metre bunded digester containment tank and permission to erect 1147 cubic metre balance tank and 517 cubic metre anoxic tank and ancillary site works; granted.

02/657 - erect new storey over existing duck processing unit, new canteen area and single storey spice store; granted.

99/420 - erect new office building, car parking area and septic tank; granted.

96/402 - construct an ESB medium voltage substation metering room and extend existing low voltage distribution room at premises; granted.

5.0 Policy Context

5.1. Development Plan

5.1.1. Monaghan County Development Plan 2019-2025 is the operative plan. Relevant provisions include:

Industrial Policies:

INDP 1 The Planning Authority will encourage industrial development at appropriate scales and locations in line with the County's settlement strategy. Generally, where the proposed development is considered to be a significant employer and/or intensive in nature, such developments shall preferably locate within the settlement envelope for Monaghan Town or the Core Strategy's Tier 2 or 3 towns. In exceptional circumstances industries that are tied to a fixed resource and/or require extensive sites or specific settings, to permit their location in rural areas subject to normal planning criteria and environmental legislation requirements.

INDP 2 To assist anyone who wishes to establish or expand industrial, commercial or other such endeavours that will provide increased employment opportunities in the county, subject to normal development management requirements and technical criteria.

Objectives for Industry, Enterprise and Employment:

IEO 1 Ensure that sufficient and suitable land is reserved for new industrial development at appropriate locations, where there are existing infrastructural facilities, services and good communications, or where they can be provided at a reasonable cost.

IEO 2 Facilitate the growth and/or expansion of existing industrial enterprises where appropriate, subject to development management guidelines as set out in Monaghan County Development Plan 2019-2025 218 Objectives for Industry, Enterprise and Employment Development Management Guidelines, Monaghan County Development Plan 2019- 2025. Such developments should not unduly impact on the residential amenity of existing residential properties.

IEO 3 Encourage and promote the sustainable development of industry within the towns over the plan period.

IEO 4 Co-operate with IDA Ireland, Enterprise Ireland, community groups and other relevant bodies to ensure a co-ordinated approach to the provision of necessary infrastructure and services to support industrial development.

IEO 5 Ensure that a high standard of design, layout and amenity is provided and maintained in all new industrial developments.

IEO 6 Continue to support and facilitate cross-border co-operation and trade between County Monaghan and the North of Ireland.

Emmyvale is a Tier 4 settlement:

VIL 3 To consider applications for industrial and commercial development which cannot be accommodated within the village envelopes due to conflict of land uses or amenity on the fringes of the village envelope. Sites on the edges of the village envelopes shall be given preference over those located in the open countryside and any proposal shall comply with all other relevant policies set out in this Plan.

5.2. **Surface Water Regulations**

European Communities Environmental Objectives (Surface Waters) Regulations 2009, S.I. No. 272/2009

Section 5. A public authority shall not, in the performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical status or ecological status (or ecological potential as the case may be) of a body of surface water.

5.3. **Planning and Development Regulations**

Schedule 5 development requiring EIA:

Part 1 -17 installations for the intensive rearing of poultry or pigs with more than 85,000 places for broilers, 60,000 places for hens.

Part 2

1 (e) (i) installations for the intensive rearing of poultry not included in part 1 which would have more than 40,000 places for poultry.

7 food industry:

(a) installations for the manufacture of vegetable and animal oils and fats, where the capacity for processing raw materials would exceed 40 tonnes per day.

(f) installations for the slaughter of animal, where the daily capacity would exceed 1,500 units and where units have the following equivalents: 1 sheep = 1 unit.

5.4. Natural Heritage Designations

- 5.4.1. The nearest protected site is Emy Lough, Proposed Natural Heritage Area, located less than 1km straight line distance to the south east. The nearest Natura site is Slieve Beagh SPA site code 004167, located c 5.5km straight line distance to the south west.

6.0 The Appeal

6.1. Grounds of Appeal

The third party appeal, by Inland Fisheries Ireland (IFI), includes:

- From the further information (FI), and conditions, it is their opinion that there is insufficient information to ensure that it will not have a negative impact on fisheries habitats.
- Their observations were not sought on the FI. From their on-line viewing and viewing in the offices they have not been able to access the planner's assessment of the FI.
- It is proposed to treat wastewater in the existing wastewater treatment plant (WWTP). The applicant states that there is sufficient capacity. The documents do not contain this information. The applicant refers to 480m³/day which is the IE licence limit (P0422-03) and is unlikely to be the actual capacity of the treatment plant.
- The wastewater from the proposed development is likely to have a high organic and nutrient loading and to contain organic compounds (Sec 4.1.1.b of the EPA BAT Guidance Note for the Disposal or Recycling of Animal Carcasses and Animal Waste). BOD and COD are given but no other characteristics.
- It is important to ensure that the existing wastewater treatment plant has sufficient capacity to treat this wastewater.
- They note condition no. 4.a) and the requirement to review the current licence.
- The applicants state they propose to phase out the discharge of treated wastewater to the Corlattalon Stream and that they have received permission from IW to discharge the treated effluent to the town sewer.

- The current licence states that discharge to Emyvale WWTP is only for sanitary wastewater from the facility, disposal of treated wastewater is to the Corlattalon Stream when there is a 1 in 15 dilution available and otherwise discharge is by the proposed drip irrigation. The EPA inspector, in the assessment of the current licence, states that the discharge of treated effluent to Emyvale WWTP could not be licensed due to the lack of assimilative capacity at low flows.
- The applicant includes a third option for the disposal of treated wastewater if drip irrigation or sewer connection is not available, to tanker the effluent off-site for appropriate disposal. The details provided as FI refer only to storage on-site but not final disposal. IFI consider that the alternatives are not adequately addressed, in the event that drip irrigation is not available.
- IFI have concerns regarding use of drip irrigation. In their experience this method of disposal can be problematic as there are many factors influencing its success, most notably the weather and ground conditions. They have grave reservations about the suitability of the lands proposed for drip irrigation, due to their close proximity to a number of streams and lakes: Corlattallon Stream, Back Lough and Conns Lough.
- The current licence includes the requirement for a six month pilot drip irrigation project. It states that drip irrigation must be carried out, at minimum, in accordance with the Good Agricultural Practice for the Protection of Waters Regulations 2017 (SI 605 of 2017). In the FI it is suggested that the drip irrigation system should be operated in accordance with the EPA guidance on the authorisation of discharges to groundwater (2011).
- The watercourses are tributaries of the Ulster Blackwater River, the Mountain River and Emy Lough. The Corlattallon Stream flows into the Ulster Blackwater River at the townland of Killyearagh. Lands to the south and west of the facility are in the catchment of Back Lough and Conns Lake, which flow into the Mountain Water River and Emy Lough. These watercourses contain valuable fisheries habitats and support a variety of fish species and other aquatic fauna. The ecological status of these watercourses are: poor in the case of Mountain River_040 to currently un-assigned as in the case of the Ulster Blackwater tributaries. It is imperative to ensure that the proposed development does not impact negatively on the current ecological status or

impede the achievement of good status, in all of these watercourses, in accordance with the Water Framework Directive.

The reasons for the appeal:

- Insufficient information to alleviate concerns that the proposed development may impact negatively on fisheries habitats.
- Information regarding wastewater management is at variance with the current IED licence and the EPA assessment for same.
- Lack of information on the planning file regarding Monaghan Co Co's final assessment of the FI.

6.2. Applicant Response

6.2.1. Michael Hetheron Architectural & Engineering Services Ltd, have submitted a response on behalf of the applicant to the grounds of appeal. The response attaches a report from Rowan Engineering Consultants, which includes:

- Effluent from the WWTP currently discharges into Corlattalan Stream approx. 1.2 km northeast of the facility which discharges to the River Blackwater approx. 5.6km northeast of the facility. The River Blackwater continues on to enter Lough Neagh west of Derrywarragh Island.
- Silver Hill Foods were advised by the EPA prior to the 2011 Industrial Emissions Application that they believed the unnamed stream into which the treated effluent is discharged did not have the capacity for the volumes of effluent received. A number of waste assimilation capacity reports were produced to assess this, but following lengthy discussions with the EPA, 'the site' has elected to go with alternative disposal routes and the wastewater produced by the site in the longer term will be disposed of by drip irrigation and/or sewer.
- The existing wastewater treatment plant is licensed to discharge 480m³ / day (EPA Licence P0422-03).
- The WWTP process flow diagram is provided.

- The ability of any WWTP to treat wastewater to a specific standard relies on the appropriate systems being installed that can deal with hydraulic flow (m^3/day) and strength (pollutant) loadings.
- Rowan have produced a Red, Amber, Green (RAG) report that shows, in theory, where the pinch points are in terms of the current threshold throughput in the plant; for typically required capacities, versus current ($230\text{m}^3/\text{day}$) and licence limit ($480\text{m}^3/\text{day}$). They conclude that, at the current flow rates, the plant has 200%, if required, treatment capacity at the pinch point which is the DAF unit and even at the higher flow rates, the plant has sufficient capacity to treat the 480m^3 permitted under the licence across all key treatment elements.
- The most recent licence review application (04) also assumes that $230\text{m}^3/\text{day}$ would be discharged to sewer. The connection was approved by Irish Water and payment was made on 2nd April 2021. Silver Hill have an agreement with IW to provide the connection, which is due to be installed in September 2021.
- As regards the pet food project the process is based around high temperature cooking with thermal oxidation of all the vapours coming from the process. The exhaust from this thermal treatment is recovered and used as energy for steam production.
- The only waste water produced will be from cleaning the plant: floors & trailers. There will be no condensed process water that will require treatment.
- Cleaning water from the decanter will contain some solids and fat when cleaned, on shut down at the end of a shift, but this can be collected and processed through the plant next day.
- Wash water from the floor would be the same BOD loading as cleaning water from the main process facility. The 150m^3 low strength, effluent weekly provided for is much higher than expected operational levels. Based on available WWTP capacity, minimal increased loadings from the pet food facility and a connection to IW sewer, the current and proposed systems have more than sufficient headroom to accommodate the proposed development.
- Licence P0422-03 does not consider discharge to the IW sewer as a disposal option, although it was included in P0422-02. The review, P0422-04, assumes

230m³/day would be discharged to sewer and Silver Hill have an agreement with IW.

- The inspector's report 4/12/20, referred to by IFI, relates to the review of licence P0422-03. The planning permission now being sought has been progressed by Silver Hill, in parallel with a licence review, to address plant expansion, including the Pet Food Plant licence review application P0422-04.
- There are no reports/findings specific to Emyvale WWTP that have been published by the EPA or IW that they have found, that would suggest that the plant cannot receive treated effluent from sites within the agglomeration for further treatment and release. IW will have assessed their capacity to take this effluent before an offer was made.
- They list the options available for disposal of treated effluent:
 - normal operations – options A (i) and A (ii) – discharge to drip irrigation and / or IW sewer up to specified limits.
 - drip irrigation under service - options A (ii) – effluent held in on-site tank and then discharged to sewer at allowed times and rates.
 - drip irrigation under service and sewer capacity used – option B – discharge to sewer and tankering the balance as needed.
 - In the unlikely event that drip irrigation and sewer connection are not available at the same time – option C – all effluent tankered off site for appropriate disposal.

Item 3 - Silver Hill has opted for a subsurface dripline system to disperse the effluent. 'Bosta' has designed a system for approx. 14.6ha with a proposed pilot project area of 1.6ha. The 1.6ha was installed late in July 2021 and discharge commenced early August 2021. The remaining 13ha will be installed at a later date in July 2022 following EPA review of the pilot study outcomes. 'Bosta' has designed the system with a network of PE (polyethylene) piping for the 14.6ha land, main lines, semi lines, branch off, water valves, air release valves, flush valves, and driplines.

Under the design headings: controlling the volume, understanding the effluent movement behaviours when dispersed under the ground and understanding

the lands behaviour, moisture sensors, and contamination into water courses; the system is described in detail. Upon acceptance of the expansion plan 'Bosta' will install a weather model in the control computer which will allow installation of moisture and weather probes in each zone which will automatically remotely and wirelessly connect back to the pump. This will be connected to the Irish International Weather satellite and will use predicted rainfall to prevent puddling, overloading and contamination.

Nutrient Management Plan: Rowan Engineering Consultants Ltd were engaged to provide a Nutrient Management Plan including an Aquifer Vulnerability Assessment and associated mapping in support of Silver Hill Foods drip irrigation pilot study. The conclusion in the report is based on the statutory requirements set out in SI No 605 2017, and on soil and final discharge analysis.

The landbank was soil sampled and mapped in 2021. Buffer zones were incorporated into the mapping per SI No 605 2017 and will need to be considered during the installation of the drip irrigation system. On this basis, the actual useable area of the landbanks may be less than the total area of the land holding brought forward for consideration. The landbank has a phosphorus index of 1. In some instances a maximum volumetric loading 438,000m³/ha/year will be applied once the nutrient content of the final effluent is not the limiting factor, in accordance with SI No 605 2017.

If an area is identified on maps compiled by the Geological Survey of Ireland as 'extreme vulnerability areas on karst limestone aquifers, soiled water shall not be applied to land by irrigation at a rate exceeding 3mm per hour unless the land has a consistent minimum thickness of 1m of soil and subsoil combined.

The proposed landbank for this pilot trial has a capacity to receive 79,302.5m³ of final effluent via drip irrigation per year (365 days). The actual volume that would be discharged is closer to 17,500m³ which is significantly less than the carrying capacity of the landbank and so unlikely to lead to nutrients migrating off-site due to hydraulic overloading.

6.3. Planning Authority Response

6.4. Appellant Response

6.4.1. Inland Fisheries Ireland have responded to the applicant response to the grounds of appeal, which includes:

- Wastewater treatment (appeal item 1):
- Treatment plant capacity – the capacity of treatment plants is generally presented in the form of hydraulic capacity (as-constructed and current flows) and organic capacity (as constructed and current loading), which should provide a clear and concise summary. The information provided in table page 3 of the report submitted is unclear.
- Discharge to sewer – consent to discharge to sewer is at variance with EPA assessment of the current licence for the facility. It states that the discharge of treated effluent to Emyvale WWTP was found not be licensed due to the lack of assimilative capacity at low flows; and the response provides a link to the EPA inspector's report.
- Pet Food Plant – insufficient information has been provided regarding the volumes and strength of wastewaters arising from the Pet Food Plant.
- Wastewaters from the Pet Food Plant are likely to have a high organic and nutrient loading and also to contain organic compounds; ref. to Section 4.1.1.1.b of the EPA BAT Guidance Note for the Disposal or Recycling of Animal Carcasses and Animal Waste.

The water consumption from unspecified rendering processes has been reported to be 500-1000l/t of raw materials. Consumption is divided as follows: condensers consume 200-500l/t, boilers 150-200l/t, and cleaning 200-300l/t (BREF, 2003).

For every tonne of raw material used 1,000-1,500 litres of wastewater is produced, including approximately 600l from condensate, i.e. water evaporated from the raw materials. On average, one tonne of raw material is reported to produce 5kg of COD, 600g of nitrogen and 1.65kg of solids (BREF, 2003) before wastewater treatment. Vapour condensate accounts

for 50-90% of the wastewater contamination. The waste water from the process exhaust air treatment can be highly loaded with organic components, up to 25g/l COD, mercaptans <2g/l, hydrogen sulphide <800mg/l, ammonium nitrogen <400mg/l, volatile oils, phenols, aldehydes and others.

The wastewater from lorry cleaning may contain mineral oil, solids and possibly cleaning agents. De-sludging wastewater from evaporators has little organic load, but may contain phosphorus compounds from any conditioning agents used. It can have high pH values, which need to be neutralised.

There is wastewater from the de-sludging of the cooling water recirculation, (BREF sections 1.3.2 ad 3.2.2 for useful data on water consumption).

- 6.4.2. Wastewater disposal (appeal item 2) – IFI has raised concerns with EPA, the licensing authority for both wastewater treatment plant and the facility regarding discharge to the Emyvale WWTP in relation to the limited assimilative capacity in the receiving water.
- 6.4.3. Drip Irrigation (appeal item 1) – they note that the trial has commenced. It is important that the drip irrigation system is managed in a sustainable manner and that there are no negative impacts on ground or surface waters in accordance with the relevant legislation.

7.0 **Assessment**

- 7.1.1. The first matter to be addressed is whether a meaningful assessment of the appeal can be carried out based on the information presented with the application and appeal.
- 7.1.2. The site is an existing industrial site where the proposed development would be integrated with existing processes and operations. The documentation provided gives little information on the existing operations carried on, the buildings and structures, their use, and how the current operation would be altered by the proposed development; the nature of the operation, the volume and nature of inputs/outputs, existing and proposed; the volume and nature of

emissions/discharges, etc. The proposed development involves an additional process, the conversion of an existing waste product into a pet food input; but it also involves potentially increased capacity in the existing production as the proposed development increases the floor area associated with the existing factory. There is an existing duck rearing facility within the site which is not documented such as to enable assessment of the totality of activities on the site.

- 7.1.3. The development is part of an operation involving contract rearers, in respect of which details are required for an overall understanding of the activity associated with the processing facility.
- 7.1.4. The operations on the subject site fall into a number of separate categories within Schedule 5 of the Planning and Development Regulations, with regard to development for which Environmental Impact Assessment is required.
- 7.1.5. The poultry rearing requires to be considered under part 2 category 1 (e) (i) installations for the intensive rearing of poultry not included in part 1 which would have more than 40,000 places for poultry. It is stated that there is capacity for 100,000 ducks on the site.
- 7.1.6. The processing of waste is referred to in the planner's report as falling within part 2, category 7, food industry:
- (a) installations for the manufacture of vegetable and animal oils and fats, where the capacity for processing raw materials would exceed 40 tonnes per day. It is stated that the proposed development would have a capacity of 18 tonnes per day, making it sub-threshold.
- 7.1.7. The existing and proposed main processing plant requires to be considered under part 2, category 17, food industry:
- (f) installations for the slaughter of animal, where the daily capacity would exceed 1,500 units and where units have the following equivalents: 1 sheep = 1 unit.
- The number of units currently processed is not specified, but the response to the further information request refers to 'when the site processes c120,000 ducks a week'. The information is not available on the file to convert a weekly duck throughput of 17,143 units to equivalent units under 17(f) of schedule 5.
- 7.1.8. I have carried out EIA screening per attached report.

- 7.1.9. Having regard to the size of the proposed development, in cumulation with the other development on the site, the production of waste, the potential for pollution and nuisances and the sensitivity of the area, in particular taking account of the extremely limited dilution capacity of receiving waters to accept treated effluent, it is my opinion that environmental impact assessment is required. An EIAr has not been provided and I do not consider it appropriate to request an EIAr at the advanced stage of the application / appeal process that has been reached in this case, because it would not sufficiently enable the involvement of third parties and prescribed bodies in the process.
- 7.1.10. Four alternative proposals are put forward in relation to the discharge of treated effluent, none of which are sufficiently detailed to enable full assessment. The Environment Section Report refers to Emy Lake, which is nearby and drains the site and vicinity: 'this lake is currently in an at risk category and a tributary of the Ulster Blackwater which the local authority are tasked with improving. The lake is also a water supply. Surface waters from the facility flow towards the supply. Contamination of the surface watercourse was observed by Environment section staff in 2019 which resulted in the EPA issuing direction in this regard.'
- 7.1.11. Based on the information on the file the Board cannot be satisfied, that to permit the proposed development would not cause a deterioration in the chemical or ecological status (or ecological potential) of the receiving surface water body. As a public body the Board may not undertake its functions in a manner that knowingly causes or allows deterioration of a surface water body, in accordance with the 2009 Surface Waters Regulations.
- 7.1.12. As previously stated there is a significant shortfall in information provided with the application: buildings, their use, throughputs, discharges, emissions, drainage, receiving waters, slurry management etc. In relation to the latter issue, it is stated in response to the planning authority's further information request, that the matter is covered by the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 and that due to GDPR restrictions the applicant is restricted in the distribution of records, Silver Hill are in a position to provide the herd number of the importing farmer and the amount received for the last number of years to Monaghan Co Co, this information will allow Monaghan Co Co. to liaise with DAFM to receive the most up to date information (incl. maps, stock numbers and N and P details) on

the customer farmers, while allowing the applicant to comply with GDPR requirements. They further state that given, in particular, that the farming activity will reduce as a result of this application, it is felt that this approach is both pragmatic and proportionate, and in compliance with legislation, the customer farmers that have used organic fertiliser in recent years are the most likely to use same forthwith.

7.1.13. If information was provided to Monaghan County Council's Environment Section, it is not available on the file.

7.1.14. This is an unacceptable response to the further information request. The Board cannot assess the environmental implications of the proposed development in the absence of all relevant information. Following implemented of a permitted development the ongoing management of organic fertiliser is subject to the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017, but at application/appeal stage all the relevant information in relation to these matters must be available to public examination and must be part of the planning assessment.

7.1.15. The Environment Section Report raised concern regarding slurry and sludge disposal to land: that due to the existing and proposed exports of duck slurry and sludge into the Mountain Water catchment and the waterbody risks, the cumulative impact of nutrient imports on water quality status throughout needs to be addressed. In this regard it is of concern that townlands in this high status water body will be used for the application of sewage sludge from Silver Hill Foods: Mountain Water 10 being one of a few such high status water bodies in the country, a blue dot catchment, which is part of research and monitoring programmes. Their concern, in relation to Mountain Water 40, is that it is an at risk category and a tributary of the Ulster Blackwater; hydrogeological assessments are required to assess whether the proposed drip irrigation system poses a threat to the improvement of this waterbody. The site proposed for the drip distribution system lies in vulnerabilities classified as high and moderate in terms of near surface phosphate susceptibility, per EPA Pollution Impact Potential Mapping (PIP), where there is a high run off risk for phosphorus and other parameters.

7.1.16. Their report following the further information response states that no assessment has been carried out in relation to pollution runoff potential as per the EPA pollution

impact potential mapping; no information on the method of application of sludge to land has been submitted; and the submitted information does not adequately address their queries, or address or demonstrate compliance with the EU Good Agricultural Practice for Protection of Waters) Regulations 2017.

- 7.1.17. In addition to the foregoing concerns, the cumulative impacts, in combination with the landspreading of duck slurry from contract growers' facilities would require assessment and this has not been documented.
- 7.1.18. Lack of clarity in relation to the disposal of treated effluent and sludge is the basis of the IFI appeal. In my opinion their concerns are justified.
- 7.1.19. In relation to Appropriate Assessment, a Stage 1 AA Screening Report was submitted in the response to the further information request. The report concludes that this application does not need to proceed to stage II of the appropriate assessment process.
- 7.1.20. It is stated in the response to the further information request that the EPA have advised that they have screened out the facility and that the Ecological Impact Assessment (EcIA) done as part of the licence review concluded that there was no hydrological link with Sliabh Beagh SPA. It is also stated that there is hydrological connectivity to Lough Neagh (Lough Neagh and Lough Beg SPA UK9020091) which is approx. 70km distance downstream and therefore significant effects arising can be ruled out.
- 7.1.21. This is a reasonable conclusion in relation to the direct impacts likely to arise, however in the absence of sufficient information on landspreading, indirect impacts likely to arise from the proposed development cannot be determined. There are water dependent habitats and species, protected as part of the Natura network, in the general area within both jurisdictions. In the absence of sufficient information on landspreading, appropriate assessment of the proposed development cannot be completed. In such circumstances the Board is precluded from granting permission

8.0 Recommendation

- 8.1. In the light of the foregoing assessment I recommend that planning permission be refused for the following reasons and considerations.

9.0 Reasons and Considerations

- 1 Having regard to the scale and nature of activities carried on and to be carried on at the application site, the proposed development is likely to have a significant impact on the environment. Insufficient information has been submitted to enable the Board to assess the likely impact of the proposed development on the locality and the wider environment, accordingly to permit the proposed development would be contrary to the proper planning and sustainable development of the area.
- 2 The Board cannot be satisfied, based on the information on the file, that to permit the proposed development would not cause a deterioration in the status of surface waters, in such circumstances the Board is precluded from granting permission.

Planning Inspector

February 2022

Appendices

Appendix 1 Photographs

Appendix 2 Monaghan County Development Plan 2019-2025 extracts

Appendix 3 Map extracts showing Natura sites in the area.