

Mr. Ronan Megannety
An Bord Pleanála
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AN BORD PLEANÁLA	
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ABP- _____	
13 NOV 2024	
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Time: _____	By: <u>REST</u>

Re: Observation to Case reference: APB-320954-24 (previous case reference APB – 311366-21)
Killugger Farm, Killugger, Killinick, Co. Wexford.

A Chara,

Our submissions submitted and received by An Bord Pleanála on 4th October 2021 and 16th November 2021 in respect of previous case reference APB – 311366-21 still stands.

Section 5 declaration planning reference and change of use from class 6 to class 7

The issues of change of use from class 6 to class 7 and the significant alterations and change of structures of the sheds from that of a straw-based cattle shed to a large commercial pig finishing unit with slurry tanks, slats, internal automatic thermostatically controller ventilation system, external chimneys constantly releasing gas and fumes onto the residents additional slurry tanks and silos to allow Premier Pigs to operate in its current use as a commercial scale piggery has still not been addressed.

On September 4th 2020, EXD00824, Wexford County Council concluded that planning permission was needed for change of use from cattle to pigs.

Why has EXD00824 not been respected, acknowledged and adhered to?

Substantial changes to the former cattle shed to bring it to its current use to support commercial industrial scale production unit.

The previous shed, which now houses pigs has been significantly modified, both internal and external.

Without these modifications, the pig production unit would not be able to operate in current capacity. As you can see from the significant modifications of this shed, it was never intended for pigs (extractor fans, slatted tanks, bioproducts feed system, several silos). It was not designed to house pigs.

- When in use as cattle shed, the cattle were exposed to the elements as the walls were partially opened up with gaps not closed up entirely. Kevin Riordan, Premier Pigs **built up and closed in these walls entirely** on purchasing in 2017.
- Previously this shed was only used in winter months to house cattle.
- Local residents noted no smells for decades until the pigs first arrived in Summer 2017.
- Additional silos are now on site needed to feed the pigs, also without planning. There are at least 5 silos on site. Many of them are higher than the sheds, so over 12 meters in height and are now attaching to two sheds at least.
- Internal automatic thermostatically controller ventilation system and 14 external chimneys have now been built externally on the roof and constantly releasing gases onto the residents.
- External ramp and installation of slatted tanks under raised floor level of 2-2.5 metres to hold slurry (FOI documents reference two heights).
- Increased traffic with constant movement of slurry tanks, delivery and collection of pigs and pig feed.
- External Solar panels have been installed on roof and substantially cover the roofed area of the shed without the benefit of planning. Also upgraded higher phase power supply as required for intense pig production. In former state as cattle shed for winter months, partial exposed to elements, and did not require such a high level of electric power supply for cattle farming.

All these modifications are necessary to support and enable a large commercial pig finishing production unit. The raised floor and slurry tank covers the full area of the shed, being 1689 metre squared or 0.417 acres in size and is 2 metres in height; thus holding a significant volume in litres of slurry based on this shed side.

A publicly available photograph of the farm from the view of the main Rosslare road is available at this website (<https://www.geograph.ie/photo/1236356>) and is dated April 2009. There is no evidence of pigs on site with feeding silos and external chimneys for ventilation systems visible.

© David Hawgood

To415 : Farm buildings at Killugger, Wexford

taken 16 years ago, 3 km from Killinick, Co Wexford, Ireland

[Mark]



Farm buildings at Killugger, Wexford
View from N25 road.

Pig Planning applications omitting the description of pigs and the number of Pigs

I would find it hard to believe that a planner in their capacity would allow loopholes or allow such a blanket planning permission. If that were the case, anyone can simply apply for agriculture and put in pigs, mink or poultry on site or buy an existing agriculture site and do what they want with it. We have searched the planning register from several counties and examined several planning applications in respect of pig operations and have yet to find an application for an intensive pig operation where pigs were omitted from the entire application. We have included a sample below for your reference.

Local Authority	Applicant Name	Reference	Brief Development description	Number of pigs	EIA Assessment Y/N
Tipperary County Council	Future Pigs Ltd	20650	Permission to construct a Pig fattening house, feed kitchen, bins, geomembrane lined manure storage basin, water tanks, roof mounted solar panels	1950	YES
Laois County Council	Garrett Behan	2024	Full planning permission for the development of pig finishing unit, 2 meal bins and associated site works	1932	NIS carried out and planning refused
Wexford County Council	Healy Pigs Limited	20171191	Permission for the erection of a pig rearing facility with associated feed storage, ancillary services and site works, with improvements to existing access lane including the realignment of the access point onto the public road. an appropriate assessment screening report forms part of this application.	1880	Planning refused but no EIA/NIS carried out

This pig production operator has significant investments companies and multiple sites and is not a small-time pig farmer. Even Premier Pigs, the company operating this site has another site at Bulgan, Glynn, Wexford, planning reference 20110975. From publicly available records, the pig investor holds directorships in the following limited companies.

The pig producer is likely to use every space available to him within his property and not be prohibited by number limitations.

Kevin Riordan - DoB 10 Jun 1964- Bulgan, Glynn, Co. Wexford [Search Reports](#)

158371	Rosedale Limited	Normal	08/03/2001
160464	Wexford Pig Development Limited	Normal	10/03/1995
235590	Natural Pigs Limited	Normal	12/07/1995
276143	Cereal Feeds Limited	Normal	03/02/1998
354319	Kerry Pig Producers Limited	Normal	11/03/2002
393963	Tiesan Investments Limited	Normal	19/11/2004
417781	Premier Pigs Limited	Normal	29/03/2006
448062	Montgomery Property Investments Limited	Normal	24/10/2007

Kevin Riordan - DoB 10 Jun 1964- Bulgan, Glynn, Enniscorthy, Wexford, Ireland [Search Reports](#)

735058	Bonnur Limited	Normal	14/02/2023
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On acquiring the property, he initially put pigs straight onto straw beds and that entailed changing the characteristic nature of the former cattle shed by building up and closing in the walls for approximately 500-600 pigs per internal council memo documents dated Oct 27th 2017 for enforcement notice file 0090/2017. Thereafter, since that date, there has been substantial modifications as already detailed and more pigs. As you are aware there was an enforcement notice from Nov 2020 ref 0023/2019 covering some of these additional modifications such as the slats and ramp.

I called to the above site accompanied by my colleague Mr. Barry Lambert on the 25th October 2017 to inspect in relation to possible unauthorised development (Pig Farming) Taking place and the following points were noted.

The Complaint:

A complaint was made by local residents that intensive pig farming was taking place in a former cattle shed and that this activity may be unauthorised.

On Site:

When we called to site we noted they was very little odor in the farm yard, we could hear that pigs were being kept in a large shed on the eastern side of the farm complex. We entered the shed and noted a large number of pigs kept in very large stalls on each side of the shed. I would state that there were approximately between 500 and 600 pigs in the shed at the time of our inspection. The pigs are being kept on straw in the stalls, this has reduced the odour substantially.



Our conclusions are that as follows

- Does not have planning for change of use from class 6 to class 7, and intensive pig factory production.
- Planning reference EXD00824, and Executive Orders P0887/20 signed by Diarmuid Houston shows that the pig operation is not exempt from planning permission has been ignored.
- Retention planning for additional size
- Given the scale of the activity, why hasn't the holding of waste, spreading and transportation, impact and emissions of same been checked by anybody? Are regulations around the same being adhered to?
- The permissions granted are therefore limited to the class of use on site at the time of their making which was not general agriculture or piggery but the keeping of sheep and cattle. In order to determine that a change of use has occurred from Class 6 to Class 7 the council need only determine that a change from the keeping of cattle and sheep to intensive pig farming occurred after the planning permissions were granted. This is known to be the case and occurred in 2017. Which they have validated with the section 5 EXD00824.
- We also want to note the volume of extra traffic now with articulated food lorries, tanks with liquid feed, large pig lorries unloading and loading pigs, slurry tanks day and night. None of this traffic activity occurred when the operation was a mere cattle farm.

I appeal to the Board to consider our observations in the overall context of this commercial scale pig farm and our residential community.

Yours Sincerely

Katherine Bail

Signed on behalf of individuals named below:

Contact Name KATHERINE BAIL

Date 11th NOV '24

Address Bally Kelly, Deiraugh, Norfolk NR10 43SC2NO

Name Kevin Bail - Chelsea Bail

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society market

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