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An Coimisiún Pleanála
Strategic Infrastructure Division
64 Marlborough Street
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Formal Objection — Cashla Peaker Plant, located at Polinagroagh and Rathmorrissy, Athenry, Co. Galway

Planning Reference: PA07.324113 | Applicant: Bord Gáis Energy Ltd

1. Who I Am and Why I Am Objecting

My name is Andrew King. I am a dairy farmer and I hold a 15-year lease on Knocknacreeva Farm, Athenry, Co. Galway. I milk a dairy herd from a parlour located approximately 720 metres from the proposed Cashla Peaker Plant site. My livelihood, my herd, and the quality of the milk I produce all depend on the land, the water, and the air of this place.

I am not a developer, a lawyer, or a planning expert. I am a working farmer with skin in this game. What I am objecting to is the placing of a major industrial hazard facility — storing over 6,000 tonnes of diesel fuel — less than a kilometre from my milking parlour, my herd, and the private water well that supplies water to this farm. I object because this development threatens the very foundation of what I do here, and because the planning application does not adequately address the risk it poses to farming businesses like mine.

2. My Private Water Well — 700 Metres from the Proposed Site

The farm at Knocknacreeva relies on a private water well located approximately 700 metres from the proposed Cashla Peaker Plant. This well is the sole water supply for the farm — for the dairy herd, for the parlour, and for day-to-day farm operations. There is no mains water backup. If this well becomes contaminated, the farm cannot function.

The proposed site sits on 'Extreme' vulnerability karst limestone. The applicant's own NIS (Section 1.4.11.3) identifies 18 geophysical anomalies across the site — designated A1 to A18 — indicating potential voids and fissures in the karst bedrock through which surface water can pass directly into the groundwater with no filtration. This is the same groundwater that feeds private wells in this area, including mine.

In karst terrain, contaminants do not travel slowly through soil. They move rapidly through underground channels, fissures, and voids — bypassing the natural filtration that would otherwise protect groundwater quality. A diesel spillage, a bund failure, or a runoff event at

the Cashla site could reach my well without warning and without remedy. The planning application does not assess this risk for private wells in the surrounding area. That is a fundamental gap.

My Dairy cows grazing on Knocknacreeva farm

3. The Risk to My Dairy Herd and Milk Quality

Water is not optional in dairy farming. My herd requires large volumes of clean water every day — for drinking, for parlour washing, and for all routine farm hygiene. Dairy cows are acutely sensitive to water quality. Any contamination of the water supply — whether from hydrocarbons, combustion by-products, or chemical runoff — can directly affect herd health, milk production, and milk quality.

The proposed plant will store between 5,470 and 6,003 tonnes of diesel fuel — a substance classified as H411 (toxic to aquatic life with long lasting effects). The applicant's own COMAH Report, at Appendix B Figure B-120, explicitly models the scenario of bund overtopping and a diesel pool fire off-site to the east. The site's stormwater drainage discharges to a soakaway on 'Extreme' vulnerability karst ground. The NIS also confirms that construction dewatering water will be deliberately infiltrated to groundwater via a lagoon.

If diesel or diesel combustion products enter the karst groundwater system and reach my well, the consequences for my herd are direct and severe. Hydrocarbon contamination of drinking water causes a range of effects in cattle, including reduced feed intake, reduced milk yield, reproductive problems, and in serious cases, organ damage. Contaminated milk

cannot be sold. A single contamination event could destroy a season's production and expose me to serious liability under food safety regulations.

The planning application does not assess this risk. There is no assessment of the impact of the proposed development on private water wells used by neighbouring dairy farms. That is unacceptable.

4. Air Emissions and the Dairy Herd

The proposed plant will emit exhaust gases from a 334 MW gas turbine — and from diesel combustion during mandatory testing and during any gas supply interruptions.

The applicant's NIS (Section 1.5.1.1.5) confirms mandatory diesel testing for up to 18 hours per annum, but this is a minimum figure. The plant is designed to run on diesel backup whenever gas supply is interrupted, and no credible assessment of the total diesel operating hours over a 24-year operational life has been provided.

It is important to note that this facility will generate harmful air pollutants during both modes of operation. Combustion of natural gas in the proposed OCGT will produce;

nitrogen dioxide (NO_2), nitrogen oxides (NOx), fine particulate matter (PM2.5 and PM10), sulphur dioxide (SO_2), and carbon monoxide (CO).

Switching to diesel backup does not reduce these risks — **it increases them.** Diesel combustion in a large OCGT produces significantly elevated levels of NOx, particulate matter, SO_2, and black carbon compared to natural gas combustion.

My milking parlour is located **720 metres** from the proposed plant. Under prevailing winds, exhaust plumes from this facility will routinely pass directly over my fields and my herd.

The effects of these **emissions on livestock are not theoretical.** They are documented in peer-reviewed scientific literature.

PM2.5 — Reduced Milk Yield and Increased Somatic Cell Count

Beaupied, B.L. et al. (2022). *Cows as Canaries: The Effects of Ambient Air Pollution Exposure on Milk Production and Somatic Cell Count in Dairy Cows.* Environmental Research, 204(B).

- Two-year Colorado study. PM2.5 was associated with a **105,500 cells/mL increase in somatic cell count** (marker of mastitis/udder inflammation) and significant reductions in daily milk yield. PM2.5 identified as a previously unrecognised confounding variable in dairy cow health and production.
- PubMed PMID: 34699758 / URL: https://www.sciencedirect.com/science/article/abs/pii/S0013935121014985

PM2.5 and NOx — Cattle Mortality

Cox, B. et al. (2016). *Ambient Air Pollution-Related Mortality in Dairy Cattle: Does It Corroborate Human Findings?* Epidemiology, published on PMC.

- Belgian epidemiological study of 87,108 dairy cow deaths (2006–2009). A **10 µg/m³ increase in same-day NO_2** was associated with a **9.2% increase in dairy cattle mortality.** PM10 increase of 10 µg/m³ linked to 1.6% increased mortality. Effects of PM10 cumulated over 26 days, indicating persistent harm well beyond acute exposure.

- PMC URL: https://pmc.ncbi.nlm.nih.gov/articles/PMC5400059/

PM2.5 — Heavy Metals in Milk

Nieckarz, Z. et al. (2023). *The Concentration of Particulate Matter in the Barn Air and Its Influence on the Content of Heavy Metals in Milk.* Scientific Reports (Nature), 13(1):10626.

- Outdoor PM2.5 and PM10 concentrations directly translated into elevated particulate levels inside dairy cattle barns via gravity ventilation. Heavy metal content in milk correlated with ambient particulate pollution. Notes that PM2.5 is "considered one of the main factors that increase the risk of death" and is associated with reduced fertility and abnormal foetal development in mammals.

- URL: https://www.nature.com/articles/s41598-023-37567-2

Elevated particulate and NOx concentrations are therefore associated in the scientific literature with respiratory stress in cattle, reduced milk yields, increased somatic cell counts, increased susceptibility to infection, elevated heavy metal contamination of milk, and in the case of NO_2, directly increased mortality risk. These are not abstract risks for a certified organic dairy herd grazing 720 metres from a 334 MW combustion facility that will burn both natural gas and diesel across a 24-year operational life.

The EIAR does not present a separate quantified assessment of diesel-firing emissions at agricultural receptors in the vicinity of the site. It does not present a quantified assessment of natural-gas combustion emissions at agricultural receptors either. My farm is one of those receptors. My herd, my milk quality, my organic certification, and my livelihood are directly at risk from an air quality assessment that was never conducted at my location. The gap in the assessment directly and personally affects me.

5. The COMAH Contradiction and What It Means for This Farm

The COMAH Report submitted with this application contains an internal contradiction that I ask An Coimisiún Pleanála to examine carefully. On one hand, the Report dismisses the Major Accidents to the Environment (MATTE) assessment, asserting that bund containment is adequate and that no hazardous substances can credibly reach the surrounding environment. On the other hand, the same Report at Appendix B, Figure B-120, explicitly models the scenario of bund overtopping and a diesel pool fire extending off-site to the east — onto the karst limestone terrain between the site and my farm.

These two positions cannot both be correct. Either the bunding is adequate and Figure B-120 should not exist, or Figure B-120 represents a real modelled risk, in which case the MATTE dismissal is false.

As a farmer with a herd, a water well, and a working dairy operation within 720 metres of this proposed COMAH establishment, I have a direct and legitimate interest in which of these positions is true. I respectfully ask that An Coimisiún Pleanála require the HSA to independently examine this contradiction before any decision is made.

6. Road Access — A Dairy Farm Cannot Accept Any Road Closure

This is one of the most serious practical objections I can make, and I want An Coimisiún Pleanála to understand it fully from a farming perspective.

The planning application confirms that the underground grid connection cable will run along local roads serving this area, including the L3103. The applicant's own NIS (Table 1-4) confirms full road closure of the L7108 (Castlelambert to Lisheenkyle) for up to five months during cable works, with additional resurfacing periods bringing the **total potential disruption to eight months.** A diversion of approximately 8km, adding 5km to every journey, is proposed.

I strongly and formally object to any road closure or sustained access restriction on the roads serving Knocknacreeva Farm. Here is why this is not negotiable for a working dairy farm:

- **Milk is collected from this farm every one to two days without exception.** Milk collection cannot be rerouted, delayed, or diverted without spoilage. If a milk tanker cannot reach the farm on collection day, the milk in the bulk tank is lost. That is a **direct financial loss** for which I would bear responsibility, and under my milk supply contract, repeated failures to present milk for collection carry serious consequences.
- The bulk milk tank on this farm must be maintained at a precise temperature at all times. If the refrigeration system fails — for any reason — an emergency engineer must be able to reach the farm immediately, day or night. A road closure or an 8km diversion is not compatible with an emergency response. If milk spoils because a repair engineer could not get through in time, that milk is lost and the **farm may be subject to penalties under food safety regulations.**
- **A vet must be able to reach this farm at any hour**, on any day of the year, without delay. Dairy cows calve around the clock. Difficult calvings, injuries, illness outbreaks, and lameness emergencies do not wait for road closures to lift. A diversion that adds 5km and 15 to 20 minutes to every journey is not a minor inconvenience — in an obstetric emergency, it is the difference between saving and losing an animal. Animal welfare law places positive obligations on me as a farmer to ensure my animals receive timely veterinary attention. A road closure that impedes that is not something I can accept or manage around.
- Feed deliveries, AI technicians, hoof trimmers, machinery contractors, and farm suppliers all need regular access. A sustained road closure of up to eight months during a key farming period would cause serious and ongoing disruption to every aspect of farm operations.

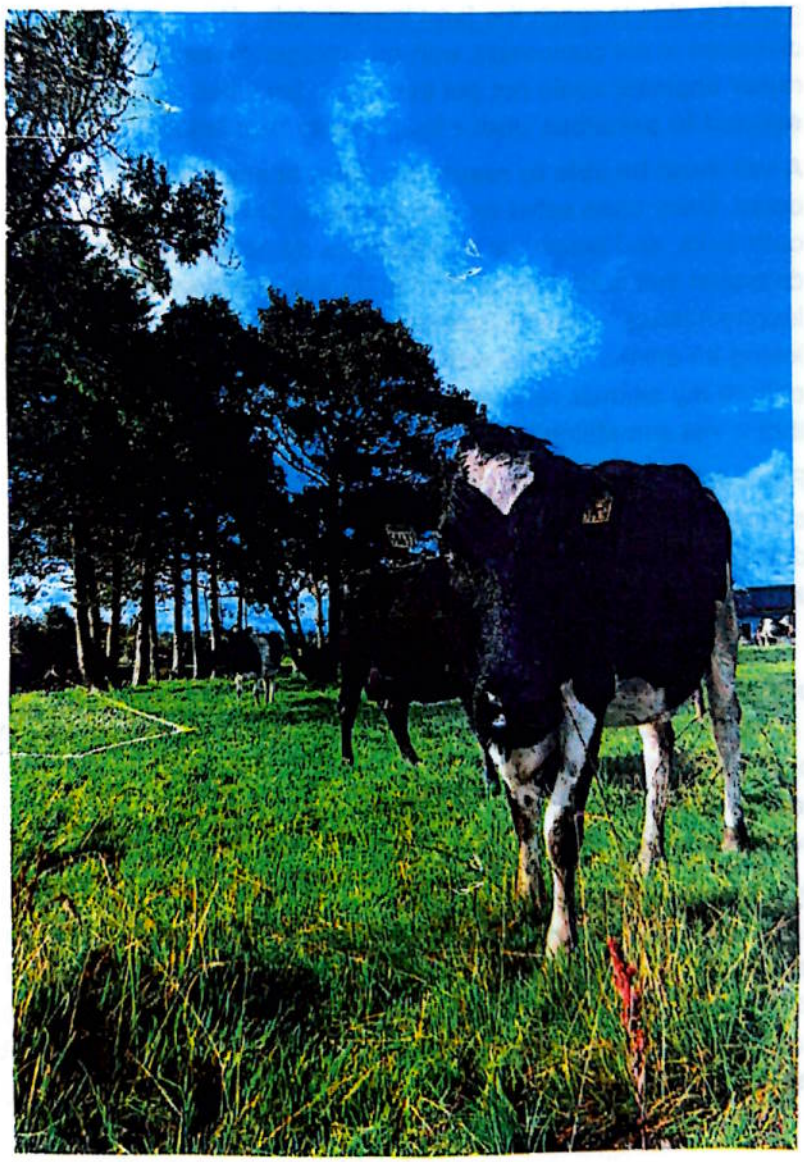
The applicant has not demonstrated that the cable route could have been designed to avoid closure of roads that serve active agricultural operations. The NIS does not assess the impact of these road closures on dairy farms and livestock holdings in the affected area. This is a material omission. **A blanket diversion route is not an adequate response to the 24-hour access requirements of a working dairy farm.**

I formally request that An Coimisiún Pleanála impose, as a minimum condition if permission were to be granted, a requirement that **24-hour access for emergency agricultural vehicles — including milk tankers, veterinary services, and farm emergency contractors** — be guaranteed and maintained throughout the construction period. However, my primary position is that the road closures as planned are **incompatible with the welfare and operational needs of dairy farms** in this area, and constitute an additional ground for refusal.

7. A 15-Year Lease and a Long-Term Investment in This Land

I hold a 15-year lease on Knocknacreeva Farm. This is not a short-term arrangement. I have made a long-term commitment to dairy farming on this land, investing in the herd, the parlour, and the infrastructure needed to run a productive and compliant dairy operation. That investment was made on the basis of the existing character and conditions of this location.

Planning permission for a COMAH lower-tier major hazard establishment 720 metres from my milking parlour fundamentally alters the risk profile of this farm and the viability of my long-term lease. It is not sufficient for the applicant to assert that risks are managed. The risk to my water supply, my herd, my milk quality, and my road access has not been properly assessed in this application, and that gap cannot be filled by general assurances.



Dairy cows grazing on one of the fields that is 700 meters away from the proposed development

8. What I Am Asking For

I formally and respectfully request that An Coimisiún Plānála refuse planning permission for the proposed Cashla Peaker Plant on the following grounds:

- The proposed development poses **a direct and unassessed risk to a private water well 700 metres from the site** — the sole water supply for an active dairy farm on **'Extreme' vulnerability karst limestone**;
- The application contains no assessment of the impact of diesel storage, runoff, or **contamination on private wells** and dairy operations in the surrounding area;
- The COMAH Report contains irreconcilable internal contradictions regarding off-site diesel escape scenarios that must be **independently verified by the HSA**;
- Diesel and gas combustion emissions at a facility 720 metres from my milking parlour will directly affect my herd and have **not been assessed at agricultural receptors**;
- The planned road closures of up to eight months are incompatible with the 24-hour access requirements of a working dairy farm — for milk collection, emergency tank repair, and veterinary care — and no adequate assessment of the impact on agricultural operations has been provided;
- **The development is contrary to the Climate Action and Low Carbon Development (Amendment) Act 2021 and Ireland's legally binding climate obligations**.

I also formally request that An Coimisiún Pleanála require an independent hydrogeologica assessment of the risk to private water wells within a 1km radius of the proposed site, wit specific reference to wells supplying dairy farms on karst terrain.

I reserve the right to make further submissions and to be represented at any oral hearin convened by An Coimisiún Pleanála in connection with this application.

Yours sincerely,

Andrew King

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