OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Assumpta Loughran
Winterton
Knocknacreeva
Athenry
Galway
H65 XR15

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902
Date: 24 April 2026

Re: Observation to the proposed development of open-cycle gas turbine (OCGT) and generator with ancillary equipment.

Location: Pollnagroagh and Rathmorrissy (Townlands), Athenry, Co. Galway

Applicant: Bord Gáis Energy Limited

Dear Sir/Madam,

I am making this submission as a local resident and wish to formally object to the proposed development and I live 820m from the proposed site of the Cashla Peaker Plant (Athenry)

While my children are now in their 20s, I remain deeply concerned about their future and the kind of environment they — and future generations — will inherit. Decisions made now will shape environmental quality for decades.

My elderly parents also live nearby and suffer from respiratory conditions. Air quality and environmental conditions directly affect their health and daily life.

With a projected operational lifespan extending to 2050 for this development, there is significant concern as to what this will mean not only for them, but also for myself and future generations.

In addition, my siblings live in the area with their children — my nieces and nephews — and I am deeply concerned about the long-term implications of this development for them. The prospect of living with the environmental consequences of this project for decades raises serious questions about the type of environment being created for the next generation.

I had intended to retrofit my home using supports from the Sustainable Energy Authority of Ireland, including solar panels and improved ventilation. These actions are encouraged under national climate policy and require significant personal investment. However, I now question that investment if the surrounding environment is at risk from industrial emissions.

This highlights a fundamental contradiction: individuals are encouraged to reduce emissions and invest in sustainable living, while large-scale fossil fuel infrastructure is being developed with a projected lifespan extending to the same period in which climate neutrality is to be achieved.

I have carefully reviewed the application documentation, including the Environmental Impact Assessment Report, and I wish to formally object to the proposed development.

I wish to make clear that I am not opposed to appropriate development or to the need for secure energy infrastructure. However, this proposal represents the wrong development in the wrong location. It would introduce fossil fuel-based industrial infrastructure into a rural, environmentally sensitive area, close to homes, farms, community facilities, and vulnerable receptors. In my view, this is inconsistent with Government policy on clean air, public health, renewable energy, and the transition to a low-carbon economy.

This objection is based on significant concerns relating to air pollution and human health, major accident risk, groundwater vulnerability, road safety, impacts on farming, landscape and visual impact, biodiversity, heritage setting, deficiencies in public participation, project fragmentation, lack of strategic need, and inconsistency with climate policy.

AIR POLLUTION & HUMAN HEALTH

The proposed development will emit nitrogen oxides (NO_x), particulate matter ($PM_{2.5}$ and PM_{10}), and other combustion-related pollutants which are well-established contributors to adverse human health outcomes. As a peaker plant, the facility will operate intermittently, with high-intensity emission spikes during start-up and ramp-up phases. This gives rise to a fundamental inconsistency: individuals are required to eliminate diesel use in order to reduce emissions, while new industrial-scale diesel combustion is being introduced.

The EIAR relies primarily on average-based modelling. This approach fails to capture short-duration, high-concentration emission events, which are particularly relevant to peaker plants. Such modelling does not reflect real-world exposure and is inconsistent with the requirements of the Environmental Impact Assessment Directive, which requires a complete and accurate assessment of likely significant effects on population and human health.

The health impacts of nitrogen dioxide and fine particulate matter are well established. The World Health Organization Air Quality Guidelines confirm that there is no safe level of $PM_{2.5}$ exposure and that even low concentrations are associated with increased mortality and morbidity. Long-term exposure contributes to cardiovascular disease, respiratory illness (including asthma and COPD), lung cancer, and reduced life expectancy. The European Environment Agency has consistently identified air pollution as the largest environmental health risk in Europe.

In Ireland, the Environmental Protection Agency has highlighted air pollution as a significant contributor to respiratory and cardiovascular illness, with particular concern in rural areas where baseline air quality is currently high. In such areas, the introduction of new emission sources represents a disproportionate deterioration in environmental quality.

In the local context, the receiving environment around Athenry is currently characterised by relatively good air quality, reflecting its rural nature and absence of significant industrial sources. This existing baseline is an important environmental and public health asset. The introduction of a new industrial emissions source in such a setting represents a clear deterioration in air quality, rather than an incremental change. For local residents, this would result in a permanent alteration of a previously clean and healthy environment.

Peaker plants are of particular concern because emissions are concentrated in short periods, often during peak demand times, including evenings. Start-up phases are associated with higher pollutant concentrations than steady-state operation. Evidence from comparable facilities indicates elevated local pollutant levels during these periods, reinforcing the inadequacy of relying on averaged modelling alone.

The EIAR does not adequately assess how people experience exposure in practice. It fails to consider:

- sustained outdoor activity at schools, sports facilities, and recreational areas
- evening and weekend use of community buildings
- prolonged exposure during physical activity

Physical activity significantly increases inhalation rates, meaning individuals engaged in outdoor exercise inhale greater quantities of pollutants. This represents a critical exposure pathway which has not been adequately assessed.

Children, older persons, and those with pre-existing health conditions are particularly vulnerable. However, the EIAR does not meaningfully assess key receptors, including:

- schools and educational facilities
- evening use of school buildings
- outdoor recreational facilities such as sports grounds and golf courses

These omissions are significant, particularly given that such locations are in active use during likely operational periods and often involve sustained physical activity.

The EIAR also fails to consider the exposure of domestic animals. While my own animals are limited to household pets — dogs, often described as a person's closest companion — they are nonetheless exposed through outdoor activity, increased inhalation during exercise, and contact with soil and water. These impacts are not trivial and reflect a broader failure to assess real-world environmental exposure.

Beyond domestic animals, there are serious implications for agriculture. Livestock are directly dependent on air quality, water quality, and soil conditions. Any deterioration in these environmental factors may affect animal health and productivity. In this context, I am particularly concerned for local farmers whose livelihoods depend entirely on maintaining a clean and healthy environment.

At the same time, national policy actively encourages the removal of diesel vehicles from the road and a transition to electric transport, with the stated aim of reducing emissions, improving air quality, and supporting Ireland's climate targets, including the transition to climate neutrality by 2050. Individuals are being asked to move away from diesel use due to its recognised impacts on both air quality and climate change. In this context, the introduction of a development which incorporates diesel combustion raises a fundamental question: why are individuals expected to eliminate diesel use to reduce emissions, while new sources of diesel emissions are being permitted at an industrial scale? This inconsistency further undermines confidence in the coherence, fairness, and effectiveness of environmental and climate policy.

The proposed development would introduce a continuous risk of episodic emissions into a currently low-pollution rural setting. Over time, this represents:

- a permanent deterioration in air quality
- cumulative exposure across multiple pathways
- increased baseline risk for vulnerable populations and animals

The Ambient Air Quality Directive requires that air quality should not be degraded where it is already good. The introduction of a new industrial emissions source in such an environment is contrary to this objective.
taken together:

- the failure to assess peak emissions
- the omission of key receptors
- the lack of real-world exposure modelling

- the absence of cumulative assessment

mean that the EIAR does not provide a complete, precise, or reliable evaluation of impacts on human health.

In circumstances where significant uncertainty remains regarding risks to population and human health, and where vulnerable groups are affected, the precautionary principle must apply.

It has not been demonstrated that the proposed development will not give rise to significant adverse effects on human health.

FIRE HAZARDS, EXPLOSION RISK AND MAJOR ACCIDENT POTENTIAL

The proposed development involves the storage, handling, and combustion of significant quantities of natural gas and backup diesel fuel. This gives rise to a credible risk of major accident events, including fire and explosion.

Such developments require a high level of risk assessment and control, consistent with the objectives of the Seveso III Directive, which seeks to prevent major accidents involving dangerous substances and to limit their consequences for human health and the environment.

However, the EIAR does not provide a sufficiently detailed, site-specific, or worst-case assessment of these risks.

The key hazards associated with the proposed development include:

- high-pressure natural gas infrastructure, with potential for ignition, jet fires, and vapour cloud explosions
- large-scale diesel storage, creating a significant fire load and risk of prolonged fire events
- start-up and operational phases involving combustion instability and increased emission intensity

In the event of a major accident, the consequences would not be confined to the immediate site. Fire, explosion, or thermal radiation impacts could extend across a wider area, affecting nearby residential properties, farmland, and community infrastructure.

I reside approximately 800 metres from the proposed site. At this proximity, I would be directly within any potential impact zone associated with a major accident scenario. At this distance, it is reasonable to expect that the effects of a major incident — including heat, noise, smoke, or airborne contaminants — could be directly experienced.

There is also existing gas infrastructure in close proximity to residential properties in the area, including a gas line running near my home. The EIAR does not clearly demonstrate whether the interaction between the proposed development and existing gas infrastructure has been fully assessed. In particular, it is not evident that the potential for secondary or cascading effects — including the propagation of fire or ignition involving nearby gas infrastructure — has been adequately considered.

A significant concern also arises in relation to firewater management. The proposed development is located within a karst limestone environment, which is inherently vulnerable to contamination and requires a high level of protection.

Karst geology is characterised by fissures, fractures, and underground conduits that facilitate rapid and often unpredictable movement of groundwater. In such environments, contaminants can travel quickly through the subsurface with little or no natural filtration or attenuation.
In the event of a fire, large volumes of contaminated firewater are likely to be generated. This may contain hydrocarbons from diesel fuel, firefighting foams, and combustion by-products.

Given the karst nature of the site, there is a high risk that such contaminated runoff could infiltrate rapidly into the groundwater system.
The surrounding area relies heavily on groundwater for:

- private domestic wells used for drinking water
- livestock watering and agricultural use
- irrigation and soil productivity

Any contamination event could therefore result in:

- degradation of drinking water quality
- long-term exposure risks for residents
- impacts on livestock health and agricultural productivity
- loss of confidence in local water supplies

The EIAR does not provide sufficient detail regarding:

- firewater containment capacity
- system performance under extreme or failure conditions
- the consequences of containment system exceedance or breach

This represents a significant omission in the assessment of major accident risk.

More broadly, the EIAR fails to provide:

- clearly defined impact or hazard zones
- a robust assessment of worst-case scenarios
- adequate consideration of off-site consequences
- a detailed evaluation of interaction between gas infrastructure, diesel storage, groundwater vulnerability, and surrounding receptors
- sufficient assessment of emergency response and access under real-world conditions

Instead, the assessment relies on generalised assumptions and standard mitigation measures, without sufficient site-specific analysis.

Under established EU case law, including Sweetman v An Bord Pleanála, environmental assessments must provide complete, precise and definitive findings and remove reasonable scientific doubt as to the absence of adverse effects. This standard has not been met.

In a receiving environment characterised by the proximity of residential properties, existing gas infrastructure, reliance on groundwater, and high geological vulnerability, the potential consequences of a major accident are significant and potentially far-reaching. Where worst-case scenarios have not been adequately assessed, and where uncertainty remains regarding risks to human health and the environment, the precautionary principle must apply.

It has not been demonstrated, on the basis of complete, precise and definitive information, that the proposed development will not give rise to significant risk to human health, property, and the environment. Accordingly, the proposed development gives rise to serious concerns in relation to major accident risk, environmental protection, and compliance with EU law and the principles of proper planning and sustainable development.

GROUNDWATER, KARST LIMESTONE AND ENVIRONMENTAL RISK

The proposed development is located within a karst limestone environment, which is inherently vulnerable to contamination and requires a high level of protection.
Karst geology is characterised by fissures, fractures, and underground conduits that enable rapid and often unpredictable movement of groundwater. In such environments, contaminants can travel quickly through the subsurface with little or no natural filtration or attenuation. This creates a high-risk setting for developments involving fuel storage, industrial processes, and significant ground disturbance.
The proposed development introduces multiple potential sources of contamination, including:

- large-scale diesel storage
- accidental spills or leaks during operation
- construction-phase runoff and disturbance
- contaminated firewater runoff in the event of a fire or major incident

In a karst system, pollutants entering the ground may migrate rapidly beyond the site boundary and impact the wider receiving environment. Even minor contamination events may give rise to long-term effects, due to the limited capacity for natural attenuation and recovery.
The surrounding area relies heavily on groundwater for:

- private domestic wells used for drinking water
- livestock watering and agricultural use
- irrigation and soil productivity

Any deterioration in groundwater quality would therefore have direct implications for human health, agricultural activity, and rural sustainability. Contamination could result in:

- degradation of drinking water quality
- long-term exposure risks for residents
- impacts on livestock health and farm productivity
- loss of confidence in local water supplies

A particular concern arises in relation to firewater contamination. In the event of a fire, large volumes of contaminated runoff may be generated, containing hydrocarbons, firefighting agents, and combustion by-products. Given the karst nature of the site, there is a high risk that such contaminants could infiltrate rapidly into the groundwater system. The EIAR does not provide sufficient detail regarding containment capacity, performance under extreme conditions, or the potential for system failure. This represents a significant omission in the assessment.
The protection of groundwater is a fundamental requirement under the Water Framework Directive, which requires the prevention of deterioration in water status and the protection of groundwater quality. In addition, the Groundwater Directive requires the prevention of the entry of hazardous substances into groundwater and the control of pollutant inputs.
The introduction of a development with multiple potential contamination pathways in a highly vulnerable karst environment is fundamentally at odds with these objectives.
Furthermore, under established EU case law, including Sweetman v An Bord Pleanála, environmental assessments must provide complete, precise and definitive findings and remove reasonable scientific doubt as to the absence of adverse effects. The EIAR does not meet this standard. In particular, it fails to:

- clearly identify groundwater flow pathways and connectivity

- demonstrate the effectiveness of proposed mitigation measures
- assess worst-case contamination scenarios
- evaluate cumulative and long-term impacts

Instead, the assessment relies on generalised assumptions and standard mitigation approaches, without sufficient site-specific analysis.

In a receiving environment characterised by high vulnerability and direct reliance on groundwater, the potential consequences of contamination are significant and potentially irreversible. Once groundwater in a karst system is contaminated, remediation is extremely difficult and impacts may persist for decades.

In these circumstances, having regard to the level of scientific uncertainty and the sensitivity of the receiving environment, the precautionary principle must apply.

It has not been demonstrated, on the basis of complete, precise and definitive information, that the proposed development will avoid significant adverse effects on groundwater.

Accordingly, the proposed development gives rise to serious concerns in relation to groundwater protection and compliance with EU environmental law and the requirements of proper planning and sustainable development.

TRAFFIC, ROADS AND PUBLIC SAFETY

The proposed development will give rise to a significant increase in traffic volumes during both the construction and operational phases. This includes construction workers, heavy goods vehicles (HGVs), abnormal loads, fuel tankers, and ongoing service and maintenance traffic.
The receiving road network is rural in character and was not designed to accommodate sustained industrial traffic of this nature. Roads in the vicinity of the site, including the L3103 and surrounding local routes, are characterised by:

- narrow carriageways with limited passing space
- absence of hard shoulders and pedestrian infrastructure
- bends, dips, and restricted sightlines
- soft verges, ditches, and boundary walls

These are not minor constraints; they are defining characteristics of the local road network and significantly limit its capacity to safely accommodate increased traffic volumes.

Existing Traffic Environment

The existing daily traffic environment is complex and reflects a shared rural road network used by:

- agricultural machinery accessing multiple fields
- school buses serving a dispersed rural population
- parents and families travelling to schools and activities
- pedestrians, cyclists, and recreational users
- local residents commuting to work

This is not an industrial road network, but a multi-use environment where different types of road users interact continuously.

Interaction of Road Users (Core Safety Issue)
The primary issue is not simply the volume of traffic, but the interaction between fundamentally different types of road users.
The EIAR does not adequately assess real-world interactions between:

- HGVs and agricultural vehicles
- HGVs and school buses
- construction traffic and young or inexperienced drivers
- industrial traffic and pedestrians or cyclists

These interactions create a complex and inherently hazardous environment, particularly on roads with limited visibility, constrained geometry, and no segregation between users.

A typical day on l3103

School Traffic and Vulnerable Users

A significant omission in the EIAR is the lack of meaningful assessment of school-related traffic.

The local road network is heavily used by:

- school buses making frequent stops along narrow roads
- secondary school students, including newly qualified drivers
- parents transporting children to and from schools and activities

These groups are particularly vulnerable. School buses frequently stop in locations with limited visibility, and young drivers are statistically at higher risk, particularly on rural roads.

Peak traffic periods coincide with school start and finish times, increasing the likelihood of conflict with construction and operational traffic. This interaction has not been adequately assessed.

Construction Phase Impacts

The construction phase will give rise to a sustained period of disruption, including:

- large numbers of workers travelling to and from the site
- frequent HGV movements associated with materials and earthworks
- abnormal loads relating to plant and infrastructure
- extended works along local roads, including temporary restrictions and reduced access

While traffic management measures may be proposed, real-world conditions — including delays, overlapping peak periods, and unpredictable movements — mean that conflict with existing road users is likely.

Operational Phase Impacts

The operational phase introduces a long-term traffic presence, including:

- fuel tanker deliveries
- maintenance and service vehicles
- occasional abnormal loads

These movements will continue for the lifetime of the development and represent a permanent change in the function of the local road network, shifting it from a rural and community-based system to one partially serving industrial activity.

Access to Community Infrastructure

The road network also provides access to essential and community infrastructure, including:

- schools and educational facilities
- sports grounds and recreational amenities
- community buildings and events
- local businesses

Any increase in traffic volumes or associated risk therefore affects not only transport, but access to essential services and community life.

Cumulative Impact

The cumulative effect of increased traffic includes:

- reduced road safety
- increased stress and uncertainty for road users
- loss of amenity and perceived safety
- reduced suitability of roads for walking, cycling, and recreation

From a local perspective, roads that were historically safe and suitable for everyday use have already undergone change. The proposed development would accelerate this trend and further erode the safety and quality of the local environment.

Assessment Deficiencies

Under the Environmental Impact Assessment Directive, the assessment must identify, describe, and assess the likely significant effects of a development on population and human health, including safety.

The EIAR does not adequately reflect:

- real-world road conditions
- the complexity of daily traffic patterns
- the interaction between different road users
- the vulnerability of key groups

As a result, it underestimates the true level of impact.

Taken together, the characteristics of the existing road network, the complexity of traffic patterns, the vulnerability of users, and the scale and duration of the proposed increase in traffic demonstrate that it has not been established that the local road network can safely accommodate the development.

Accordingly, the EIAR does not provide a complete or reliable assessment of traffic impacts, and it has not been demonstrated that the proposed development would not give rise to significant adverse effects on road safety and the quality of life of the local community.

IMPACT ON FARMING, AGRICULTURAL LIVELIHOODS AND RURAL SUSTAINABILITY

Farming is a fundamental component of the local economy, as well as the cultural identity and long-term sustainability of the area. This submission is informed by direct experience of farming in the locality, with family members, including my brothers, continuing to make a living from agriculture. Their livelihoods, and the future viability of farming in the area, are directly dependent on the quality of the surrounding environment.

Farmers are operating within an increasingly stringent regulatory framework, including obligations under the Nitrates Directive, which places strict controls on nutrient management, water protection, and environmental compliance. In this context, the introduction of additional environmental risk from an external industrial source places farmers in a position where compliance may be compromised through no fault of their own.

Agricultural production is intrinsically linked to environmental conditions. Livestock health and farm productivity depend directly on:

- air quality
- water quality
- soil condition and integrity

Any deterioration in these environmental factors has the potential to adversely affect:

- animal welfare
- productivity and output
- the long-term viability of farming enterprises

The proposed development introduces a range of risks to the agricultural environment, including:

- impacts on soil quality through deposition, disturbance, and potential contamination
- risks to water quality through surface and groundwater contamination pathways, particularly in a vulnerable karst environment
- impacts on livestock health through prolonged exposure to degraded environmental conditions

In addition to direct environmental impacts, there are significant indirect and economic risks associated with the perception of contamination. The Irish agricultural sector is highly dependent on reputation, traceability, and consumer confidence, both domestically and internationally.

The 2008–2009 Irish pork contamination crisis, which arose from dioxin contamination entering the food chain, provides a clear precedent for how a localised environmental incident can have widespread and disproportionate consequences. These included:

- national product recalls
- collapse of market confidence
- long-term reputational damage to the sector
- significant financial losses extending far beyond the immediate source of contamination

This demonstrates that even the perception of environmental risk can have serious and far-reaching implications for farmers.

The proposed development therefore gives rise not only to environmental risk, but also to economic vulnerability for the local farming community. Farmers in the receiving environment

derive no direct benefit from the development yet may bear a disproportionate share of the associated risks.
This raises fundamental concerns in relation to:

- fairness and equity
- rural sustainability
- the protection of established livelihoods

Furthermore, the introduction of industrial activity into a predominantly agricultural landscape represents a clear conflict in land use. It alters the environmental baseline upon which farming depends and introduces external risks that are entirely outside the control of those managing the land.
The EIAR does not provide a sufficiently detailed or site-specific assessment of these impacts. In particular, it does not:

- assess the cumulative effect of environmental changes on agricultural productivity
- evaluate risks to livestock health in a meaningful or evidence-based manner
- consider the economic implications of actual or perceived contamination
- address the interaction between environmental regulation and externally imposed industrial risk

In the absence of such analysis, it has not been demonstrated that the proposed development will avoid significant adverse effects on agricultural activity, farm viability, and rural livelihoods.
Accordingly, the proposed development gives rise to serious concerns in relation to the protection of the rural economy, the sustainability of farming, and compliance with the principles of proper planning and sustainable development.

LANDSCAPE, VISUAL IMPACT AND RURAL CHARACTER

The proposed development represents a significant industrial intrusion into a predominantly rural landscape.
It will introduce large-scale infrastructure, including turbine buildings, plant structures, extensive hardstanding, security fencing, continuous lighting, a stack of approximately 30 metres in height, and a telecommunications mast of approximately 36 metres, into an area currently characterised by agricultural land use, open fields, and dispersed residential settlement.
The scale, height, and industrial character of the proposed development are fundamentally at odds with the existing landscape, which is defined by low-lying topography, limited built form, and a strong sense of rural openness.
The inclusion of prominent vertical structures, in particular the stack and telecommunications mast, will introduce visually dominant elements that will be highly visible across a wide area and will alter the skyline of the receiving environment.
The development will result in:

- visual intrusion across a wide area, including from nearby dwellings, local roads, and surrounding farmland
- loss of rural character and landscape coherence
- the introduction of an industrialised environment into a previously non-industrial setting

The image above is taken from the Applicant's Appendix 6.1 (Part 1, Viewpoint 2), approximately 590m from the site boundary.. The image above illustrates the existing rural agricultural character of the receiving environment. It should be noted that existing trees and hedgerows on adjoining lands are outside the control of the applicant and cannot be relied upon as effective or permanent mitigation.

The impact is not confined to visual effects alone. It extends to the overall perception and experience of the area. The existing environment is characterised by quiet, low-intensity rural activity and a strong connection to the surrounding countryside. The introduction of a large-scale industrial facility will fundamentally alter this experience, resulting in a clear transition from a rural to a semi-industrial landscape.

This change in character has direct implications for:

- residential amenity and quality of life
- the enjoyment of the countryside by local residents and visitors

- the setting of nearby homes, farms, and community infrastructure

The presence of continuous and artificial lighting will further intensify these impacts, particularly during evening and night-time hours, when the contrast between the development and the surrounding landscape will be most pronounced.
In planning terms, the proposed development is inconsistent with the objectives of the Galway County Development Plan 2022–2028, which seeks to:

- protect landscape character and visual amenity
- safeguard the rural environment from inappropriate development
- maintain the distinct identity and quality of rural areas

The introduction of large-scale industrial infrastructure, including tall vertical elements such as the stack and telecommunications mast, represents a material change in land use and landscape function and conflicts directly with these objectives.
Furthermore, the EIAR does not adequately assess:

- the cumulative impact of visual, lighting, and industrial activity
- the long-term transformation of landscape character
- the interaction between visual impacts and other environmental stressors, including noise and traffic

In the absence of a robust, site-specific, and cumulative assessment, it has not been demonstrated that the proposed development will avoid significant adverse effects on landscape character, visual amenity, and the overall quality of the rural environment.
Accordingly, the proposed development gives rise to serious concerns in relation to landscape protection, rural character, and compliance with the principles of proper planning and sustainable development.

BIODIVERSITY AND ECOLOGICAL CORRIDORS

The receiving environment includes a network of agricultural land, hedgerows, treelines, and field boundaries which function as important ecological corridors. These features facilitate wildlife movement and are particularly important for protected species such as bats, as well as other mammals including badgers and foxes.

I reside approximately 800 metres from the proposed development site and, from regular observation in the locality, wildlife activity is frequent and consistent. Bats are commonly observed during evening walks, moving along the same routes in the direction of Rathmorrissey. This repeated and patterned activity strongly indicates the presence of established commuting routes, most likely aligned with hedgerows and field boundaries linking feeding and roosting areas.

In addition to bats, the area supports other wildlife, including foxes and badgers. There is clear evidence of fox activity locally, including the presence of dens within nearby fields and boundaries. These species rely on the same network of hedgerows, field margins, and undisturbed ground for shelter, foraging, and movement. Their presence further demonstrates that the area functions as an active and interconnected ecological system.

Bats are strictly protected under the Habitats Directive, which affords protection not only to the species themselves but also to their breeding sites, resting places, and commuting routes. Badgers are also protected under Irish wildlife legislation, reflecting their ecological importance. Disturbance or disruption of habitats and movement corridors, even indirectly, can give rise to significant adverse effects.

The EIAR does not appear to fully capture this site-specific and long-term ecological activity. While ecological surveys may have been undertaken at particular times, they cannot reliably reflect the full extent of species presence and movement across seasons. Regular, long-term observation provides important additional context and indicates that the area supports active and sustained wildlife use.

There is also a relevant historical context. Prior to the construction of the motorway, the area surrounding the proposed site was characterised by semi-natural vegetation, including furze (gorse), which would have supported a higher level of biodiversity. Since approximately 2001, much of this land appears to have been reclaimed or altered, resulting in a reduction in habitat availability.

In this context, it is reasonable to conclude that a significant proportion of the original biodiversity has already been lost. As a result, the remaining hedgerows, treelines, and field boundaries are of increased importance as functional ecological corridors. Any further disturbance or fragmentation of these features is likely to have a disproportionate impact on local biodiversity.

The proposed development gives rise to a number of risks, including:

- fragmentation of established ecological corridors
- disturbance arising from construction and operational activity
- introduction of artificial lighting, which is known to deter bat movement
- increased noise and vibration
- loss or disturbance of habitats used by mammals such as foxes and badgers

These impacts are not isolated. Over time, they may contribute to the gradual displacement, fragmentation, or decline of wildlife populations in the area.
There is also a clear cumulative effect to consider. The combination of:

- historic habitat loss
- ongoing disturbance
- further fragmentation of ecological corridors

has the potential to result in long-term biodiversity decline, even where individual impacts may appear limited when considered in isolation.

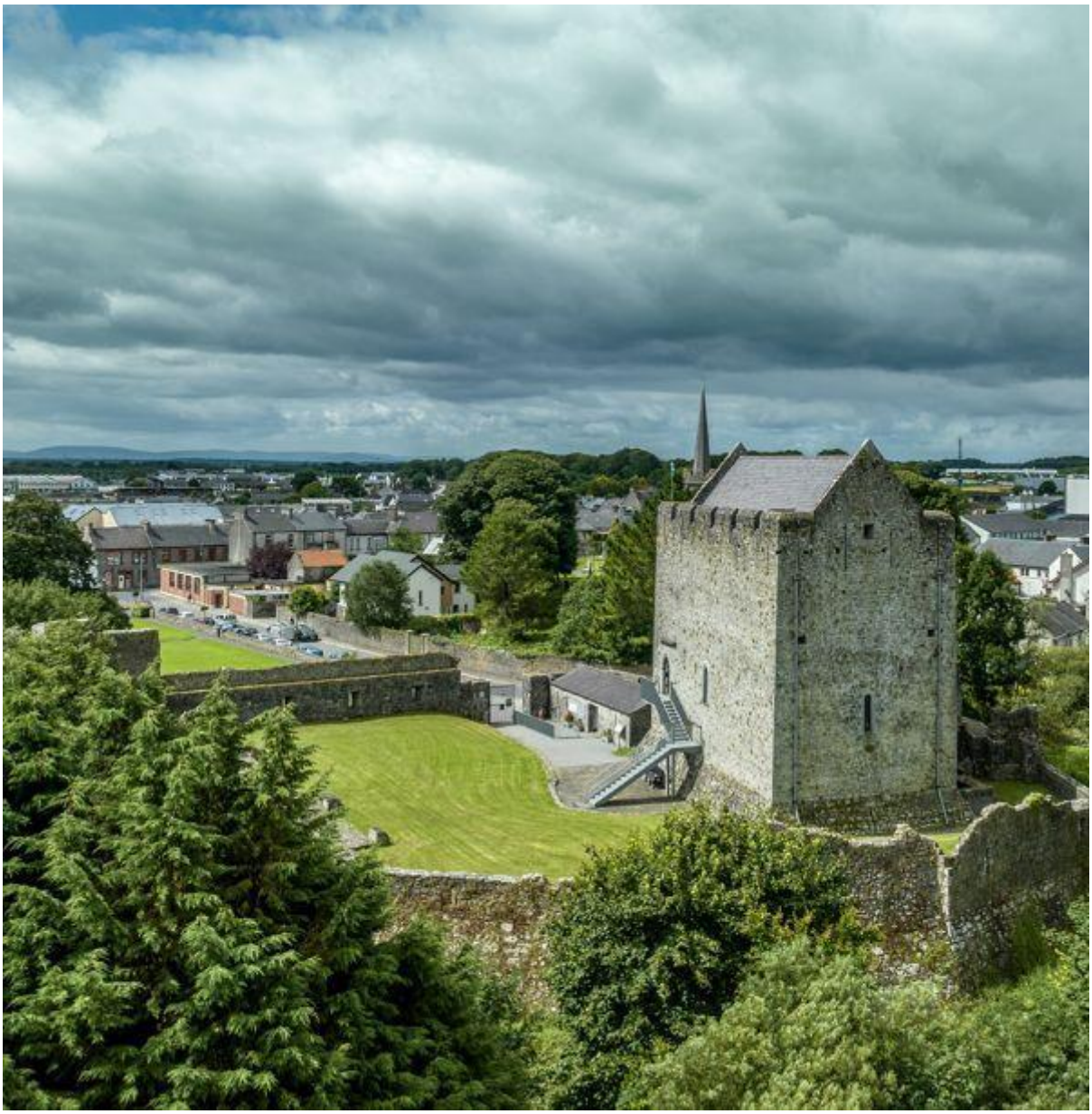
Under the Habitats Directive, it must be demonstrated beyond reasonable scientific doubt that a development will not adversely affect protected species or their habitats. The EIAR does not provide sufficient certainty that ecological corridors will be maintained or that impacts on wildlife can be effectively avoided or mitigated.

In these circumstances, it has not been demonstrated that the proposed development will avoid significant adverse effects on protected species, including bats, and on the wider ecological integrity of the area.

Accordingly, the proposed development gives rise to serious concerns in relation to biodiversity protection, ecological integrity, and compliance with EU environmental legislation and the principles of proper planning and sustainable development.

IMPACT ON ATHENRY AS A HERITAGE TOWN

Athenry is a recognised historic town of significant cultural and architectural importance, characterised by its well-preserved medieval fabric, including the town walls, castle, historic street pattern, and associated built heritage. Its identity is closely linked not only to these architectural features, but also to its wider rural landscape setting.




GUINNESS
DRAUGHT
Smithwicks

The surrounding countryside plays a fundamental role in defining the setting of Athenry. It contributes to:

- the visual context in which the historic town is experienced
- the sense of place and identity associated with the town
- the attractiveness of the area for tourism, recreation, and local amenity
- the overall environmental quality for residents and visitors

The Athenry Local Area Plan places clear emphasis on:

- the protection of the town's historic character
- the preservation of its landscape setting
- the promotion of Athenry as a sustainable and attractive place to live, work, and visit
- the enhancement of quality of life

The proposed development introduces large-scale industrial infrastructure into the wider setting of this historic town. This represents a significant and incompatible change in the character of the surrounding landscape and conflicts with the objectives of the Local Area Plan. The development would:

- introduce industrial structures, including a prominent stack, into the rural setting of the town
- alter the perception of Athenry as a predominantly rural and heritage-focused location
- create a stark visual and environmental contrast with the established character of the area
- contribute to the gradual industrialisation of the landscape surrounding the town

The impact is not limited to visual considerations. It extends to how the town is experienced by:

- residents
- visitors
- users of local amenities and heritage sites

The presence of industrial infrastructure in proximity to a historic town alters the broader experiential context, diminishing the sense of heritage, continuity, and place which defines Athenry.

There is also a cumulative dimension to this impact. When combined with:

- increased traffic and associated disturbance
- potential noise and lighting impacts
- perceived environmental risk
- progressive changes to landscape character

the development has the potential to erode the overall quality, character, and attractiveness of Athenry as both a heritage destination and a place to live.

Under Irish planning policy, the protection of heritage extends beyond individual structures to include their setting and the wider landscape context in which they are experienced. The introduction of incompatible development within that setting can give rise to significant adverse effects, even where direct physical impacts on heritage structures do not arise.

The EIAR does not adequately assess:

- the impact of the development on the setting of Athenry
- the interaction between visual, environmental, and experiential effects
- the cumulative impact of the development in combination with other environmental changes

In the absence of a robust and site-specific assessment, it has not been demonstrated that the proposed development is compatible with the protection of heritage, the preservation of landscape setting, or the long-term planning vision for Athenry.

COMMUNITY ENGAGEMENT, PUBLIC PARTICIPATION AND ACCESS TO INFORMATION

There are serious concerns regarding the adequacy of community engagement and the accessibility of information associated with this application.

Meaningful public participation is a fundamental requirement of the planning process. It is underpinned by both national planning legislation and European law, including the Environmental Impact Assessment Directive and the Aarhus Convention. These frameworks require that environmental information be made available in a manner that is accessible, understandable, and provided in sufficient time to enable informed and effective participation. In this case, these requirements do not appear to have been met.

The Environmental Impact Assessment Report (EIAR) and associated documentation are extremely large, highly technical, and complex. While such complexity may be inherent to large-scale infrastructure projects, it creates a significant barrier to meaningful engagement, particularly for members of the public without specialist expertise.

The effectiveness of public participation is not determined solely by the formal availability of documentation, but by whether that information is realistically accessible and capable of being understood within the available timeframe. In this case, the scale, volume, and technical nature of the documentation significantly limit the ability of the public to engage in a meaningful way.

In addition, there were issues regarding the **availability of documentation at local level**. The EIAR was intended to be accessible in a **public location, including a local library, but was not available for a significant period (5 weeks**) after the expected availability date. This delay materially reduced the effective time available for members of the public to review the documentation and prepare submissions.

In practical terms, this has the effect of constraining meaningful participation, notwithstanding the formal timelines provided for in the process.
Furthermore, there is limited evidence of meaningful engagement with key community stakeholders. In particular:

- schools and educational facilities
- sports clubs and recreational organisations
- community groups and local users of the surrounding environment

do not appear to have been directly or proactively engaged.

These are not peripheral stakeholders; they represent core users of the receiving environment and are among those most likely to be directly affected by the proposed development.
Effective community engagement requires more than the passive provision of information. It requires:

- early and proactive communication
- clear and accessible presentation of information
- meaningful dialogue with affected parties
- demonstrable consideration of concerns raised

There is limited evidence that these elements have been achieved. The documentation does not clearly demonstrate how concerns raised during consultation have influenced the design, assessment, or mitigation of the proposed development.

In addition, the fragmentation of the overall project across multiple consent processes further complicates public engagement. Relevant information is dispersed across different applications and technical documents, making it difficult for members of the public to:

- understand the full extent of the development
- identify interactions between different project components
- assess cumulative and in-combination effects

This lack of a clear and integrated presentation undermines transparency and further restricts meaningful participation.
Taken together, the combination of:

- complex and highly technical documentation
- delayed availability of key materials
- limited direct engagement with affected stakeholders
- fragmented presentation of the overall project

creates a situation in which meaningful public participation is significantly constrained.

In these circumstances, it has not been demonstrated that the requirements for effective public participation, as set out under the Environmental Impact Assessment Directive and the Aarhus Convention, have been satisfied.

This raises serious concerns in relation to procedural fairness, transparency, and the ability of the competent authority to rely on the EIAR as a complete and robust assessment of environmental impacts.

PROJECT FRAGMENTATION AND INCOMPLETE ENVIRONMENTAL ASSESSMENT

The proposed development forms part of a wider and interdependent system, including gas infrastructure, grid connections, and associated works, which are subject to separate consent processes.
This approach results in the fragmentation of what is, in reality, a single integrated project into multiple components. Consequently, the overall scale, nature, and combined environmental effects of the development are not presented or assessed in a comprehensive or transparent manner.
Under the Environmental Impact Assessment Directive, it is a fundamental requirement that all elements of a project which are functionally interdependent be assessed together. This is necessary to ensure that:

- the full extent of environmental effects is identified
- cumulative and in-combination impacts are properly assessed
- the competent authority is provided with a complete and reliable basis for decision-making

This requirement has been reinforced through case law of the Court of Justice of the European Union, including O'Grianna v An Bord Pleanála, which established that projects must not be artificially divided in order to avoid or reduce the scope of environmental assessment.
In the present case, the separation of the proposed development from related infrastructure, including gas supply and electricity grid connections, prevents a proper and integrated assessment of:

- cumulative environmental impacts
- the interaction between different elements of the project
- the overall footprint, scale, and operational characteristics of the development

As a result, neither the public nor the competent authority is provided with a clear, single, and complete understanding of the project and its environmental consequences.
This fragmentation also gives rise to practical difficulties in reviewing the Environmental Impact Assessment Report (EIAR). Relevant information is dispersed across multiple applications and technical documents, making it difficult to:

- identify the full extent of the development
- understand how different components interact
- assess cumulative impacts in a coherent and transparent manner

This lack of clarity undermines both the effectiveness of the assessment process and the transparency of the application.
The fragmentation of the project also has direct implications for public participation. Where information is divided across multiple processes, it becomes more difficult for members of the public to:

- access all relevant information
- understand the full scope of the development
- make informed and meaningful submissions

This approach is inconsistent with the requirements of the Aarhus Convention, which emphasises transparency, accessibility of information, and effective public participation in environmental decision-making.

Furthermore, the EIAR does not adequately address cumulative and in-combination effects arising from the interaction of the proposed development with related infrastructure and other environmental stressors, including:

- traffic impacts
- groundwater vulnerability
- landscape and visual effects
- risks associated with major accidents

In environmental assessment terms, it is not sufficient to consider each element of a project in isolation. The interaction of multiple components may give rise to impacts which are greater in scale and significance than the sum of individual effects. This has not been adequately assessed.

In these circumstances, it has not been demonstrated that the full extent of environmental impacts — including cumulative and in-combination effects — has been properly identified, described, or assessed.

The fragmentation of the project therefore undermines:

- the integrity of the Environmental Impact Assessment process
- the transparency and clarity of the application
- the ability of the competent authority to carry out a lawful and fully informed assessment

Accordingly, the proposed development gives rise to serious concerns in relation to compliance with the Environmental Impact Assessment Directive and the principles of proper planning and sustainable development.

ECONOMIC JUSTIFICATION, STRATEGIC NEED AND ALTERNATIVES

The need for the proposed development has not been clearly or robustly demonstrated.
In planning terms, a development of this scale and nature must be justified in the context of national policy, long-term strategic need, and the principles of proper planning and sustainable development. In this case, the justification provided is insufficient and does not adequately reflect the rapidly evolving nature of Ireland's energy system.

Ireland's energy policy framework, including the Climate Action Plan 2024, emphasises the transition towards a low-carbon energy system, with increasing reliance on renewable energy, energy storage, interconnection, and demand-side management. These measures are intended to reduce dependence on fossil fuel generation over time.

The justification for the proposed development appears to rely, in part, on energy demand projections derived from modelling tools such as the Long-range Energy Alternatives Planning system (LEAP). However, such models are inherently based on assumptions regarding future demand growth, technology deployment, and policy direction. They do not establish a fixed or definitive requirement for specific infrastructure projects, particularly where alternative pathways exist.

Independent analysis by the Economic and Social Research Institute has highlighted significant uncertainty in relation to future electricity demand, particularly in the context of large energy users. A substantial proportion of projected demand growth in Ireland is associated with data centres, which represent a highly concentrated and rapidly expanding source of electricity consumption.
This raises a critical question as to whether the proposed development is intended to serve:

- broader public and national energy needs
- or specific commercial demand associated with large-scale energy users

In planning terms, this distinction is fundamental. Infrastructure which gives rise to significant environmental and community impacts must be clearly justified in terms of wider public benefit. This has not been demonstrated.

The growth in electricity demand driven by data centres also has implications for energy affordability. Ireland already experiences relatively high electricity prices compared to other European countries, in part due to its reliance on imported fossil fuels, particularly gas. Increased investment in gas-fired generation risks reinforcing this dependency and exposing consumers to continued price volatility.

Rather than addressing structural issues within the energy system, the proposed development may contribute to:

- sustained high electricity costs
- continued exposure to international gas price fluctuations
- increased economic vulnerability for households and businesses

The EIAR and supporting documentation do not adequately assess alternative approaches to meeting energy demand, including:

- renewable energy expansion
- grid-scale battery storage

- demand-side management and energy efficiency measures
- enhanced use of interconnection

These alternatives are central to both national and EU energy policy and should be considered as reasonable alternatives under the Environmental Impact Assessment Directive. The absence of a meaningful assessment of these options represents a significant deficiency.

Furthermore, the proposed development gives rise to concerns regarding long-term economic sustainability. Investment in fossil fuel infrastructure creates a risk of "carbon lock-in," whereby reliance on such infrastructure persists beyond the point at which it is compatible with climate policy objectives. This may result in stranded assets or require costly retrofitting or premature decommissioning.

The reliance on potential future technologies, such as hydrogen or alternative fuels, is speculative and does not provide a robust basis for decision-making. There is no certainty that such technologies will be viable, scalable, or available within the operational lifetime of the development.

Taken together:

- the need for the development has not been clearly established
- demand projections remain uncertain and are heavily influenced by data centre growth
- alternative, lower-impact solutions have not been adequately assessed
- the development risks reinforcing high electricity costs and fossil fuel dependency
- the proposal gives rise to long-term risks of economic inefficiency and carbon lock-in

In these circumstances, it has not been demonstrated that the proposed development is necessary, appropriate, or aligned with national policy and long-term economic and environmental objectives.

Accordingly, the proposed development gives rise to serious concerns in relation to economic justification, strategic need, and compliance with the principles of proper planning and sustainable development.

CLIMATE POLICY, LONG-TERM SUSTAINABILITY AND POLICY CONSISTENCY

The proposed development raises significant concerns in relation to climate policy, long-term sustainability, and alignment with Ireland's legally binding obligations.

The development is intended to operate over a prolonged period, potentially extending to 2050. This timeframe directly overlaps with Ireland's statutory objective of achieving climate neutrality, as set out under the Climate Action and Low Carbon Development (Amendment) Act 2021.

This Act establishes a legally binding framework requiring:

- a transition to a climate-resilient, biodiversity-rich, and climate-neutral economy
- a significant reduction in greenhouse gas emissions across all sectors
- alignment of development with national carbon budgets and sectoral targets

In addition, Ireland is bound by EU climate obligations, including the European Green Deal, which sets a clear trajectory towards climate neutrality by 2050.

The proposed development is based on gas-fired generation, with provision for diesel backup. Both represent fossil fuel-based energy sources and give rise to direct greenhouse gas emissions. The introduction of new fossil fuel infrastructure at this stage of the energy transition is fundamentally at odds with the direction of national and EU climate policy.

While the role of flexible generation in supporting renewable energy is acknowledged, this does not remove the requirement to demonstrate that:

- the development is necessary
- lower-carbon alternatives have been fully assessed
- the proposal is consistent with long-term decarbonisation pathways

This has not been demonstrated.
The EIAR does not adequately assess the cumulative long-term climate impact of the development, including:

- emissions over its full operational lifetime
- interaction with national carbon budgets
- contribution to overall sectoral emissions

There are also inconsistencies within the EIAR regarding operational assumptions, including the frequency and duration of operation and reliance on backup fuels. These inconsistencies undermine the reliability of the assessment.

The proposed development also gives rise to concerns regarding carbon lock-in. Investment in long-lived fossil fuel infrastructure risks embedding reliance on gas generation beyond the period in which it is compatible with climate targets. This may:

- delay the transition to renewable energy
- require costly retrofitting or early decommissioning
- result in stranded assets

The reliance on potential future technologies, such as hydrogen or alternative fuels, is speculative and does not provide a robust or evidence-based basis for decision-making.

There are also broader issues of policy consistency and public confidence**. I had intended to invest in energy efficiency and renewable measures for my home, including upgrades supported by the Sustainable Energy Authority of Ireland. These measures represent a significant personal financial commitment and are actively encouraged under national climate policy.**
At a national level, individuals are being asked to:

- invest in energy efficiency
- reduce emissions
- transition to low-carbon living

These actions involve considerable cost and long-term commitment at household level.
However, the proposal to introduce new fossil fuel infrastructure in the locality raises fundamental questions regarding the consistency and credibility of this policy approach.

The proposed development represents a continued investment in fossil fuel-based energy generation, with an operational lifespan extending potentially to 2050. This creates a clear contradiction between:

- policy measures aimed at reducing emissions at individual level
- and infrastructure decisions which reinforce reliance on fossil fuels at system level

From a planning perspective, this inconsistency is highly significant. Public confidence in climate policy depends on coherence between:

- national strategy
- infrastructure investment
- individual action

Where individuals are expected to make costly changes to reduce emissions, it is reasonable to expect that large-scale infrastructure decisions will align with the same objectives.

The introduction of fossil fuel infrastructure in this context risks:

- undermining public confidence in climate policy
- discouraging investment in energy efficiency measures
- weakening the overall effectiveness of national climate action

There is also a broader economic implication. Failure to align infrastructure decisions with climate obligations may expose the State to future costs or penalties arising from non-compliance with EU targets. In practice, such costs are likely to be borne by the public.

In planning terms, developments must be assessed not only on their immediate impacts, but on their compatibility with long-term policy objectives. In this case, the proposed development:

- reinforces reliance on fossil fuels
- introduces additional greenhouse gas emissions into the system
- does not clearly align with national or EU climate targets

It has not been demonstrated that the proposed development is consistent with Ireland’s climate obligations or with the transition to a low-carbon economy.

Accordingly, the proposed development gives rise to serious concerns in relation to climate policy, long-term sustainability, and compliance with the principles of proper planning and sustainable development.

OVERALL CONCLUSION

Taken together, the issues identified in this submission demonstrate that the proposed development has not been adequately justified and that the Environmental Impact Assessment is incomplete, fragmented, and lacking in site-specific analysis.

Significant uncertainty remains in relation to human health, groundwater, major accident risk, traffic safety, farming, biodiversity, landscape, heritage, climate policy, and cumulative impacts.

In circumstances where such uncertainty remains, particularly in relation to human health and environmental protection, the precautionary principle must apply. It has not been demonstrated that the proposed development would avoid significant adverse effects or that it would be consistent with proper planning and sustainable development.

I am not opposed to development in principle, but this proposal is the wrong development in the wrong location and has not been shown to be consistent with clean air, climate, or proper planning objectives.

In these circumstances, the proposed development fails to satisfy the requirements of the Environmental Impact Assessment Directive and is not consistent with the principles of proper planning and sustainable development.

REQUEST
For the reasons set out above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Yours Sincerely,

Name: Assumpta Loughran

Date: 24 April 2026