Damien Collins

Pollnagroagh, Athenry, Co. Galway H65 PN56

Adjoining Land Owner

20th April 2026

An Coimisiún Pleanála
64 Marlborough Street, Dublin 1, D01 V902

FORMAL THIRD PARTY OBSERVATION FOR CASE NO. 324113

Development: Construction of an Open-Cycle Gas Turbine Power Plant, Above Ground Installation and Ancillary Development

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

Applicant: Bord Gáis Energy Limited

Submitted by: Damien Collins, Certified Organic Farmer, Adjoining Landowner and resident.

Who I Am and Why This Matters

I, Damien Collins, am the owner and occupier of a residential dwelling and certified organic farm at Pollnagroagh, Athenry, County Galway. My home and farm directly adjoin the proposed development site and the 1.3km long access road. This land and home are not a second property or an investment. This is my home, my livelihood, I am the fourth generation of my family to farm this land. It was inherited from my late uncle, whom I cared for in his final years. It carries deep personal, familial, and cultural significance that cannot be measured in planning terms alone.I live here with my 2 adult children Jamie & Laura.

My property sits in a uniquely exposed position relative to this application:

- The proposed 1.3km long access road to the peaker plant is 19 metres from my kitchen door
- The proposed access road entrance is located on a bend immediately adjacent to my own farm entrance, which is defined by original stone pillars over 100 years of age
- My boundary wall — a traditional dry stone field wall that has stood for the lifetime of this farm — runs directly alongside the proposed access route(1.3km long)
- My land adjoins the proposed development on its boundary
- The main plant compound is 900 metres from my home

Entrance gate to my traditional Farmhouse, over 100 years old. Proposed Development entrance adjoins to the right side of my pillar.

I am a certified organic beef farmer. **Organic farming under EU Regulation 2018/848** — administered in Ireland by the Department of Agriculture, Food and the Marine (DAFM) and verified by the **Organic Trust** — it is my sole source of income. I have no other employment. The economic viability of my farm, and of my life, depends entirely on maintaining my organic certification and the environmental quality of my land, water, and air.

I also participate in the **Agri-Climate Rural Environment Scheme (ACRES)**, which requires active compliance with strict environmental standards. Any deterioration in the surrounding environment has direct regulatory and financial consequences for me.

I have committed to the improvement of this farm over the last twenty years and recently have renovated the original one hundred year old farm house and sheds. I have invested heavily in sustainable living. My home has a geothermal ground source heat system, extensive insulation, and I am planning solar panels. I represent exactly the type of resident and farmer that national climate and agricultural policy is designed to support and protect. This development would place that investment and that way of life at serious risk.

In late 2024, I was approached by a **Bord Gáis representative** with an offer to sell land to them for the access road to the proposed peaker plant. During the time I had taken to consider my options, I **felt pressured by the representative to sign** an option agreement and on

preliminary research into peaker plants, I opted to decline the offer made. I was **not informed of any associated risks** of a peaker plant by the representative.

Since then, I have not been contacted by Bord Gáis Energy or any agent acting on their behalf at any point during the pre-application process, the design process, or the preparation of the Environmental Impact Assessment Report (EIAR). No survey, assessment, or inspection of any kind has been carried out on my dwelling, my farm buildings, my agricultural land, my water supply, or my entrance and boundary structures. This is a serious failure.

As the immediately adjoining landowner most directly affected by this development, I should have been identified, engaged, and assessed before this application was submitted.

My Organic Farm Enterprise — What Is at Risk

My farming enterprise comprises:

- Organic grassland used for grazing and forage production
- An organic beef suckler enterprise maintained year-round on the farm
- Biodiversity conservation areas managed under ACRES
- Hedgerow and habitat protection areas

Organic certification under EU Regulation 2018/848 requires strict and ongoing adherence to conditions that distinguish organic production from conventional farming. These include:

- Complete absence of prohibited substances in soil, water, and produce
- Rigorous prevention of contamination from any external source
- Maintenance of soil biological activity and fertility
- Active protection of biodiversity and ecological features
- Buffer zones where contamination risks from neighbouring activities exist

Organic certification is not solely determined by what happens within my farm boundary. It is equally dependent on what happens outside it. If a neighbouring industrial development introduces airborne pollutants, contaminated runoff, or chemical risk into my farming environment — even without any failure on my part — my certification body is obliged to investigate, and my status can be suspended, restricted, or removed.

The consequences of losing organic certification would be severe and potentially irreversible:

- Immediate loss of the organic premium on all beef sales
- Loss of DAFM organic farming support payments
- Loss of ACRES scheme payments that depend on environmental compliance
- Mandatory re-conversion period of up to two years before certification could be regained
- Reputational damage within the organic and agricultural sector
- Potential total loss of farm income during re-conversion

The EIAR (Volume 2, Chapter 5, Agricultural Impact Assessment) does not identify any organic farm holding in proximity to the site as a sensitive receptor. It does not assess implications for organic certification. It does not assess whether the introduction of combustion emissions, chemical storage, cooling system chemicals, or construction runoff would interact with organic certification requirements. This is a fundamental omission given that I am the immediately adjoining certified organic operator.

My agricultural consultant, Áine Gordon B.Agr.Sc (Organic Agricultural Advisor), has prepared a detailed technical submission supporting this observation. That submission is lodged alongside this observation and should be read in conjunction with it.

No Contact, No Survey, No Assessment — A Fundamental Failure of the EIAR Process

The applicant has not, contacted me in connection with the preparation of this application. No representative of Bord Gáis Energy, AtkinsRéalis, AWN Consulting, or any other agent has:

- Visited my dwelling to assess structural condition before works
- Inspected my farm buildings or agricultural structures
- Surveyed my private water supply or tested its baseline quality
- Assessed my farm entrance, entrance pillars, or boundary wall
- Engaged with me about the routing of the access road and its proximity to my property
- Sought my input on how the development would affect my organic farming activities
- Offered any pre-construction structural baseline survey
- Discussed noise, vibration, or construction impacts with me directly

The EIAR (Volume 2, Chapter 12, Water Quality, p. 575) identifies six wells and springs in the general vicinity of the site, including abstractions described as agricultural and domestic uses. My private water supply is among these. No baseline water quality testing has been carried out on my supply. There is therefore no evidential basis on which the applicant can claim to have assessed the risk to my water supply from this development.

The EIAR (Volume 2, Chapter 9, Noise and Vibration) states that baseline noise surveys were conducted at a limited number of noise sensitive locations. My dwelling — located 19 metres from the proposed access road — was not individually assessed. The applicant cannot demonstrate that the noise impact on my specific property has been adequately evaluated.

The EIAR (Volume 2, Chapter 4, Population and Human Health, Table 4-16) confirms 82 residential properties within 250 metres of the site boundary. Yet no direct engagement or individual assessment has been conducted with the property that is closest to and most directly affected by the proposed access road.

This failure to engage with me is not a minor procedural oversight. It means that the EIAR does not contain the site-specific information necessary to properly assess the impact of this

development on my home, my farm, my livelihood, and my water supply. The Board cannot be satisfied that likely significant effects have been identified, described, and assessed in accordance with the requirements of Directive 2011/92/EU as amended.

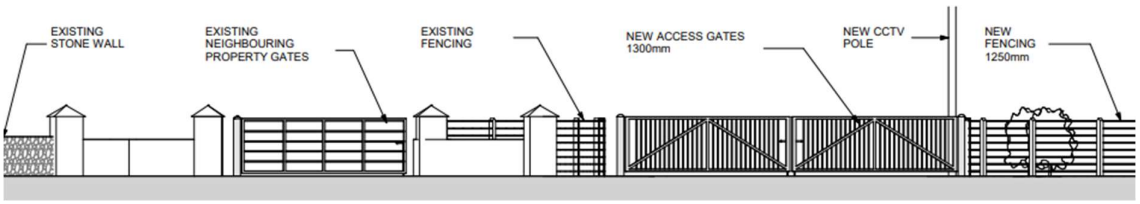
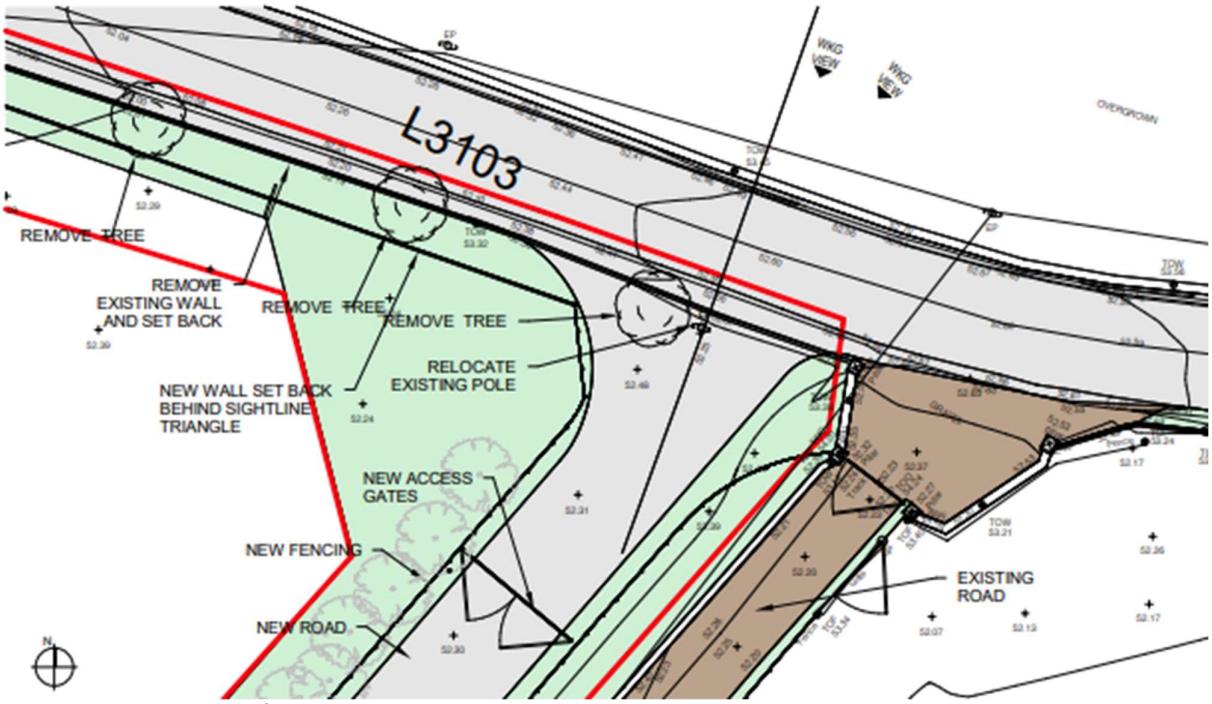


Image above taken from applicants drawing; PEK3-ATK-ZZ-ZZ-DR-A-ATK-000040, This shows my Existing Pillars and Entrance to my property alongside the proposed Entrance.

My Entrance, My Pillars, and Road Safety at the Proposed Access Junction

The proposed access to the Cashla Peaker Plant is located immediately adjacent to my existing farm and residential entrance on the L3103. My entrance is defined by original stone pillars that are over 100 years old. They are a historic and irreplaceable feature of this property. They are not decorative — they are a structural and heritage element of a period dwelling that was constructed to last and has lasted. No offer of protection, survey, or safeguarding commitment in respect of these pillars has been made by the applicant.

The juxtaposition of the proposed site entrance with my personal entrance creates a specific, concrete, and serious road safety problem that the EIAR does not adequately address.



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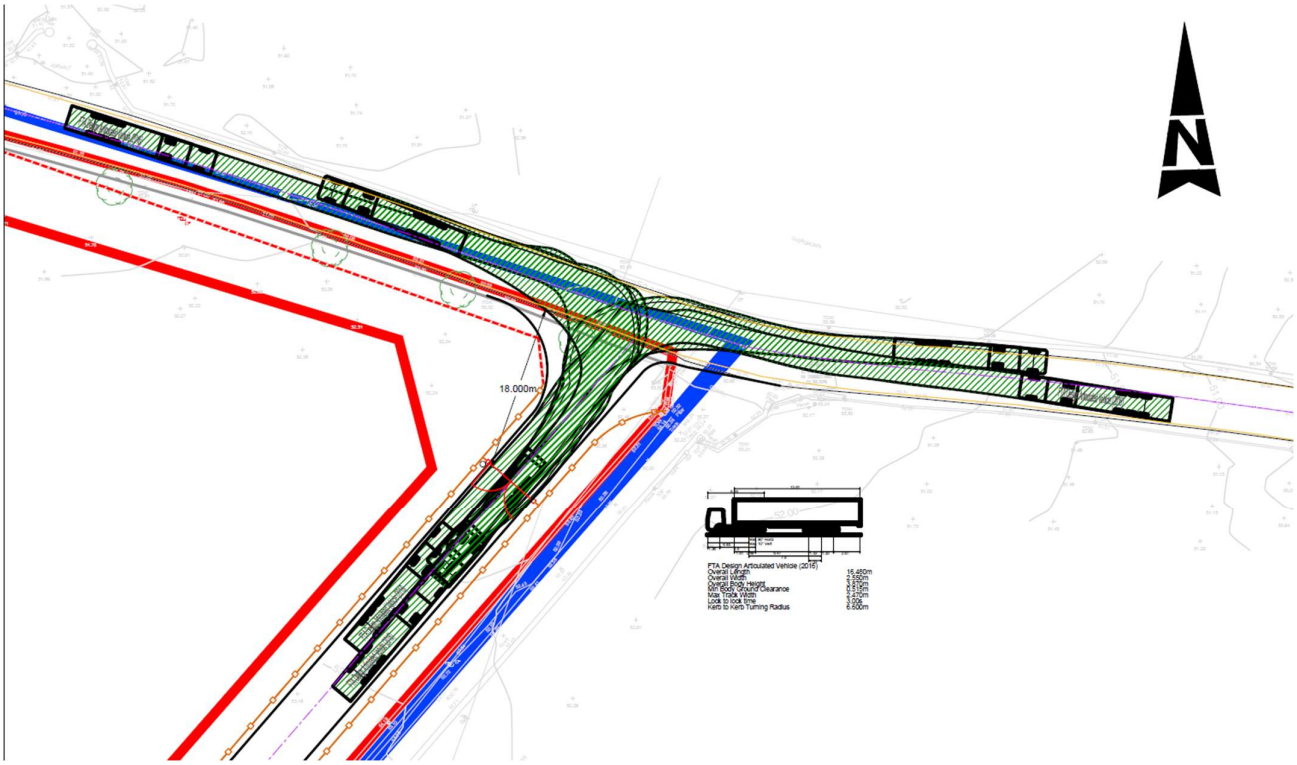


Image above taken from applicants drawing; PEK3-ATK-ZZ-01-DR-CE-901200, which shows the Autotrack done for Heavy goods Vehicles at the entrance. This is confusing and hard to read each individual one, however when studied its alarming to see their proposal.

The Physical Reality of This Junction

The L3103 at this location is a narrow rural road. BPS Planning (third party objection on behalf of the Athenry Peaker Plant Concern Group) has measured the carriageway width at approximately 4.97 metres using the applicant's own drawing data. The applicant's own Autotrack drawings, submitted as part of this application, demonstrate that articulated HGVs of approximately 16.5 metres in length are required to encroach into the opposing lane to enter and exit the proposed site. The vehicles physically cannot make the turning movement without using the full width of the road and occupying the oncoming traffic lane.

My entrance is immediately adjacent to this turning movement. When a large HGV or abnormal load turns into the proposed site entrance, it will swing across the full width of the L3103, directly in front of and into the space occupied by my entrance. A vehicle entering or exiting my property at the same moment as an HGV executes this manoeuvre faces a head-on conflict with no room to avoid it.

What the EIAR Fails to Address

The EIAR (Volume 2, Chapter 10, Traffic and Transportation) concludes that traffic impacts will not be significant. That conclusion is based on theoretical road capacity modelling, not on an assessment of the physical geometry of this specific junction. The EIAR does not:

- Assess the interaction between the proposed site access turning movement and my existing entrance
- Provide swept path analysis demonstrating that HGV turning movements can be completed without occupying my entrance space
- Assess sightlines from my entrance given the new HGV turning activity immediately adjacent to it
- Assess the safety implications of the juxtaposition of two active entrances on a 4.97 metre wide road
- Address the risk to my entrance pillars from the physical proximity of large turning vehicles
- Assess cumulative road safety risk during peak construction delivery periods

The applicant's own EIAR confirms that abnormal loads of up to 380 tonnes will use the L3103 for turbine and generator delivery. For diesel refuelling operations alone, it has been estimated that over 300 HGV tanker movements will be required during the operational phase. Every single one of these vehicles will need to execute a turning movement immediately in front of my entrance, on a road that is 4.97 metres wide.

The EIAR states at Chapter 10 that disruption to private entrances will be avoided where possible. In my case, the proposed access road emerges directly at my entrance. Avoidance is not possible. This is not a general or theoretical risk — it is a specific, unavoidable, and daily safety concern for me, my family, and any visitor to my farm.

My Entrance Pillars

My entrance pillars are original stone construction, over 100 years old. They are a defining feature of a period property of architectural and heritage character. They have never been damaged in over a century of normal rural road use. The introduction of HGVs, abnormal loads, and construction plant making tight turning movements immediately adjacent to them creates a risk of direct physical contact and irreversible damage that has not been assessed, acknowledged, or addressed in the EIAR.

I require that:

- A full photographic and structural record of my entrance pillars is made before any construction begins, at the developer's expense
- A swept path analysis is provided demonstrating that all proposed vehicle types can execute the site access turning movement without encroaching on my entrance space or within risk distance of my pillars
- A binding legal commitment is given that any damage to my pillars caused by the development will be made good using qualified traditional stone masonry at the developer's cost
- If it cannot be demonstrated that the turning movement is safe, the site access location must be redesigned

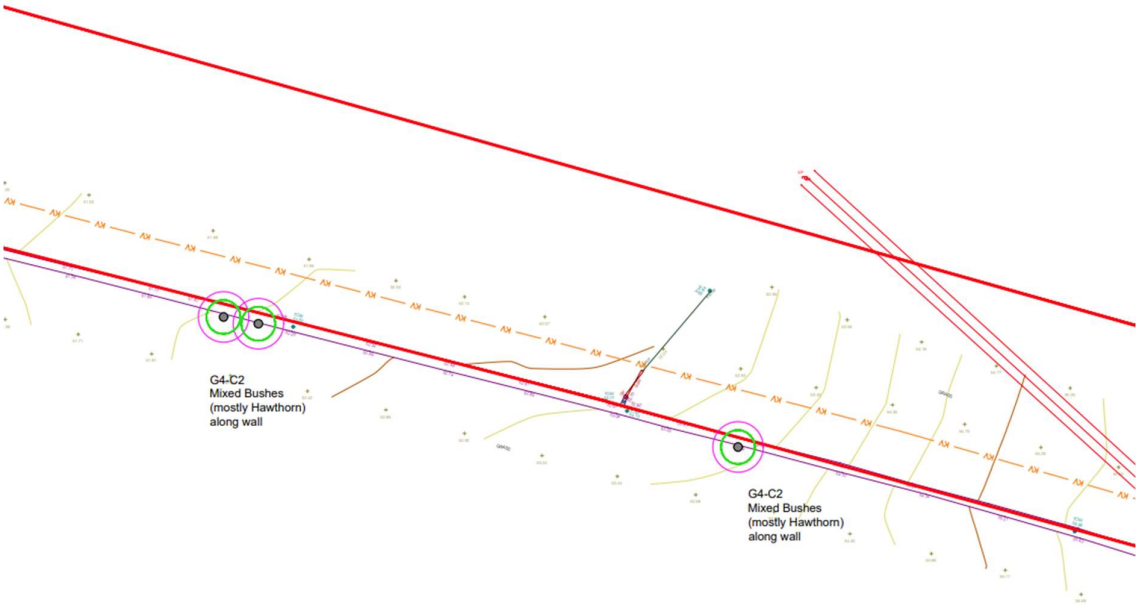
Existing Pillars and boundary stone wall to my property alongside the proposed Entrance.

My Boundary Wall, My Trees and Vegetation, and My Land — I Do Not Give Permission for Any Works

I want to make something absolutely clear at the outset of this section.

> ***I, Damien Collins, formally and unequivocally withhold consent for any works, access, alteration, removal, cutting, trimming, excavation, installation, construction activity, fencing, or any other interference whatsoever on, under, or affecting my land, my boundary walls, my entrance pillars, my trees and vegetation, my agricultural structures, my private water supply, or any part of my property at Pollnagroagh, Athenry, Co. Galway. This refusal of consent applies to Bord Gáis Energy Limited, their contractors, sub-contractors, agents, and any party acting on their behalf. No element of this development may proceed on, adjacent to, or through my land or property without my prior written agreement. I have not given any such agreement and I do not intend to do so.***

This matters because, as I will set out below, the applicant's own tree survey (Appendix 5.3, Tree Survey Report, Independent Tree Surveys Ltd, October 2025) identifies vegetation and tree groups that run directly along my boundary wall and in some cases within my property boundary — and proposes to remove, disturb, or work around them as part of this development without having sought my agreement or even contacted me.

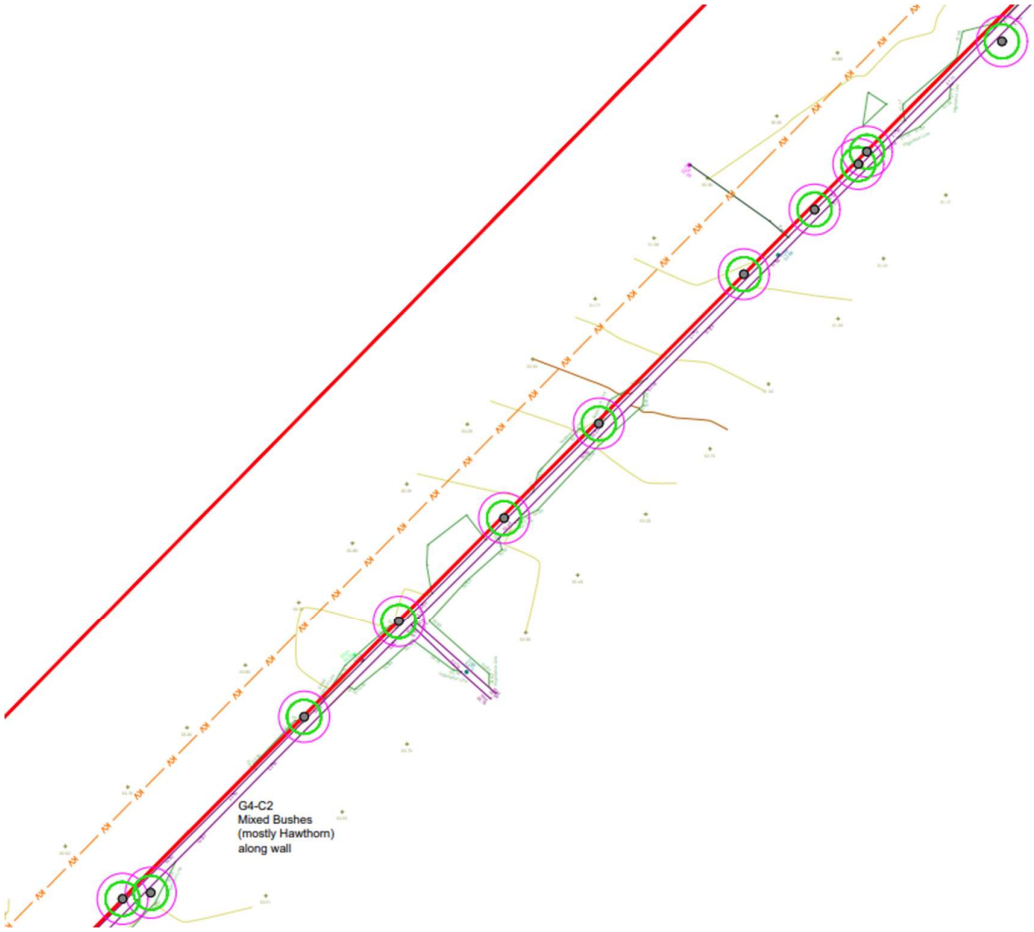


This image is taken from the Applicants tree survey report drawing ;25026_TS Sheet 5

G4- C2 Mixed Bushes, you can clearly see they are outside the proposed site boundary and within my landholding (please see a copy of my Folio map attached as a reference)

Below is an extract from page 12 of tree survey, proposing to remove 45 of these hawthorn bushes which are in my boundary wall.

> ***"This new road will require that a section(approx. 15m wide) of tree group G2 will need to be removed as the new road joins the new facility, along with a series of small (mostly Hawthorn) bushes making up part of group G4, that are growing alongside the old field boundary wall located to the northeast of the site. Approximately 45 of these bushes will need to be removed to allow for the construction of the new road and fencing."***



This image is taken from the Applicants tree survey report drawing ;25026_TS Sheet 3

G4- C2 Mixed Bushes, you can clearly see most of these are on our site boundary and some within our shared stone wall, which are proposed to be removed.

Tree Groups G4 and G5 — My Boundary Vegetation

The applicant's Tree Survey Report (Appendix 5.3) identifies and surveys two groups of trees, bushes, and hedgerow vegetation that run directly along and some within my farm boundary:

Group G4 is described in the Tree Survey Report as mixed bushes — predominantly Hawthorn (Crataegus monogyna), Blackthorn (Prunus spinosa), Elder (Sambucus nigra), and Holly (Ilex aquifolium) — growing along the line of the old stone field wall that forms the boundary between the proposed development site and my land. The report describes this group as extending along the entire northeastern boundary of the proposed access route in a series of dispersed bushes and colonising plants, mostly between 3 and 6 metres tall. The Tree Survey drawing 25026_TS shows Group G4 running along my boundary as a continuous series of vegetation groups labelled "G4-C2 Mixed Bushes (mostly Hawthorn) along wall."

This image is taken from the Applicants tree survey report drawing ;25026_TS Sheet 5

Group G5 is described as a group of self-sown Sycamore, Ash, and Elder growing alongside the old stone wall just outside the site boundary, with *"some potential for limited root spread out into the project site."* The Tree Survey explicitly notes G5 is located outside the site boundary — which means it is within or immediately adjacent to my land.

The Tree Survey Report at Section 7 (Arboricultural Impact of the New Development) states that the proposed new access road will require the removal of approximately 45 bushes making up part of Group G4, and that Group G5 — including trees T667, T668, T669, and T670 — will be removed to facilitate the road and fence layout where it extends toward the junction with the L3103.

The Tree Survey at Section 8.1 (Tree Work Operations) lists the following as proposed to be felled to facilitate this development: Group G5, trees T667, T668, T669, and T670, and approximately 45 bushes in Group G4. Additionally, Ash saplings and small Hawthorn bushes on the roadside immediately west of the new junction with the L3103 may be removed if they interfere with necessary sightlines.

What This Means for My Farm

Group G4 is not simply vegetation alongside a wall. It is the established hedgerow and boundary vegetation that has grown alongside my dry stone field wall for generations. It provides shelter for my organic suckler cattle from prevailing westerly winds. It provides

ecological habitat that contributes to my ACRES scheme obligations for biodiversity enhancement and hedgerow protection. It provides visual screening between my grazing fields and the proposed industrial site. Removing 45 bushes from this boundary does not leave my land unchanged — it exposes my livestock, degrades my ACRES habitat features, and opens my fields directly to the proposed industrial development.

Group G5 is confirmed in the survey as located outside the site boundary. If it is outside the site boundary and alongside my boundary wall, it is on or immediately adjacent to my land. No consent to remove these trees has been sought from me. None has been given. The survey itself acknowledges this group has root spread that may extend into the project site. The proposed removal of T667 through T670 and the surrounding group is proposed without my agreement and on land or boundary features that are mine.

The Tree Survey at Section 6 (Site Photographs) includes photographs showing the proposed cable route passing alongside the old stone wall boundary with my land — Group G4 is visible in these photographs as the hedgerow along that wall (Photos 3 and 4 of the survey). The survey drawings 25026_TS Sheet 3 through Sheet 5 show Groups G4 and G5 running along my boundary for the entire length of the proposed access route from the main site junction to the L3103. The Tree Protection Plan drawing 25026_TPP Sheet 3 shows the section of hedgerow to be removed for the new road directly alongside my boundary.

My Existing Driveway, which has a natural mix of native Irish trees and bushes, proposed access road just behind this stone wall boundary.

The Tree Survey Was Not Conducted on My Land

The Tree Survey Report (Section 2, Report Limitations) states:

“Trees on private property were not accessed directly, trees rendered inaccessible by thick undergrowth, fences, walls etc. were assessed using what visual information the surveyor was able to obtain.”

This means the applicant’s tree surveyor did not enter my land, did not survey the vegetation on my side of the boundary wall, did not assess the root systems of my boundary trees from my side of the wall, and did not measure or record the condition of the vegetation as it stands on my land. The report is therefore an incomplete and one-sided survey of vegetation that straddles and adjoins my boundary. Any assessment of impact on vegetation along this boundary that does not include the condition, extent, and ecological value of the vegetation as seen from my land is fundamentally incomplete.

The survey also states at Section 6 that the positions of trees along the cable route are indicative only, not plotted by topographic survey methods. The exact positions of G4 and G5 groups relative to my boundary are therefore approximate. Given that G5 is described as outside the site boundary — i.e. on or adjacent to my land — and its removal is nonetheless proposed, there is a real risk that trees actually within my ownership are being proposed for removal without my knowledge or consent.

On the right is G5 group which is proposed to be removed, these trees provide shelter to my animals, they are integral part of my organic farm.

The Ash Dieback Context — and Why It Does Not Justify Removal

The Tree Survey identifies significant Ash dieback (Hymenoscyphus fraxineus) in many of the Ash trees along the northern site boundary (trees T623 through T659, many graded Category U). The report recommends felling or coppicing a significant number of these trees as part of enabling works.

I note that while many of the trees along the main site boundary are graded Category U due to Ash dieback, the G4 and G5 groups along my boundary are predominantly Hawthorn, Blackthorn, Elder, Holly, Sycamore, and Elder — not Ash. The survey grades G4 as Category C2 — low value but with positive remaining life expectancy and some habitat value. The Ash dieback problem along the main site boundary does not justify the removal of my healthy Hawthorn boundary hedgerow. These are different species, in different condition, on different ground.

The survey notes that G4,

"*forms a fragmented group along the wall, rather than a traditional hedge" and has "some habitat value, but otherwise limited value."*

That characterisation is made from the applicant's perspective for planning purposes. From my perspective as an organic farmer under ACRES, the Hawthorn and Blackthorn along my boundary wall is active ecological habitat, a windbreak, and a feature I am contractually obliged to protect and enhance under my scheme obligations. Its removal directly affects my compliance position.

On the right is G5 group which is proposed to be removed, my boundary wall with native mixed bushes which is an active ecological habitat.

My Boundary Wall

The dry stone field wall that runs along the boundary between my land and the proposed access route has stood for the lifetime of this farm. It is the primary physical boundary of my holding. It contains my livestock. It is a traditional and irreplaceable structure built using techniques that cannot simply be replicated with modern construction materials.

The proposed access road runs immediately alongside this wall for its entire length (1.3km) from the main site entrance to the L3103 junction through beautiful green fields. Ground alteration, excavation for the road formation, vibration from construction traffic and HGV movements, and the installation of fencing and surface drainage all create direct and continuous risk to the structural integrity of this wall throughout the construction phase.

The Tree Protection Plan (drawing 25026_TPP Sheet 5) shows temporary tree protection fencing being erected along the boundary before the Cellular Confinement System is installed for the road surface passing trees T660-T665. This fencing will be erected along or at my boundary. No consent to erect fencing on my boundary has been sought from me. I have not given it. I will not give it.

I formally notify the applicant, the Board, and any contractor acting on behalf of Bord Gáis Energy that:

- I do not consent to any fencing, hoarding, or temporary protective structure being erected on, against, or attached to my boundary wall
- I do not consent to any excavation, ground disturbance, or installation activity within my boundary
- I do not consent to the removal of any tree, bush, shrub, or hedgerow vegetation on or within my boundary
- I do not consent to any access to my land for the purpose of this development by any person
- I do not consent to any survey, inspection, monitoring, or assessment activity on my land without a separate written agreement negotiated with me directly
- I do not consent to any alteration to my entrance pillars, my entrance gateway, my driveway, or any access to my property
- Any works affecting my property without my written consent will be treated as a trespass and damage to my property and I reserve all legal rights accordingly

The applicant has never contacted me to discuss any of the above. The EIAR was prepared, the tree survey was conducted, the access road was designed, and this application was submitted — all without a single conversation with the person whose land, boundary wall, trees, livestock, and livelihood are directly affected. That is not acceptable, and An Coimisiún Pleanála cannot grant permission on the basis of an application that has not addressed the rights and interests of the immediately adjoining landowner.

I also have agricultural sheds and farm structures essential to housing livestock and storing feed, hay, and equipment. These structures may be sensitive to vibration and ground

disturbance. The EIAR (Volume 2, Chapter 9) does not provide site-specific vibration assessment at my farm structures. Damage to these buildings could compromise livestock safety, trigger animal welfare obligations, and disrupt farming operations at critical seasonal periods.

Bat Activity on My Farm — Personal Observation

I wish to place on formal record that I regularly observe bats foraging at dusk and during the night on my farm at Pollnagroagh. Bats are a consistent presence in and around my agricultural sheds and along the boundary trees and hedgerow on the northeastern boundary wall — the very same treeline that the applicant's Bat Report (Appendix 5.2, Caroline Shiel, July 2025) identifies as the principal foraging corridor on the site.

The Bat Report confirms that the tree line along the northeastern boundary recorded the highest bat activity of all four detector locations, with 4,339 bat calls detected over 13 nights across six species including **Leisler's bat, Common pipistrelle, Soprano pipistrelle, Whiskered bat, Brown long-eared bat, and Nathusius' pipistrelle.**

The report itself acknowledges that crevices visible in the mature ash and sycamore trees along this boundary are suitable roosting sites for bats, and that any trees proposed for felling should be supervised by an experienced bat ecologist.

This is the boundary directly adjoining my land. The removal of Group G5 trees — confirmed as outside the site boundary and therefore on or immediately adjacent to my property — and the significant disturbance to the Group G4 hedgerow along my boundary wall, would directly impact a confirmed active bat foraging and commuting corridor.

The applicant's own survey data establishes this beyond doubt. No assessment has been made of the impact of these works on the bat population using my land and farm structures. The EIAR does not address bat activity or the connectivity between the foraging corridor on the site boundary and the wider farm landscape on my side of the wall. This is a material omission that must be addressed before any permission is granted.

On the left is G5 group which is proposed to be removed, my home is 19 meters from the access road, these trees and bushes provide privacy and is also block some of the south westerly winds.

My Dwelling — A Period Structure of Over 100 Years

My home is a period dwelling constructed over 100 years ago using traditional techniques including mass concrete and stone walls. Buildings of this type are fundamentally more vulnerable to vibration, ground movement, and construction disturbance than modern construction. When I built on a rear extension, it was investigated at the time and was clear that there was no deep foundation used under this traditional farmhouse. Materials behave differently under sustained dynamic loading. Even relatively modest levels of persistent vibration can initiate cracking, stress fractures, and progressive structural degradation that is difficult to detect until damage is already advanced.

The access road passes 19 metres from my kitchen. I will have no privacy.The EIAR (Volume 2, Chapter 9, Noise and Vibration) assesses vibration using generic guidance thresholds without site-specific modelling at my property. No pre-construction structural assessment of my dwelling has been commissioned. No real-time vibration monitoring programme specific to my property has been proposed.

My dwelling also ventilates through wall vents, meaning external air enters directly into living spaces without filtration. This makes my home directly and continuously exposed to any deterioration in air quality during both construction and operational phases.

I require:

- A full independent structural condition survey of my dwelling, carried out by a suitably qualified structural engineer appointed independently of the developer, before any construction begins

- Photographic and written baseline records of all existing conditions and any current defects or vulnerabilities
- A real-time vibration monitoring programme during all construction phases, all abnormal load movements, and all rock-breaking or excavation activities
- An independent post-construction structural assessment to confirm that no damage has occurred
- A clear, financially secured, and legally binding compensation mechanism for any structural damage attributable to the development

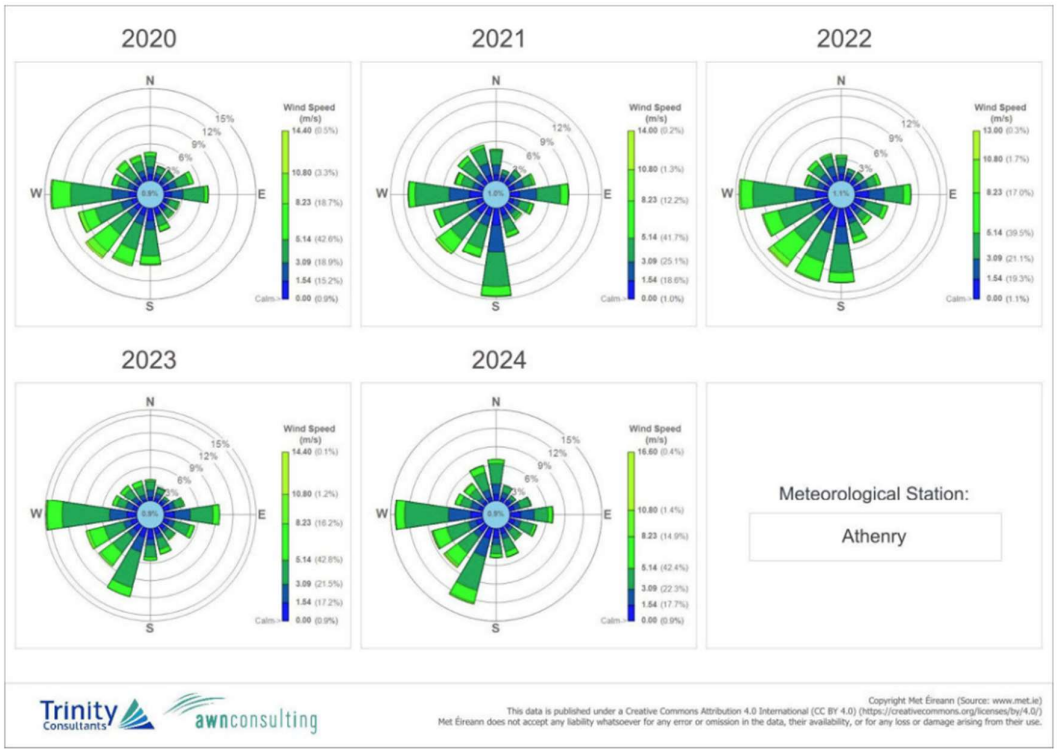


Figure 7-2 – Wind Roses for Athenry Meteorological Station

Air Quality, Deposition, and My Organic Farm

The applicant's EIAR (Volume 2, Chapter 7, Figure 7-2) confirms that the prevailing wind direction at the site is westerly and south-westerly. My land lies to the east and northeast of the proposed plant — directly in the prevailing downwind corridor. Combustion emissions from the gas turbine stack, including nitrogen oxides (NOx), carbon monoxide (CO), and particulate matter, will be carried by the prevailing wind consistently across my organic grassland and grazing land.

The EIAR's air quality assessment (Volume 2, Chapter 7) models ambient air quality compliance using AERMOD dispersion modelling. However, it does not assess:

- Atmospheric deposition of NOx and particulates onto organic grassland
- Foliar uptake of deposited pollutants by grass and silage crops
- Ingestion of deposited material by organic livestock

- Implications of nitrogen deposition for Nitrates Directive nutrient management compliance at farm level
- Impacts on organic certification arising from proximity to a combustion emission source

Organic farming standards under EU Regulation 2018/848 require that the farm environment is protected from contamination from external sources. Atmospheric deposition of combustion pollutants onto certified organic grassland — even at levels below ambient air quality thresholds — is an external contamination risk that certification bodies are obliged to assess. The EIAR has not addressed this pathway at all.

Furthermore, the EIAR (Volume 2, Chapter 8, Section 8.7.2) states in express terms:

"There are no specific measures proposed to mitigate the GHG emissions of the operational phase of the proposed project."

This confirms that the plant will operate with no operational emission mitigation for up to 25 years on my doorstep.

During startup, shutdown, and part-load operation — the characteristic operating modes of a peaker plant — emission rates are materially higher than during steady-state operation. The EIAR does not assess these transient emission profiles. For an organic farmer whose certification depends on maintaining a clean environment, the pattern of repeated short-duration elevated emission events from a peaker plant is precisely the type of risk that requires specific assessment. It has not received it.

The Effect of These Emissions on My Organic Suckler Herd

The peer-reviewed scientific literature on **the effects of PM2.5, PM10, and NOx emissions on cattle and livestock** is directly relevant to my situation and has not been considered anywhere in the EIAR.

Cox et al. (2016), in an epidemiological study of 87,108 dairy cow deaths in Belgium, found that a 10 μg/m³ increase in same-day NO_2 was associated with a **9.2% increase in cattle mortality**, and that the effects of PM10 cumulated over a 26-day period — meaning a single emission event creates harm in a herd that persists for nearly a month (*Ambient Air Pollution-Related Mortality in Dairy Cattle: Does It Corroborate Human Findings?*, Epidemiology, PMC5400059).

Bautista et al. (2024), in a two-year study of beef steers exposed to wildfire smoke pollution, found **significant negative associations between PM2.5 and feed intake, average daily gain, and body weight in both grass-finished and grain-finished cattle** — direct measures of growth performance and, for a suckler farmer, of the weight at which calves are sold (*Establishing the Relationship Between Wildfire Smoke and Performance Metrics on Finished Beef Cattle in Western Rangelands*, PMC10943418).

Nieckarz et al. (2023) demonstrated a near-perfect correlation (r = +0.95) between outdoor PM concentrations and particulate levels inside cattle housing, with heavy metal content in animal products directly linked to ambient air pollution (*Scientific Reports*, 13:10626, PMID: 37391588).

The **MSD Veterinary Manual and Cutlip (1966, *Veterinary Pathology*, 3(5))** document that **NO_2 inhalation in cattle causes respiratory distress, pulmonary oedema, methemoglobinaemia, and in acute cases death** — effects observed experimentally at elevated but achievable concentrations from industrial combustion sources.

My organic suckler cattle graze the land that adjoins the access road boundary and lies directly in the prevailing downwind corridor confirmed by the EIAR's own meteorological data. The income from my organic beef enterprise depends entirely on the condition, growth performance, and health of my herd. A reduction in average daily gain — the outcome documented in peer-reviewed research on beef cattle exposed to ambient PM2.5 — translates directly into lighter calves at sale, lower prices, and a direct financial loss to my organic enterprise. An increase in respiratory susceptibility in my herd translates into veterinary costs and mortality risk. Neither of these consequences has been assessed anywhere in the EIAR. The assessment models air quality compliance at residential receptors. **It does not assess the impact on my herd, my grazing land, or my organic certification.** These are entirely different questions. Only one of them has been asked, and it is not the one that matters to my livelihood.

Furthermore, the applicant's own EIAR (Volume 2, Chapter 8, Section 8.7.2) confirms:

> ***"There are no specific measures proposed to mitigate the GHG emissions of the operational phase of the proposed project."***

An organic farmer under EU Regulation 2018/848 is required to protect their animals and their farm environment from external contamination. Unmitigated combustion emissions from a 334 MW gas turbine upwind of a certified organic suckler herd for 25 years is precisely the type of long-term, continuous external contamination risk that organic certification is designed to prevent — and that this EIAR has not assessed.

My Private Water Supply, My Land, and the Galway Bay Complex

I want to explain clearly what is beneath my farm and beneath this proposed development site — because I do not believe the planning authority has been given the full picture of what is at risk, and the truth about how serious this is.

My farm sits on **karst limestone**. So does the proposed plant. The ground beneath us is not solid rock in the way most people imagine. It is riddled with caves, conduits, swallow holes, and underground passages. Water does not filter slowly down through deep soil here. It disappears into the ground and travels, fast, through channels that nobody can see from the surface. The applicant's own EIAR (Volume 2, p. 572) describes this system — the Clarinbridge Groundwater Body — using the Geological Survey Ireland's own words:

"Rapid groundwater flow velocities have been recorded through groundwater tracing" and *"the potential for contaminant attenuation in such aquifers is limited."*

Attenuation means the natural ability of the ground to filter and slow down pollution. In this karst system, the EIAR's own source says that ability is limited.

This is my existing private well that I use for my livestock.

My Well Is Identified in the EIAR — and Has Never Been Tested

The EIAR (Volume 2, p. 575, Table 12-7) identifies six wells and springs within the general vicinity of the site. One of these — abstraction reference 1421SWW019 — is a borehole located 30 metres from the proposed access road boundary. It is 31.1 metres deep and is listed as used for agricultural and domestic purposes. That is my well. It is on my land, which adjoins the proposed access road. It is the water I give to my organic suckler cattle.

Nobody from Bord Gáis Energy, AtkinsRéalis, or any agent has ever come to test this well, to take a baseline water quality sample, or to explain to me what the risk to it might be. It appears in a table in the EIAR as a data point, a grid reference, and a yield figure. It is not a data point to me. It is the water my animals drink . The fact that it has been identified but never assessed is not an administrative oversight. It is a failure to do the basic work that should have been done before this application was submitted.

No dye tracing or tracer testing has been carried out from the proposed development site to my well or to any of the other six abstractions listed in Table 12-7. In a karst conduit system, the only reliable way to know whether two points are hydraulically connected — and how fast that connection is — is to trace it. It has not been done. The EIAR itself (p. 590) admits that groundwater monitoring may still be required pending a Detailed Piling Risk Assessment and Hydrogeological Assessment. That is the applicant acknowledging the work has not been completed. This Board is being asked to grant permission before the most fundamental question about groundwater risk has been answered.

The Aquifer Classification Means Conventional Risk Modelling May Not Apply

The EIAR classifies the **aquifer beneath the site as Regionally Important Aquifer — Karstified**, conduit type, sub-classification Rkc (EIAR Volume 2, p. 570). The EIAR itself explains the difference between the two karst sub-types. Rkc — the type beneath my land and this proposed plant — is the one where "numerical modelling using conventional programs is not usually applicable."

I want An Coimisiún Pleanála to understand what that means in plain terms. The standard groundwater risk modelling tools used in environmental impact assessments are not designed for this type of ground. The applicant's own document says so. Yet the EIAR proceeds to use those tools and to reach conclusions about groundwater safety that are built on a modelling approach the applicant has simultaneously acknowledged is not usually applicable here. This is not a minor technical requirement. It goes to the reliability of every groundwater safety conclusion in the entire assessment.

A Protected European Ecosystem Lies Within the Site Boundary Itself

This is the part of the EIAR that I find most alarming, and I want to make sure it is not overlooked.

The EIAR (Volume 2, p. 574) confirms that part of the proposed development site — including sections of the access track and underground cable route — is underlain by a Groundwater Dependent Terrestrial Ecosystem (GWDTE) that is **directly connected to the Galway Bay Complex Fens (SAC000268). This GWDTE is connected to a Special Area of Conservation**. The EIAR assigns it "*extremely high importance*."

Let me say that again in straightforward terms. There is a protected European ecosystem — one formally connected to a Special Area of Conservation under the Habitats Directive — inside the boundary of the proposed development. Not beside it. Not near it. Inside it. Construction, excavation, hardstanding, access roads, underground tanks, and industrial infrastructure are being proposed on top of and around an ecosystem that is legally protected under European law and that the applicant's own consultants have given the highest possible importance rating.

The Galway Bay Complex SAC (SAC000268) is **one of the most significant Natura 2000 designations in Ireland**. Its qualifying interests include turloughs, alkaline fens, Cladium fens, orchid-rich calcareous grassland, and limestone pavement. These are not common habitats. They are rare, internationally protected, and directly dependent on the quality and flow of the groundwater that moves through the karst system beneath this site and beneath my farm.

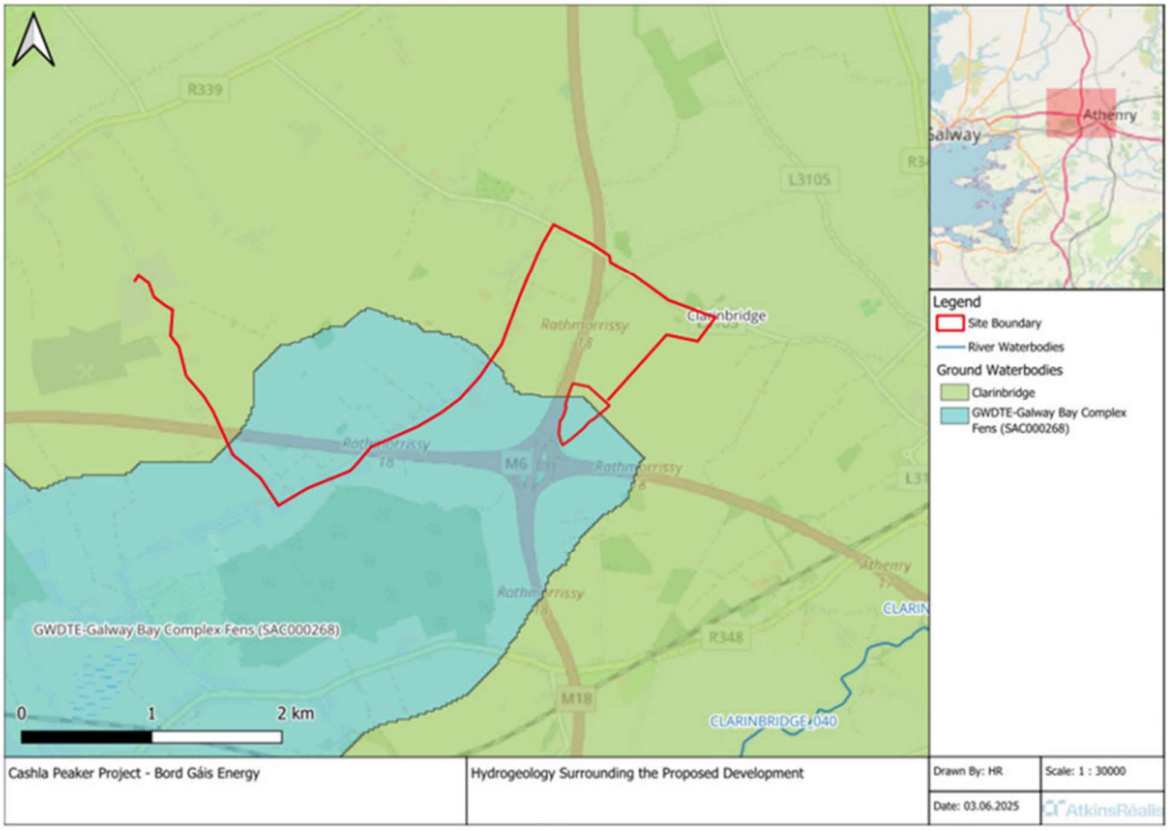


Figure 12-3 - Groundwater Bodies underlying the Proposed Project (EPA, 2025).

Applicants EIAR (Volume 2, p. 573) shows Galway Bay complex Fens in blue and Clarinbridge Groundwater body in green.

Seven European Sites Are Connected Through the Same Groundwater System

The Clarinbridge Groundwater Body — the system beneath this site — **feeds not one but seven Natura 2000 sites**. The EIAR (Volume 2, p. 573) lists them. They are:

- Castletaylor Complex (000242),
- Greganna Marsh (000253),
- Galway Bay Complex (000268),
- Kiltiernan Lough (001285),
- Lough Fingall Complex (000606),
- Monivea Bog (000311)
- Rahasane Turlough (000322).

The applicant's own source — GSI, 2004 — states of this groundwater body that

“surface water catchments are often bypassed by groundwater flowing beneath surface water channels and across surface water catchment divides.”

In ordinary language, this means contamination does not follow the routes you would expect by looking at the landscape. It travels underground, through conduit passages, to places you would not predict from the surface. It can emerge kilometres away, in a SAC or a turlough, without ever having appeared at the surface between the source and the receptor.

This is not speculation. It is the documented character of this specific groundwater system, described in the applicant’s own EIAR. **No dye tracing from the development site to any of these seven European sites has been carried out**. Without that tracing, nobody — not the applicant, not their consultants, not this Board — can say with certainty that a contamination event at this site would not reach one or more of those protected areas.

The Water Framework Directive Protects Good Status - Not Just Prevents Bad

The EIAR records that both the Clarinbridge Groundwater Body and the Galway Bay Complex Fens GWDTE are currently classified as “Good” under Water Framework Directive assessments and are “Not at risk” of failing to achieve good status by 2027 (EIAR Volume 2, p. 576). The EIAR appears to present this as a reassurance — things are fine now, so this development should be acceptable.

That is the wrong reading of the law. Article 4 of the Water Framework Directive (Directive 2000/60/EC) does not only require that water bodies achieve good status. It separately requires that member states **prevent deterioration of water bodies that are already in good status.** The fact that this groundwater body is currently in good condition is not permission to introduce risk. It is the baseline that must be protected. Proposing to build a COMAH-classified industrial facility with 6.2 million litres of diesel, biocides, transformer oils, and cooling chemicals above a directly connected Rkc conduit aquifer — without completed hydrogeological assessment, without tracer testing, and without a Water Framework Directive assessment (which was screened out by the applicant) — is not consistent with that protection obligation.

The Ponds on My Land

A Natural Wildlife Habitat Dependent on Clean Groundwater

There is something else that connects directly to the groundwater risk described above, and that the EIAR has failed to address in the context of my land specifically.

The applicant's own bird survey (Appendix 5.1, Delichon Ecology, 2025) records two circular ponds located approximately 260 metres west/north-west of the proposed access road. These ponds are described in the survey as being "most likely fed by groundwater" and as providing "the most suitable habitat for wintering birds within the study area." The survey records Mallard using these ponds during the December 2024 site visit, Golden Plover foraging on the adjacent grassland in January 2025, and Snipe — a Red-listed species under the Birds of Conservation Concern in Ireland (BoCCI) 2020–2026 list — flushed from the improved grassland within and north of the peaker plant footprint during multiple survey visits. During the breeding bird surveys of May and June 2025, Mallard, Moorhen, Swallow, Sand Martin, and House Martin were all recorded using these ponds and their margins as foraging and habitat sites.

This is a photo of the pond on my land, the stone wall behind this is access road to the proposed development – this is how close this habitat is to the COMAH labelled site

These are not incidental features. They are groundwater-fed. They exist because of the karst system I have described above — the same Rkc conduit aquifer that the EIAR's own source describes as having rapid flow velocities and limited capacity for contaminant attenuation. What feeds these ponds is the same groundwater system that feeds my well and that flows, untraced, toward seven European Natura 2000 sites.

If a contamination event — a diesel spill, a biocide release, a construction runoff entry into the karst — reaches this groundwater, it will reach these ponds. It will reach the species that depend on them. It will reach my well. In a conduit aquifer, these outcomes are not sequential risks to be weighed and balanced. They are simultaneous pathways through the same connected system.

The bird survey identifies these ponds as **the principal wildlife habitat value in the study area**. The EIAR does not identify them as a groundwater receptor requiring protection from the proposed development. No contamination pathway assessment from the site to these ponds has been carried out. No baseline ecological survey of the ponds themselves — their water chemistry, invertebrate communities, or species-specific usage — has been conducted. The applicant has recorded the habitat value of these ponds and has not protected them.

What This Means for My Farm and My Certification

My organic cattle drink from the borehole that is listed inside the development site boundary in the EIAR's own groundwater table. That water moves through the same karst conduit system that the applicant's own source describes as having rapid flow velocities and limited attenuation capacity. If a diesel spill, a biocide leak, a tank failure, or a construction runoff event enters this system — through a soakaway, a sinkhole, a construction trench, or a drainage pathway — I have no way of knowing how quickly it would reach my well. Neither does the applicant, because they have not done the tracing work to find out.

EU Regulation 2018/848, which governs my organic certification, requires that I protect my farm from contamination from external sources. If my water supply is contaminated by an industrial facility built next door, my certification body will investigate. I will not be able to prove my water is clean. My organic status — which is my income — will be at immediate risk. This is not a theoretical concern. It is a direct, foreseeable, and legally structured consequence of placing this development adjacent to my certified organic holding without completing the groundwater assessment that the EIAR itself acknowledges remains unfinished.

I require as a minimum:

- **Site-specific dye tracing** from the development footprint to my well (abstraction 1421SWW019, EIAR Table 12-7) before any works commence
- **Baseline water quality testing** of my well, at the developer's cost, before any works commence, to establish the pre-development condition
- **Dye tracing from the development site to all seven European sites** connected through the Clarinbridge Groundwater Body, as part of a completed Appropriate Assessment under Article 6(3) of the Habitats Directive
- **A completed Water Framework Directive assessment** — not screened out — demonstrating that the development will not cause deterioration of either the Clarinbridge GWB or the Galway Bay Complex Fens GWDTE
- A completed **Detailed Piling Risk Assessment** and **Hydrogeological Assessment** before permission is granted, not as a post-permission condition
- **Full disclosure of all chemical formulations** for biocides, cooling system chemicals, and transformer oils, with a karst-specific fate and transport assessment for each substance in the Rkc conduit aquifer setting

Fire, Safety, and Emergency Access

The proposed development is a lower-tier COMAH establishment involving storage of hazardous substances including high-pressure gas and diesel. The EIAR (Volume 2, Chapter 15, Table 15-5 page 676-677) identifies credible major accident scenarios including vapour cloud explosions, jet fires, and fireballs.

The development **relies on a single access route**(1.3km long) via the L3103. My farm entrance is located immediately adjacent to the proposed site entrance. In the event of a major accident at the plant, emergency vehicles must use the same access point that serves my home and farm. Any obstruction of this junction — whether due to a traffic incident, HGV

manoeuvre, or emergency response activity — directly compromises my ability to evacuate my property and could delay emergency access to my home and animals.

My agricultural buildings contain hay, silage, and livestock. In the event of a fire spreading to adjacent land in dry conditions, response times are critical.

> **The EIAR does not assess evacuation zones for nearby residents, does not identify emergency response times from the nearest fire stations, and does not consider how the single access road geometry — 4.97 metres wide, with two active entrances in immediate proximity — would function under emergency conditions.**

Proximity to an installation carrying major accident hazard risk, combined with inadequate emergency access assessment, creates a continuous and unacceptable stress and safety risk that the EIAR has not acknowledged.

Noise, Vibration, and Disturbance at 19 Metres

The proposed access road passes 19 metres from my kitchen. The EIAR (Volume 2, Chapter 9) classifies residential properties as Noise Sensitive Locations (NSLs). However, my dwelling was not individually assessed in the noise model. The key modelling appendix (Appendix 9.3) does not include receptor-specific results for my property. The noise assessment relies on limited monitoring at a small number of representative locations and does not demonstrate compliance at my specific dwelling.

During construction, activities immediately adjacent to my home will include excavation, rock breaking, heavy plant operation, and continuous HGV traffic at a distance of 19 metres. There is no meaningful attenuation at that distance. The EIAR characterises construction noise as temporary, but construction and underground cable installation is estimated to extend over approximately nine months. **Nine months of construction noise at 19 metres is not an acceptable residential impact**.

During operation, the intermittent start-up and shut-down cycles of a peaker plant generate elevated, tonal, and impulsive noise characteristics. The EPA Guidance Note NG4 requires assessment using the rating level descriptor LAr,T for daytime and evening periods — capable of including penalties for tonal or impulsive character. The EIAR presents compliance in LAeq,T terms and does not demonstrate that LAr,T requirements are met. This is a methodological failure that is particularly significant for my dwelling given its proximity.

Also on top of this, I will have the added noise of the HGV'S using this access road, daily and weekly, which is located 19meters from my kitchen. The vibrations on my house, could be detrimental as , it is an older traditional farm house that was not built on proper foundations.

Some of my suckler stock grazing together, on the right, planted area for the ACRES, proposed development site located behind the other stone wall.

Continuous Night Lighting and My Organic Suckler Herd

I want to raise a specific impact that has not been addressed anywhere in the applicant's EIAR and that is directly relevant to my organic suckler enterprise. The proposed development will be a continuously lit industrial facility operating 24 hours a day, seven days a week. The EIAR confirms that the site will include security fencing, CCTV, perimeter lighting, and operational lighting across the full 11.54-hectare compound. This lighting will be permanent. It will not be switched off when the plant is not generating. A peaker plant in standby mode is still a lit, secured, staffed industrial installation.

My farm borders this site. My cattle graze fields that will be directly exposed to this permanent **artificial light source throughout every night of the year**. I am an organic suckler farmer. The reproductive cycle of my suckler herd — the timing of bulling, conception, calving, and calf rearing — **is governed by natural photoperiod**. Cattle are seasonally polyestrous animals. Their reproductive hormones, including melatonin and luteinising hormone, are regulated by the natural alternation of light and dark. Artificial light at night suppresses melatonin production, disrupts the hormonal signals that govern the onset of oestrus, and can delay or disrupt the breeding cycle.

For an organic suckler farmer, the timing of the breeding season and calving period is not an administrative matter. It determines when calves are born, how long they are available for the premium autumn weanling sales, and directly sets the income of the farm for the year. A disrupted or delayed calving pattern has immediate and measurable financial consequences. It also has animal welfare consequences, as cattle that fail to cycle normally or that have extended calving intervals are under additional physical stress.

The EIAR (Volume 2, Chapter 4) identifies my property as within the study area for human health receptors but does not identify agricultural livestock as receptors for artificial light assessment. The EIAR (Volume 2, Chapter 5, Ecology) notes that increased artificial lighting has the potential to disrupt nocturnal species behaviour, but this is addressed only in the context of bats and other wildlife. There is no assessment anywhere in the EIAR of the impact of permanent night-time industrial lighting on adjoining livestock enterprises, and specifically no assessment of the impact on the reproductive management of suckler cattle.

This is a material omission for my organic enterprise specifically. **Under EU Regulation 2018/848, organic livestock production requires that animals are managed in conditions that support their natural behaviour and biological cycles.** The introduction of permanent artificial light that disrupts the natural photoperiod experienced by my herd is an external environmental pressure that interferes with the natural management conditions on which my certification depends.

I am also concerned about the behavioural impacts on my cattle more broadly. Cattle that are exposed to sudden, bright, or flickering light sources at night — including the lights of large vehicles manoeuvring at an adjacent industrial site — can become agitated, move erratically, and create dangerous conditions in fields near public roads. This is a real and practical safety concern, not an abstract one. My animals are beside the proposed access road. HGV headlights sweeping through fields at night, combined with permanent perimeter lighting, represents a genuine animal welfare and farm safety issue that the EIAR has not considered.

The EIAR does not provide a lighting design scheme, a lux level assessment at my field boundaries, or any assessment of the direction, height, or intensity of proposed luminaires relative to adjacent agricultural land. Without this information, it is not possible to assess whether the lighting as proposed would be intrusive to my livestock, and the EIAR's conclusions on lighting impacts cannot be verified.

I require:

- A full lighting design scheme showing the location, height, direction, and lux output of all proposed luminaires across the site
- An assessment of predicted lux levels at my field boundaries during night-time operational conditions
- An assessment of the impact of permanent night-time artificial light on the reproductive management of suckler cattle on adjoining organic holdings
- Consideration of downward-directed, shielded lighting to prevent light spill onto adjacent agricultural land
- A commitment that lighting levels at my field boundaries will not exceed levels that would disrupt the natural photoperiod of grazing livestock

Visual Impact and the Loss of a Rural Home

My home is a period dwelling of over 100 years of age with original stone construction, a long native Irish tree-lined driveway, and traditional entrance pillars. It sits in a rural agricultural tranquil landscape that has been managed by my family for generations. The visual character of this place — its openness, its farmland setting, its absence of industrial infrastructure — is not incidental to its value. It is fundamental to what makes it a home worth living in and a farm worth working.

The EIAR (Volume 2, LVIA, Appendix 6) uses a 3.5km study area despite Galway County Council explicitly requesting a 5km study area at pre-application stage. The visual assessment therefore does not fully capture impacts at my property. The EIAR acknowledges that significant adverse visual effects will be experienced by a small number of nearby receptors. My dwelling is among the closest receptors to the development and is directly overlooked by the proposed infrastructure.

The introduction of a 30-metre industrial stack, large industrial buildings, security lighting, HGV traffic movements, and continuous plant activity into the view from my home and farm will constitute a permanent, irreversible, and fundamental transformation of my living environment. This is not a temporary or marginal impact. It is a permanent industrialisation of the landscape I live and work in.

Policy Conflict — Organic Farming Is State Policy

Ireland has committed to **significant expansion of organic farming under the national Agri-Food Strategy 2030** and the implementation of the EU Farm to Fork Strategy. DAFM actively supports and funds organic conversion and maintenance through dedicated payment schemes. ACRES provides additional payments for organic farmers meeting enhanced environmental standards. These are not marginal programmes — they are central instruments of State agricultural and environmental policy.

I am a certified organic farmer participating in ACRES. I represent exactly what those policies are designed to support and protect. A planning decision that introduces industrial fossil fuel infrastructure immediately adjacent to my certified organic holding — without having assessed the impact on my organic status, my ACRES obligations, or my livelihood — is directly inconsistent with the policy objectives that the State is simultaneously promoting and financially supporting.

The EIAR does not address this policy conflict. It does not identify organic farming or ACRES participation as factors in the assessment of agricultural impacts. This omission is not a technicality — it is a fundamental failure to consider the interaction between this development and the agricultural policy framework within which my farm operates.

Engagement Failure

The applicant undertook pre-application consultation with An Coimisiún Pleanála and Galway County Council. The minutes of the GCC pre-application meeting (13 February 2025) confirm that the Council emphasised the need for robust **in-person community engagement,** targeted outreach to elected representatives, and direct engagement with those most affected.

The applicant's own EIAR (Volume 2, Chapter 2) acknowledges that community engagement was conducted through public events and a website. For the immediately adjoining landowner — the person whose home is 19 metres from the proposed access road — this is not meaningful engagement. It is not even close to what the GCC pre-application minutes explicitly required.

This is not simply a procedural criticism. The failure to engage with me means that the EIAR does not contain information that only I could have provided: the baseline condition of my dwelling, my boundary structures, my entrance pillars, my private water supply, and my organic certification obligations. The EIAR is materially incomplete as a result.

Relief Sought

For all of the foregoing reasons, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Cashla Peaker Plant.

My primary request is:

- Refusal of planning permission on all grounds set out in this submission

If the Board is nonetheless minded to consider permission, I ask that no determination issue unless and until all of the following have been provided, assessed, and published for public inspection:

Groundwater and European Sites

- **Site-specific dye tracing** from the development footprint to my well (abstraction 1421SWW019, EIAR Table 12-7), at the developer's cost, before any works commence
- **Baseline water quality testing of my well** before any works commence, establishing pre-development water quality conditions
- **Dye tracing from the development site to all seven Natura 2000 sites** connected through the Clarinbridge Groundwater Body, as required to complete a lawful Appropriate Assessment under Article 6(3) of the Habitats Directive
- A completed **Water Framework Directive assessment** demonstrating no deterioration of the Clarinbridge GWB or the Galway Bay Complex Fens GWDTE (IE_WE_G_0087) — the WFD assessment was screened out by the applicant and must be reinstated
- A completed **Detailed Piling Risk Assessment and Hydrogeological Assessment** — acknowledged as outstanding by the EIAR itself (p. 590) — before permission is granted

- **Full disclosure of all chemical formulations** for biocides, cooling system chemicals, and transformer oils, with a site-specific karst fate and transport assessment for each substance in the Rkc conduit aquifer setting
- A **binding long-term groundwater monitoring programme** with enforceable trigger levels for my well and for the GWDTE within the site boundary

Organic Farming

- A **specific Organic Farming Impact Assessment** for my holding addressing air deposition, groundwater contamination pathways, and implications for EU Regulation 2018/848 and ACRES compliance
- A **legally binding and financially secured compensation mechanism** for any loss of organic certification, ACRES payment disruption, or agricultural income loss attributable to this development

Boundary Wall, Trees, Vegetation and Land Access

- A **formal acknowledgement** from the applicant that no works of any kind may be carried out on, adjacent to, or affecting my land, boundary wall, entrance pillars, trees, or vegetation without my prior written consent
- Removal from the application of any works that propose to affect Group G4, Group G5, or any tree, bush, or hedgerow vegetation on or within my boundary, unless and until separate written agreement has been reached with me
- An **independent arboricultural survey of the vegetation along my boundary wall**, conducted from my side, by a qualified arborist appointed by me at the developer's cost, to establish the true baseline condition and extent of vegetation within my ownership
- A commitment that no temporary fencing, tree protection hoarding, or any other structure will be erected on or against my boundary wall without my written consent
- **Full replacement planting of all G4 boundary hedgerow vegetation removed** or damaged, using native species of equivalent size and maturity, at the developer's cost, under a supervised planting scheme agreed with me
- A **legally binding commitment** that any damage to my dry stone boundary wall caused by this development will be made good by a qualified dry stone wall mason using traditional techniques at the developer's full cost

Structural and Property Protection

- **A full independent structural condition survey of my dwelling** and all agricultural buildings at the developer's cost before any works commence
- A **photographic and structural baseline record of my entrance pillars and boundary wall** before any construction begins
- A **swept path analysis demonstrating** that all proposed vehicle types, including abnormal loads, can complete the **site access turning movement without encroaching on my entrance space** or creating risk to my entrance pillars

- A **real-time vibration monitoring programme** at my property throughout all construction phases and abnormal load movements
- A **binding commitment** that any damage to my entrance pillars, boundary wall, or farm structures will be made good by qualified traditional craftspersons at the developer's cost

Noise, Air Quality and Lighting

- A **site-specific noise assessment at my dwelling** address using LAr,T descriptors in accordance with EPA NG4, including assessment of tonal and impulsive characteristics during peaker start-up and shut-down
- An **assessment of the air quality** and atmospheric deposition impacts on my organic grassland from the prevailing downwind position of my land relative to the proposed turbine stack
- A full lighting design scheme showing the location, height, direction, and lux output of all proposed luminaires, **with predicted lux levels at my field boundaries during night-time operational conditions**
- An **assessment of the impact of permanent night-time artificial lighting on the reproductive management** of suckler cattle on adjoining certified organic holdings
- A commitment that lighting design will be shielded and directed to prevent light spill onto adjacent agricultural land at levels that would disrupt the natural photoperiod of grazing livestock

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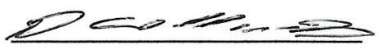
This is my & my children's home. My mother was born & reared here.This is my livelihood. I am the fourth generation of my family to farm this land. I have invested in sustainable energy, in organic farming, and in caring for this place for future generations. Beneath my feet, and beneath this proposed development, is a karst groundwater system that feeds the Galway Bay — one of the most protected marine and wetland environments in Ireland. My well draws from that system. My cattle drink from it. Seven European protected sites depend on it. The applicant has not traced where the water goes. They have not tested my well. They have not completed the hydrogeological work they acknowledged was outstanding. They have not told me what chemicals they plan to store above the ground my animals drink from. They have not asked me a single question. They have not knocked on my door. They surveyed the trees along my boundary wall without entering my land and then proposed to remove my hedgerow and my trees without my consent. I am not a data point in a table. My land is not a resource to be used without permission. This application should be refused.

Signed:



Damien Collins
Certified Organic Farmer and Adjoining Landowner
Pollnagroagh, Athenry, Co. Galway
20th April 2026

Supporting document lodged alongside this observation:

- Áine Gordon B.Agr.Sc, Organic Agricultural Advisor — Technical Submission on Organic Farming Impacts, dated 06.03.2026
- Copy of Organic Trust Compliance Report, my annual inspection took place on 04/02/26
- Copy of my Folio Map, no,GY27127F. My landholdings are outlined in Red, the access route and site are outlined in blue so it is clear how it is adjoined to my land.

Áine Gordon
Agricultural Consultant B.Agr.Sc

Course,
Castleblakeney,
Ballinasloe
Co. Galway

Tel: 087 2974907
Email: agordonorganic@gmail.com

Submission to An Coimisiún Pleanála
Re: Strategic Infrastructure Development (SID) Application – Proposed 300MW+ Gas-Fired Peaker Plant and 220kV Substation at Cashla, Athenry, Co. Galway

On behalf of:
Damien Collins
Certified Organic Farmer
Pollnagroagh, Athenry, Co. Galway

Date: 06.03.2026

This submission is made on behalf of my client, Damien Collins, who owns and operates a certified organic agricultural holding adjoining lands at Cashla, Athenry, Co. Galway, where Bord Gáis Energy proposes to develop a 300MW+ gas-powered peaker plant with associated infrastructure including a 220kV electrical substation and grid connection to the existing Cashla substation.

My client's holding is certified under the organic production standards governed by European Commission Regulation (EU) 2018/848 on organic production and labelling of organic products, as administered in Ireland by Department of Agriculture, Food and the Marine (DAFM) and verified through the Organic Trust certification body.

The proposed development raises significant concerns regarding:

- Potential contamination pathways affecting organic land
- Risk to organic certification status
- Impacts on soil, water, air quality and biodiversity
- Operational disturbances incompatible with organic farming
- Precedent for industrialisation of agricultural lands

Given the proximity of the proposed infrastructure to certified organic farmland, the project presents material risks to the economic viability and regulatory compliance of the holding.

It is noted that a separate proposal for a power generation facility was previously advanced on nearby lands in 2009 but was later withdrawn following local concerns and planning issues.

The current proposal represents a major industrial energy infrastructure development within an active agricultural landscape, and its potential externalities must be assessed in relation to neighbouring farm enterprises, particularly those operating under organic certification where contamination thresholds and environmental integrity requirements are significantly stricter. Organic agriculture is dependent upon:

- Protection from contamination
- High environmental quality
- Natural ecological processes
- Traceability and consumer confidence

Any industrial development capable of introducing airborne pollutants, chemical contamination, or ecosystem disruption may therefore have disproportionate consequences for organic farms.

Description of Organic Farm & Enterprise

My client operates a mixed organic enterprise comprising:

- Organic grassland used for grazing and forage production
- Organic livestock production – Suckler Enterprise maintained on the farm
- Biodiversity conservation areas
- Hedgerow and habitat protection areas

The farm has undergone the required conversion period and maintains ongoing certification under EU organic regulations.

Organic certification requires strict adherence to conditions including:

- Absence of prohibited substances
- Prevention of contamination
- Environmental protection measures
- Maintenance of soil biological activity
- Buffer zones where contamination risks exist

Loss of organic certification would result in:

- Significant financial loss
- Market access restrictions
- Mandatory re-conversion periods

Such consequences would be disproportionate and unjustified given the farm's compliance with existing regulatory requirements.

Air Quality and Contamination Risks

Gas-fired power generation plants, including peaker plants designed for rapid dispatch during peak demand periods, produce emissions including:

- Nitrogen oxides (NOx)
- Carbon monoxide
- Particulate matter
- Volatile organic compounds
- Combustion by-products

While gas generation is often presented as lower-emission compared with other fossil fuels, the episodic nature of peaker plant operation can result in short periods of elevated emissions.
Organic farms are particularly vulnerable to:

- Atmospheric deposition of pollutants
- Contamination of forage crops
- Deposition onto soil surfaces
- Indirect contamination of livestock feed

Organic certification bodies may require investigation if contamination risks arise from neighbouring industrial operations.
If any prohibited substance or contamination event occurs, organic status may be:

- Suspended
- Restricted
- Removed

The planning documentation must therefore demonstrate clearly that no realistic pathway exists for contamination of adjacent organic lands.
At present, the proposal does not adequately address these concerns.

Water Quality and Hydrological Concerns

Organic farms rely heavily on high-quality surface and groundwater resources.
The proposed development includes:

- Significant hardstanding areas
- Electrical infrastructure
- Fuel supply systems
- Surface water drainage networks

These elements introduce risks including:

- Hydrocarbon contamination
- Chemical leaks
- Construction runoff
- Altered drainage patterns

Should contamination enter local drainage systems or groundwater flows affecting the farm, this could lead to:

- Contamination of livestock drinking water
- Soil contamination
- Organic certification risks

A detailed hydrogeological assessment must demonstrate that no contamination pathway exists between the proposed facility and adjacent agricultural lands.

Soil Integrity and Land Contamination

Organic farming depends on maintaining healthy living soils with active microbial populations. Potential contamination sources from power generation infrastructure include:

- Chemical storage
- Transformer oils
- Construction materials
- Accidental spillages

Electrical substations may contain insulating oils and other materials that pose contamination risks if leaks occur.

Any contamination migrating into adjoining farmland soils could:

- Compromise soil biological integrity
- Trigger certification investigations
- Require costly remediation
- Result in loss of organic status

The application documentation must therefore demonstrate robust containment, monitoring, and emergency response measures.

Impacts on Biodiversity and Organic Farming Systems

Organic farms rely heavily on natural ecosystem services, including:

- Pollination
- Natural pest control
- Soil biodiversity
- Hedgerow ecosystems

Industrial developments can negatively affect these systems through:

- Noise
- Lighting
- Habitat fragmentation
- Air pollution
- Increased traffic

Organic certification standards require farmers to actively enhance biodiversity. Industrialisation of adjacent land may undermine these efforts.

Construction Phase Impacts

Construction activities associated with the proposed development are likely to involve:

- Large volumes of excavation
- Heavy machinery
- Dust generation
- Soil movement
- Increased heavy vehicle traffic

Dust deposition represents a significant concern for organic farms because:

- Contaminated dust may settle on organic crops
- Soil microbial systems may be affected
- Certification concerns may arise

Construction Environmental Management Plans must therefore provide specific mitigation measures protecting neighbouring organic holdings.

Economic Impacts on the Organic Farm Enterprise

Organic farming often operates on premium market pricing structures, dependent on consumer trust and certification.

Loss or suspension of certification would lead to:

- Immediate financial losses
- Reduced product value
- Market exclusion
- Re-conversion periods of up to two years

The proposed development therefore poses material economic risks to the farm enterprise. Planning authorities must consider these impacts in assessing the public interest balance of the proposed project.

Landscape and Rural Character

The proposed facility represents a major industrial installation within a rural agricultural landscape traditionally characterised by farming activity.

The introduction of:

- Power generation infrastructure
- Electrical substations
- Industrial buildings
- Security lighting

would fundamentally alter the rural character of the area and reduce the suitability of the surrounding lands for agricultural use.

Planning and Policy Considerations

The development must be assessed against national and regional policies relating to:

- Sustainable agriculture
- Rural development
- Environmental protection
- Climate transition

While energy security is a legitimate policy objective, it must be balanced against:

- Protection of existing agricultural enterprises
- Preservation of environmental quality
- Safeguarding organic farming systems

Ireland has committed to significant expansion of organic farming under national agricultural policy frameworks administered by the Department of Agriculture, Food and the Marine. Industrial developments that may jeopardise organic holdings should therefore be subject to rigorous scrutiny.

Requested Actions

Given the above concerns, this submission requests that the Planning Authority

1. Require a specific **Organic Farming Impact Assessment** for neighbouring certified holdings.
2. Require detailed modelling of **airborne pollutant dispersion.**
3. Require full **hydrological and contamination pathway analysis**.
4. Require **buffer zones** between the facility and organic farmland.
5. Require legally enforceable **environmental monitoring**.
6. Ensure **construction management plans protect adjacent agricultural operations**.

If these issues cannot be satisfactorily addressed, An Coimisiun Pleanala should consider **refusal of the application** due to unacceptable risk to neighbouring agricultural enterprises.

The proposed gas-powered peaker plant at Cashla represents a significant industrial development adjacent to active organic farmland.
The potential for air, soil, or water contamination presents a material risk to the organic certification status and economic viability of my client's farm enterprise.
Organic agriculture depends fundamentally on environmental integrity. Developments which may compromise that integrity must be assessed with particular care.
Until the applicant can demonstrate conclusively that no contamination risk exists to adjacent organic farmland, this proposal should not be permitted to proceed.

Signed
Aine Gordon B.Agr.Sc
Organic Agricultural Advisor

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Tel/Fax: 00 353 45 882 377 Email: info@organictrust.ie Website: www.organictrust.ie

Damien Collins,
Pollnagroagh, Athenry,
Co. Galway.
H65 PN56

Date 15/4/2026

Compliance Report

Dear Damien

We refer to the Annual Inspection which took place on your holding on 4/2/2026. The inspection report was reviewed as per the Organic Trust certification process and the following decisions were made regarding the contents of that report.

- No issues of non-compliance were identified during the course of the inspection indicated above, therefore, your licence remains valid to the current expiry date.

Thank you for your co-operation.

Yours sincerely

Signed: _____

Stephen Connolly
Chief Executive Officer

In the event that you wish to appeal any decision made, this must be notified to the office within 14 days of the date of this letter - the applicant is referred to Appendix 1 (as amended) of the Organic Food & Farming Standards in Ireland, for full details of the Appeals Procedure which must be strictly adhered to.

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Naas Town Centre
Naas, Co Kildare
Ireland
Tel/Fax: 00 353 45 882 377
Email: info@organictrust.ie
Web: www.organictrust.ie

ORGANIC TRUST CLG

Inspection • Certification • Training • Education

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SYMBOL CERTIFICATE

This is to certify that the

ORGANIC TRUST SYMBOL

has been awarded to

Damien Collins

Pollnagroagh, Athenry, Co. Galway.
H65 PN56

Additional Land, Processing Sites & Producer Specific Abattoirs
Pollnagroagh. H65 PN56
Mountain West, Co. Galway. H91 CC6H

for the following organically certified enterprises

Grassland
ASBP* Cows, Calves born on this holding from 01.04.2024 onwards will be eligible for organic status simultaneously with the land on 01.01.2026
Beef
ASBP* = Approved for Symbol Breeding Purposes

This document has been issued in accordance with **Regulation (EU) 2018/848** to certify that the operator complies with that Regulation. The declared operator has submitted his activities/processes under control and meets the requirements laid down in the named Regulations as implemented in the Organic Food & Farming Standards in Ireland

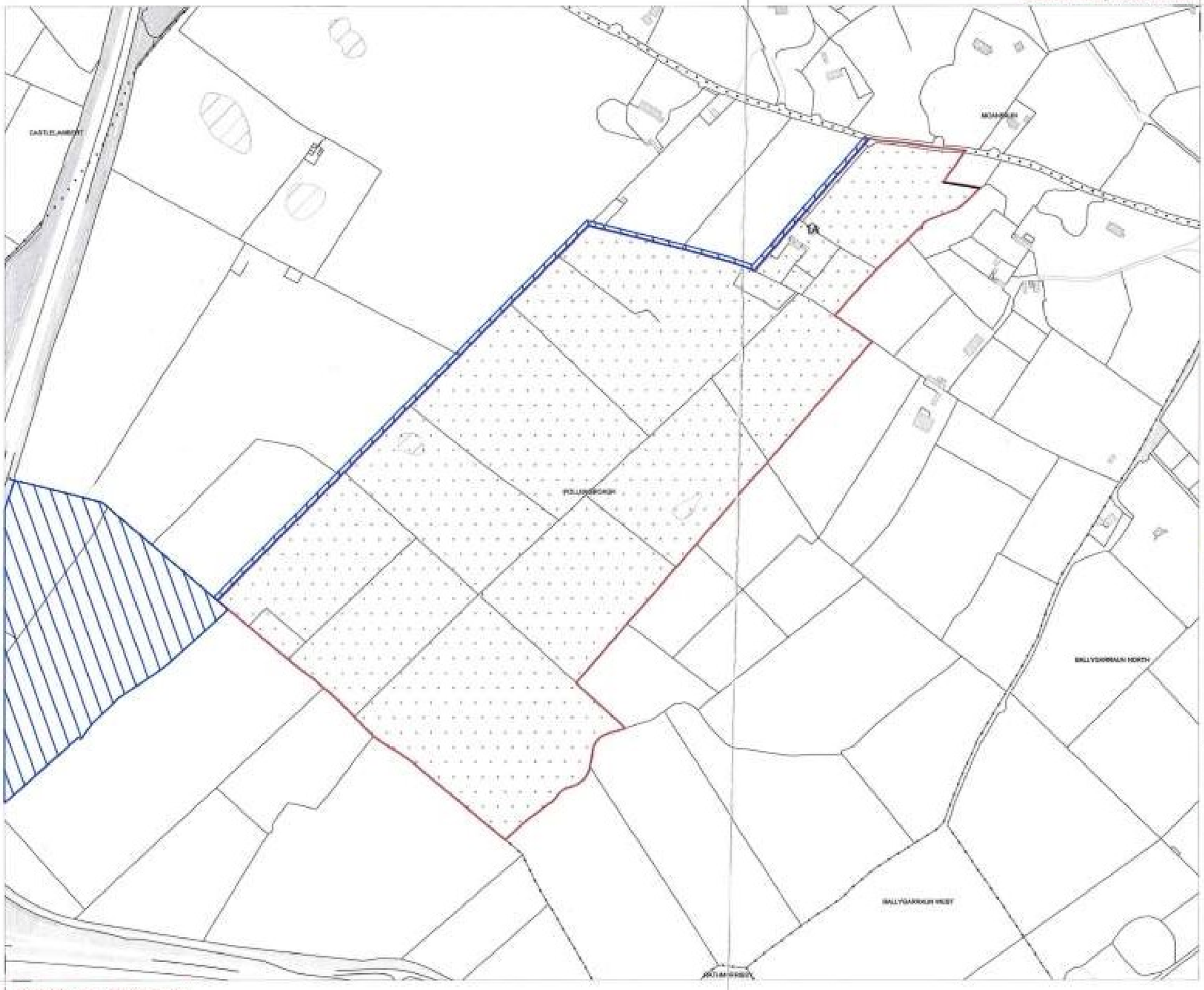
Symbol/Licence Number: 2925

Valid From: 01/01/2026
Valid Until: 31/12/2026

Signed:

Stephen Connolly
Chief Executive Officer

548080 mE, 729010 mN



546480 mE, 727710 mN

The Property Registration Authority
An tÚdarás Clárúcháin Maoine

Folio: GY27127F

This map should be read in conjunction with the folio.

Registry maps are based on OSi topographic mapping. Where registry maps are printed at a scale that is larger than the OSi published scale, accuracy is limited to that of the original OSi map scale.

For details of the terms of use and limitations as to scale, accuracy and other conditions relating to Land Registry maps, see www.prai.ie.

(centre-line of parcel(s) edged)

- Freehold
- Leasehold
- SubLeasehold

Burdens (may not all be represented on map)

- Right of Way / Wayleave
- Turbary
- Pipeline
- Well
- Pump
- Septic Tank
- Soak Pit

A full list of burdens and their symbology can be found at: www.landdirect.ie

The registry operates a non-conclusive boundary system. The Registry Map identifies properties not boundaries meaning neither the description of land in a register nor its identification by reference to a registry map is conclusive as to the boundaries or extent. (see Section 85 of the Registration of Title Act, 1964). As inserted by Section 62 of the Registration of Deed and Title Act 2006.

1:5000 Scale