

Lisheenkyle Group Water Scheme Co-Operative Ltd.

Registration # R5565

Secretary, Palmerstown, Derrydonnell, Oranmore. GALWAY H91 P4AP

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Submission to An Bord Pleanála - April 8th, 2026

SID application for the Cashla Peaker Plant and Above Ground Installation (AGI)

(Energy generation infrastructure – Ref: PA07.324113, deadline: 24 April 2026)

The Board of Lisheenkyle Group Water Scheme Co-operative Society Limited wishes to lodge a submission on Bord Gais Energy, Planning application number: **324113**

The Lisheenkyle Group Water Scheme is a community owned Group Water Scheme (GWS) that provides potable water to over 130 houses and farms, as well as a School and Golf Course. The pipework from the scheme is close to the proposed development substation.

The board would like to reiterate that this infrastructure provides vital services to the local community in the area and it is crucial that the sources, infrastructure and services provided by the scheme are not negatively impacted as a result of the proposed development during construction and long term.

The Board of Lisheenkyle Group Water Scheme Co-Operative Society Limited would like to highlight the following in relation to the above proposed development by Bord Gais Energy.

The Lisheenkyle Group Water Scheme has concerns regarding the risk posed to groundwater, which is a critical resource for local households, farms, and ecosystems

1. Risk of Groundwater Contamination from Fuel Storage and Handling

A peaker plant requires the storage and handling of fuels such as diesel, lubricating oils, and other chemical substances, all of which present contamination risks. These substances may enter the ground through leaks, spills, or contaminated runoff over the long operational lifespan of the facility (to at least 2050).

This risk is significantly heightened by the karst limestone geology of the area, where groundwater vulnerability is classified as *extreme*. In such environments, water and contaminants can move rapidly through fissures, conduits, and underground channels with little or no natural filtration.

Key concerns include:

- Rapid migration of contaminants through underground karst pathways
- Construction-phase risks such as fuel spills, concrete washout, and sediment runoff
- The difficulty of protecting groundwater in a highly vulnerable conduit-karst system

The application relies on standard mitigation measures such as bunding, underground tanks, soakaways, and pH-triggered firewater diversion systems. However, these are not demonstrated

to be fail-safe in a karst environment, where any failure could result in rapid and widespread contamination.

Once contamination occurs, remediation is extremely difficult and impacts may persist for decades. This raises serious concerns under the Water Framework Directive, which requires prevention of deterioration in water quality.

Long-Term Accumulation of Pollutants

The presence of diesel tanks, hardstanding, and drainage infrastructure increases the risk of gradual pollutant accumulation over time. Even minor, repeated leaks can result in hydrocarbons entering soil and groundwater.

In a karst aquifer, these pollutants can bypass natural filtration and travel significant distances, leading to unpredictable and potentially widespread contamination beyond the site boundary.

The EIAR does not provide sufficient site-specific hydrogeological evidence to demonstrate that such long-term impacts can be avoided.

2. **Interference:** No interference with our pipework without prior consultation and approval of the Lisheenkyle Group Water Scheme.

3. **Restoration of services:** Where excavations interfere with water supplies, these services will be restored as a matter of urgency by the contractor.

4. **Costs of a qualified engineer:** Bord Gais Energy will pay for the costs of a qualified engineer, on behalf of the Lisheenkyle Group Water Scheme to verify that any pipework that was altered or damaged during the cable laying construction was repaired and/or replaced to the satisfaction of the Lisheenkyle Group Water Scheme.

5. **Insurance indemnification:** Lisheenkyle Group Water Scheme want Bord Gais Energy to indemnify them for the duration of the construction, from all possible claims, arising from possible contamination of schemes water supplies, from alterations of pipework or breakage to the pipes.

6. **Ducted Pipe Crossings:** Where requested by homeowners, any water crossings that are encountered during the cable laying process will be ducted into a 6-inch duct, to allow for easier leak detection as the electrical cable will present an additional hazard for repair post construction.

7. **Additional Blind Crossings:** Additional blind crossings (indeterminate number at this stage) will be requested by the scheme to allow for safer connection to the scheme in the future,

Locations of these crossings will be located in cooperation with the Lisheenkyle Group Water Scheme Board.

8. **Schematics:** Lisheenkyle Group water Scheme will require a detailed Engineers map of the placement of electrical cables in relation to water pipe work, to allow for safe maintenance of the scheme, should the need arise.

9. **New/Replacement Connections/Equipment :** Bord Gais Energy to bear the costs for any new or replacement specialised connections or equipment to the Lisheenkyle Group Water Scheme if required as a result of this development into the future.

10. **Contact Details:** The scheme can be contacted by email at seclishgws@gmail.com

Gearoid Lacey

GWS Secretary