Observation on a Strategic Infrastructure Development Application

Martin Mc Namara

2 Sheaunpark,

Cartymore,

Athenry,

Co.Galway

H65E797

I wish to make a submission in relation to the proposed development and to highlight a number of concerns arising from the nature and scale of the project, particularly as they relate to local infrastructure, traffic safety, and environmental impacts.

The local access road (L3103) is a rural road of limited width, alignment, and structural capacity. It was not designed to sustain frequent heavy construction traffic or long-term operational traffic associated with an industrial-scale development of this nature. The proposal will generate significant volumes of Heavy Goods Vehicle (HGV) movements during both the construction phase and the operational lifetime of the development.

Of particular concern is the proposed on-site contingency fuel supply of approximately 6 million litres of diesel fuel, which will require delivery by articulated fuel tankers. The frequency, size, and weight of these vehicles will place additional strain on the road surface, verges, junctions, and adjoining structures, increasing the risk of road degradation, traffic congestion, and hazards for existing road users, including residents, agricultural traffic, pedestrians, and cyclists.

The current road layout does not facilitate safe access and egress for articulated vehicles. Due to the restricted road width and geometry, articulated vehicles will be required to cross onto the opposing carriageway in order to enter and exit the site. This manoeuvre would place such vehicles directly into the path of oncoming traffic, creating an unacceptable road safety risk.

This issue is particularly concerning given the anticipated frequency of HGV movements and the limited visibility available on the local road network. In my view, the existing access arrangements do not comply with safe road design principles and would pose an ongoing risk to all road users.

I also wish to question the rationale for the proposed reduction in stack height, particularly when considered in conjunction with the absence of emission scrubber technology. A reduced stack height has the potential to result in poorer dispersion of emissions, increasing the concentration of pollutants at ground level.

This raises serious concerns regarding air quality impacts on the immediate surrounding rural and urban communities, including residential areas and agricultural lands. Without adequate mitigation measures such as scrubbers, there is an increased risk that pollutants will be deposited closer to the source, contrary to the precautionary principle and best practice in environmental protection.

Given the constraints of the existing road infrastructure, the unsafe access arrangements for articulated vehicles, the scale of fuel deliveries required, and the potential air quality implications arising from reduced stack height and lack of emission controls, I respectfully submit that the proposed development raises significant planning, safety, and environmental concerns which warrant careful reconsideration.