

THIRD PARTY OBSERVATION – SID APPLICATION CASE REF. 324113

Cashla Peaker Plant, Rathmorrissy and Pollnagroagh, Athenry, Co. Galway

Submitted by: Maryrose and Philip McGregor

Address: Castlambert, Athenry, Co. Galway H65 WY26

Distance from proposed site: 670 metres

Date: 24 April 2026

Case Reference: SID Application 324113

Dear Members of An Coimisiún Pleanála,

My name is Maryrose McGregor. I write this observation on behalf of myself, my husband Philip, and our four children. We live at Castlambert, Athenry – 670 metres from the proposed Cashla Peaker Plant site. We formally object to this SID application and ask An Coimisiún Pleanála to refuse permission.

Five years ago I came home. I grew up in Castlambert. When Philip and I decided where to build our family home, we built here, beside my parents, on land that has been in our family for generations. We invested everything we had to do it right: an A-rated energy-efficient home, mechanical ventilation in every room, PV solar panels on the roof, a heat pump, and a battery that stores what the sun gives us. We built for the future. We hoped our children would want to build on this land one day too – as we built beside my parents – and raise their own families in Castlambert.

This application threatens that future. If permission is granted, by the time this plant ceases operation in 2050, our youngest child will be 35 years old. Every year of their childhood, adolescence, and early adult life will have been spent within 670 metres of an industrial combustion facility. This is not an inconvenience we are raising. It is a documented, foreseeable, and fundamental threat to the health, wellbeing, our home, and the living landscape around us.

1. Our Home – What We Built and What This Development Would Cost Us

1.1 Our MVHR System – Existing Overload and Future Costs

Our home has a whole-house mechanical ventilation with heat recovery (MVHR) system. Every cubic metre of air entering this house is filtered. The filters are rated for annual replacement. They already require changing every six months because of elevated particulate load from the nearby M6 motorway. A 334 MW open-cycle gas turbine operating 670 metres upwind will

increase that load further. Every additional filter change, every early component replacement is a direct financial cost imposed on us for the duration of this plant's operation – until 2050.

EIAR Volume 2, Chapter 8, Section 8.7.2

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

An A-rated home with MVHR was built precisely to avoid dependence on fossil fuel combustion. The EIAR has not assessed the impact of its unmitigated emissions on any A-rated home, any MVHR system, or any indoor air quality in the residential properties closest to the site. This is a specific, measurable, and ongoing financial harm.

1.2 Our Solar Panels – Particulate Soiling Reduces Generation

We have a PV solar panels and battery system. For close to half the year, this house generates and stores its own electricity. Research published in *Nature Sustainability* (2020) found that particulate matter can reduce photovoltaic generation by more than 50% in heavily polluted regions without cleaning, with soiling accounting for over two-thirds of the total reduction. *Frontiers in Energy Research* (2022) confirmed that dust accumulation is directly linked to airborne particle concentration and proximity to industrial emission sources.

Nature Sustainability (2020) – PM reduces PV generation by more than 50% without cleaning; soiling accounts for over two-thirds of total reduction

Frontiers in Energy Research (2022) – Dust accumulation rate directly linked to airborne particle concentration and proximity to industrial sources

Combustion particles from a gas turbine 670 metres upwind under prevailing westerly winds will settle on our panels, reduce our output, and increase our cleaning and maintenance costs. The EIAR contains no assessment of the impact of its emissions on any residential renewable energy installation.

1.3 Construction Vibration and Structural Risk

Our home sits 670 metres from the development footprint on karst limestone. The EIAR confirms 22-tonne rock breakers for cable route works (Volume 2, Chapter 10, p.485) and construction noise of 87 dB at 10 metres (Volume 2, p.282). Engineering literature consistently documents that rock breaking, piling, and heavy equipment traffic produce ground vibrations capable of damaging neighbouring structures, first appearing as cracks at window and door corners. In karst terrain, vibration propagation and the potential for differential settlement under foundations is less predictable than in conventional soil.

No pre-construction structural survey of our property has been committed to. No vibration monitoring protocol for residential properties within 700 metres has been specified. The EIAR (Volume 2, Chapter 9, Section 9.11.1) states monitoring is not required as the nearest sensitive receptor is at least 450 metres away. We are 670 metres away. That decision not to monitor is an active choice to leave us without protection or recourse if our home is damaged.

2. Our Children – Health Evidence, the EIAR’s Own Admissions, and the Law

Our two eldest children attend Presentation College Athenry (2.5km from plant). Our two youngest children attend Lisheenkyle National School (2.8km). Both schools are in the downwind corridor under prevailing westerly conditions confirmed by the EIAR’s own meteorological data (Volume 2, Chapter 7, p.374). Neither school appears in the AERMOD air quality receptor model. Neither is on the noise sensitive location register (EIAR Table 9-11). Four children, two schools, zero assessments.

Our youngest child is currently 10. This plant will operate until 31 December 2050. Our youngest will be 35. Every year of their childhood, adolescence, and early adult life will have been spent growing up within the emission and noise footprint of this facility. That is the duration of this decision.

2.1 The EIAR’s Own Admissions on Children’s Health

The EIAR’s own sensitivity assessment states that children and adolescents are considered to have high sensitivity to air quality because their bodies, organs, and immune systems are still developing.

EIAR Table 4-19 assigns High sensitivity to families with children for both air quality and noise. EIAR Table 4-5 provides that High sensitivity exposed to a Medium magnitude impact generates a Significant finding.

That calculation is never performed for any operational scenario, because – as EIAR Section 4.4.1.2 explicitly states – operational health impacts have been deferred to post-consent EPA licensing.

EIAR s.4.4.1.2 – explicit admission

“Any potential impacts associated with the day to day operations of the plant are not considered within the Population and Human Health Assessment as these will be managed under the appropriate regulatory framework of consents and licensing.”

In Holohan v An Bord Pleanála, the Court confirmed that human health must be assessed as an integral component of environmental assessment, including direct, indirect and cumulative effects, before the Board determines a planning application. Deferral of the

operational health assessment to a post-consent EPA licence is not a permissible approach under the EIA Directive. This is a legal ground for refusal.

2.2 The Diesel NOx Spike – 7.1 Times Normal Rate

EIAR Table 7.8 confirms that diesel testing is modelled at an NOx emission rate of 152.778 g/s – 7.1 times the normal operations rate of 21.389 g/s – for up to one hour per week, approximately 52 hours per year.

Emergency diesel operation is confirmed at up to 500 hours per year (EIAR s.7.2.3.2.7).

These are repeated, intense, short-duration emission spikes that are not captured by average-based dispersion modelling. The cumulative health burden on our family, 670 metres from the stack, from 52 or more hours per year of NOx at 7.1 times the normal operational rate, **has not been assessed anywhere in the EIAR.**

2.3 American Research on Peaker Plants and Children

The United States has documented experience of the health consequences of living near gas-fired peaker plants. Liu, Lessner and Carpenter (2015) analysed hospitalisation data from 1993 to 2008 across New York State and found significant increases among people living in a zip code containing a fuel-fired power plant: 11% higher hospitalisation for asthma, 15% for acute respiratory infection, and 17% for COPD, after controlling for age, sex, race, income, and urban or rural status. In Mott Haven and Melrose in the Bronx – areas surrounded by peaker plants – the asthma emergency room visit rate among children aged 5 to 17 is nearly triple the citywide average.

Liu, Lessner & Carpenter (2015), Environmental Health Perspectives, PMC3385425 –

Living near a fuel-fired power plant: 11%, 15%, 17% increased hospitalisation for asthma, ARI, and COPD respectively

New York Public Service Commission – Peaker plants emit up to 20× more NOx per unit; children in surrounding Bronx areas show asthma ER rates nearly triple citywide average

2.4 The 500m Study Area Deliberately Excludes Every Sensitive Receptor – Including Our Own Family

EIAR s.4.2.1 defines the human health study area as 500 metres from the project boundary. Lisheenkyle NS is at 600 metres – just outside. All six schools within 3.5 km are outside. All five sporting and recreational facilities are outside. **EIAR Table 4-7 confirms the local population contains 23.6% children aged 0-14 – higher than County Galway (21%) and the national average (19.6%).** A study area boundary was drawn so as to exclude every school, every sports facility, and the most vulnerable members of the local population from the formal operational health assessment. That is not precautionary planning. It is the opposite.

Our family is a direct illustration of who falls outside that boundary and why it matters. Two of our children train with Athenry Football Club three times a week – the club is 2.26 km from the

proposed plant, in the prevailing downwind direction confirmed by the EIAR's own meteorological data, and absent from every operational assessment in the EIAR.

Four of the six people in our family play golf weekly at Athenry Golf Club, which sits 2.8 km south-west of the proposed plant – also in the prevailing downwind direction, also absent from the AERMOD model, the noise assessment, the health chapter, and the major accident assessment. On any given week, members of our family will be engaged in sustained outdoor physical activity at both of these locations, breathing the open air of the Athenry countryside, for hours at a time. The EIAR has never assessed what that means for their health.

The science on outdoor exercise and air pollution is unambiguous and directly relevant to both activities. At rest, inhalation is approximately 7–8 litres per minute. During moderate to vigorous exercise, this rises to **40-70 litres per minute** – meaning a person exercising outdoors inhales **5-8 times more pollutant per minute** than a person at rest. A child running at football training or an adult walking an 18-hole golf course does not breathe like a residential receptor at rest indoors. They breathe faster, deeper, and for longer, maximising their uptake of whatever is in the air around them.

PM2.5, PM10, NO₂ and NO_x are associated with inflammatory responses and reduced lung function. **Detrimental effects can occur after brief exposures of only 60 minutes.** Polluted outdoor exercise has been shown to increase cardiovascular stress and reduce heart rate variability, demonstrating that exercise in a polluted environment negatively affects cardiovascular response compared to exercise in clean air. The physiological risks include increases in resting and exercise heart rate and blood pressure, ischaemia, and asthma, as well as decreases in lung function and oxygen-carrying capacity.

For our children training three evenings a week at Athenry Football Club, and for our family playing golf every week at Athenry Golf Club, these are not abstract statistics. Evening is precisely when a peaker plant is most likely to dispatch – peak electricity demand in Ireland occurs in the early evening. The plant will fire up, emit at elevated levels during start-up, and run under prevailing westerly winds toward a football club 2.26 km away and a golf course 2.8 km away, both occupied by members of our family engaged in sustained outdoor physical activity with elevated inhalation rates. Neither facility, and neither activity, was assessed.

Madureira et al. (2019), Environmental Research, 176 – Cardio-respiratory health effects of exposure to traffic-related air pollutants while exercising outdoors: inhalation rate rises to 40–70 L/min during exercise; polluted outdoor exercise increases cardiovascular stress and reduces heart rate variability

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2.5 Psychosocial Health – 25 Years of COMAH Proximity

The EIAR does not assess the indirect psychosocial impacts of long-term proximity to a COMAH-classified industrial installation. Stress, anxiety, and reduced quality of life arising from living beside a facility storing 5,470 tonnes of diesel, handling pressurised gas, and classified as a major accident hazard are recognised in environmental health literature as real health effects. Our family will experience this for 25 years. It was never assessed.

2.6 Our Daughter Learning to Drive

Our eldest daughter is learning to drive. Her lessons are on the L3103 and the roads around Castlelambert. EIAR Table 10-3 confirms 28 two-way HGV trips per hour on the L3103 during peak construction. A learner driver meeting a 40-tonne HGV on a road with a continuous white centre line and no hard shoulder is a specific, foreseeable, and unassessed safety risk.

3. Our Roads – Four Trips a Day, No Margin for Error

Between school runs, Athenry Soccer Club training, and Athenry Music School lessons, our family makes up to four return trips between Castlelambert and Athenry town every day. We know the L3103. We know its continuous white centre line, its blind dips, the stretches where two cars barely pass. Two HGVs cannot pass each other safely on this road. There is no hard shoulder, no passing bay, no footpath. The county council's own road markings are the most credible evidence of this: the continuous white line was placed there because there is no room.

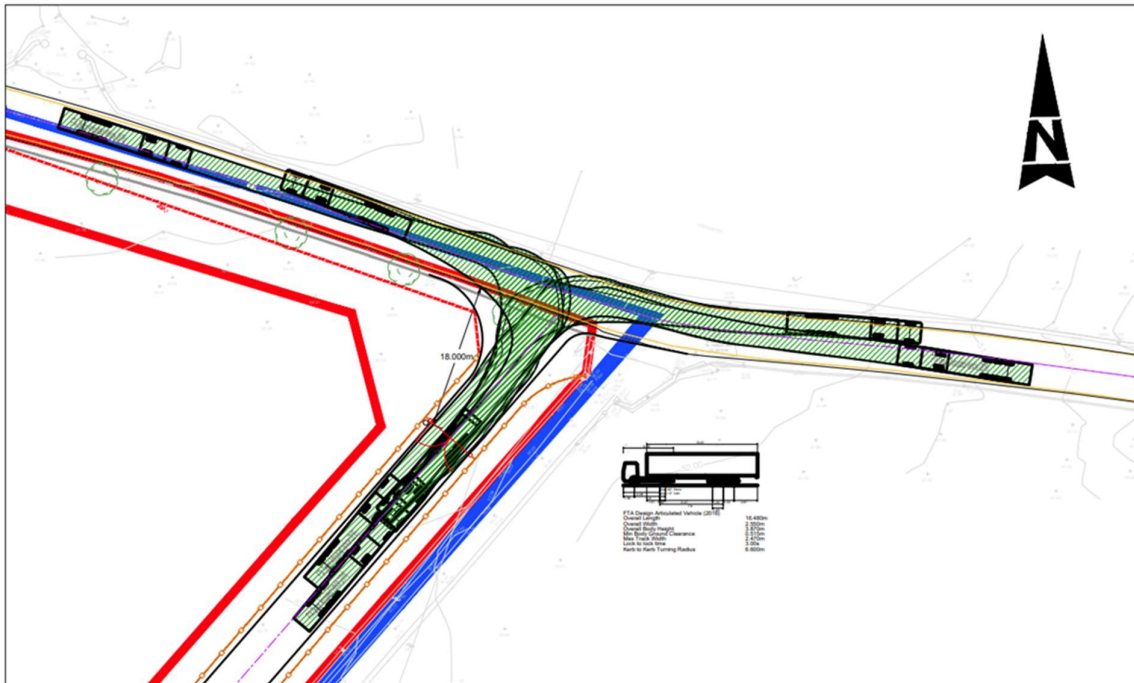
The proposed site entrance is on this road. Every HGV, worker vehicle, and abnormal load for 25 years enters and exits through a junction on the road our family uses four times a day. From looking at the autotrack drawing for HGV's, it is clear that they can not make this turn safely without crossing into oncoming traffic to make the turn need to enter and exit the development. This is an unmeasurable road hazard and will put the lives of everyone else in danger everyday and we can not let this be granted.

EIAR Volume 2, p.480

"Currently, there are no cycling facilities along the L3103 Local Road near the Proposed Project."

EIAR Volume 2, p.493 – partial closure during cable works

"A minimum 2.5m wide carriageway will be maintained for traffic flow on the other side. Temporary traffic signals will be used to safely guide vehicles through the work zone."



Applicants drawing PEK3-ATK-ZZ-01-DR-CE-901200, Autotrack for HGV at the entrance, all four turning accesses laid on top of each other which makes the drawing confusing and extremely difficult to read

A 2.5 metre carriageway is the width of a parking space. This is what remains for our car, school buses, tractors, and emergency vehicles during cable installation. The EIAR classifies this as “negative, moderate and short term.” We travel this road four times a day with our children.

The EIAR classifies the L3103 using an Urban Access Road (UAP4) standard with a theoretical capacity of 1,500 vehicles per hour (EIAR Volume 2, p.482). The L3103 is not an urban road. Applying this standard to a narrow rural road with a continuous centre line is a methodological error.



Reality of this road on any given day, when Agricultural traffic and a HGV meet

3.1 The Castlambert Overbridge – 380-Tonne Loads Through Our Townland

The EIAR (Volume 2, p.495) confirms three exceptional abnormal loads of up to 380 tonnes each. The alternative route was rejected because the Castlambert Overbridge could not bear the load. Our townland's roads will carry a 90-metre girder truck carrying 380 tonnes. We were never told.

The continuous white line on the L3103 is there because the county council judged the road too narrow for safe two-way traffic at speed. Every HGV turning in or out of the proposed site entrance creates a conflict that the road markings themselves warn is dangerous. The EIAR ignores this.

3.2 Additional Road Concerns

- Diesel tanker movements during the 25-year operational phase will be a permanent feature on this road – no operational-phase tanker frequency assessment has been provided
- The **single-day, 13 February 2025 traffic count does not represent** summer traffic, agricultural peak periods, or school term conditions – an inadequate basis for an 18-month assessment
- The EIAR (Volume 2, p.504) acknowledges HGV deliveries must avoid “conflict with local residents’ commute or school run” – acknowledging the conflict exists – then rates the overall traffic impact as “not significant”

4. Our Groundwater – Karst, Diesel, and Unanswered Risks

EIAR Volume 2, p.572 – GSI description of Clarinbridge Groundwater Body

“Rapid groundwater flow velocities have been recorded through groundwater tracing. Groundwater storage in karstified bedrock is low and the potential for contaminant attenuation in such aquifers is limited.”

The proposed development stores 5,470 tonnes (6,670 m³) of low sulphur diesel on site in bunded tanks above this karst aquifer for 25 years (NTS s.2.2). In karst terrain, a spill does not filter slowly through clay. It travels rapidly through underground conduits to emerge unpredictably in wells, springs, and groundwater beneath family lands and homes.

The new documents provided to the Board identify further specific contamination risks that the EIAR has not assessed, including the following:

- Propane gas storage of 1 tonne for turbine start-up (NTS s.2.2) – release risk in a karst setting not assessed

- Contaminated firewater runoff in a major accident event – overflow risk in karst, where subsurface flow is rapid and unpredictable, not assessed
- Alkaline concrete washout water during construction – in a karst environment, even minor releases can adversely affect groundwater quality due to limited natural buffering capacity. Not assessed
- No long-term groundwater monitoring programme is specified in the EIAR that would enable early detection of a contamination event before it reaches private wells
- Stage 2 Flood Risk Assessment is absent – karst groundwater flood risk is not addressed
- The Detailed Piling Risk Assessment and Hydrogeological Assessment confirmed as necessary in the NTS (s.12.2.1) had not been completed at time of submission

*In Waddensee (C-127/02) and Sweetman v An Bord Pleanála, the Court established that **where scientific doubt remains as to the absence of adverse effects, consent cannot be granted**. Given the incomplete hydrogeological assessment, the six unassessed private water abstractions, and the 5,470-tonne diesel storage risk above a karst aquifer, this standard has not been met.*

5. Our Hens – Our Son’s Food and What Emissions Would Do to It

Our youngest son, aged 10, keeps seven hens and collects their organic eggs for our family. The peer-reviewed science on air pollution and poultry is specific: Chen et al. (2023) demonstrated PM2.5 penetrates the respiratory system of chickens, perturbing the pulmonary microbiome and weakening immune function; Liu et al. (2021) showed particulate matter causes metabolic disruption and lung damage; Xie et al. (2020) demonstrated PM2.5 causes developmental cardiotoxicity in chicken embryos. Chronic exposure leads to reduced laying rates and poorer shell quality. Our hens live outdoors. Their coop is 670 metres downwind of the proposed stack. The EIAR has not assessed the impact of its emissions on any poultry or small-scale food production in the study area.

Chen et al. (2023), Animals – PM2.5 perturbs pulmonary microbiome in chickens; weakens immune function

Liu et al. (2021), PMC – Particulate matter causes dyslipidaemia and lung damage in poultry

Xie et al. (2020), PMC – PM2.5 causes developmental cardiotoxicity in chicken embryos

6. The Wildlife Around Our Home – Bats, Birds, and What the Applicant’s Own Surveys Confirm

We walk the land around Castlelambert regularly as a family. On dark evenings, we see bats flying along the hedgerows and treelines around our home. We have always seen them. Large flocks of starlings land in our garden regularly. Swallows return every spring to nest in the area and spend the summer feeding over the surrounding fields. House Martins are a regular presence. This is not background countryside to us. It is the living landscape our children are growing up in, and it is directly and specifically threatened by this development. The applicant’s own ecological surveys confirm both the presence and the legal significance of what would be lost.

6.1 Bats – The Highest Level of Legal Protection, and 4,545 Confirmed Calls

All bat species in Ireland are **strictly protected under Annex IV of the EU Habitats Directive and the Irish Wildlife Acts 1976-2018**. It is a criminal offence to deliberately disturb bats or to damage or destroy their resting places. The protection is absolute. It does not depend on population size, frequency of use, or commercial convenience.

The applicant’s own bat survey (EIAR Appendix 5.2) **recorded six bat species actively foraging on and around the site:** *Soprano pipistrelle*, *Common pipistrelle*, *Nathusius’ pipistrelle*, *Leisler’s bat*, *Whiskered bat*, and *Brown long-eared bat*. A total of **4,545 bat calls** were recorded across three survey points. These are the bats we see on our evening walks in Castlelambert. This is not a site bats occasionally pass through. The applicant’s own data proves it is a primary foraging and commuting hub.

- Songmeter 1 recorded 785 calls and confirmed a Whiskered bat inside the on-site shed. **A confirmed bat roost.** The proposed demolition of this structure without a confirmed NPWS Derogation Licence at the planning stage is a breach of the precautionary principle under EU Habitats Directive law
- Songmeter 2, on the south-eastern boundary near the M18, **recorded 3,760 calls** – including 1,801 Soprano pipistrelle calls. This boundary is a critical dark commuting corridor used by bats navigating past the motorway. The peaker plant will place 20-metre high industrial LED lighting masts directly adjacent to this corridor. The applicant’s own bat report identifies this as potentially **creating an impermeable photic barrier for these species**
- Songmeter 3 confirmed the north-eastern treeline as a “core foraging area” for Leisler’s bats. Leisler’s bats are high-altitude, open-space foragers. The placement of a 30-metre exhaust stack and 36-metre telecommunications mast directly in this core foraging zone **creates a documented collision and barotrauma risk for a strictly protected species**
- The applicant’s own EIAR explicitly admits that lighting disturbance to bats during the operational phase represents a **“permanent significant negative impact at the local**

scale” prior to mitigation. They admit the impact is significant. The adequacy of their proposed mitigation has not been independently verified

EIAR – applicant’s own lighting assessment admission

“Lighting disturbance to bats during the operational phase represents a permanent significant negative impact at the local scale.”

*In Ennis Data Centre [2025] IEHC 158, planning permission was quashed because the Board incorrectly stated no bat roosts were present when one existed. The Court ruled that **under EU law, the destruction of a protected roost is a significant impact requiring assessment before permission is granted** – regardless of how frequently it is used. A confirmed Whiskered bat roost has been identified in the on-site shed in this application. In Crofton Buildings Management v ABP [2024], the High Court ruled that developers cannot rely on “bland assertions” that mitigation is standard; they must provide an evidence-based guarantee that it will work for the specific populations identified.*

6.2 The Birds of Our Garden and the Landscape – Confirmed by the Applicant’s Own Survey

The hirundines – Swallows, Sand Martins, and House Martins – that we see every year in our garden and over the fields around Castlelambert are the same birds recorded by the applicant’s own breeding bird survey (EIAR Appendix 5.1) feeding over the two groundwater-fed ponds 260 metres west of the proposed access road. These ponds, fed by the same karst aquifer that runs beneath our land, are confirmed by the survey as the primary wildlife habitat in the study area. The hirundines depend on the insects over these ponds. They depend on the ponds themselves. If the ponds are contaminated – through groundwater pathways the EIAR acknowledges cannot be reliably predicted in karst terrain – the birds that feed over them will lose their food source.

The **starlings we see landing in flocks in our garden** are the same species recorded in the survey overflying and feeding on the improved grassland adjacent to the plant footprint. Starlings **are highly sensitive to changes in agricultural land quality** and to industrial disturbance of foraging areas. The large flocks our family watches from our kitchen windows are part of the same ecological network that the applicant’s own survey documents.

Beyond the species we personally observe, the applicant’s own bird survey confirms the following findings of legal significance:

- Golden Plover – a flock of 46 individuals, Annex I of the EU Birds Directive, confirmed grazing and roosting on the grassland north of the groundwater-fed ponds during the January 2025 survey. Annex I species require the highest level of habitat protection under European law. Their confirmed presence on and adjacent to the proposed footprint has not been adequately assessed in the operational impact section of the EIAR

- Snipe – Red-listed under Birds of Conservation Concern in Ireland (BoCCI 2020–2026), confirmed flushed from within the peaker plant footprint and immediately north of it during multiple survey visits. Red-listed species are of the highest conservation concern in Ireland
- Meadow Pipit – Red-listed, confirmed displaying and singing males directly within the proposed plant footprint. The construction of the facility will permanently eradicate the specific grassland habitat these birds are currently using as breeding territories
- Skylark – Amber-listed, confirmed displaying and singing males within and north of the peaker plant footprint. The EIAR acknowledges the “loss of breeding bird breeding/foraging habitats” as a permanent negative impact. This acknowledgement is not accompanied by an adequate assessment of cumulative and long-term consequences
- Mallard and Moorhen – both confirmed at the groundwater-fed ponds during the breeding bird surveys. These are the ponds that feed the swallows and hirundines. Their ecological value depends entirely on groundwater quality. That groundwater runs through a karst system the EIAR confirms has limited capacity for contaminant attenuation

The applicant’s own survey team identified these species. The applicant’s own ecologists documented this foraging hub, these breeding territories, this commuting corridor. Having documented it all, they proposed a development that will permanently destroy much of it and then concluded the impacts were acceptable. We do not accept that conclusion, and neither should this Board.

6.3 Artificial Light at Night – What the Proposed Lighting Scheme Would Do

The proposed development includes 20-metre high LED lighting masts with operational and security lighting on a 24-hour basis. The applicant’s own site lighting report details the installation of multiple high-intensity LED masts. Castlelambert is currently a dark rural landscape. On a clear night we can see stars from our garden. Our children know what a dark sky looks like. The introduction of 20-metre industrial lighting masts 670 metres from our home will permanently alter that.

Beyond our own amenity, the ecological consequences of industrial artificial light at night in this specific location are documented and serious:

- The south-eastern treeline boundary – recording 3,760 bat calls – functions as a dark commuting corridor between the agricultural landscape and foraging areas. Twenty-metre LED masts alongside this corridor will create what the literature describes as a “**photic wall**” – a barrier of light that bats cannot cross. Their established commuting routes, used for generations, will be severed
- Swallows, House Martins, and Sand Martins are **crepuscular feeders** – most active at dawn and dusk. Artificial light extending and distorting the effective length of the day

disrupts their feeding cycles, their navigation, and their migratory behaviour. The ponds that these birds feed over are 260 metres from the access road boundary. Industrial lighting on a 24-hour basis changes the ecological character of that habitat fundamentally

- Galway County Development Plan **Policy LP 1** requires that lighting schemes minimise excessive light spillage and limit light pollution to residential amenity and wildlife. **No night-time visualisations have been provided.** No assessment of the lighting scheme's impact on the wildlife corridors and habitats confirmed by the applicant's own ecological surveys has been conducted. Compliance with LP 1 has not been demonstrated.

6.4 Trees, Habitat Loss, and Root Protection Areas

The applicant's own tree survey (EIAR Appendix 5.3) confirms that the construction of the access road requires the felling of trees and bushes including trees T667, T668, T669, and T670, and the coppicing or felling of multiple mature ash trees including those tagged 625, 626, 630, 631, 632, 634, 639, 643, and 645. The entirety of tree Group G1 will be removed. The 8.1 km underground cable route passes directly through or close to the Root Protection Areas of multiple woodlands, hedges, and tree groups (G6-G13, W1, H1) with confirmed risk of severing significant tree roots.

These are not abstract trees on a survey schedule. The mature ash and sycamore trees on the north-eastern boundary contain crevices identified as having medium potential for bat roosting. They are the shelter belt that makes the north-eastern boundary an ideal foraging corridor for Leisler's bats, pipistrelles, and the insects they follow. Remove the trees, introduce the lights, erect the 30-metre stack, and the foraging corridor that produced 4,545 bat calls is gone.

The air quality and climate chapters of the EIAR apply fundamentally different operational assumptions to the same combustion process. This inconsistency is material.

- Chapter 7 (Air Quality): Dispersion modelling assumes continuous or near-continuous operation – standard methodology to establish a conservative worst-case for ground-level concentrations, equivalent to up to 8,760 hours per annum
- Chapter 8 (Climate): GHG emissions are stated as equivalent to 0.04% of Ireland's 2024 national emissions when annualised over the project lifespan – based on approximately 100 hours per year of operation
- Both air pollutants and greenhouse gases arise from the same combustion of the same fuel. They scale directly with operating hours. A discrepancy of up to 85 times between the two assessments applies to the same combustion process.
- At the reported rate of approximately 21,000 tCO₂e per 100 hours, continuous operation at 8,760 hours per annum would produce emissions in the order of 1.8 million tCO₂e – not 21,000 tCO₂e. One of these assessments is seriously wrong.

The EIAR also omits from its emissions inventory the 10 AGI boiler flues and two pressure reduction kiosks confirmed in NTS Section 2.3(b). These are operational combustion and venting

sources. Their emissions are not quantified in the air quality or climate chapters. The EIAR's compliance conclusions cannot be relied upon when material emission sources have been excluded from the inventory.

The EIAR also relies on potential future biomethane fuel switching as a climate mitigation measure (NTS s.8.6), while simultaneously confirming that the assessment has not relied on this material. Speculative future fuel switching with no binding commitment is not a mitigation measure. The EIAR itself confirmed that HVO was rejected as a backup fuel due to supply reliability concerns – the same uncertainty applies to biomethane.

Furthermore, the NTS (s.16.1) states no cumulative effects with the Athenry Local Area Plan are anticipated – but does not address cumulative effects with the proposed Gannow Windfarm (Planning Reference 25/61412) on the same population exposed to the same environmental stressors. This cumulative health burden has not been assessed.

*In **Friends of the Irish Environment v Ireland**, the Supreme Court emphasised the requirement for clear, evidence-based compliance with climate obligations. In **ClientEarth v United Kingdom**, compliance with air quality obligations must be ensured in practice. The internally inconsistent EIAR does not meet either standard.*

7. Fire, Major Accident, and Our Safety at 670 Metres

We live 670 metres from a proposed lower-tier COMAH establishment storing **5,470 tonnes (6,670 m³) of diesel and handling pressurised natural gas**. The EIAR (Volume 2, Chapter 15) identifies credible major accident scenarios including gas release, jet fire, and vapour cloud events. In the event of a major incident, we would need to evacuate via the L3103 – the same road committed to HGV construction traffic and the proposed site access.

No pre-emergency planning assessment has been conducted for residential properties within 700 metres. No community evacuation protocol, no notification plan, and no assessment of emergency access interaction with construction and operational traffic has been provided for the homes at Castlelambert. We are among the closest residential receptors. We do not know what we would be told, or when, if the plant caught fire.

8. Our View, Our Amenity, and What the Applicant Admits

The applicant's own EIAR and independent peer review establish findings on landscape and visual impact that directly contradict the overall conclusion of "not significant."

- EIAR Table 6.8 records Moderate Adverse visual effects at six operational viewpoints: VP01, VP02, VP05, VP07, VP08 and VP13. EIAR Table 6.5 defines Moderate Adverse as significant. The conclusion that effects are “not significant” is contradicted by the applicant’s own table
- EIAR Sections 6.3.3.2.2, 6.3.3.4.2, and 6.3.3.5.2 each state: ‘the planting would never completely screen the emissions stack.’ Three separate admissions in the applicant’s own document that their primary mitigation measure does not work for the dominant element of the development
- The Year 1 and Year 15 photomontages are visually identical at assessed viewpoints, directly demonstrating that no visual improvement occurs over the 15-year assessment period
- The proposed development includes 8-metre floodlighting columns, operational security lighting, and AGI and ESB substation lighting. The **LVIA contains no night-time visualisations and no assessment of artificial light impact on residential amenity**. Galway County Development Plan Policy LP 1 requires minimising light spillage to residential amenity. Compliance has not been demonstrated
- GCC Planning Reference 17/1538 – a solar farm in the wider Cashla area – was refused with concerns about visual impact including glint and glare. If a solar farm was refused at this location for visual impact, a 30-metre stack and 36-metre telecommunications mast engage the same policies with far greater force
- The applicant’s ZTV shows potential visibility from the western edge of Athenry, in **proximity to the Athenry Architectural Conservation Area** – a designation of international significance (Galway CDP Appendix 7). No viewpoints were assessed from the ACA boundary

We built our home in Castlambert because this is a rural community of farms, families, and open countryside. An industrial stack visible from six viewpoints, confirmed by the applicant’s own table as a significant effect, that can never be screened by planting.

9. Noise – At Night, at Start-Up, at 670 Metres

The EIAR’s noise assessment underestimates the potential impacts on our home for the following specific reasons, which I raise based on the technical analysis available to the objectors:

- The baseline noise survey was conducted in a single afternoon (12:30-14:45, 12 May 2025) and on a single night in September. Surveys were conducted in dry, calm conditions. Stable atmospheric conditions, temperature inversions, and low wind speeds – which significantly enhance noise propagation over distance – were not captured. This is not a representative baseline for a 25-year assessment
- Gas turbines **emit tonal and low-frequency noise components**, which are known to **penetrate buildings more readily than broadband noise** and to propagate further

over flat, open terrain. The EIAR does not assess these characteristics for residential receptors at 670 metres

- The plant dispatches on demand, including during evening and overnight peak electricity demand. **Start-up and shutdown are the noisiest events in a peaker plant's operation.** These short-term peak noise events are not assessed. For our children sleeping 670 metres away, repeated unpredictable overnight start-up events were never evaluated
- The standby diesel generator is assessed using a 55 dB noise criterion conditional on rare emergency and testing use. If demand increases and operational frequency exceeds the assumed level, this criterion is no longer justified

10. Our Children's Future – Family Land, Future Homes, and Permanence

10.1 Our Hope and What This Development Would Take From It

We built our home on family land. Under the Galway County Development Plan 2022-2028, members of a rural family are entitled to apply for planning permission for a primary residence on their family's landholding. We hoped each of our children might one day want to exercise that right – to build beside us, as we built beside my parents, and raise their own families in Castlelambert.

Why would they? If this development is permitted, they will spend their entire childhood 670 metres from an industrial gas plant. They will enter adulthood knowing that their family land lies in the emission footprint, the noise footprint, the visual and lighting footprint, and the traffic footprint of a COMAH facility. They will know that any home they build on this land will sit beside a permanent 220 kV cable running through the road outside, with restrictions on where they can excavate, install drainage, or connect utilities. They will know that their children – our grandchildren – will grow up in the same conditions. This development sterilises the future of this land for the generation after us.

10.2 Property Value

The EIAR contains no assessment of the impact on the value of residential properties in the immediate area. We invested substantially in building an A-rated home in Castlelambert. A COMAH-classified industrial facility 670 metres from our front door will affect the market value and saleability of this property for the life of the plant. Research consistently documents the negative effect of industrial energy infrastructure on nearby residential property values. A 25-year depreciation of our home's value is a direct and permanent financial harm imposed by this development on our family.

10.3 Underground Cable Constraints on Future Development Rights

The **220 kV underground cable runs 8.1 kilometres along the local road network**. The preferred route follows the existing road network (EIAR Volume 2, p.157). Those roads run through Castlelambert.

EIAR Volume 2, p.140 – decommissioning

“It is based on the assumption that the cable will remain within the roads after decommissioning and will not be removed.”

The cable will not be removed. It will remain permanently. High-voltage underground infrastructure of this type imposes permanent restrictions on excavation, foundation works, drainage installation, erection of structures, and installation of services within and adjoining the cable corridor. The EIAR identifies no safeguarding corridors, no exclusion zones, no easements or wayleaves. It does not assess whether adjoining land parcels remain developable. It does not address whether a future planning applicant can connect a new home to water services if the cable runs beneath the road through which the connection would normally be made.

If a member of our family applies to build a home on Castlelambert land, they may find the road through which a water connection would normally be routed contains a permanent 220 kV cable. The EIAR does not address this. It should.

The absence of a clear framework creates uncertainty in land use rights, additional cost and delay for any future development, and a dependency on third-party consent from the cable operator for works that should be matters of right. The Galway County Development Plan 2022-2028, Policy RD1, supports sustainable rural development and appropriate rural housing. Permanent unassessed infrastructure constraints on family land are not consistent with that objective.

11. What We Are Asking For

We formally object to SID Application Case Reference 324113 and ask An Coimisiún Pleanála to refuse this application.

If An Coimisiún Pleanála is minded to consider permission, we ask that no determination issue until:


- A **standalone Health Impact Assessment** is conducted, integrating all environmental stressors – air, noise, traffic, lighting, groundwater, and accident risk – for all sensitive residential and community receptors, including properties within 700 metres of the site, and covering the full 25-year operational lifespan

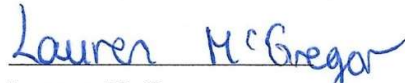
- The operational health deferred to EPA licensing in EIAR s.4.4.1.2 is assessed before the Board, as required by *Holohan v An Bord Pleanála*
- AERMOD air quality receptors are placed at Presentation College Athenry, Lisheenkyle NS, and all schools within 3.5 km, using correct children's breathing heights for all construction and operational phases including start-up, diesel testing (152.778 g/s, 52 hrs/year), and emergency diesel operation (up to 500 hrs/year)
- A pre-construction structural survey of all residential properties within 700 metres is conducted, with an enforceable vibration monitoring and compensation protocol throughout construction
- The impact of operational particulate emissions on residential MVHR filter systems and PV solar installations within the downwind corridor is specifically assessed and quantified
- A completed Detailed Piling Risk Assessment and Hydrogeological Assessment including dye tracing from the development footprint to local groundwater receptors is provided, including assessment of the six private water abstractions, contaminated firewater overflow risk, alkaline concrete runoff, and propane release risk in karst
- A comprehensive road safety audit of the L3103 using an appropriate rural road standard addresses the interaction between HGV traffic, school runs, agricultural traffic, learner drivers, and 24-hour emergency access
- A formal assessment of the impact of the permanent underground cable corridor on future development rights of adjoining land parcels is provided, including identification of safeguarding corridors, exclusion zones, and implications for future utility connections and planning applications
- Night-time visualisations of the proposed development are provided, an artificial light impact assessment is conducted for residential properties within 700 metres, and compliance with Galway CDP Policy LP 1 is demonstrated
- Emissions from the 10 AGI boilers and two pressure reduction kiosks are included in the air quality and climate assessments, and the 85-times operational assumption discrepancy between Chapter 7 and Chapter 8 is reconciled with a consistent worst-case scenario
- A quantified property value impact assessment is provided for residential properties within 700 metres of the proposed facility
- An emergency planning and evacuation assessment for residential properties within 700 metres of the COMAH facility is provided, with community notification protocols

I came home to build something here. A home, a family, a life rooted in the place I grew up. I spent every penny we had doing it the right way – cleanly, efficiently, with the future in mind. I want my children to have the same choice. I want to know our grandchildren can be born in Castlelambert, as I was. I am asking An Coimisiún Pleanála to protect that future, and to refuse this application.

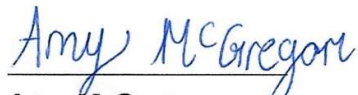
Yours sincerely,


Maryrose McGregor


Philip McGregor


Lauren McGregor


Jack McGregor


Amy McGregor


Dylan McGregor

Castlelambert, Athenry, Co. Galway H65 WY26
24 April 2026 • 670 metres from proposed site • Family of six
SID Application Case Reference 324113