

Damien Collins

Pollnagroagh, Athenry, Co. Galway H65 PN56

Adjoining Land Owner

25th May 2026

An Coimisiún Pleanála

64 Marlborough Street, Dublin 1, D01 V902

FORMAL THIRD PARTY OBSERVATION FOR CASE NO. 324162

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 fundamental failure of engagement

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 is my home, my livelihood, I am the fourth generation of my family to farm this land. 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.

The proposed 1.3km access road is 19 metres from my kitchen door. My 100-year-old stone entrance pillars sit immediately adjacent to the proposed site entrance on a bend of the L3103. My traditional dry stone boundary wall runs the full 1.3km length of the access route. The main plant compound is 900 metres from my home.

Organic farming under EU Regulation 2018/848, administered by DAFM and verified by the Organic Trust, is my sole source of income. My certification and livelihood depend entirely on maintaining environmental quality of land, water, and air.

Critical fact: Bord Gáis Energy have not contacted me during the design or EIAR preparation. No survey, assessment, or inspection has been carried out on my dwelling, farm buildings, water supply, entrance pillars, or boundary structures. As the immediately adjoining landowner most directly affected by the 1.3km access road, 8km grid connection route, and associated substation infrastructure, this represents a fundamental failure of the EIAR process and Directive 2011/92/EU requirements.

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. I have had no contact since and as the immediately adjoining landowner most directly affected by this development, I should have been identified, engaged, and assessed before this application was submitted.



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

Access Road — Proven Safety Hazard and Property Risk

HGV Swept Path Analysis Proves Oncoming Lane Encroachment

The applicant's own Autotrack drawing (PEK3-ATK-ZZ-01-DR-CE-901200) demonstrates that 18-metre articulated lorries cannot complete the turn into the site entrance without crossing into the oncoming lane of the L3103. This is not interpretation — the swept path shown in the engineer's own drawing occupies the full carriageway width and extends comprehensively into opposing traffic.

Vehicle specification used (ETA Design Articulated Vehicle 2018): Overall length 16.460m, width 2.550m, kerb-to-kerb turning radius 6.600m. The L3103 is a narrow rural local road not designed for repeated HGV turning movements. Any vehicle approaching from the opposite

The continuous white centre line at this location is a formal road marking under the Road Traffic (Signs) Regulations indicating that visibility and alignment are insufficient for safe overtaking. Galway County Council cannot rationally maintain this safety marking while approving a new industrial access generating decades of HGV traffic at the same point.

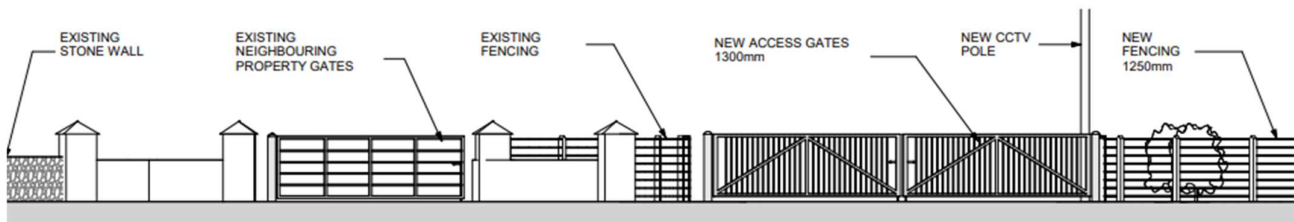


My entrance is defined by original stone pillars over 100 years old. They are not decorative — they are structural and heritage elements of a period dwelling constructed to last. These pillars sit immediately adjacent to the proposed site entrance on a bend.

The sightlines drawing (PEK3-ATK-ZZ-01-DR-CE-901200) shows sightlines can only be achieved by removing multiple trees, demolishing and setting back existing stone walls, and relocating utility poles. Even after these interventions, sightline achieved is approximately 90 metres — inadequate for a junction generating sustained HGV traffic on a road with a continuous white centre line.



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



Boundary Wall — 1.3km of Structural Risk

My traditional dry stone boundary wall — a field wall that has stood for the lifetime of this farm — runs directly alongside the entire 1.3km access route. Construction traffic, vibration from abnormal load movements carrying 350 tonne substation transformers, and works along the wall create serious risk of structural damage.

Ground alteration, excavation for the road formation, and excavation of over 2m depth to put in joint bays and cables, will cause vibrations 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.

No baseline structural survey, no photographic record, and no binding damage remediation commitment has been provided. The EIAR contains no assessment of vibration impacts on traditional stone structures from abnormal load movements or sustained HGV traffic.

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, that will happen this close to my boundary. 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.

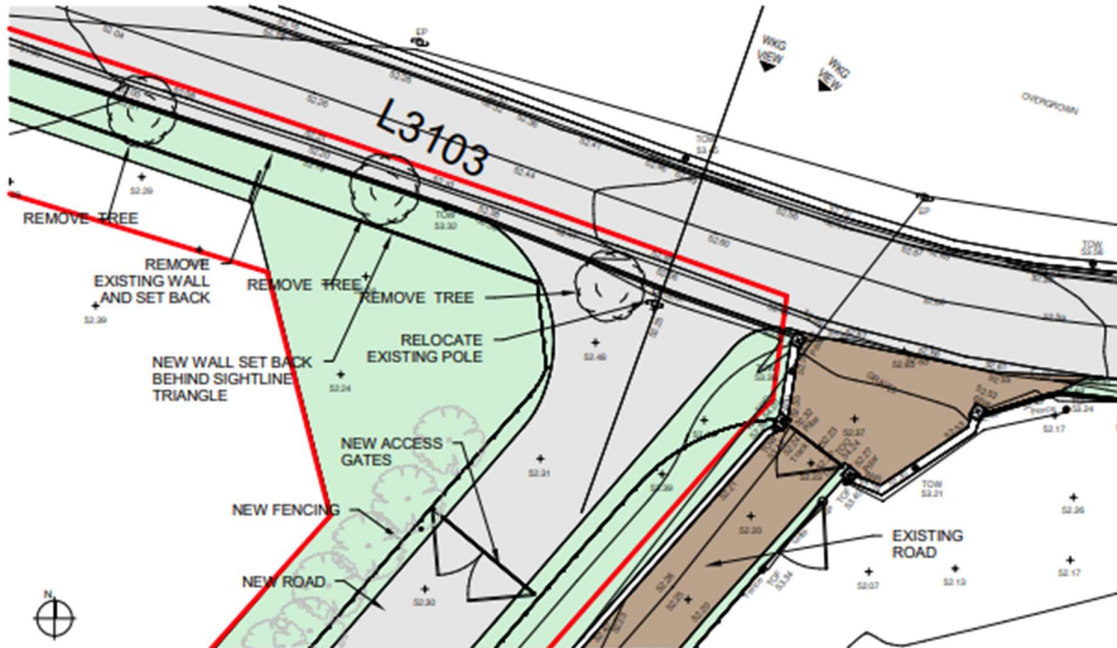


Image above taken from applicants drawing; PEK3-ATK-ZZ-ZZ-DR-A-ATK-000040, This shows my Existing Pillars and Entrance to my property alongside the proposed Entrance.

The Physical Reality of This Junction

The L3103 at this location is a narrow rural road. 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.

During construction of the proposed sub-station and laying of the grid connection cable, heavy goods vehicles and other machinery will be operating directly beside my land, my boundary walls and within a few meters of my home. I am concerned about the level of disruption the proposed works would cause to my farm and livelihood. I need to travel the L3103 and L7108 daily, sometimes two round trips are needed to access my farm at Mountainwest, Derrydonnell.

I believe insufficient has been given to the impact prolonged trenching works, excavation, road occupation, traffic management systems and heavy construction traffic would have on narrow rural roads and the communities that rely on them daily. The application documentation confirms significant road closures, stop/go traffic systems and substantial

HGV movements during construction, which could result in serious disruption and ongoing inconvenience for local residents and road users. As the entrance to my house and farm is directly beside the proposed access for the substation, this would mean that a proposed stop/go station will be located outside my entrance. This creates safety issues for my family when trying to access and exit our home.

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.

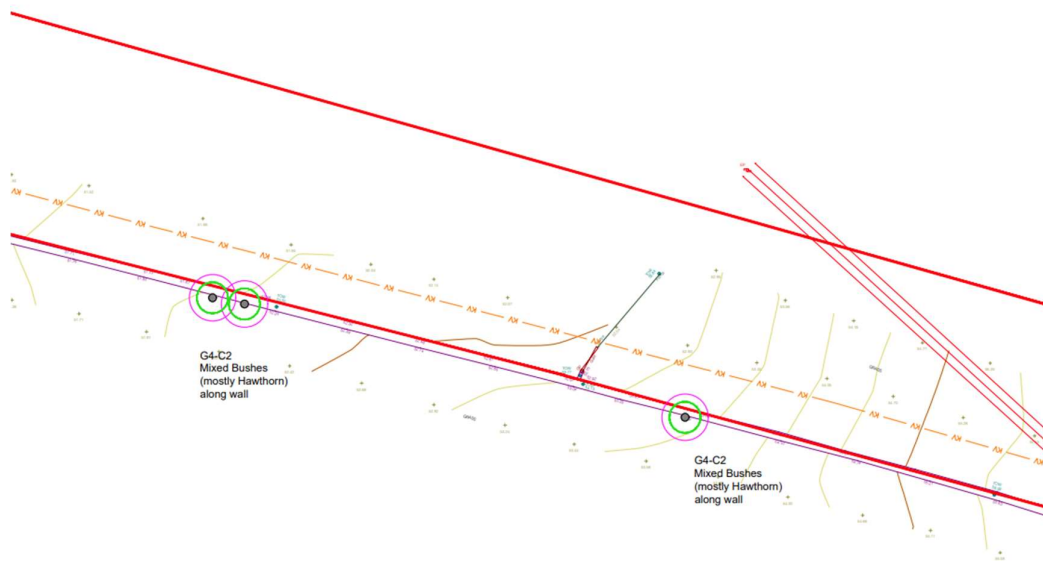
No Permission for Any Works on my land

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.

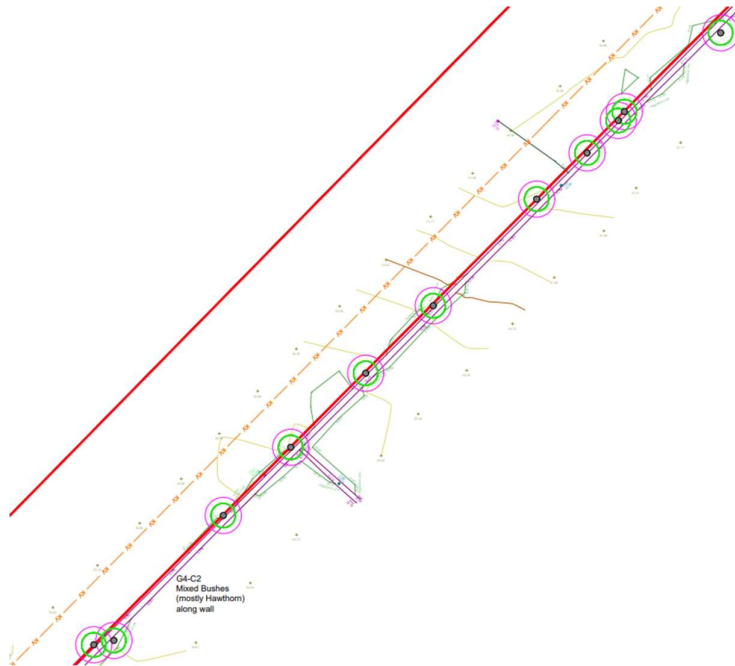


This image is taken from the Applicants tree survey report drawing ;25026_TS Sheet 5

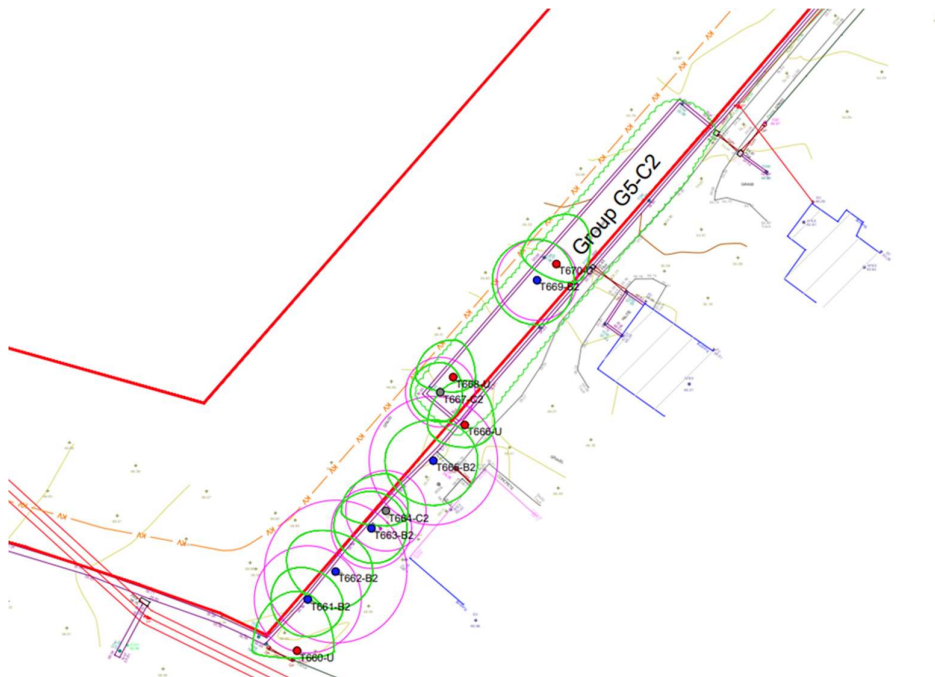
G4- C2 Mixed Bushes, you can clearly see they are outside the proposed site boundary and within my landholding (please see a copy of my Folio map attached as a reference)

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.



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, which will carry the grid connection cable, 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.



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.

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 underground grid connection cables will pass 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 of the complete project.

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

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, or any of their agents have 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.

Karst Aquifer confirmed across development footprint

The EIAR classifies the **aquifer beneath the site as Regionally Important Aquifer — Karstified**, conduit type, sub-classification Rkc (EIAR Volume 2, p. 570).

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.

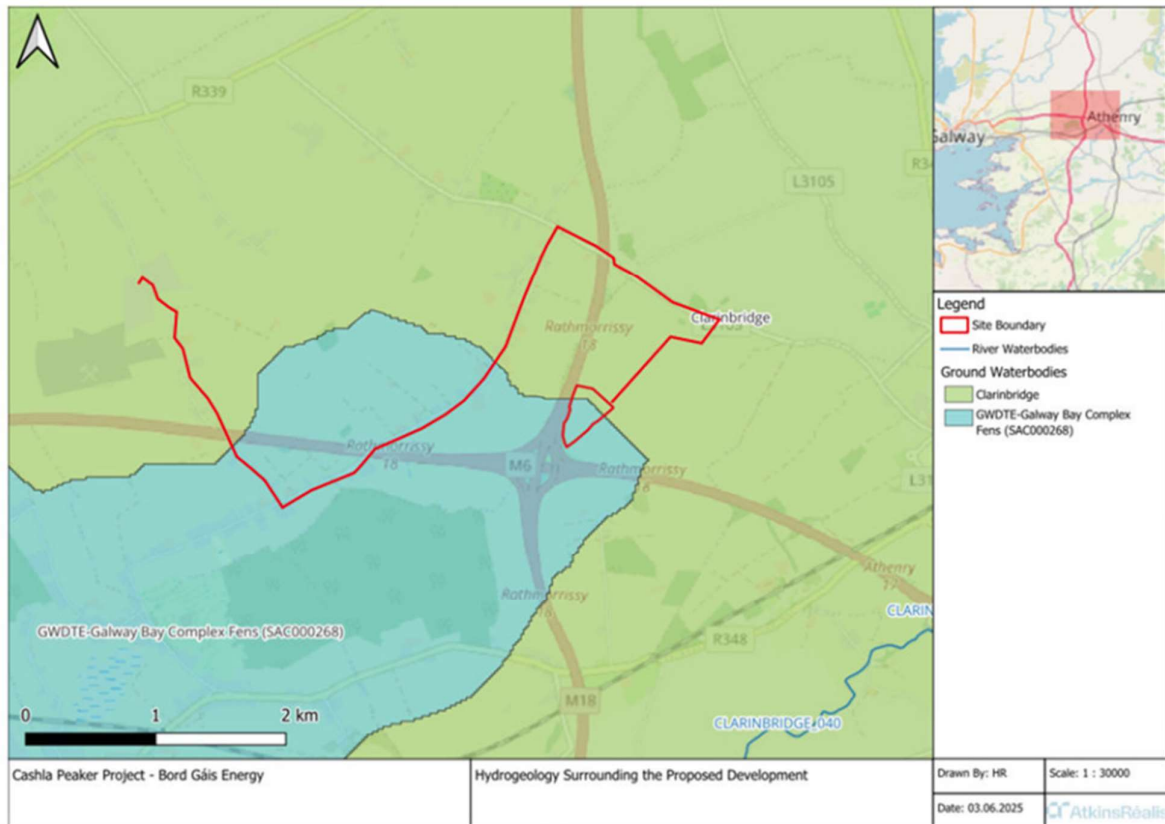


Figure 12-3 - Groundwater Bodies underlying the Proposed Project (EPA, 2025).

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 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.

If a contamination event 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.



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

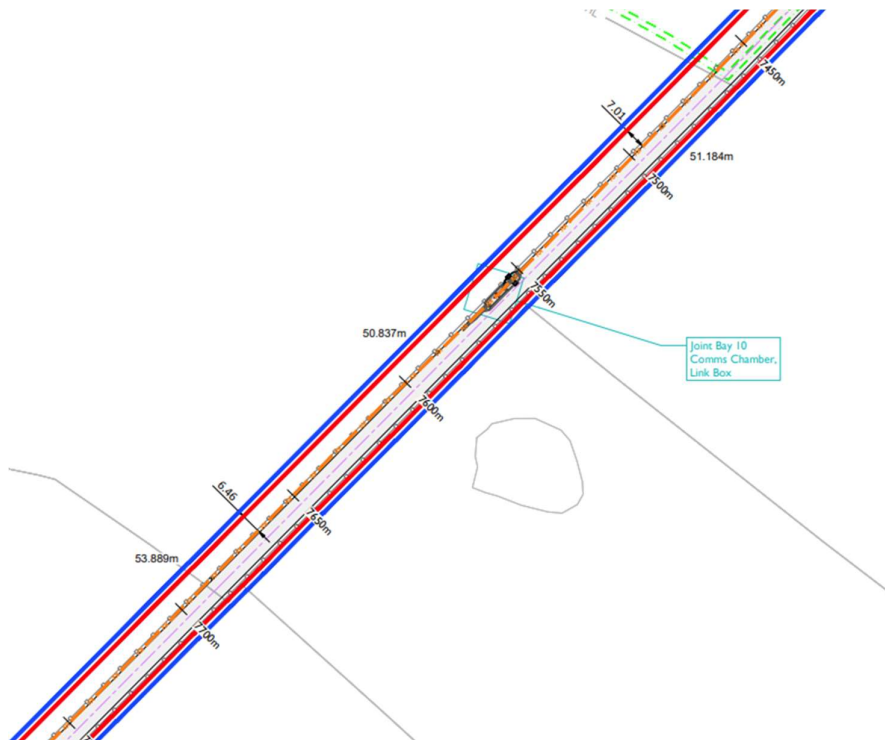


Image is taken from Applicants site layout plan- sheet 11 of 12. In this you can see the outline of my pond, one of the proposed Joint bay, comms chamber and Link box are located a few meters away. A enormous amount of excavation will be needed to set these precast concrete boxes (joint bay are 8m x 2.5mx 2m depth) all done on Karst ground within meters of a natural habitat.

Fire, Safety, and Emergency Access

The proposed development under application 324113, 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, or during the roadworks associated with grid connection under application 324162 when a stop and go system is in operation and road is reduced to one lane will 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.

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 with the grid connection cables 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 works on the access road and grid connection, 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.

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. The proposed substation compound will add an additional 11 no 20m high masts with multiple directional luminaires. 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 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.

Relief Sought

I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Cashla Peaker Plant.

- The EIAR is fundamentally incomplete — the immediately adjoining landowner most directly affected by the 1.3km access road, 8km grid connection route, and permanent substation infrastructure was not engaged, surveyed, or assessed
- The applicant's own Autotrack drawing proves HGVs and abnormal loads cannot safely access the site without crossing into oncoming traffic on a road with a continuous white centre line
- No swept path analysis demonstrates abnormal loads can navigate the junction at my entrance pillars without encroachment or collision risk to irreplaceable 100-year-old stone structures
- Works removing Groups G4 and G5 hedgerow vegetation are proposed on my land without consent
- No dye tracing or completed karst hydrogeological assessment in an Extreme vulnerability zone with confirmed sinkholes, air voids, and rapid drainage characteristics
- HDD bentonite drilling operations proposed in fissured fractured karst terrain explicitly acknowledged as unsuitable for HDD in the applicant's own Construction Grid Connection Report
- Hedgerow removal disrupts commuting routes for seven protected bat species with inadequate two-year monitoring commitment for replacement planting requiring decades to establish equivalent function
- The 220kV EirGrid substation will transfer to EirGrid ownership and remain as permanent industrial infrastructure regardless of peaker plant decommissioning — not assessed as permanent in the EIAR
- No assessment of impacts on certified organic farming operations under EU Regulation 2018/848 from permanent night-time lighting, water quality risk, or construction disruption

If the Board is nonetheless minded to consider permission, no determination should issue unless and until all of the following have been provided, assessed, and published:

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
- **Assessment of bentonite breakout risk** from HDD operations in fissured fractured karst terrain
- A **binding long-term groundwater monitoring programme** with enforceable trigger levels for my well and for the GWDTE within the site boundary

Boundary, Access and Property Protection

- **Formal acknowledgement** 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
- 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 1.3km boundary wall** before any construction begins
- Real-time vibration monitoring at my property during all abnormal load movements
- **Binding commitment** that damage to entrance pillars or boundary wall will be made good by qualified traditional craftspeople at developer's cost

Ecological and Habitat Assessment

- **Independent arboricultural survey of vegetation** along my boundary conducted from my side at developer's cost
- **Full replacement planting** of all G4 and G5 boundary hedgerow vegetation using native species of equivalent size and maturity
- **Assessment of root damage** to Category A mature trees along 8km cable route with binding mitigation where severance cannot be avoided

- **Lighting impact assessment** for six protected bat species with lux levels at field boundaries preventing disruption to commuting routes

Lighting and Organic Farming Impacts:

- Full lighting design scheme showing location, height, direction and lux output of all proposed luminaires across substation compound
- Predicted lux levels at my field boundaries during night-time operational conditions
- **Assessment of impact of permanent night-time artificial lighting on reproductive management** of suckler cattle on adjoining certified organic holdings
- Commitment that lighting will be shielded and directed to prevent light spill at levels disrupting natural photoperiod of grazing livestock

Respectfully submitted,

D. Collins

Damien Collins

Certified Organic Farmer

Pollnagroagh, Athenry, Co. Galway

548080 mE, 729010 mN

The Property
Registration Authority
An tÚdarás
Clárúcháin Maoine



Folio: GY27127F

This map should be read in conjunction with the folio.

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(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 52 of the Registration of Deed and Title Act 2006.

