

Philip Deacon House Owner Eircode R93 XR62

Garryhundon,

Milford,

Co Carlow

Dear sir/Madam,

I wish to make an observation on the proposed development at Powerstown Carlow approximately a kilometre from my property.

Main Grounds for submission:

1. Unsuitable rural location and industrial scale

- The proposed development is a large industrial facility in a rural setting.
- It includes large buildings, digestion tanks, gas-upgrading infrastructure, carbon-dioxide liquefaction equipment, digestate storage, internal roads, lighting, substations and associated plant.
- It would materially change the rural character and visual amenity of Powerstown and the surrounding area.
- The applicant should demonstrate that this site is suitable for industrial-scale infrastructure and consistent with the Carlow County Development Plan.
- Renewable-energy benefits do not remove the need to protect local residents and the rural environment.

2. Traffic and road safety

- The facility would generate regular heavy traffic, including articulated lorries, tankers, agricultural vehicles, feedstock deliveries, digestate vehicles, staff traffic and construction vehicles.
- Local roads may not have the width, alignment, junction capacity or surface condition to safely accommodate this level of additional traffic.
- Concerns include narrow roads, bends, poor visibility, road damage, mud and debris, noise, and risks to pedestrians, cyclists, residents, agricultural vehicles and emergency services.
- The traffic assessment must include realistic daily, seasonal and peak traffic movements, vehicle sizes, delivery routes and operating hours.
- A road-safety audit should examine all affected local roads, junctions and access points.

- If the road network cannot safely accommodate the proposed traffic, permission should be refused.

3. Existing quarry and cumulative impacts

- There is an existing quarry in the surrounding area.
- The quarry already generates heavy goods vehicle movements, noise, dust, vibration and pressure on the local road network.
- The proposed biomethane plant would add substantial construction and operational traffic to traffic already associated with the quarry.
- The planning assessment must examine the cumulative impact of both developments, not assess the proposed plant in isolation.
- Cumulative impacts should include combined HGV traffic, road safety, road wear, dust, noise, vibration, visual effects and loss of residential amenity.
- The applicant should provide actual quarry traffic counts, including peak and seasonal movements, alongside predicted biomethane-plant traffic.
- A combined road-safety assessment should consider local residents, pedestrians, cyclists, farm vehicles, school transport and emergency-service access.
- The Board should also assess the cumulative industrialisation of a rural area already affected by quarry activity.
- Without a robust cumulative-impact assessment, the Board cannot be satisfied that the proposal would not have unacceptable impacts.

4. Odour and residential amenity

- The plant would receive, store and process organic feedstocks, including agricultural manure, slurry and other materials, and would store digestate.
- There is a risk of odour from deliveries, unloading, storage, processing, tank openings, maintenance, leaks, equipment failure and digestate handling.
- Odour can seriously affect people's ability to enjoy their homes, gardens and outdoor spaces.
- The applicant should demonstrate how odour will be prevented during normal operations and abnormal events, including power failure, equipment breakdown and spillages.
- A legally enforceable odour-management plan should include monitoring, maintenance, complaint procedures, response times and clear action where limits are exceeded.

5. Water, drainage and soil protection

- The development would involve storage and movement of large volumes of liquid and semi-liquid material.
- There is a risk of leaks, overflows, tank failure, slurry or digestate spills, polluted runoff and fire-water contamination.

- The assessment must address potential impacts on groundwater, wells, drains, streams, watercourses and surrounding farmland.
- The applicant should provide detailed arrangements for bunding, secondary containment, drainage, fire-water retention, monitoring, tank inspections and emergency response.
- Digestate storage, transport and land-spreading must be fully assessed, including nutrient loading and cumulative impacts on soil and water quality.

6. Air quality, health and emissions

- Potential emissions may include odour, dust, ammonia, methane, vehicle exhaust, bioaerosols and emissions from plant equipment.
- The application should identify all emission sources during normal operation, commissioning, maintenance, shutdown and accidental events.
- Air-quality and human-health effects should be assessed at nearby homes and other sensitive locations.
- The Board should require transparent and enforceable monitoring arrangements, with action required where problems arise.

7. Fire, explosion and major-accident risk

- The plant would produce and process combustible gases, including biogas and biomethane.
- There are potential risks from gas leakage, fire, explosion, pressure-release events, equipment failure, vehicle collisions, electrical failure and accidental damage to infrastructure.
- The notice indicates that major-accident legislation is relevant to the development.
- The Board should require independent confirmation that all hazards, separation distances, emergency access and emergency-response arrangements are adequate.
- There must be clear arrangements for public protection, notification, evacuation where necessary, fire-water containment and consultation with emergency services.

8. Noise, lighting and visual effects

- Noise may arise from compressors, pumps, fans, loading operations, reversing alarms, vehicles, generators, maintenance and emergency equipment.
- Noise must be assessed during daytime, evening and night-time periods, including low-frequency and tonal noise.
- Lighting should not intrude into nearby homes or harm the rural character of the area.
- The visual impact of tanks, buildings, pipework, lighting columns and other industrial structures should be assessed from nearby homes, roads and public viewpoints.
- Accurate photomontages and effective landscaping proposals should be provided.

9. Construction disruption

- Construction would involve excavation, heavy machinery, concrete works, abnormal loads, construction HGVs, dust, noise, vibration and likely wear on local roads.
- These impacts may be substantial and prolonged for local residents.
- A binding construction environmental-management plan should cover working hours, HGV routes, road cleaning, dust suppression, noise control, water protection, road repair and public contact arrangements.

10. Feedstock and digestate controls

- The application should clearly identify the source, type, quantity and seasonal variation of all feedstocks.
- It should specify whether imported materials or waste-derived materials could be accepted now or in the future.
- The Board should impose strict limits on annual throughput, accepted materials, operating hours, vehicle movements and storage capacity.
- Digestate quality, storage, transport, end use and land-spreading arrangements must be clearly defined and monitored.
- Any future expansion of the plant, throughput or feedstock types should require a new planning application and environmental assessment.

11. Need for complete, independent assessment

- The Environmental Impact Assessment Report, Natura Impact Statement, traffic assessment, odour assessment, drainage assessment and major-accident information should be independently and rigorously reviewed.
- The Board should require further information where any issue remains uncertain or insufficiently assessed.
- The precautionary approach should apply where there is uncertainty about significant environmental, safety or residential-amenity effects.
- An oral hearing should be held if it would assist the Board in examining the significant public concerns raised by this proposal.