

Appeal Observation

From:

Address:

To: AN BORD PLEANÁLA

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SUBJECT:

Observation Planning Appeal

APB Case Reference : APB-308942-20

Planning Authority : Galway County Council

Planning Authority Nr : 191812

A Chara,

I wish to support Galway County Council's decision to refuse planning permission for application 191812, by Sustainable Bio-Energy Ltd. to build a Biogas plant in the townlands of Ballynamantan, Kinincha and Glenbrack, near Gort in Co. Galway. Please find below the key reasons:

Traffic Concerns:

There are inconsistencies in the PCU numbers in Traffic Analysis section of the EIAR. The applicants EIAR does not:

- Provide the detail of information previously requested by Galway County Council under the original Request-for-Information
- Consider seasonal demands of both feedstock and digestate
- Provide any analysis of traffic through Gort Town Centre which will no doubt occur during digestate disposal to lands in vicinity of biogas plant
- Consider tractor-based haulage of feedstock (Silage Trailer) or digestate (slurry tanker)
- Consider seasonal variation in traffic volumes linked to the facility

With the inconsistencies, lack of detail and clarity, it is not clear if the applicant's EIAR reflects the true traffic types, volumes and routes and therefore cannot explicitly rule out potential for traffic congestion, increased potential for accidents and conflict in Gort Town centre or at Junction 16 of the M18, impacts on Population and Human Health and impacts for tourism.

Pollution Concerns

The applicant appears to have made serious errors in reception building air venting volumes and which resolution would have potential knock-on effects on air quality and noise impacts.

The applicant has not provided sufficient information on how the 150,000 tonnes of digestate will be disposed of in nearby farms. The proposed location of the Biogas plant is situated in a highly sensitive area with high concentration of SACs and SPAS, with extremely unpredictable hydrology dynamics from the three main rivers that flow between and connect many of these SACs, by means of extensive karst underground networks. The lack of consideration of cumulative impacts of adding 150,000

tonnes of digestate fertilizer with normal farming practices means that significant impacts to sensitive areas cannot be ruled out.

Biogas plants have a well-documented history of incidents and accidents, even when they look good on paper with all of their proposed mitigations. The proposed biogas plant is located in an area that is too environmentally sensitive and too close to urban population to take any risk of incidents or accidents on this scale.

Landscape and Visual Impacts

The Applicant's EIAR does not consider the following in the Landscape and Visual Impacts Assessments:

- Gort Golden Mile
- Gort River Walk
- Existing Cycle routes
- Thoor Ballylee
- Kiltartan-Gregory Museum
- Wild Atlantic Way Loop

These omissions from the EIAR support Galway County Councils statement that it is not satisfied that the development would not be visually obtrusive and adversely impact on the Class 3 landscape, including Coole Demesne area to north, the Kinincha/Gort River Area and other potentially sensitive receptors.

Water Concerns:

The EIAR does not address how the required 120,000 m³ of water will be provided to the plant as the predicted rainfall is not a sufficient supply. The resolution of this could have an impact on the services provided to Gort, or to the biodiversity of the Gort River.

Tourism Concerns

Gort's future (social and economic) is strongly linked to tourism, with a planned loop off the Wild Atlantic Way (The Burren Discovery Loop). The proposed development will seriously affect the viability of Gort as a desirable location to visit and spend time in. The highly increased levels of traffic (HGV's, tractors, and other agricultural vehicles) transporting source material to the plant and transporting out the digestate and bottled gas end products cause delays and disruption.

The spreading of 150,000 tonnes of digestate in the nearby area can produce extended periods of obnoxious odours and could destroy visitors experience of the countryside in general and, in particular, of Gort's main attractions, such as Coole Park, Thoor Ballylee, Kiltartan Gregory Muesum, Kilmacduagh and Gort Golf Club. Local businesses including shops, restaurants, pubs, B&B's all will see their businesses greatly reduced.

SIGNED :

DATE:

Fee: €50 Enclosed