OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Alyson McGrath

Cregmore

Claregalway

Galway

H91PV26

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 18 April 2026

Re: Observation to the proposed development of open-cycle gas turbine (OCGT) and generator with ancillary equipment.

Location: Pollnagroagh and Rathmorrissy (Townlands), Athenry, Co. Galway

Applicant: Bord Gáis Energy Limited

Dear Sir/Madam,

My residence is 6.04km from the proposed site of the Cashla Peaker Plant (Athenry).

Myself my husband and children live relatively close to this proposed development. We are already being surrounded by Solar panels, BESS, Substation on an industrial scale. This has grave consequences to the land, food security and pollution including a grave impact on farming with no benefit to us the residents or our children future. Now in addition to that industrial scale development, we are going to be subject to another pollutant particularly in the air we breath and our children. International research has shown the damage peaker plants do over time to those living in the surrounding areas. I object to the development of this infrastructure.

High-Intensity Emissions and Diesel Impacts

I am concerned about the potential impact of air pollution from this proposed development. Pollutants such as nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10) are known to damage air quality, irritate

the lungs, and contribute to long-term harm to both human health and the environment. Although the plant would not operate continuously, it may run at extremely high output when required, leading to short but intense bursts of pollution, particularly during start-up and peak demand periods. The possible use of diesel during these times is especially worrying, as it produces higher levels of harmful emissions, including nitrogen oxides, sulphur dioxide, and particulate matter.

These pollutants can penetrate deep into the lungs and enter the bloodstream, increasing the risk of respiratory and cardiovascular illness, particularly for vulnerable groups such as children, older people, and those with existing health conditions. Fine particulate matter can also travel long distances and accumulate over time, meaning the impacts may extend beyond the immediate area and persist in the long term. In summary, I have reservations regarding the thoroughness of the assessment of these emissions. This issue presents significant implications for public health and environmental protection, especially in relation to EU air quality standards established by Directive 2008/50/EC.

Public Health Protection

There is significant concern within the community about the potential impact of air pollution from this proposed peaker plant on human health, particularly during periods when it is operating at full capacity and emissions are highest. The possible use of diesel is especially worrying, as it introduces additional harmful pollutants that can travel long distances and accumulate in the environment.

There is ongoing uncertainty concerning the operational frequency of the plant, its emission rates, and the extent of public exposure to pollutants through 2050. Because these issues remain unresolved, it is difficult to verify that all risks have been considered. Given these unknowns, it is wise to adopt a careful strategy to protect public health; unless definitive evidence proves no harm, any dangers to residents should be considered as part of the planning process.

Long-Term Accumulation of Pollutants and Chemical Residues

I am particularly concerned about the risk of pollution to soil and groundwater from this proposed development. The inclusion of diesel storage tanks, hardstanding areas, drainage systems, and other infrastructure increases the likelihood that pollutants could gradually enter the ground over time, potentially up to 2050. Substances such as hydrocarbons from diesel and gas, along with other chemical residues, may build up slowly, particularly where there are repeated small leaks, routine operational losses, or occasional spills, with impacts accumulating over time.

What is especially worrying is that this type of pollution may not be immediately visible but could result in long-term damage to groundwater quality and soil health. This has implications not only for environmental protection but also for local agriculture, which depends on clean soil and water. Overall, there is significant concern that these long-term and cumulative risks have not been fully addressed and could have lasting consequences for the local environment and livelihoods.

ACRES Compliance

As a local farmer, I am very concerned about how this proposed development could affect my ability to meet environmental standards. Farmers in this area already operate under strict requirements, including schemes such as ACRES and nitrates regulations, and we take these responsibilities seriously. However, emissions, airborne pollution, or runoff from this peaker plant—particularly linked to diesel use—could increase nitrate levels or environmental pressure, potentially pushing farms out of compliance through no fault of their own.

As an ACRES participant, any increase in pollution associated with this development could directly impact compliance with scheme requirements, leading to penalties, financial loss, or exclusion from essential

programmes. This creates an unfair situation where farmers may be held responsible for environmental impacts arising from an industrial activity outside their control, placing an unjust burden on the farming community.

Organic Farming

As a local organic farmer, I am very concerned about the potential impact this proposed peaker plant could have on my farm and others in the area. Organic farming is governed by strict European standards and requires high environmental quality, including keeping soil, crops, and water free from contamination. Airborne pollutants from the plant, particularly those linked to diesel such as nitrogen oxides and fine particulate matter, could settle onto land and crops, posing a risk to organic certification even at low levels.

There are also concerns about contamination through water and soil pathways, including runoff or accidental spills from fuel storage. Organic farming relies on healthy soil, clean water, and a balanced ecosystem, and any disruption to these could undermine the integrity of production. The consequences of losing organic certification would be severe, including loss of premium markets, significant financial impacts, and a re-conversion period of up to two years. Overall, there is serious concern that this development poses a disproportionate and inadequately assessed risk to organic farming and sustainable livelihoods in the area.

Vulnerability to Diesel-Related Air Pollution

As a parent living in the area, I am particularly concerned about the potential impact of this proposed development on children's health. Children are particularly susceptible to the effects of air pollution because of their developing respiratory systems, elevated respiration rates, and greater exposure to outdoor environments. Although peaker plants do not function on a continuous basis, they can produce significantly elevated levels of output during initial start-up phases or times of peak energy demand. This may lead to brief yet significant emissions of pollutants, particularly when diesel fuel is utilised. These emissions contain fine particles and nitrogen oxides that can penetrate deep into the lungs, which may affect lung development and increase the risk of respiratory conditions such as asthma. Overall, this raises serious concerns about the health and wellbeing of children and whether these risks have been fully considered.

Cumulative Impact on Child's Development

As a parent in the area, I am concerned about the impact of fine particulate matter over time. These pollutants can travel long distances and accumulate, meaning children may be exposed not only during peak pollution events but also through ongoing low-level exposure. The cumulative effect of this is particularly worrying, as repeated exposure during key stages of growth and development could have lasting impacts on lung development and overall health. From a community perspective, this raises serious concerns about the long-term safety of this development for children, and it is not clear that these cumulative impacts have been fully considered.

Inadequate Assessment of Traffic Impacts

The placement of a site entrance at this hazardous location on the L3103 raises serious safety concerns. The road is already constrained by its narrow width, the absence of a hard shoulder, and extremely poor visibility due to blind dips and sharp corners, yet the Environmental Impact Assessment does not appear to fully address the safety implications of introducing an access point at this location. There are also concerns that the cumulative impact of additional traffic has not been properly assessed, including construction traffic, ongoing operational traffic, and fuel deliveries, and the interaction between heavy goods vehicles and existing road users—such as local traffic, school-related movements, and agricultural machinery—has not been examined in sufficient detail. Overall, the lack of a thorough and robust traffic safety assessment creates

significant uncertainty as to whether the local road network can safely accommodate this development.

Risk of Fire and Explosion from Fuel Storage

As someone living in the area, I am very concerned about the safety risks associated with this proposed development. The project involves the storage, handling, and use of highly flammable fuels such as natural gas and diesel, which carry an inherent risk of fire or explosion. In the event of equipment malfunctions, leaks, or operational challenges, these substances may pose an ignition risk, potentially resulting in significant incidents. Considering the intermittent yet high-intensity operation of a peaker plant, the likelihood of such occurrences warrants careful consideration.

The potential consequences are particularly worrying, as any incident could have serious impacts on nearby homes, residents, farmland, and livestock. This raises significant concerns about whether the risks have been fully assessed and whether this location is appropriate for a development of this nature.

Emergency Response and Adequacy of Assessment

There are serious concerns about the lack of clear information on emergency response planning for this proposed development, including how a major incident would be managed, evacuation procedures, coordination with local emergency services, and the overall effectiveness of any response. This is particularly concerning in a rural area where the road network is already limited and constrained, which could make access and evacuation more difficult in an emergency and increase risks to nearby residents. When considered alongside the absence of detailed worst-case scenario analysis, it is not clear that risks to human health and safety have been reduced to an acceptable level, creating significant concern about the preparedness of the development to respond to a major incident.

Scale, Integration, and Rural Context

There are serious concerns that the scale and industrial nature of the proposed development are not in keeping with the surrounding rural environment. Building large-scale plants, structures, and infrastructure would result in a prominent addition to the landscape that does not match the area's current appearance. There is no evidence showing this development could blend into its environment or that its visual effects could be properly reduced. This raises concerns in relation to the Galway County Development Plan, particularly Policy GB1, which requires that developments be designed and located in a manner that allows them to integrate effectively into the landscape.

Cumulative Visual Impact of Industrial Infrastructure

It is noted that the visual impact of the proposed development appears to have been evaluated independently, rather than within the context of its overall effects. The project includes multiple elements, such as plant structures, fuel storage areas, electrical infrastructure, security fencing, lighting, and access roads, which together would create a substantial industrial presence within a rural setting. The cumulative visual impact of these components does not appear to have been fully assessed, and as a result, the overall level of visual intrusion may be significantly greater than that identified in the Environmental Impact Assessment.

Availability of Cleaner Alternatives

Although cleaner and more sustainable alternatives to fossil fuels—such as renewable energy, energy storage, demand response, and grid flexibility measures—are available, building new gas infrastructure may lessen the urgency to invest in these solutions. Given the climate crisis, emphasis should be placed on low-carbon and renewable options instead of furthering dependence on fossil fuels; this proposal could delay

the shift toward a more sustainable energy system.

Failure to Meet Aarhus Convention Standards

There are concerns that the consultation process for this development does not meet the standards set out under the Aarhus Convention, which provides for the public's right to access environmental information and to participate effectively in environmental decision-making. This requires not only that information is made available, but that it is understandable, accessible, and provided in a timely manner. In this case, the complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, appears to have restricted meaningful public participation. This raises serious concerns regarding transparency, accessibility, and the overall effectiveness of public engagement in the decision-making process.

Complexity of EIAR and Barriers to Public Understanding

There are concerns that, while the development is presented within a single Environmental Impact Assessment Report, the scale, volume, and complexity of the documentation make it extremely difficult for the public to understand the project as a whole. The high level of technical detail, combined with the way the information is structured, creates a significant barrier to meaningful engagement. Although the material is not formally divided into separate reports, the practical effect is similar to fragmentation, as it is not easy to assess the cumulative impacts across all aspects of the development. This raises concerns regarding transparency and accessibility within the planning process.

Reliance on Regulation Does Not Eliminate Risk

The Environmental Impact Assessment depends on forthcoming regulation, licensing, and monitoring to manage environmental effects. Nonetheless, regulatory oversight cannot entirely remove environmental risks or ensure that actual emissions and impacts will match those projected by models. Uncertainty persists regarding the long-term performance of the development, especially under diverse operational scenarios.

Conclusion

This proposal presents important concerns regarding people, public health, agriculture, and the surrounding environment. Because the documentation is complex and community engagement has been limited, many individuals have found it challenging to take part in the decision-making process. Communities should not face uncertain or potentially substantial environmental risks. Therefore, it is strongly recommended that planning permission be refused.

Yours Sincerely,

Name: Alyson McGrath
Date: 18 April 2026