OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Breda Gardiner

Clarke St

Athenry

Co Galway

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 10 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 3.43km from the proposed site of the Cashla Peaker Plant (Athenry).

My name is Breda Gardiner and I reside on Clarke Street, Athenry, located just over 3km from the site of the proposed peaker plant.
I have close family connections to farming in the local area. My sister is married to a full-time dairy and sheep farmer, and farming is central to their livelihood and depends on a safe and stable rural environment.
I have family living in the immediate vicinity of the proposed development. My niece, along with her husband and their two young children, lives in Pollnagroagh, approximately 800 metres from the site. Given their proximity, they would be directly exposed to any emissions or environmental impacts arising from the development.
These children will attend local schools within approximately 2km of the site and will participate in outdoor activities and sport within the area. I am deeply concerned about the potential impact of air pollution on their health and wellbeing, both now and into the future.
My niece and her husband are also actively engaged in farming in the area, and their livelihood, like many others locally, depends on a safe and stable rural environment. In addition to concerns regarding air quality

and health, I am also concerned about the visual impact of this industrial development on the surrounding countryside. This is a rural agricultural landscape, and the introduction of large-scale infrastructure will fundamentally alter its character and setting. I am further concerned about the impact on local roads, which are narrow and not designed for increased traffic or heavy vehicles. Increased traffic levels will affect safety, particularly for farming activity, pedestrians and children using these roads on a daily basis.
As a resident of Athenry, I value the town's character and strong sense of community. Athenry is a beautiful heritage town, and the surrounding rural landscape forms an important part of its setting. The introduction of an industrial development of this nature raises serious concerns regarding its compatibility with the town's heritage, rural character and long-term amenity.
I am also deeply concerned about the potential impact on groundwater and domestic water supply. Many homes and farms in the Athenry area rely on local water sources, and any contamination would have serious consequences for households, farming activity and the wider community. If local water supplies were to become contaminated, it is unclear how this could be adequately addressed or replaced. I question whether the site is suitable for a development of this nature, given the potential risk to such a critical and vulnerable resource.
In addition, I am concerned about the risk of fire and explosion events associated with the proposed development. In the event of a serious incident, it is not clear whether local emergency services would have the capacity, equipment or specialist training required to respond effectively. The local fire service operates as a retained station with part-time personnel, and I question whether it is adequately resourced to deal with a large-scale industrial fire or explosion involving fuel storage and energy infrastructure.
I also note that many people in the community were not aware of this development until recently. While efforts have been made by the Athenry Peaker Plant Concern Group to inform residents, it appears that engagement by the applicant has been limited, particularly beyond a 2km radius.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10), are well established as contributors to respiratory irritation, reduced air quality, and long-term environmental degradation. A peaker plant operates intermittently but at very high output during periods of peak electricity demand, resulting in concentrated bursts of emissions, particularly during start-up and ramp-up phases. Where diesel is used as a backup fuel or during start-up, emission levels may be significantly higher, as diesel combustion produces elevated levels of nitrogen oxides, sulphur dioxide, particulate matter, and other combustion-related pollutants compared to gas. These pollutants can penetrate deep into the lungs and bloodstream, contributing to respiratory and cardiovascular illness. Vulnerable groups, including children, older people, and individuals with pre-existing respiratory conditions, are particularly at risk. Fine particulate matter can travel significant distances and accumulate over time, extending the area and duration of exposure. This creates a risk of both immediate and long-term health impacts and raises concerns under Directive 2008/50/EC on ambient air quality and cleaner air for Europe.

Water & Groundwater

Long-Term Accumulation of Pollutants and Chemical Residues

The presence of diesel storage tanks, hardstanding areas, drainage systems, and associated infrastructure increases the risk of pollutants entering soil and groundwater over time (until at least 2050). Hydrocarbons (pollutants from gas, diesel) and chemical residues may accumulate gradually, particularly where there are repeated minor leaks, operational losses, or accidental discharges. These impacts may not be immediately

visible but can result in long-term degradation of groundwater quality and soil health, affecting both environmental protection and agricultural productivity.

Farming & Agricultural Impact

Protection of Agricultural Livelihoods

Farmers are already subject to strict environmental regulation and are required to meet high standards of environmental protection. It is not acceptable that industrial development, including diesel use and associated emissions (until at least 2050), could introduce environmental risks that undermine compliance, damage land quality, or threaten farming livelihoods. Farmers should not be placed in a position where they are penalised for environmental impacts arising from activities outside their control.

Children & Health

Cumulative Impact on Child's Development

Fine particulate matter can travel significant distances and accumulate over time, meaning children may be exposed not only during peak events but also through repeated low-level exposure. The cumulative effect of these exposures is particularly concerning during key stages of physical development, where long-term impacts on lung function and overall health may arise.

Local Roads, Safety & Schools

Unsuitability of Rural Road Network

The proposed site entrance is located on an exceptionally dangerous section of the L3103. Establishing an access point at this specific location introduces an unacceptable level of risk due to several compounding hazards:

- Severely Restricted Width: The road is currently too narrow to safely permit two Heavy Goods Vehicles to pass simultaneously.
- Absence of a Hard Shoulder: There is no safe refuge or margin for error for manoeuvring vehicles.
- Critically Poor Visibility: The immediate area is affected by blind dips and blind corners, severely compromising driver sightlines.

These immediate dangers constitute a severe threat to public safety and require urgent and mandatory remediation.

In addition to these existing hazards, local roads are not designed to accommodate sustained industrial traffic. The interaction between heavy goods vehicles, farm machinery, and everyday residential traffic creates a complex and potentially dangerous road environment. The introduction of additional industrial traffic, including diesel deliveries and construction vehicles, further compounds these risks.

Fire Safety & Major Accident Hazards

Major Accident Hazard and Regulatory Concerns

The operation of a gas-fired peaker plant, combined with on-site fuel storage, gives rise to potential major accident hazards. Under the Seveso III Directive, developments involving dangerous substances must demonstrate that risks are properly identified, assessed, and minimised. It is not clear that the likelihood and consequences of major accident scenarios, including fire, explosion, and fuel release, have been fully assessed or adequately demonstrated.

Visual Impact & Landscape

Impact on Residential Amenity and Long-Term Visual Change

The development will be visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This may affect residential amenity, enjoyment of the area, and the overall character of the landscape. Given the long operational lifespan of the development (until at least 2050), these visual impacts will be enduring and cannot be easily mitigated. The introduction of industrial lighting, structures, and activity into a rural setting represents a long-term change that should be carefully considered.

Climate Impact

Conflict with National and EU Climate Targets

Ireland has legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021 and EU climate frameworks. The continued development of gas-fired generation, including peaker plants, will result in additional carbon dioxide emissions over the lifetime of the project. This raises concerns regarding consistency with national carbon budgets and the State's ability to meet its climate targets.

Community Engagement

Lack of Transparency, Inclusiveness, and Early Engagement

I do not believe that consultation has been clear, inclusive, or effective. For a development of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community. This includes clear communication, accessible materials, and sufficient time for people to understand and respond to the proposal. The lack of meaningful engagement raises concerns regarding fairness, transparency, and the overall integrity of the planning process. Communities should not be placed at a disadvantage due to inaccessible information or limited consultation.

Planning & Assessment

Failure to Properly Assess Cumulative and Long-Term Impacts

The Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods. The long-term (until at least 2050) and cumulative nature of these impacts has not been fully considered, limiting the ability to understand the true environmental burden of the development. This represents a significant gap in the assessment.

Diesel Use Not Fully Assessed or Limited

Diesel use is not limited to emergency scenarios and may include routine testing and operational requirements. This introduces additional emissions, odours, and environmental risks that have not been fully assessed in the Environmental Impact Assessment. The frequency and impact of diesel use remain unclear, creating uncertainty regarding the overall environmental impact of the development.

Protection of Community, Health, and Environment

This proposal raises real and valid concerns for people, public health, agriculture, and the local environment. The complexity of the documentation and limitations in community engagement have made it difficult for the

public to fully participate in the decision-making process. Communities should not be exposed to uncertain and potentially significant environmental impacts. I strongly urge that planning permission is not granted.

Yours Sincerely,

Name: Breda Gardiner
Date: 10 April 2026