# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

## Case Reference: 324113

Caroline & Patrick Harris

Rathmorrissy,

Athenry,

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 12 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,

As a resident who values the rural character and tranquillity of this area, I wish to formally object to the proposed Cashla Peaker Plant. My concerns centre on the risks posed to community well-being and the local landscape, the insufficient consideration of the project's impacts, and the lack of clear assurances regarding health, amenity, and legal matters. With two children aged 8 and 12, I am particularly concerned about the long-term effects on their health. I do not believe adequate measures have been taken either to protect the unique qualities of our community or to address legitimate concerns raised by local residents.

My objection is made on four principal grounds:

1. Risks to Human Health from Air Pollution
2. Noise and Vibration Impacts on Amenity
3. Visual Impact and Landscape Character Change
4. Land Ownership and Legal Clarity

Each issue highlights deficiencies in the Environmental Impact Assessment Report (EIAR) and potential conflicts with Irish planning policy and EU directives. The main points are summarised below, followed by a detailed analysis of each ground.

1. Human Health Concerns from Air Pollution

Impact of Emissions

The Peaker plant will emit combustion pollutants, notably nitrogen oxides (NOx), sulphur dioxide (SO), carbon monoxide (CO), and fine particulate matter (PM and PM) during operation. These pollutants are linked to serious health effects. Long-term exposure to NO and PM, even at low concentrations, is associated with respiratory illnesses, cardiovascular disease, and premature mortality. The Irish Environmental Protection Agency (EPA) has confirmed that "there's no completely safe level of air pollution... even low levels can still harm our health over time." Approximately 1,700 premature deaths occur in Ireland each year due to air pollution. Although Ireland currently meets EU legal air quality limits, those limits are less stringent than the latest health-based guidelines of the World Health Organization. Compliance with standards cannot be equated with safety, particularly for sensitive populations.

Vulnerable Receptors

The project is located within an established rural community with numerous homes and sensitive sites near the proposed plant. Our own home lies within the 1km radius area of highest risk, and Lisheenkyle National School is only approximately 2.6 km away. Children attending the school, including my own children—infants, pregnant women, and elderly residents nearby would be especially vulnerable to air pollution and noise. The EIAR's Population and Human Health chapter does not adequately account for these sensitive groups or their heightened susceptibility, treating the population generically and failing to offer any receptor-specific analysis for vulnerable individuals.

Deficiencies in the EIAR Assessment

The EIAR's approach to human health impacts is piecemeal and overly reliant on regulatory thresholds. It concludes that because predicted air pollutant concentrations remain under EU limit values, there will be "no significant effects" on health. This compliance-focused methodology is fundamentally weak.

- No Cumulative or Combined Exposure Analysis: The EIAR considers factors like air quality and noise separately, without assessing how multiple stressors might interact simultaneously. In reality, residents could be exposed to air pollutants, noise, traffic, and lighting impacts together, compounding the strain on health and well-being. Such interactions should be considered under a holistic health impact assessment, as required by the EIA Directive.
- Failure to Assess Chronic and Long-Term Exposure: Although the plant is expected to operate for decades, the EIAR does not meaningfully evaluate the effects of chronic exposure over the full lifecycle of the development. It relies on short-term dispersion modelling and annual average concentrations, without addressing how repeated exposure over many years could gradually impact public health. Worst-case scenarios, such as periods of poor dispersion, have not been rigorously analysed, which is concerning given Galway's climate.
- Indoor Exposure Pathways Ignored: Modern insulated homes often rely on mechanical ventilation, which can draw outside air and pollution indoors. Our heat pump system is an example. The EIAR omits consideration of indoor air exposure entirely. Residents could inhale pollutants infiltrating houses, especially during prolonged operations or night-time. This recognised pathway is not addressed, underscoring a gap in the report.
- Underestimated Study Area: The EIAR limits the study of community receptors to a 500 metre radius, which is insufficient in a rural environment. Pollution and noise can travel beyond 500 metres, especially with flat terrain and strong winds. Our home one of the closest is just outside this parament at 640 metres. Urban planning guidance, such as the Dublin City development plan, uses a minimum 750 metre radius to assess community facilities. Applying a smaller radius in a rural setting undervalues the true extent of affected people and facilities.

In sum, the EIAR's health impact analysis does not align with best practice or legal requirements. The 2014 EIA Directive requires integrated assessment of a project's significant effects on "population and human health." Irish law similarly mandates a precautionary, evidence-based evaluation of health impacts. By failing to consider cumulative exposures, vulnerable populations, and worst-case conditions, the EIAR does not meet these standards. It provides an incomplete basis to conclude that the project will "not give rise to significant adverse effects on human health," especially given the scale, duration, and proximity to sensitive

receptors. The precautionary principle dictates that if there is scientific uncertainty about serious risks, preventive action is warranted. In this case, the prudent approach would be to refuse or strictly condition the project unless a far more robust health impact assessment is provided.

2. Noise and Vibration Impacts on Residential Amenity

Quiet Rural Setting

The proposed site is in a rural area with very low baseline noise levels, typical of a tranquil countryside environment. Background sound is minimal, mainly distant traffic on the M6, wind in trees, and occasional farm activities. Residents are accustomed to quiet conditions, especially at night. Even a small increase in noise can be highly intrusive in such settings. Planning authorities and An Bord Pleanála have recognised that rural dwellings deserve the same high standard of residential amenity as urban ones. The expectation of peace and quiet is often greater in the countryside due to historically low noise environments. Rural residents may be more startled by new industrial noises because of the stark contrast with existing conditions. I am highly concerned by this change to the quiet environment we chose to live in.

Noise from Operations

The Peaker plant will generate noise from multiple sources, including gas turbines, engines, cooling fans, and periodic high-intensity events like start-ups and shut-downs. These operations can produce unpredictable noise spikes. For example, cold starts of turbine units often involve louder transient noises and steam releases. The EIAR's Noise and Vibration chapter references predictive modelling and guidance, including EPA guidelines and British Standard BS 4142. It claims operational noise can be kept within absolute limits specified by regulatory guidance. However, the assessment focuses narrowly on compliance with generic limits rather than real-world impacts in context.

- Change in Acoustic Character: The EIAR largely ignores how the character of noise will change for locals. In a rural soundscape, a new continuous hum or periodic roaring from an industrial facility can be perceived as highly disruptive even if it meets a decibel limit. The report does not adequately describe qualitative impacts such as annoyance or sleep disturbance from a low-frequency drone at night. By focusing on predicted compliance, the EIAR fails to convey that such levels might still represent a significant increase over the natural background, likely to cause disturbance.
- Intermittent and Peak Noise Events: The plant's operation will be irregular, possibly starting up on short notice during peak electricity demand. Start-up and shut-down sequences can create short bursts of loud noise above normal running levels. The EIAR does not detail how loud these events could be or how often they might occur in worst-case scenarios. Cumulative noise from multiple units starting together, or concurrent maintenance activities, is also not explored in depth. Such events could be highly disruptive, especially at night or early morning.
- Vibration: The proposal involves heavy machinery and construction activities that can generate ground-borne vibration. Yet, the EIAR provides no quantitative prediction of vibration levels at the nearest houses. Our home is in the catchment area. Construction will involve excavation, piling, and heavy truck traffic for an extended period, but the report only makes general statements that vibration will be managed under standard good practice, without measurements or site-specific analysis. For operations, it assumes vibration will be negligible but offers no evidence. No enforceable vibration limits are proposed, nor is there a clear monitoring plan. In a rural area with old farmhouses and cottages, even minor ongoing vibration could cause stress or minor building damage, yet the EIAR glosses over this possibility.
- Lack of Mitigation Details: While the EIAR mentions that noise will comply with guidelines, it provides little detail on specific mitigation beyond generic measures. It does not outline any special noise barriers, enclosures, or operational curtailments that would be implemented if noise exceeds expectations. Similarly, for vibration, there is no tailored mitigation plan or commitment to pre-construction building condition surveys or vibration monitoring at nearby homes, which would be prudent given the proximity.

In summary, the noise and vibration assessment is incomplete and not sufficiently precautionary. It treats guideline compliance as a guarantee of acceptability—a flawed approach in planning terms. Irish authorities require that noise impacts be evaluated in terms of change and character, especially in quiet areas, not just

absolute compliance. By failing to fully consider this context, the EIAR does not prove that residential amenity will be protected. The absence of rigorous vibration analysis and enforceable limits is a notable gap. These shortcomings suggest the Board cannot have confidence in the conclusion that noise and vibration impacts would be minor. Any permission, if considered, would need to be conditional on much stricter noise controls, continuous monitoring, and enforceable vibration thresholds, or else the application should be refused as currently presented.

3. Visual Impact and Rural Landscape Character

Rural Landscape Context

The site lies in an open agricultural landscape characterised by gently rolling, low-lying fields with hedgerows and sporadic trees. The area has a predominantly horizontal visual character, green fields, low farm buildings, and a lack of tall structures. There are no existing industrial installations on the site, and the locality is not zoned for heavy industry. The established pattern of development is overwhelmingly rural: one-off houses, farmsteads, and small local facilities. This setting is inherently sensitive to visual change; any large new structure is likely to be noticeable over long distances due to broad visibility in the flat terrain. My husband is a keen astronomer and this development will mark the end of the dark skies environment.

Scale and Appearance of the Proposed Plant

The Peaker plant involves industrial-scale structures unlike anything currently in the area. Plans include tall emission stacks (chimneys) approximately 30 metres high, large turbine hall buildings, cooling units, fuel tanks, and extensive hardstand yards. These elements will far exceed the height and bulk of typical farm buildings or trees, with a 30 metre stack puncturing the skyline in a landscape where hedgerows and buildings are only a few metres high. The project also brings night-time lighting, security fencing, and constant industrial activity into a currently dark and quiet rural area. The visual effect is a dramatic "step change "a transformation from rural to industrial character that cannot be concealed.

Visual Impact and Landscape Assessment Issues

- Significant Visual Transformation: The LVIA acknowledges that the development will introduce prominent vertical structures into a low, flat landscape, becoming visually dominant due to lack of screening or topographic variation. The area's visual character will shift from pastoral to semi-industrial, a permanent alteration of the landscape for decades. The EIAR downplays this by treating visual impacts in a compartmentalised manner, without acknowledging the fundamental erosion of rural character.
- Rural Amenity and Sense of Place: The sense of place and amenity would be severely impacted. Locals and visitors experience this area as tranquil countryside, with open views, natural darkness at night, and a quiet atmosphere. The plant would compromise these qualities: adding continuous noise and activity, visible structures and plumes, and light pollution. The EIAR's focus on visual simulations does not adequately discuss intangible aspects like loss of tranquillity and character, which are recognised components of landscape value under Irish planning guidance.
- Fragmented and Opaque LVIA Presentation: Visual impact information is not presented clearly or accessibly. The main EIAR chapter on Landscape contains almost no imagery; critical visual evidence is relegated to technical appendices. This undermines transparency, making it difficult for the public to understand the true extent of the plant's visibility. My husband, a landscaper, could not find meaningful data on the type of plants and scheme to be used, outside of highly generic information. The fragmented approach risks significant impacts being overlooked or underestimated.
- Cumulative Landscape Impact: The project does not exist in isolation. Other infrastructure elements in the area—such as the M6 motorway and a telecommunications mast—have a modest footprint, but adding a large power plant could consolidate an infrastructural corridor and push the landscape further toward an industrial character. The EIAR does not fully assess this cumulative effect or the risk of setting a precedent for future proposals, potentially accelerating the loss of rural character. Planning precedent in Ireland shows that once a large utility installation is introduced, similar projects tend to cluster, a risk that should be evaluated.

Overall, the visual and landscape impacts are considerable and insufficiently mitigated. Local development

plan policies typically seek to protect scenic quality and residential amenity. Irish planning law allows refusal of developments that "seriously injure the amenities" of an area. This project would seriously injure local amenities and the rural character. The EIAR's failure to clearly communicate the full extent of visual intrusion and landscape change is a serious shortcoming. The Board is obligated to ensure significant effects—on landscape and cultural heritage are plainly described and assessed. Given the irreversible and transformative nature of the impact identified, there is a strong case that the proposal is incompatible with the area's character and should be refused on visual/landscape grounds alone.

4. Land Ownership and Legal Basis of the Application

Scope of the Project Lands

The proposed development includes the main power plant site (approximately 19.17 hectares), and an 8.1 km underground grid connection route along local public roads to link the plant into the national grid. The project affects multiple land parcels and roadside verges across several townlands, involving both private lands and public road reservations. Under Irish planning law, an applicant must demonstrate sufficient legal interest in all lands required for the development—either through ownership or consent of the owners—otherwise permission may be at risk.

Applicant's Legal Interest

The application documentation includes letters of consent from some private landowners who own portions of the site needed for the Peaker plant and associated works. These letters presumably cover the main development site. However, significant questions remain about the completeness of consents for the entire project:

- The consent letters do not explicitly cover the full 8.1 km cable route along public roads. Laying a cable in a public road typically requires consent or agreement from the local authority or proof of statutory authority. It is not evident from the application if such consent exists or is handled separately. The EIAR notes instances where boundaries overlap public roads, implying reliance on public land for the grid connection, yet there is no clear documentation of consent for those stretches.
- As a local resident with private road access beside the proposed plant, I am concerned that construction traffic may attempt to use our road or that it may become a rat run to a public road in future as a result of this development. Bord Gais representative have not engaged with us in a meaningful way, they call to some properties door to door but not to any in the Rathmorrissy areas closest to the potential development.
- The project appears split between a generation station application and possibly a separate transmission infrastructure application. The interface between these processes must be transparent. The Board needs to be satisfied that all lands and permissions are accounted for across the combined scheme. There is a lack of clarity on which lands are included in this application and which might fall under a different consent. This fragmentation could conceal gaps where neither process clearly demonstrates legal access.
- The overall red-line area of ~19.17 ha is quite large, and it is not clear if every bit is owned or consented to by the applicant. If any corners or access routes cross third-party lands, those require consent. The information is fragmentary. The applicant must leave no ambiguity about landownership or permission for every metre of the development, especially since it spans a long linear route.

Importance of Legal Clarity

This is not a mere technicality. Irish planning practice holds that an application lacking full landowner consent can be deemed invalid or refused. An Bord Pleanála must ensure the applicant is not seeking approval for works on lands where they have no right to implement that approval. The Board should verify that all lands within the boundary are supported by appropriate ownership or consent documents, that the division between applications is clear, and that the development does not depend on utilising any lands without demonstrated legal basis. At present, documentation lacks the necessary clarity on these points.

Ensuring a solid legal footing is critical for public transparency and fairness. Affected landowners have the right to know their property is included in a planning application and to object if they wish. If some stretch of road or land was mistakenly assumed available without consent, it could lead to future legal disputes or inability to complete the project as approved. Approval conditions often hinge on land; if the applicant cannot

lawfully access those lands, conditions cannot be met. Therefore, before any permission is granted, the Board should demand full cartographic and legal clarity from the applicant. The present lack of clarity undermines confidence in the application. It would be prudent for An Bord Pleanála to either seek further information or refuse permission until the applicant demonstrably corrals all necessary land interests.

**Human Health & Air Pollution**

**Cumulative Health Impacts Over Time**

The intermittent but high-intensity operation of a peaker plant, combined with periodic diesel use, can result in repeated short-term spikes in air pollution. While individual emission events may appear limited in duration, repeated exposure over time (until at least 2050) creates a cumulative health burden. Pollutants such as nitrogen oxides and fine particulate matter can worsen asthma, trigger respiratory symptoms, and contribute to long-term health impacts, including chronic respiratory disease and cardiovascular conditions. The cumulative effect of these emissions over the operational lifespan of the development has not been fully assessed, particularly in relation to long-term exposure pathways and sensitive populations living nearby.

**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**

**Exposure During Daily Activities and School Times**

Children living or attending school near the site may be exposed to elevated air pollution during peak operation periods, which may coincide with times when children are outdoors, including school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants. This raises concerns about repeated exposure to harmful emissions during critical stages of development.

**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**

**School Safety and Peak-Time Risks**

Positioning the site entrance at this location on the L3103 introduces extreme risk to road users. This treacherous section of the road is entirely devoid of a hard shoulder and is physically too narrow for two HGVs to pass one another safely. Furthermore, severely compromised sightlines caused by blind dips and sharp corners make this access point highly perilous. It is imperative that these severe, compounding traffic hazards are urgently mitigated before any development is permitted.

Additional traffic associated with the development may significantly increase risks near schools and residential areas, particularly during peak periods such as morning and afternoon school times. The interaction between heavy vehicles, farm machinery and local traffic creates a heightened risk of accidents, particularly for children and other vulnerable road users. This is especially concerning given the existing constraints and hazards on this section of road.

**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**

**Emergency Response and Adequacy of Assessment**

There is insufficient information provided regarding emergency response planning, including evacuation procedures, coordination with local emergency services, and the ability to respond effectively to a major incident. This is of particular concern in a rural area with constrained road infrastructure. Taken together, the absence of detailed worst-case analysis and robust emergency planning means it has not been demonstrated that risks to human health and safety have been reduced to an acceptable level.

**Visual Impact & Landscape**

### Cumulative Visual Impact of Industrial Infrastructure

The visual impact of the development should not be considered in isolation. The proposal includes multiple elements, including plant structures, fuel storage areas, electrical infrastructure, security fencing, lighting, and access roads. When considered together, these elements will create a significant industrial presence within a rural setting. The cumulative visual impact of these components has not been fully assessed and may result in a greater level of visual intrusion than identified in the Environmental Impact Assessment.

## Climate Impact

### Underestimation of Operational Emissions

The Environmental Impact Assessment may underestimate emissions associated with the development by relying on assumed operational patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during periods of energy system stress. This creates uncertainty regarding total greenhouse gas emissions over time and raises concerns that the climate impact of the development has not been fully assessed.

### Availability of Cleaner Alternatives

Cleaner and more sustainable alternatives to fossil fuel generation are available, including renewable energy, energy storage, demand response, and grid flexibility measures. The development of new gas infrastructure may reduce the urgency to deploy these solutions. In the context of the climate crisis, priority should be given to low-carbon alternatives rather than extending reliance on fossil fuels.

## Community Engagement

### Ineffective Engagement and Limited Opportunity to Participate

While documentation has been made available, the approach to community engagement has not ensured meaningful or effective participation. Many residents were not directly informed of the development, and engagement appears to have relied on passive methods rather than proactive outreach. Opportunities to engage were limited and may not have reached all affected individuals, particularly those without the time, resources, or technical background to interpret the material. Effective consultation requires early, inclusive, and accessible engagement with the community, which does not appear to have been achieved in this case.

### 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

### Complexity of EIAR and Barriers to Public Understanding

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 in its entirety. The level of technical detail, combined with the structure of the documentation, creates a barrier to meaningful engagement. Although not formally divided across separate EIARs, the practical effect

is like fragmentation, as the public cannot easily assess cumulative impacts across all aspects of the development. This raises concerns regarding transparency and accessibility in the planning process.

**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.

**Operational Uncertainty and Lack of Enforceable Limits**

There is no clear or enforceable limit on how often or how long the plant will operate. As a demand-led facility, operation may be more frequent or prolonged than assumed in the Environmental Impact Assessment. This includes diesel use during start-up and operation. If this occurs, impacts such as emissions, noise, and traffic may be significantly greater than predicted. This uncertainty raises concerns regarding the accuracy of the assessment.

**Inadequate Assessment and Planning Concerns**

There are serious concerns regarding environmental impact, safety risks, and the adequacy of the assessment process. The Environmental Impact Assessment does not fully address cumulative, long-term, or worst-case impacts and relies on assumptions that may not reflect real-world operation. These issues create uncertainty regarding the true impact of the development. On this basis, I ask that permission for the proposed development be denied.

Yours Sincerely,

Caroline Harris

Patrick Harris

Name: Caroline & Patrick Harris
Date: 12 April 2026