

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Daniel Healy

Pollagooil

Athenry

Galway

H65YX34

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 24 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 1.94km from the proposed site of the Cashla Peaker Plant (Athenry).

I am writing this statement to formally record my strong objection to the proposed gas and diesel peaker power plant in Athenry and to outline how this development will impact my family and the wider community.

My primary concern is the effect this plant will have on public health and wellbeing. Residents live, work, and attend school nearby and will be exposed daily to emissions from this plant, raising concerns about long-term health impacts and quality of life. Increased noise, traffic, and industrial activity will further affect the area, with likely disruption to local traffic and added safety risks, particularly for children cycling on local roads.

There are also significant environmental concerns. A fossil fuel-based plant will contribute to greenhouse gas emissions and air pollution at a time when Ireland should be accelerating its transition to renewable energy, with potential impacts on local biodiversity.

Of particular concern is what this project represents for Ireland's energy future. Rather than a short-term

measure, it reflects long-term reliance on fossil fuels. With a proposed 40-year lifespan, the plant would operate well beyond 2050, Ireland's target for carbon neutrality.

In summary, the risks to public health, the environment, and long-term sustainability outweigh any short-term benefits. For these reasons, I strongly urge that this proposal be refused.

### **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 (NO<sub>x</sub>) and fine particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) 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.

### **Cumulative Health Impacts Over Time**

I have serious concerns about how this proposed peaker plant would operate over time. Although it would run intermittently, it would do so at extremely high intensity, and the potential use of diesel adds to these concerns, as it could result in repeated short-term spikes in air pollution. While individual emission events may be brief, the fact that they could occur repeatedly over many years—potentially up to 2050—raises concerns about ongoing exposure and cumulative health impacts.

Pollutants such as nitrogen oxides and fine particulate matter are known to worsen asthma, trigger respiratory symptoms, and contribute to long-term conditions including chronic respiratory and cardiovascular disease. This is particularly concerning for nearby residents, especially vulnerable groups such as children, older people, and those with existing health conditions. There is still uncertainty regarding whether the lasting and cumulative effects of these emissions have been fully studied, which leads to real concerns that continued exposure during the development's lifetime could affect public health and wellbeing in the future.

### **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.

## **Unsuitability of Site Due to Environmental Sensitivity**

I do not believe this site is suitable for this type of development. The area is environmentally sensitive, with a strong reliance on clean groundwater and agricultural land, both of which are essential to the local community. Introducing a development involving diesel storage and industrial processes, potentially operating until at least 2050, brings significant long-term risks to water quality, soil health, and surrounding land uses.

These effects are not temporary or easily controlled, and once harm is done, it can be extremely challenging—sometimes even impossible—to completely fix. Because of uncertainty and the risk of permanent environmental damage, it's best to proceed with caution. In summary, there are significant concerns about whether this development is suitable for this 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.

## **Exposure During Daily Activities and School Times**

As a parent in the area, I am concerned that children living nearby or attending local schools will be exposed to higher levels of air pollution when the plant is operating at peak times, particularly when they are outdoors during school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants and making them more vulnerable to harmful effects. What is especially worrying is the potential for repeated exposure during key stages of development, which could have lasting impacts on their health and wellbeing. Overall, this raises serious concerns as to 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.

### **Need for Precaution Due to Uncertainty**

There is significant concern regarding the insufficient assessment of long-term health impacts on children, particularly with respect to repeated exposure associated with intermittent plant operation and diesel utilisation. Since children are especially susceptible to air pollution, uncertainty surrounding these effects warrants scrutiny. It is inadequate to presume minimal risk without substantial, transparent evidence. Given these circumstances, it is recommended that a precautionary approach be adopted to prioritise the health and wellbeing of children and to ensure that all potential risks are thoroughly evaluated and mitigated.

### **Increased Heavy Traffic and Diesel Transport Risks**

As someone who lives locally and uses this road, I am concerned about road safety in relation to the proposed entrance on the L3103. This stretch of road is already extremely narrow, with no hard shoulder, making it difficult for two heavy goods vehicles to pass safely and leaving no margin for error. Visibility is also poor due to blind dips and sharp bends, meaning drivers often cannot see oncoming traffic in time. The proposed development would increase traffic levels, including heavy goods vehicles, construction traffic, and fuel deliveries such as diesel tankers, all of which require space and clear sightlines that this road does not provide.

Given that these rural roads are used by residents, farm machinery, and school-related traffic, the addition of significant industrial traffic would increase the risk of accidents and create a more hazardous environment. Overall, there is strong concern that the existing road infrastructure is not suitable for this level of traffic and that the associated safety risks have not been adequately addressed.

### **School Safety and Peak-Time Risks**

As someone who lives locally and extensively uses this road, I am concerned about the proposed location of the site entrance on the L3103. This section of road is already extremely dangerous, as it is narrow, has no hard shoulder, and does not provide sufficient space for two heavy goods vehicles to pass safely. Visibility is also poor due to blind dips and sharp bends, meaning drivers often cannot see oncoming traffic in time, and introducing a site entrance at this location would significantly increase the risk to all road users.

There are strong concerns that adding traffic—particularly large vehicles—would worsen these existing hazards, especially near homes and schools during busy periods such as morning and afternoon times. The interaction between heavy goods vehicles, farm machinery, and everyday local traffic creates a higher risk of accidents, particularly for children and other vulnerable road users. Overall, this is not a suitable location for this level of traffic, and the associated safety risks for the community are a critical concern.

### **Unsuitability of Rural Road Network**

There are serious concerns about the proposed site entrance on the L3103, which is an exceptionally dangerous stretch of road where introducing an access point would create an unacceptable level of risk. The road is extremely narrow and cannot safely accommodate two heavy goods vehicles passing at the same time, there is no hard shoulder to allow for safe manoeuvring or recovery, and visibility is severely limited due to blind dips and sharp corners. These are significant existing hazards that already pose a real danger to road users, and the addition of a site entrance would further increase that risk.

There are also concerns regarding the suitability of local roads for this type of traffic. Rural roads are not built to support continuous industrial activity, and when heavy trucks, farm equipment, and regular local vehicles share these routes, it often leads to difficult and dangerous traffic conditions. The introduction of additional industrial traffic, including construction vehicles and diesel deliveries, would further increase the risk and make these roads more dangerous for all users.

### **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.

### **Major Accident Hazard and Regulatory Concerns**

I am concerned about the potential for major accidents associated with this proposed development. A gas-fired peaker plant, combined with on-site fuel storage, introduces real risks, including fire, explosion, and the release of fuel. According to the requirements of the Seveso III Directive, any development involving hazardous substances must present clear evidence that relevant risks have been appropriately identified, assessed, and minimized. In this instance, it appears that full compliance may not have been achieved. Locally, there is concern regarding whether the probability and impact of serious incidents have been comprehensively evaluated or clearly demonstrated, which raises ongoing questions about the adequacy of risk management and the safety of nearby residents.

### **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.

### **Landscape Character and Policy Conflict**

There are serious concerns that the proposed development would represent a significant industrial intrusion into a rural landscape characterised by agricultural land use and dispersed residential development. The scale, height, and industrial nature of the plant—including buildings, stacks, lighting, and fuel storage—would fundamentally alter the character of the area, introducing a visually dominant feature into what is currently a quiet rural setting. This type of development does not appear consistent with the existing landscape, nor does the area have the capacity to absorb such change without significant adverse effects. These concerns are particularly relevant in the context of the Galway County Development Plan, specifically Policies LCM1, LCM2, and LCM3, which seek to protect landscape character, recognise landscape sensitivity, and ensure that development is appropriate to its setting.

### **Conflict with National and EU Climate Targets**

There are serious concerns regarding Ireland's legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021, as well as wider 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, raising questions about alignment with national carbon budgets and emissions reduction targets. In this context, there is concern that the proposal may undermine the State's ability to meet its climate commitments and transition to a low-carbon energy system.

### **Lack of Clear, Accessible, and Effective Communication**

There are concerns that community engagement in relation to this project has been insufficient and ineffective. Many residents did not receive any direct communication or notification about the proposed development, and while some individuals report receiving a flyer or attending an information event, the material provided was highly technical and difficult to understand without specialist knowledge. This limits meaningful public participation, as effective consultation requires information to be accessible, clearly explained, and actively communicated to all affected members of the community. In this case, the complexity and level of technical detail in the documentation creates a barrier to understanding, meaning that many people cannot fully assess the potential impacts of the development.

### **Lack of Transparency, Inclusiveness, and Early Engagement**

There are concerns that consultation in relation to this development has not been clear, inclusive, or effective. For a project of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community, including clear communication, accessible information, and adequate time for people to understand and respond to the proposal. The lack of meaningful engagement raises issues around fairness, transparency, and the overall integrity of the planning process, and creates concern that communities may be placed at a disadvantage due to inaccessible information and limited consultation.

### **Absence of Worst-Case Scenario Assessment**

There are concerns that the Environmental Impact Assessment relies on assumed or typical operating scenarios rather than fully assessing worst-case conditions. As a demand-led facility, a peaker plant may operate more frequently, for longer periods, or at higher intensity than predicted, and this may include the use of diesel during start-up, testing, or operational phases. As a result, actual emissions and environmental impacts could be significantly greater than those modelled. A comprehensive evaluation of worst-case scenarios is essential to ensure the reliability of the assessment. Without such an analysis, it is not possible to affirm with confidence that major negative environmental impacts will be avoided, and this omission

constitutes a critical limitation.

### **Failure to Properly Assess Cumulative and Long-Term Impacts**

There are concerns that the Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and ongoing environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods, yet this interaction has not been fully examined. The long-term nature of the development, potentially extending to at least 2050, further increases the importance of understanding these cumulative effects. Without a comprehensive assessment, it is difficult to fully understand the overall environmental burden of the project, and this represents a significant gap in the evaluation.

### **Operational Uncertainty and Lack of Enforceable Limits**

There are concerns that the Environmental Impact Assessment relies on assumed operational scenarios rather than fully assessing worst-case conditions. As the plant will operate in response to electricity demand, there is uncertainty regarding how frequently or intensively it may run, including periods when diesel will be used, potentially resulting in higher emissions than those modelled. Without a thorough evaluation of the worst-case scenario, it is not possible to confidently rule out the possibility of major environmental impacts.

### **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,

A handwritten signature in black ink that reads "Daniel Healy". The signature is written in a cursive, flowing style with a large initial 'D'.

Name: Daniel Healy

Date: 24 April 2026