OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Darragh Kavanagh

Tourkeel

Athenry

Galway

H65 WA06

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 23 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 8.46km 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, Co Galway.

I am a lifelong resident of Athenry, having grown up on a family farm in Tourkeel. I attended the local national school in Newcastle and later the vocational school in Athenry. Throughout my youth, I was actively involved in the community, particularly through juvenile hurling and football with St Mary's Hurling Club. Now, more than 30 years later, I am raising my own young son, who is beginning to follow the same path as I did, as did previous generations of my family. As a parent, my foremost concern is the potential impact this proposed power plant may have on his health and overall wellbeing. My child will grow up in close proximity to this facility, attending school and participating in sports such as soccer, hurling, and Gaelic football within a 3–4 kilometre radius. This raises serious concerns about the extent to which he, and other children in Athenry, may be exposed to emissions from the plant.

I am particularly concerned about pollutants commonly associated with diesel combustion, including nitrogen dioxide, nitrogen oxides, fine particulate matter, sulphur dioxide, and carbon monoxide. These substances are known to have adverse effects on air quality and human health. Prolonged or elevated exposure can impair lung development in children, increase the risk of respiratory and cardiovascular conditions, and exacerbate existing health issues such as asthma. It is essential that any assessment of this proposal fully considers the potential health implications for children and the wider community. I strongly believe that no development should proceed without clear, evidence-based assurances that it will not negatively impact public health, particularly that of the next generation.

A further concern relates to the proposed on-site storage of up to 6.4 million litres of diesel, which presents several significant risks. Firstly, the transportation of such large volumes of fuel will inevitably increase heavy goods vehicle traffic along the narrow rural roads leading into Athenry. This raises concerns regarding congestion, road safety, and the heightened risk of traffic accidents involving large fuel tankers. Such conditions may pose a particular danger to pedestrians and cyclists, and could discourage active travel by making these routes less safe for local residents, including children.

Secondly, the environmental risks associated with storing substantial quantities of diesel must be carefully considered. In the event of a spill, leak, or structural failure, there is a potential for contamination of nearby land and water sources, including underground waterways and private wells. The implications of such contamination for both public health and the local ecosystem could be severe and long-lasting. Given these factors, it is essential that the safety, environmental protection measures, and infrastructure capacity associated with this proposal are rigorously assessed and clearly communicated.

From both personal experience and a strong commitment to climate action, I have made a deliberate transition away from fossil fuels. I live in a newly built, A1-rated home and have invested significantly in high-efficiency insulation, a heat pump system, and solar energy. I have also adopted an electric vehicle. These choices reflect my belief in moving toward cleaner, more sustainable energy sources, and represent a substantial financial and personal commitment to reducing my carbon footprint and mitigating the impacts of climate change. Equally important to me is setting a responsible and forward-looking example for the next generation. Against this backdrop, I am deeply concerned by the proposal to develop a diesel-powered plant approximately 8.5 kilometres from my home, with the capacity to store and burn 6.4 million litres of fuel. This raises serious questions about consistency in our national approach to climate policy and environmental responsibility.

I would like to understand the rationale behind such a development at a time when there is a clear and urgent need to reduce greenhouse gas emissions. What level of emissions is anticipated from this facility on an annual basis, and over its operational lifetime? What will be the broader environmental and public health impacts for the surrounding communities? While individuals are being encouraged—and are making considerable efforts—to transition to low-carbon lifestyles, projects of this nature risk undermining that progress. It is difficult to reconcile the development of new fossil fuel infrastructure with our stated climate objectives and the example we wish to set for future generations.

In the context of an ongoing climate crisis, it is essential that investment and planning decisions align with long-term sustainability goals. I would urge that greater consideration be given to cleaner, renewable alternatives that support both energy security and environmental responsibility. If this peaker power plant is built, will the next generation bow their heads in shame that this plant was built in the middle of a existential climate crisis.

The proposed development would constitute a COMAH (Control of Major Accident Hazards) / Seveso-designated site, involving the storage of up to 6.4 million litres of diesel. This classification reflects the significant hazards associated with such facilities and warrants careful consideration.

The presence of large volumes of combustible fuel introduces inherent risks, including fire and explosion. In the event of a major incident, there may be a requirement for emergency response measures, including potential evacuation of nearby residents. This raises concerns regarding the capacity and resilience of local infrastructure, particularly given the limited number of access and egress routes serving the area.

In addition, it is important to consider evolving risk factors in the modern context, including the potential for cyber security breaches or other external threats that could impact critical infrastructure. While such risks may be low in probability, their potential consequences are serious and should be addressed through robust safety, security, and emergency planning frameworks.

Given these considerations, it is essential that any proposal of this nature is subject to rigorous risk assessment, with clear and transparent communication of the measures in place to safeguard the local community and environment.

In conclusion, while the need for reliable energy infrastructure is acknowledged, this proposal raises significant and far-reaching concerns that cannot be overlooked. It appears fundamentally at odds with the urgent transition toward cleaner, more sustainable energy systems, particularly at a time when individuals and communities are being encouraged to reduce their reliance on fossil fuels.

The scale of diesel storage and combustion proposed presents clear environmental, health, and safety risks. These include increased greenhouse gas emissions, potential degradation of local air quality, and associated impacts on public health—especially for children and those with existing respiratory conditions. The proximity of the development to residential areas, schools, and recreational facilities heightens these concerns.

In addition, the transport and storage of large volumes of fuel introduce further risks relating to road safety, environmental contamination, and major accident hazards. The designation of the site as a COMAH / Seveso facility underlines the seriousness of these risks, including the potential for fire, explosion, and the need for emergency response measures that could place additional strain on local infrastructure.

Taken together, these factors raise important questions about the long-term suitability of this development in its proposed location. In the context of an ongoing climate crisis and the responsibility to protect both current and future generations, it is imperative that planning decisions prioritise sustainable, low-risk alternatives that align with environmental and public health objectives.

For these reasons, I respectfully submit a strong objection to the proposed development. I urge An Coimisuin Pleanala to refuse planning permission for this development based on the health and welfare of the local community, nature and the environment.

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.

Risk of Groundwater Contamination from Fuel Storage and Handling

I am concerned about the risks of soil and groundwater contamination from this proposed peaker plant. The development would involve the storage and handling of fuels such as diesel, along with lubricating oils and other chemicals, all of which could pose a risk to the surrounding environment. There is a real possibility that these substances could leak, spill, or enter the ground through surface runoff over the long lifetime of the facility, potentially up to 2050, and even small but repeated incidents could lead to a gradual build-up of pollution in soil and groundwater.

This is particularly worrying because once groundwater becomes contaminated, it is extremely difficult and costly to remediate, and the impacts can persist for decades. This raises serious concerns about the long-term protection of local water resources and the surrounding environment. There remains uncertainty about whether these risks have been adequately managed, raising substantial worries that the project might cause permanent damage to water quality. This would violate the obligations under EU Directive 2000/60/EC, which mandates the protection of water bodies and prohibits their deterioration.

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.

Dependence on Groundwater for Domestic and Agricultural Use

I am concerned about the potential risk to groundwater from this proposed development. The area depends heavily on clean groundwater for essential needs, including drinking water, farming, and livestock, making it a vital resource for the community. The introduction of an industrial facility involving the storage and handling of fuels creates an ongoing risk to this resource, and any contamination, even if accidental, could have serious and long-lasting consequences for water quality, livestock health, and agricultural productivity.

What is particularly worrying is that once groundwater becomes contaminated, the damage can be extremely difficult—if not impossible—to reverse. This raises serious concerns about whether this type of development is appropriate for this location. To sum up, significant worries persist that the dangers to groundwater have not been fully assessed, and any consequences could be permanent.

Protection of Agricultural Livelihoods

Farmers work diligently within stringent environmental guidelines and uphold rigorous standards of environmental stewardship, fully recognising the importance of these obligations. There is concern that an industrial development of this nature—particularly one involving diesel use and long-term emissions, potentially until 2050—could introduce risks that undermine that work by affecting land quality and increasing environmental pressures. This situation presents significant challenges for farmers, who should not face penalties for problems caused by factors beyond their control. There are concerns that agricultural risks remain overlooked and the development may affect local farming long-term.

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.

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.

Proximity and Worst-Case Scenario Risks

There are serious concerns about the location of this proposed development, given its proximity to residential homes, agricultural land, and local infrastructure. In this context, even a low-probability event could have serious consequences for public safety, property, and the local rural economy. While such incidents may be unlikely, the potential impact of events such as fire, explosion, or fuel-related incidents could be significant, particularly given how close the development is to where people live and work. The Environmental Impact Assessment does not clearly demonstrate that worst-case scenarios have been fully examined, with limited detail on potential fire spread, explosion impact zones, and fuel ignition risks. Without this information, the true scale and severity of potential impacts remain unclear, giving rise to significant concern about the level of risk associated with the development.

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.

Lock-in of Fossil Fuel Infrastructure

There are serious concerns that the proposed development represents new fossil fuel infrastructure with a long operational lifespan, potentially extending to at least 2050, which risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure of this nature may delay or displace the development of renewable energy and energy storage solutions, leading to continued reliance on fossil fuels over the long term. Overall, there is concern that the proposal is not aligned with current climate objectives and may undermine the transition to a low-carbon energy system.

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.

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.

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 Worst-Case Assessment

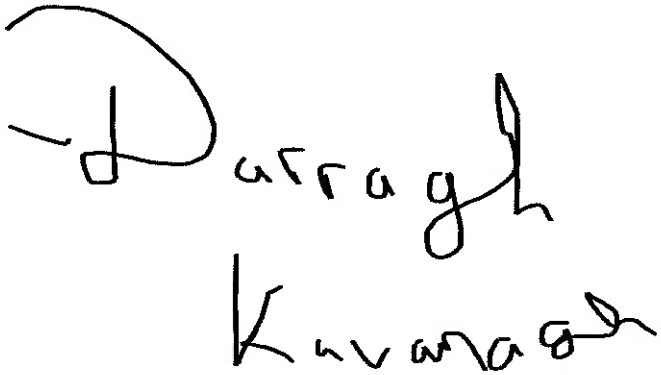
The Environmental Impact Assessment bases its findings on expected operating scenarios instead of

evaluating the worst-case possibilities. Because the plant's operation will depend on electricity demand, it's unclear how often or how intensely it might run. This uncertainty also applies to diesel usage, which could produce higher emissions than those estimated. Without a thorough assessment of the most severe potential impacts, it is impossible to guarantee that major environmental effects will not happen.

Conclusion

The proposal raises important concerns about environmental protection, public health, agriculture, road safety, and community welfare. Due to uncertainties regarding how often operations would occur, diesel usage, and overall impacts, this development cannot be considered acceptable. A thorough and cautious assessment is needed to ensure that significant environmental effects are avoided, but such an evaluation has not been conducted. Therefore, I recommend that approval for this development be refused.

Yours Sincerely,



Name: Darragh Kavanagh
Date: 23 April 2026