

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Deirdre Kelly
castlelambert
athenry
Galway
H65 KT91

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 680m from the proposed site of the Cashla Peaker Plant (Athenry).

As an Oncology Nurse and a Public Health Nurse, I have always understood health as something shaped far beyond the walls of a clinic or a hospital. It is influenced by where people live, the air they breathe, and the systems that determine whose communities are protected and whose are overlooked. This understanding has deepened through my growing concern about the impact of the proposed Cashla Peaker Plant and its potential pollution on vulnerable populations.

In my work, I have cared for patients with asthma, chronic respiratory conditions, cardiovascular disease and many oncological and haematological conditions, that are often exacerbated by environmental exposures. Peaker Plants, which are activated during periods of high electricity demand, often have a back up of fossil fuels and can potentially emit disproportionately high levels of pollutants in short bursts. While they serve a functional role in energy systems, their health consequences are not evenly distributed.

My role as a Nurse has increasingly involved not only treating illness but also advocating for prevention. This

has meant educating patients about environmental triggers, collaborating with community organisations, and engaging in conversations about environmental health policy. I have come to see advocacy as an essential extension of nursing practice—one that aligns with many core principles of nursing: Quality and Safety, and Accountability and Responsibility.

Our Health Service Executive (HSE) is under significant pressure, and that can make you wonder if the system is too busy to cope with additional illness. This is due to numerous factors like high demands, staff shortages, hospital capacity limits, back logs and population growth and ageing. I feel the potential added pressure of a Peaker Plant emitting fumes into our air will furthermore add to the pressure on our already thin HSE.

Ultimately, my concern about the Cashla Peaker Plant potential pollution is rooted in a broader commitment to ensuring that all individuals have the opportunity to live in environments that support, rather than undermine, their health. Nursing has taught me to listen closely to patients' experiences; public health has taught me to look at the systems shaping those experiences. Together, they compel me to advocate for cleaner air, healthier communities, and a more just approach to public health. I fear this Peaker Plant will have detrimental affects on our growing community in relation to potential increase in respiratory illnesses and cancers.

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_x) and fine particulate matter (PM_{2.5} 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.

Short-Term Exposure

I'm concerned that emissions from the planned peaker plant could impact the environment, particularly if diesel is used at start-up or during periods of high demand. Diesel exhaust releases various dangerous pollutants, such as nitrogen oxides, fine particles, and other toxic chemicals. These substances are associated with respiratory issues, impaired lung function, and heart disease. What is especially worrying is that these emissions may occur in short but intense bursts rather than in a steady, predictable way, particularly during start-up and peak operation. The average-based modelling used in the assessment seems not to capture this kind of real-world operation completely.

There are worries that residents in nearby areas might face greater pollution levels than expected, especially when the weather is calm and pollutants linger instead of spreading out. There is considerable uncertainty

regarding how accurate these air quality forecasts are, which makes it hard for the community to be sure that both public health and the environment are truly safeguarded.

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.

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.

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.

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.

Impact on Residential Amenity and Long-Term Visual Change

There are concerns that the proposed development will be clearly visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This has the potential to impact residential amenity, reduce enjoyment of the area, and alter the overall character of the landscape, with a large and visually prominent industrial facility introduced into what is currently a rural setting. Given the long operational lifespan of the development, potentially extending to at least 2050, these impacts would be

long-lasting and not easily mitigated. The addition of industrial structures, lighting, and ongoing activity represents a significant and enduring change that requires careful consideration.

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.

Underestimation of Operational Emissions

There are concerns that the Environmental Impact Assessment may underestimate the emissions associated with the proposed development by relying on assumed operating patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during times of pressure on the energy system. This creates uncertainty around the total level of greenhouse gas emissions over the lifetime of the project and raises concerns that the full climate impact of the development has not been adequately assessed.

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.

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.

Reliance on Regulation Does Not Eliminate Risk

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

Conclusion

There are serious concerns regarding environmental impacts, safety risks, and the adequacy of the assessment process. The Environmental Impact Assessment overlooks cumulative, long-term, and worst-case scenarios, depending instead on assumptions that may not accurately represent the actual operation of the development. This leads to considerable uncertainty regarding the real extent of its impacts. For these reasons, it is respectfully requested that approval for the proposed development be refused.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "D Kelly". The signature is written in a cursive style with a large, rounded "D" and a long, sweeping tail on the "y".

Name: Deirdre Kelly
Date: 23 April 2026