OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Brendan and 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).

I am writing as a parent to express my deep concern about the proposal to build the Cashla Peaker Plant near where our children live and grow. This is not an abstract policy issue for us—it is about the air our children breathe, the environment they learn in, and the kind of community we are shaping for their future.

Peaker plants are typically used during periods of high electricity demand, but they often rely on fossil fuels and can produce significant emissions in short bursts. These emissions include pollutants that are known to affect respiratory health, which is especially worrying for children. Young lungs are still developing, and exposure to poorer air quality can increase the risk of asthma and other long-term health issues.

We have a five year old boy with asthma and we have had some periods where he found it very difficult to breathe with the disease. These were very traumatic experiences as parents, watching your child struggling to take in a breath of air. Studies have shown that peaker plants increase the risk of asthma developing in young children. I would not wish our asthma experiences upon any child/parent, especially if this could be

potentially prevented by not building this fossil fuel generator that is Cashla Peaker Plant.

We have tested the air quality coming into our house and it is standard and healthy. We have a heat recovery ventilation unit in the house which sucks in the enviromental air and heats it up slightly thus keeping the house warm and the air fresh. If air quality decreases potentially due to the Peaker Plant who will compensate us for the decreased air quality and thus the potential asthma/cancer that may ensue.
Who would be liable; Bord Gais, the Irish Government or both??
The air quality will be tested every year from now on to see any potential changes.

Beyond the direct health impacts, the presence of a peaker plant so close to homes, schools, and playgrounds raises broader concerns about quality of life. Parents should not have to worry that the air their children breathe during outdoor play could be harmful. Communities thrive when they are safe, clean, and supportive of healthy development—not when they are burdened with avoidable environmental risks.

There is also a broader responsibility to consider. At a time when we are being urged to move toward cleaner, more sustainable energy solutions, placing new fossil fuel infrastructure near our children sends the wrong message. It suggests that short-term convenience is being prioritised over long-term health and environmental responsibility. We would urge policy makers to explore renewable energy alternatives at this site; for example wind and/or solar. This would be a more long term solution and give a better example to the younger generations about our integrity and realistic belief in safer long term energy production.

Our children deserve clean air, safe surroundings, and a future that reflects thoughtful, responsible decision-making.

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.

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.

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.

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.

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.

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.

Diesel Use Not Fully Assessed or Limited

Diesel is used beyond emergencies, including routine tests and operations. This leads to extra emissions, odours, and environmental risks not fully covered by the Environmental Impact Assessment. The frequency and impact of diesel use are unclear, making the total environmental effect uncertain.

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,

B Kelly

D. Kelly

Name: Brendan and Deirdre Kelly
Date: 23 April 2026