

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Eoin Kelly
Villette
Lisheenkyle
Athenry
Galway

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 08 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 1.86km from the proposed site of the Cashla Peaker Plant (Athenry).

I grew up in this local area and have gone to school at the local school in Lisheenkyle. My 8 year old son is also attending the local national school. We have seen tremendous change to the area over the last 20 years, new motorway, data centre benign proposed in our local forest amenity. During the construction of the roads, we have huge disruption for 3 years, with road closures and ongoing construction at long hours. Now we are facing this potential development which will cause huge disruption regarding local access to Schools, Town and daily life activities. We also have tremendous concerns on the health and environment concern of the impact of this development. Both my parents are elderly pensioners and also live in very close proximity of this development, they have worked hard all their lives and should be able to enjoy their retirement without this anxiety of their health concerns.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NO_x) and fine particulate matter (PM_{2.5} and PM₁₀), are well established as contributors to respiratory irritation, reduced air quality, and long-term environmental degradation. A peaker plant operates intermittently but at very high output during periods of peak electricity demand, resulting in concentrated bursts of emissions, particularly during start-up and ramp-up phases. Where diesel is used as a backup fuel or during start-up, emission levels may be significantly higher, as diesel combustion produces elevated levels of nitrogen oxides, sulphur dioxide, particulate matter, and other combustion-related pollutants compared to gas. These pollutants can penetrate deep into the lungs and bloodstream, contributing to respiratory and cardiovascular illness. Vulnerable groups, including children, older people, and individuals with pre-existing respiratory conditions, are particularly at risk. Fine particulate matter can travel significant distances and accumulate over time, extending the area and duration of exposure. This creates a risk of both immediate and long-term health impacts and raises concerns under Directive 2008/50/EC on ambient air quality and cleaner air for Europe.

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.

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.

Local Roads, Safety & Schools

Inadequate Assessment of Traffic Impacts

The placement of a site entrance at this hazardous location on the L3103 introduces significant and clearly identifiable safety risks, including restricted road width, lack of a hard shoulder, and severely limited visibility due to blind dips and corners. Despite these known constraints, the Environmental Impact Assessment does not adequately assess the safety implications of this access point.

The cumulative impact of construction traffic, operational traffic, and fuel deliveries has not been fully assessed. This includes the interaction of heavy goods vehicles with existing rural traffic, school-related movements, and agricultural use. The absence of a detailed and robust traffic safety assessment creates uncertainty regarding whether the local road network can safely accommodate the proposed development.

Climate Impact

Conflict with National and EU Climate Targets

Ireland has legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021 and 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. This raises concerns regarding consistency with national carbon budgets and the State's ability to meet its climate targets.

Lack of Worst-Case Assessment

The Environmental Impact Assessment relies on assumed operational scenarios rather than assessing worst-case conditions. Given that the plant will operate in response to electricity demand, there is no certainty regarding how frequently or intensively it will operate. This includes diesel use, which may result in higher emissions than those modelled. In the absence of a robust worst-case assessment, it cannot be concluded that significant environmental impacts will not occur.

Protection of Community, Health, and Environment

This proposal raises real and valid concerns for people, public health, agriculture, and the local environment. The complexity of the documentation and limitations in community engagement have made it difficult for the public to fully participate in the decision-making process. Communities should not be exposed to uncertain and potentially significant environmental impacts. I strongly urge that planning permission is not granted.

Yours Sincerely,

A handwritten signature in black ink that reads "Eoin Kelly". The signature is written in a cursive, slightly slanted style. The first name "Eoin" is written in a smaller, more compact script, while "Kelly" is written in a larger, more prominent script with a long, sweeping tail on the final 'y'.

Name: Eoin Kelly
Date: 08 April 2026