

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Grace OHara  
Slieverue  
Athenry  
Galway  
H65C584

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

Date: 17 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 6.44km from the proposed site of the Cashla Peaker Plant (Athenry).

I have travelled overseas during the Christmas period, in Vietnam and we observed poor air quality there was in that area. Throughout the trip we were using an air quality tracking APP called Air visual, while visiting the area we frequently observed reading of over 200 US AQI, the main pollutants PM2.5. This then triggered me to view the air quality in my local area where I live in Athenry and the reading and we observed this to be in the single digit, 7 US AQI for the Athenry area. As a parent of two young children, my husband has Asthma and my husband's elderly parents also live close by. My children will grow up potentially exposed to the emission emitted from the Power plant, their home life living in proximity, they are attending school (2.5KM away from the plant), will attend secondary school also close by (2KM). As a parent, this give me huge anxiety and concerns for my family's health, especially as the air quality in the Athenry region is current of such a high standard. Why should we compromise this for corporate profits over families health.

## **Human Health & Air Pollution**

### **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 (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.

## **Water & Groundwater**

### **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.

### **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.

## **Children & Health**

### **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.

## **Local Roads, Safety & Schools**

### **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.

### **Fire Safety & Major Accident Hazards**

#### **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.

## Climate Impact

### **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.

## Community Engagement

### **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.

### **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 3 – Protection of Community, Health, and Environment**

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,

[Signed electronically]

Name: Grace OHara

Date: 17 April 2026