

23rd April 2026

An Coimisiún Pleanála
64 Marlborough St, Rotunda,
Dublin 1, D01 V902, Ireland.

Ref.: 324113, Bord Gáis Energy Cashla Peaker Project

Dear Inspector,

Ibec, Ireland's leading business representative organisation, welcomes the opportunity to respond to Planning Application Ref. 324113, the Bord Gáis Energy Cashla Peaker Project. On behalf of Ibec's West Regional Executive Council, we would like to express our support for Bord Gáis Energy's proposed Cashla Peaker Project in County Galway and for the granting of approval for Planning Application Ref. 324113.

Contribution to National Climate and Energy Policy Objectives

Ireland has committed, under both national legislation¹ and the European Climate Law², to achieving climate neutrality by 2050. Irish businesses are fully engaged in this transition and are investing heavily in innovation, new technologies, supply chain development and workforce upskilling. At the same time, the pace of electrification across the economy, combined with rising demand, grid constraints and the variable nature of renewable generation, has underscored the need to maintain security and reliability of electricity supply during the transition.

National policy clearly recognises this challenge. The Government's Climate Action Plan 2025 includes a national target to deliver at least 2GW of new flexible gas generation on the grid by 2030 to support electricity supply in times of accrued demand³. This position reflects and builds on the Government's Policy Statement on Security of Electricity Supply (November 2021), which confirms that new gas-fired generation is a national priority to safeguard electricity security and enable the continued growth of renewable generation⁴.

Planning authorities were further advised, through *Circular Letter PL12/2021* to have regard to this policy framework when assessing planning applications that may impact

¹ Government of Ireland (2021) *Climate Action and Low Carbon Development (Amendment) Act 2021* (No. 32 of 2021). Dublin: Government of Ireland. Available at: <https://www.irishstatutebook.ie/eiv/2021/act/32/enacted/en/html>

² European Union (2021) *Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality (European Climate Law)*. Official Journal of the European Union, L 243, 9 July, pp. 1–17. Available at: <https://eur-lex.europa.eu/eli/reg/2021/1119/oj/eng>

³ Department of Climate, Energy and the Environment (2025) *Climate Action Plan 2025*. Dublin: Government of Ireland, p. 87. Available at: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/>

⁴ Department of Climate, Energy and the Environment (2021) *Policy Statement on Security of Electricity Supply*. November. Dublin: Government of Ireland. Available at: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/policy-statement-on-security-of-electricity-supply/>

electricity supply⁵. Consistent with this policy context, Ireland's Energy Security Framework and the strategy *Energy Security in Ireland to 2030* identify significant supply-side and demand-side risks facing the electricity system, particularly during periods of low wind and peak demand⁶. These documents emphasise the need to significantly increase dispatchable generation capacity to ensure uninterrupted energy supply for homes, communities and businesses as the electricity system becomes increasingly renewable-led.

Supporting Security of Supply During the Energy Transition

Within this system, peaker plants perform a vital function. While peaking generation entails limited short-term emissions, such plants typically operate at low load factors and are required only at times of system stress, making them essential to maintaining security of supply while the electricity system transitions to low-carbon generation. Renewables will increasingly meet Ireland's base electricity demand, but flexible generation remains essential when renewable output is low or demand is high. The development would connect directly to the national grid via an underground cable to the existing Cashla 220kV substation and would deliver approximately 325MW of flexible generation capacity, supporting secure electricity supply during periods when demand exceeds the capacity of installed renewable infrastructure. The proposed use of an open-cycle gas turbine technology is specifically suited for this type of operation, as it can be started and reach operating load quickly, making it appropriate for short, system-driven dispatch periods. By providing modern, highly flexible capacity that operates only when required by the electricity system, the proposed development supports a more efficient overall generation mix during the transition to a renewables-led grid.

In addition, the role of the project within the wider electricity system has been independently assessed through the all-island capacity market, operated by EirGrid, SONI and SEMO under the oversight of the electricity regulators. The capacity market is designed to ensure that sufficient generation capacity is secured to meet forecast demand and maintain security of electricity supply. While the award of a capacity contract does not confer any planning consent, it provides independent, regulator-led confirmation that the project forms part of the overall framework required to ensure electricity system adequacy and security of supply during the energy transition.

This project has also been designed with regard to Ireland's longer-term decarbonisation objectives. While assessed on the basis of operation using natural gas, the technology is designed to be technically compatible with alternative decarbonised gaseous fuels such as biomethane and hydrogen, subject to the future decarbonisation of the gas network and to policy evolution. This reflects Government

⁵ Department of Housing, Local Government and Heritage (2021) *Circular PL 12/2021: Government Policy Statement on Security of Electricity Supply*. 10 December. Dublin: Government of Ireland. Available at: <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/circulars/circular-pl-122021-government-policy-statement-on-security-of-electricity-supply/>

⁶ Department of Climate, Energy and the Environment (2023) *Energy Security in Ireland to 2030*. November. Dublin: Government of Ireland. Available at: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/energy-security-in-ireland-to-2030/>

policy and Gas Networks Ireland strategies, including the National Biomethane Strategy (2024)⁷ and GNI's Pathway to a Net Zero Carbon Network⁸, and supports Ireland's net-zero strategy.

Supporting Regional Development, Investment, and Competitiveness

Beyond its role in the electricity system, reliable energy infrastructure underpins economic activity, employment and regional development. The proposed project, located west of Athenry in County Galway, would generate employment during both the construction and operational phases, contributing positively to the regional economy. Local impact assessments have been addressed in detail through an Environmental Impact Assessment Report. These issues have therefore been fully considered.

More generally, the availability of a secure and reliable electricity supply is a key determinant of investment decisions by both domestic and international firms. Recent research indicates that 68% of Irish businesses cited fears around long-term energy availability⁹, highlighting the growing importance of energy availability and reliability to business confidence and competitiveness. Similar concerns, if shared by international investors, risk undermining Ireland's attractiveness as a location for enterprise. Projects that support grid flexibility and electricity generation at peak demand therefore contribute directly to Ireland's continued competitiveness and economic growth.

Timely Delivery of Strategically Important Energy Infrastructure

The Government has acknowledged that the delivery of electricity infrastructure is foundational to regional development and national competitiveness. Both Government and independent bodies, including the IEA have also highlighted that the lack of a speedy and predictable planning and consenting regime was a major bottleneck for energy infrastructure in Ireland¹⁰. In response, the Government's Accelerating Infrastructure Report and Action Plan recognises the need to streamline the consenting and delivery of critical infrastructure, including electricity generation in order to support economic growth¹¹. Increased delays for critical energy infrastructure inevitably brings about increased renewable curtailment, higher system costs, and inevitably reliance on emergency measures when electricity supply is too low

⁷ Department of Climate, Energy and the Environment and Department of Agriculture, Food and the Marine (2024) National Biomethane Strategy. May. Dublin: Government of Ireland. Available at: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publication/national-biomethane-strategy/>

⁸ Gas Networks Ireland (GNI) (2022) *Pathway to a Net Zero Carbon Network*. Dublin: Gas Networks Ireland. Available at: <https://www.gasnetworks.ie/sites/default/files/docs/renewable/Pathway-to-a-Net-Zero-Carbon-Network.pdf>

⁹ EY Ireland (2025) *Rising business energy demand creates both challenges and opportunity for providers*. 27 June. Dublin: Ernst & Young. Available at: https://www.ey.com/en_ie/newsroom/2025/06/rising-business-energy-demand-creates-both-challenges-and-opportunity-for-providers-ey

¹⁰ International Energy Agency (IEA) (2025) *Ireland 2024: Executive summary*. Paris: IEA. Available at: <https://www.iea.org/reports/ireland-2024/executive-summary>

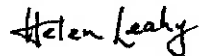
¹¹ Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation (2025) *Accelerating Infrastructure Report and Action Plan*. Dublin: Government of Ireland. Available at: <https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/publications/accelerating-infrastructure-report-and-action-plan/>

compared to demand. Given its alignment with national energy security policy, the timely delivery of the Cashla Peaker Project is therefore of particular importance.

Ibec has been briefed as part of the project's extensive stakeholder engagement and has been kept informed as the project has progressed. As the project now reaches the planning approval stage, and for all reasons set out above, Ibec's West Regional Executive Council supports the proposed Cashla Peaker Project and believes it represents a necessary response to Ireland's current and future electricity system needs. We respectfully encourage the granting of planning approval for this strategically important development which will allow flexible electricity generation and contribute to the wider objectives of the climate transition.

Yours sincerely,

Helen Leahy

A handwritten signature in black ink that reads "Helen Leahy". The signature is written in a cursive style with a prominent initial 'H'.

Head of Regional Policy

CC: Ibec West Regional Executive Committee