

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Jane Molloy Kilbane

71 The Glade

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 10 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 2.87km from the proposed site of the Cashla Peaker Plant (Athenry).

My name is Jane Molloy Kilbane, and I live at 71 The Glade, Athenry.

I have made a conscious effort to contribute positively to the environment by investing in solar panels in my home, doing my part to reduce emissions and support sustainable living. I am therefore very concerned about any development that may undermine these efforts and negatively impact the local environment.

I live with my two children. My daughter attends Clarin College Athenry, and my son commutes daily to college. Their health, safety, and future in this community are extremely important to me.

I currently work in a childcare facility, where I see first-hand the importance of a safe and healthy environment for young children. I am particularly concerned about the potential impact of this development on air quality, as children spend time outdoors playing and are especially vulnerable to pollution.

In addition, I have serious concerns about:

- Air pollution, and its impact on children, families, and the wider community
- Water pollution, which could affect local supplies and environmental safety
- Increased traffic and road safety, particularly for families, commuters, and young people

Given my role working with young children, my responsibility as a parent, and my commitment to

environmental sustainability, I am deeply concerned about the potential health and environmental impacts of this development on our community.

For these reasons, I strongly oppose any development that poses risks to public health, environmental quality, and community safety in Athenry.

I object to this development and set out my concerns below.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NOx) and fine particulate matter (PM2.5 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.

Water & Groundwater

Risk of Groundwater Contamination from Fuel Storage and Handling

A peaker plant requires the storage and handling of fuels such as diesel, lubricating oils, and other chemical substances, all of which present potential contamination risks. These substances may enter the ground through leaks, spills, or contaminated surface runoff, particularly over the long operational lifespan of the facility (until at least 2050). Even minor but repeated incidents can lead to the gradual accumulation of pollutants in soil and groundwater. Once groundwater contamination occurs, it is extremely difficult and costly to remediate, and impacts can persist for decades. This raises serious concerns under Directive 2000/60/EC, which requires the protection of water bodies and the prevention of deterioration in water quality.

Children & Health

Cumulative Impact on Child's Development

Fine particulate matter can travel significant distances and accumulate over time, meaning children may be exposed not only during peak events but also through repeated low-level exposure. The cumulative effect of these exposures is particularly concerning during key stages of physical development, where long-term impacts on lung function and overall health may arise.

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.

Fire Safety & Major Accident Hazards

Proximity and Worst-Case Scenario Risks

The proposed site is in proximity to residential dwellings, agricultural lands, and local infrastructure. In this context, even a low-probability but high-impact event could result in serious consequences for public safety, property, and rural economic activity. The Environmental Impact Assessment does not clearly demonstrate that worst-case scenarios, including fire spread, explosion impact zones, and fuel ignition events, have been fully assessed. Without this information, the true scale and severity of potential impacts remain uncertain.

Emergency Response and Adequacy of Assessment

There is insufficient information provided regarding emergency response planning, including evacuation procedures, coordination with local emergency services, and the ability to respond effectively to a major incident. This is of particular concern in a rural area with constrained road infrastructure. Taken together, the absence of detailed worst-case analysis and robust emergency planning means it has not been demonstrated that risks to human health and safety have been reduced to an acceptable level.

Visual Impact & Landscape

Impact on Residential Amenity and Long-Term Visual Change

The development will be visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This may affect residential amenity, enjoyment of the area, and the overall character of the landscape. Given the long operational lifespan of the development (until at least 2050), these visual impacts will be enduring and cannot be easily mitigated. The introduction of industrial lighting, structures, and activity into a rural setting represents a long-term change that should be carefully considered.

Climate Impact

Availability of Cleaner Alternatives

Cleaner and more sustainable alternatives to fossil fuel generation are available, including renewable energy, energy storage, demand response, and grid flexibility measures. The development of new gas infrastructure may reduce the urgency to deploy these solutions. In the context of the climate crisis, priority should be given to low-carbon alternatives rather than extending reliance on fossil fuels.

Community Engagement

Failure to Meet Aarhus Convention Standards

Under the Aarhus Convention, the public has a right to access environmental information and to participate effectively in environmental decision-making. This requires not only the provision of information, but that such information is understandable, accessible, and provided in a timely manner. In this case, the consultation process does not appear to meet these standards. The complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, has restricted meaningful public participation.

This raises concerns regarding compliance with fundamental principles of transparency, accessibility, and public engagement in environmental decision-making.

Planning & Assessment

Failure to Properly Assess Cumulative and Long-Term Impacts

The Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods. The long-term (until at least 2050) and cumulative nature of these impacts has not been fully considered, limiting the ability to understand the true environmental burden of the development. This represents a significant gap in the assessment.

Reliance on Regulation Does Not Eliminate Risk

The Environmental Impact Assessment relies on future regulation, licensing, and monitoring to control environmental impacts. However, regulatory oversight does not eliminate environmental risk or guarantee that real-world emissions and impacts will align with modelled predictions. There remains uncertainty regarding how the development will perform in practice over time, particularly under varying operational conditions.

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, appearing to read 'Jane Molloy Kilbane', written in a cursive style.

Name: Jane Molloy Kilbane
Date: 10 April 2026