



## **OBSERVATION/SUBMISSION TO PLANNING APPLICATION**

**Case Reference: 324113**

Joan O'Connor, Children's Language Development Preschool  
Garrai Glas  
Tuam Road  
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H65PW95

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

Date: 22 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 3.19km from the proposed site of the Cashla Peaker Plant (Athenry).

I am the Manager of the Children's Language Development preschool in Athenry. We opened in 2018 in Moyvilla, Oranmore and relocated to Athenry in October 2020. We currently have an enrolment of 37 children and employ 13 staff.

We are a specialised service who cater for children between the ages of 2 and a half and 6 years of age, all of who present with communication needs. We offer classes for children diagnosed with Autism.

The children attending our setting come from all parts of Galway City and County. We also have children attend from neighbouring counties as we are a unique service offering early intervention to children.

The children attending our service are vulnerable children and often present with medical needs so we have huge concerns about a Power Plant being located only 3km from our service.

Our children spend a good part of their day outside in our play area and we have concerns about the air pollution that is linked to a power plant.

Also our children have sensory needs, many children experience noise sensitivities, which is another concern of ours.

We as an organisation are strongly opposed to the plan of having a Power Plant in Athenry.

## **Human Health & Air Pollution**

### **Short-Term Exposure**

I'm concerned that emissions from the planned peaker plant could impact the environment, particularly if diesel is used at start-up or during periods of high demand. Diesel exhaust releases various dangerous pollutants, such as nitrogen oxides, fine particles, and other toxic chemicals. These substances are associated with respiratory issues, impaired lung function, and heart disease. What is especially worrying is that these emissions may occur in short but intense bursts rather than in a steady, predictable way, particularly during start-up and peak operation. The average-based modelling used in the assessment seems not to capture this kind of real-world operation completely.

There are worries that residents in nearby areas might face greater pollution levels than expected, especially when the weather is calm and pollutants linger instead of spreading out. There is considerable uncertainty regarding how accurate these air quality forecasts are, which makes it hard for the community to be sure that both public health and the environment are truly safeguarded.

### **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.

### **Long-Term Accumulation of Pollutants and Chemical Residues**

I am particularly concerned about the risk of pollution to soil and groundwater from this proposed development. The inclusion of diesel storage tanks, hardstanding areas, drainage systems, and other infrastructure increases the likelihood that pollutants could gradually enter the ground over time, potentially up to 2050. Substances such as hydrocarbons from diesel and gas, along with other chemical residues, may build up slowly, particularly where there are repeated small leaks, routine operational losses, or occasional spills, with impacts accumulating over time.

What is especially worrying is that this type of pollution may not be immediately visible but could result in long-term damage to groundwater quality and soil health. This has implications not only for environmental protection but also for local agriculture, which depends on clean soil and water. Overall, there is significant concern that these long-term and cumulative risks have not been fully addressed and could have lasting consequences for the local environment and livelihoods.

## 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**

#### **Increased Heavy Traffic and Diesel Transport Risks**

As someone who lives locally and uses this road, I am concerned about road safety in relation to the proposed entrance on the L3103. This stretch of road is already extremely narrow, with no hard shoulder, making it difficult for two heavy goods vehicles to pass safely and leaving no margin for error. Visibility is also poor due to blind dips and sharp bends, meaning drivers often cannot see oncoming traffic in time. The proposed development would increase traffic levels, including heavy goods vehicles, construction traffic, and fuel deliveries such as diesel tankers, all of which require space and clear sightlines that this road does not provide.

Given that these rural roads are used by residents, farm machinery, and school-related traffic, the addition of significant industrial traffic would increase the risk of accidents and create a more hazardous environment. Overall, there is strong concern that the existing road infrastructure is not suitable for this level of traffic and that the associated safety risks have not been adequately addressed.

#### **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.

#### **Inadequate Assessment of Traffic Impacts**

The placement of a site entrance at this hazardous location on the L3103 raises serious safety concerns. The road is already constrained by its narrow width, the absence of a hard shoulder, and extremely poor visibility due to blind dips and sharp corners, yet the Environmental Impact

Assessment does not appear to fully address the safety implications of introducing an access point at this location. There are also concerns that the cumulative impact of additional traffic has not been properly assessed, including construction traffic, ongoing operational traffic, and fuel deliveries, and the interaction between heavy goods vehicles and existing road users—such as local traffic, school-related movements, and agricultural machinery—has not been examined in sufficient detail. Overall, the lack of a thorough and robust traffic safety assessment creates significant uncertainty as to whether the local road network can safely accommodate this development.

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

### **Proximity and Worst-Case Scenario Risks**

There are serious concerns about the location of this proposed development, given its proximity to residential homes, agricultural land, and local infrastructure. In this context, even a low-probability event could have serious consequences for public safety, property, and the local rural economy. While such incidents may be unlikely, the potential impact of events such as fire, explosion, or fuel-related incidents could be significant, particularly given how close the development is to where people live and work. The Environmental Impact Assessment does not clearly demonstrate that worst-case scenarios have been fully examined, with limited detail on potential fire spread, explosion impact zones, and fuel ignition risks. Without this information, the true scale and severity of potential impacts remain unclear, giving rise to significant concern about the level of risk associated with the development.

## **Climate Impact**

### **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.

### **Ineffective Engagement and Limited Opportunity to Participate**

There are concerns that, while documentation has been made available, the approach to community engagement has not ensured meaningful or effective participation. Many residents were not directly informed of the development, and engagement appears to have relied on passive methods rather than proactive outreach. Opportunities to engage were limited and may not have reached all affected individuals, particularly those without the time, resources, or technical background to interpret the material. Effective consultation requires early, inclusive, and accessible engagement with the community, and it does not appear that this standard has been achieved in this case.

## **🔗 Planning & Assessment**

### **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.

### **Failure to Properly Assess Cumulative and Long-Term Impacts**

There are concerns that the Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and ongoing environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods, yet this interaction has not been fully examined. The long-term nature of the development, potentially extending to at least 2050, further increases the importance of understanding these cumulative effects. Without a comprehensive assessment, it is difficult to fully understand the overall environmental burden of the project, and this represents a significant gap in the evaluation.

### **Lack of Worst-Case Assessment**

The Environmental Impact Assessment bases its findings on expected operating scenarios instead of evaluating the worst-case possibilities. Because the plant's operation will depend on electricity demand, it's unclear how often or how intensely it might run. This uncertainty also applies to diesel usage, which could produce higher emissions than those estimated. Without a thorough assessment of the most severe potential impacts, it is impossible to guarantee that major environmental effects will not happen.

### **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: Joan O'Connor, Children's Language Development Preschool

Date: 22 April 2026