

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Kay O'Brien  
98 the glade  
athenry  
Galway  
H65 H562

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

Date: 18 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,

As an older person with chronic obstructive lung disease, I am vulnerable to the impact of the proposed peaker plant. I am conscious of the need to protect my future health. Introducing a new source of industrial air pollution into the local area causes me great concern. Emissions associated with gas combustion and diesel testing are known to effect air quality and for someone with a medical history like mine, the risk of additional long term exposure is worrying. Clean air is not a luxury, it is essential, particularly for those who have already an existing lung condition.

In recent years I have become dependent on care in the home and access to reliable, safe road networks is critical for me. I am concerned about the possible reliance on hospital admission and about the added stress this facility could bring to our already overstretched public health services as pollutants are linked to stroke and heart disease.

Finally, I am worried about fire and safety risks, given the storage and burning of large volumes of diesel fuel close to homes and community facilities.

For the reasons outlined above (health, access, community wellbeing and safety), I strongly object to the Cashla Peaker Plant.

## **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.

## **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.

## **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.

## **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.

### **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.

### **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.

### **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.

### **Complexity of EIAR and Barriers to Public Understanding**

There are concerns that, while the development is presented within a single Environmental Impact Assessment Report, the scale, volume, and complexity of the documentation make it extremely difficult for the public to understand the project as a whole. The high level of technical detail, combined with the way the information is structured, creates a significant barrier to meaningful engagement. Although the material is not formally divided into separate reports, the practical effect is similar to fragmentation, as it is not easy to assess the cumulative impacts across all aspects of the development. This raises concerns regarding transparency and accessibility within the planning process.

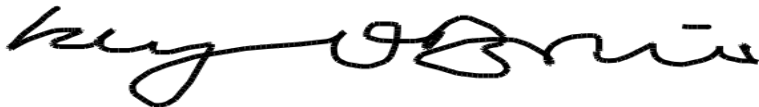
### **Diesel Use Not Fully Assessed or Limited**

Diesel is used beyond emergencies, including routine tests and operations. This leads to extra emissions, odours, and environmental risks not fully covered by the Environmental Impact Assessment. The frequency and impact of diesel use are unclear, making the total environmental effect uncertain.

### **Conclusion**

The proposal raises important concerns about environmental protection, public health, agriculture, road safety, and community welfare. Due to uncertainties regarding how often operations would occur, diesel usage, and overall impacts, this development cannot be considered acceptable. A thorough and cautious assessment is needed to ensure that significant environmental effects are avoided, but such an evaluation has not been conducted. Therefore, I recommend that approval for this development be refused.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Kay O'Brien". The signature is fluid and cursive, with a long horizontal stroke extending from the start of the name.

Name: Kay O'Brien

Date: 18 April 2026