Re: Proposed Cashla Peaker Plant, Athenry
Planning Reference: 324113

Dear Sir/Madam,

I wish to make a formal submission to An Coimisiún Pleanála regarding the proposed Cashla Peaker Plant in Athenry.

I am a resident living approximately 12km outside Athenry with my family. Our daily lives are closely tied to the town. We regularly use local amenities including schools, healthcare services, shops, and community facilities. My children will attend secondary school in Athenry, and our family relies heavily on access to the M6 motorway via Exit 17 and Exit 18 for essential journeys, including medical appointments for our two neurodiverse children.

Given this proximity and reliance, I have serious concerns regarding the potential impacts of the proposed development.

1. Air Quality and Public Health

The operation of a peaker plant raises significant concerns regarding emissions of nitrogen oxides (NOx), sulphur dioxide (SO_2), and fine particulate matter (PM2.5), all of which are linked to respiratory and cardiovascular illness.

Under the **EIA Directive 2014/52/EU**, the EIAR must provide a complete and definitive assessment of impacts on human health.

However:

- The intermittent classification of a peaker plant does not ensure low emissions exposure
- Increased reliance on backup generation may result in higher-than-assessed operational frequency
- Worst-case scenario modelling is not clearly demonstrated

Children are especially vulnerable to poor air quality. Evidence from comparable peaker plants internationally has shown elevated rates of asthma-related hospitalisations in nearby communities.

There is also concern that such plants, while described as operating intermittently, may operate more frequently in practice, increasing long-term exposure risks.Given that my children will be attending secondary school in Athenry, I am deeply concerned about the long-term health implications of introducing such a facility in close proximity to residential areas and schools. The EIAR must demonstrate with certainty that air quality will not be adversely affected; however, uncertainty remains.

Conclusion: The EIAR does not adequately demonstrate that air quality and public health will not be adversely affected.

2. Traffic, Road Safety and Cumulative Impacts

The EIAR acknowledges that there is a shared section of approximately 2.2 km of local road network (including the L7108 and L7109) between the proposed development and the proposed Gannow Ltd Wind Farm development grid connection,in appeal currently with ACP Case Number 500493. It further confirms that cumulative construction impacts will arise, including full road closures, with disruption lasting up to seven months and resurfacing works extending for approximately four months .

While the EIAR categorises these impacts as temporary and mitigated, this conclusion does not adequately reflect the real constraints of the local road network.

These roads are:

- Narrow, with single-lane sections and pinch points
- Serve a national school, pre-school, and community facilities
- Include infrastructure such as bridges that cannot accommodate two large vehicles simultaneously
- Have a history of structural damage from heavy construction traffic from the M6 Motorway construction

The EIAR does not sufficiently demonstrate:

- How emergency vehicle access will be maintained during closures
- How safe access for schoolchildren, pedestrians, and cyclists will be ensured
- That traffic diversion routes have the capacity to safely accommodate displaced traffic

- Structural resilience of the road network
- That mitigation measures will be effective in practice

Conclusion: The duration and scale of disruption cannot reasonably be considered insignificant in a rural community context. The cumulative assessment is therefore incomplete and understates the real-world impact on population, safety, and infrastructure.

3. Strategic Transport Risk (M6 Motorway Access)

The development introduces potential risks to the M6 and M18 motorway,a critical route relied upon for emergency services, healthcare access and daily commuting.

There is insufficient assessment of:

- Incident scenarios (fire, explosion, or fuel spill)
- Potential disruption to motorway access
- Contingency planning for such disruption

Conclusion: The EIAR fails to adequately assess risks to critical transport infrastructure.

4. Major Accident Risk and COMAH Considerations

The proposal includes storage of significant quantities of diesel, introducing risks of:

- Fire and explosion
- Environmental contamination

Clarification needs to be sought on the following issues:

- Whether the development falls under the scope of the **COMAH** (Control of Major Accident Hazards) Regulations
- What specific safety measures are proposed in relation to fuel storage
- What emergency response plan is in place in the event of a major incident
- What preparedness and response capacity exists within the local fire brigade

Under the **Seveso III Directive 2012/18/EU**, such risks must be robustly assessed.

The EIAR does not clearly demonstrate:

- Whether COMAH thresholds apply
- Quantitative risk assessment of major accident scenarios
- Emergency response capacity

Chief Fire Officer for Galway County Council has publicly addressed concerns on ability to correctly and safely attend industrial fires.Given the damage to the Firefighters who attended the Xerotech lithium battery fire in Claregalway 31st January 2025,it was demonstrated that the Galway County Fire Service or any Fire Service in the country are prepared for such an event.

Galway East in particular is a high risk area due to the vast Peatland surrounds and potential cumulative impacts with the proposed Belville Solar Development in the Monivea/Abbeyknockmoy with large Battery Energy Storage,Gannow Ltd proposed sub station in Attymon and more developments coming to planning such as Woodlawn and Gurteen Windfarms.

Conclusion: The assessment of major accident risk is inadequate and the potential consequences of a fire or fuel-related incident are severe and must be fully and transparently assessed.

5. Project Splitting and Grid Connection

The development is functionally dependent on grid infrastructure connecting to Cashla Substation.

Under EU law, including **People Over Wind v Coillte C-323/17**:

- Projects must be assessed as a whole
- Functional interdependence requires integrated assessment

The separation of the plant and grid connection raises a risk of **unlawful project splitting**, particularly if cumulative impacts are not fully assessed.

Conclusion: The Board cannot be satisfied that the project has been assessed in its entirety.

6. Hydrology and Water Quality

The Natura Impact Statement acknowledges a "precautionary assumption" that groundwater from the proposed project could drain into nearby water bodies, identifying a potential hydrological pathway.

This is particularly concerning given the proximity of the River Clarin and its connection to the Galway Bay Complex SAC. Any contamination event could have far-reaching consequences across interconnected water systems and sensitive ecological areas.

The identification of pathways to designated sites highlights uncertainty. Mitigation measures do not eliminate risk, and the precautionary principle must be applied.

Under the **Water Framework Directive 2000/60/EC** and Habitats Directive:

- There must be no deterioration in water quality
- Effects must be excluded beyond reasonable scientific doubt

The reliance on mitigation and precautionary assumptions is insufficient.

Conclusion: Compliance with EU water protection and habitats law has not been demonstrated.

7. Biodiversity and Protected Species

Ecological surveys identify several Special Conservation Interest bird species in the vicinity, including:

- Hen Harrier *(Circus cyaneus)* – amber-listed
- Golden Plover *(Pluvialis apricaria)* – red-listed
- Snipe *(Gallinago gallinago)* – red-listed
- Lesser Black-backed Gull *(Larus fuscus)* – amber-listed

Conclusion: The presence of these species indicates ecological sensitivity. Potential impacts from noise, disturbance, and habitat change must be fully assessed and cannot be dismissed as negligible without robust supporting evidence.

8. Badgers, Agriculture and Indirect Impacts

Badgers are a protected species, and disturbance to habitat may:

- Displace populations
- Increase movement patterns
- Contribute to concerns regarding TB transmission in cattle

Given proximity to agricultural lands,Athenry Mart and the Teagasc campus, these impacts warrant assessment.

9. Cumulative Development in East Galway

The EIAR does not adequately assess cumulative impacts with:

- Existing and proposed wind energy developments in East Galway
- Solar developments in the wider area
- Grid intensification at Cashla Substation

Conclusion: The cumulative assessment is incomplete and does not reflect actual development pressure.

10. Heritage and Tourism Impact

Athenry is a medieval historic town of cultural significance.

The introduction of industrial infrastructure may:

- Undermine the town's character
- Impact tourism and amenity value
- Affect built heritage through environmental change,building vibrations and changes to the water table

11. Fuel Security and Sustainability

The reliance on diesel introduces:

- Supply chain uncertainty in a current fuel security crisis

- Conflict with national and EU climate policy
- Why take the risk to grant permission to this development when operation is not guaranteed in the future.

Conclusion: The development raises serious concerns regarding long-term sustainability and strategic fit.

12.Machinery Directive concerns

While all plant and equipment associated with the proposed development should be required to comply with the **Machinery Directive 2006/42/EC,** such compliance relates to individual components and does not address the broader risks associated with the integration and operation of complex industrial systems at this location.

In this regard, the EIAR fails to demonstrate, at a system level, that risks associated with mechanical failure, control system malfunction, or interaction between plant components have been fully assessed, particularly in the context of major accident scenarios. This deficiency reinforces concerns regarding the adequacy of the overall risk assessment presented in the COMAH.

Summary

Having regard to:

- The requirements of the **EIA Directive 2014/52/EU**, **Habitats Directive 92/43/EEC**, and **Water Framework Directive 2000/60/EC**;
- The scale, nature and location of the proposed development;
- The deficiencies identified in the EIAR and Natura Impact Statement;
- The failure to adequately assess cumulative and interrelated impacts;

it is considered that:

1. The Environmental Impact Assessment is **inadequate**, failing to provide a complete and definitive assessment of likely significant effects on human health, traffic safety, major accident risk and infrastructure.

2. It cannot be excluded, beyond reasonable scientific doubt, that the proposed development would adversely affect the integrity of European sites, contrary to the Habitats Directive.
3. The proposed development gives rise to a risk of deterioration in water quality, contrary to the Water Framework Directive.
4. The assessment of major accident hazard is insufficient, and the Board cannot be satisfied that risks to public safety have been adequately addressed.
5. The proposed development raises a material risk of **unlawful project splitting**, due to the separation of functionally interdependent infrastructure.
6. The proposed development would give rise to unacceptable traffic and road safety impacts and would seriously injure the amenities of the area.
7. The development is not consistent with the proper planning and sustainable development of the area.

I respectfully request that An Coimisiún Pleanála carefully consider the risks to human health, environmental integrity, and long-term sustainability before making any decision on this proposal.

Yours sincerely,

Lisa McMullin,

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