

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Michael Freeney

Derrydonnell

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 04 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 3.91km from the proposed site of the Cashla Peaker Plant (Athenry).

Although I live 3.9 Km from this proposed site, I have a large farm holding bordering this proposed development. I am a Dairy farmer with 190 Cattle and I am a third Generation Farmer on our family land. Over the last number of years the dairy sector and farming in general has had to deal with derigation, banding system and introduction of the fertliser register and increased Board Bia inspections.

Derigation - Is a restriction put on dairy herds over the last number of years in an attempt to reduce the emissions coming from the dairy sector.

Banding - This came in 3 years ago and has a huge impact in the dairy sector as it catagories the various Dairy systems in an attempt to reduce emmisions also.

Fertliser Registration- This was introduced in 2024 in an attempt to control the levels of chemical emmision released into the athmosphere, which previousuly wasnt controlled. In addition, the push for the use of protected Urea is a further attempt to control the emmisions in the enviroment.

In taking all of the above measure into account, all my hard work and compliance will be outweighed 100 fold with the emissions released from buring Gas and Diesel in close proximity to my farm that supports my family. I have 3 young children who have a keen interest in farming and for the last 10 years we have been all over Ireland attending Dairy shows with our herd and we have won numerous prizes with our highly bred animals. This has given me enourmous pride and exceptional family memories. My dream is for one of my children to continue the dairy enterprise my Grandfather began in the 1950's. When I attended the open event ran by Bord Gais in the Raheen Woods Hotel, I was shocked to learn they will store 3.5M litres of Diesel onsite as 'Back-up' fuel for 72 hours burning. I was flabbergasted to calculate this as 48,000 litres of diesel per hour, how can this be good for the environment as diesel is a catagory 4 fuel. I further read on the submission the name the diesel as 'Low Sulphur' diesel to make it sound clean, however, this is the only diesel that cars within the EU run on since 2005.

I have researched and also my experience on the farm is Diesel goes off after 4 to 6 months depending on conditions stored. I was informed they would burn this diesel off and replace the diesel when empty. Furthermore, in our sector we have been adhering to the slurry ban over the last 20 years when we are unable to spread slurry to protect our waterways, which i support for the furure of all our children. Yet, we will burn fossil fuels in all kinds of weather regardless if it is raining or not. This will have an effect on our soil and pastures due to acid rain, and noting it raining on average 258 days in the West of Ireland as reported by Met.ie (https://www.met.ie/annual-climate-statement-for-2025#:~:text=The%20number%20of%20rain%20days*,days%20at%20Newport%2C%20Co%20Mayo.)

I know this site very well and I have walked these lands since the 1980's and have observed alot of animal species in this location, foxes, badgers, Hares, Rabbittes, Phesants andvarious types of birds. This land was fully 80% overgrown with furrs and bushes until recently. Any wildlife assessment completed after this land recreation, will not give a true reflection of is glorious past. I also note, the bat assessment completed was for just 14 days in one year and I have researched that a true Bat assessment should be conducted over at least 3 years and at different times. The report noted the bats were not foraging during this period, I belive they would have been foraging prior to the reclamination works.

Farming & Agricultural Impact

Derogation Limits

As a derogation farmer, I operate under strict limits and must comply with detailed environmental regulations. Any additional environmental pressure from nearby industrial activity, including emissions or contamination associated with diesel use, could increase nitrate levels and push farms beyond permitted limits. This may result in penalties, reduced stocking capacity, or loss of derogation status, despite full compliance with regulations. This creates an unfair burden on farmers who are already operating under strict controls.

Protection of Agricultural Livelihoods

Farmers are already subject to strict environmental regulation and are required to meet high standards of environmental protection. It is not acceptable that industrial development, including diesel use and associated emissions (until at least 2050), could introduce environmental risks that undermine compliance, damage land quality, or threaten farming livelihoods. Farmers should not be placed in a position where they are penalised for environmental impacts arising from activities outside their control.

Fire Safety & Major Accident Hazards

Risk of Fire and Explosion from Fuel Storage

The proposed development involves the storage, handling, and use of highly flammable fuels, including natural gas and diesel, which present inherent risks of fire and explosion. In the event of equipment failure, leakage, or operational malfunction, these substances could ignite and result in a serious incident. Given the high-intensity and intermittent operation of a peaker plant, the potential for such events cannot be dismissed. The consequences for nearby homes, people, farmland, and livestock could be significant.

Visual Impact & Landscape

Landscape Character and Policy Conflict

The proposed development represents a significant industrial intrusion into a rural landscape characterised by agricultural land use and dispersed residential development. The scale, height, and industrial nature of the plant, including associated infrastructure such as buildings, stacks, lighting, and fuel storage, will fundamentally alter the character of the area. This type of development does not appear consistent with the existing landscape or its capacity to absorb such change. This raises concerns under Policies LCM1, LCM2 and LCM3 of the Galway County Development Plan, which require the protection of landscape character, sensitivity, and capacity, and seek to ensure that development is appropriate to its setting.

Climate Impact

Conflict with National and EU Climate Targets

Ireland has legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021 and 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. This raises concerns regarding consistency with national carbon budgets and the State's ability to meet its climate targets.

Lack of Worst-Case Assessment

The Environmental Impact Assessment relies on assumed operational scenarios rather than assessing worst-case conditions. Given that the plant will operate in response to electricity demand, there is no certainty regarding how frequently or intensively it will operate. This includes diesel use, which may result in higher emissions than those modelled. In the absence of a robust worst-case assessment, it cannot be concluded that significant environmental impacts will not occur.

Precautionary Refusal Based on Uncertainty and Risk

The proposal raises significant concerns in relation to environmental protection, public health, farming, road safety, and community wellbeing. The level of uncertainty regarding operational frequency, diesel use, and cumulative impacts means that the development cannot be considered acceptable. In the absence of a complete and precautionary assessment, it cannot be concluded that significant environmental effects will not arise. I respectfully request that permission for this development be refused.

Yours Sincerely,

Michael Freney

Name: Michael Freney

Date: 04 April 2026