

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

MICHAEL LAWLOR

Palmerstown

Oranmore

Galway

H91E3HA

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 19 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,

I object to the proposed Cashla Peaker Plant at Rathmorrissety, Athenry. The negative impact of Peaker Plants on the residents living within close proximity to the pollutants has been validated by Jourdain J., 2022 'The Impact of Peaker Plants' concluded that the pollutants emitted from Peaker Plants (NOx & SO2) can trigger asthma and other lung diseases. The adverse effect of the pollutants emitted combined with the negative impact on water quality, disruptive and increased noise, unsafe and highly dangerous HGV usage of small country roads, contaminated land and the exposure of children from local school to the pollutants. It has been documented and validated by Kheirbek et al., 2016 that the exposure of the public, especially children to the pollutants is fatal 'Ambient fine particulate matter public health impacts in New York City: a health burden assessment') that the combustion of fossil fuels cause more than 3,000 deaths, 2,000 hospital admissions for lung and heart conditions and approximately 6,000 emergency visits for asthma in children and adults. This proposed development and the pollutants it produces is not welcome and can not be allowed to contaminate our location where children populate within the local school, the golfers are present and people reside in a currently safe environment.

High-Intensity Emissions and Diesel Impacts

I am concerned about the potential impact of air pollution from this proposed development. Pollutants such as nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10) are known to damage air quality, irritate the lungs, and contribute to long-term harm to both human health and the environment. Although the plant would not operate continuously, it may run at extremely high output when required, leading to short but intense bursts of pollution, particularly during start-up and peak demand periods. The possible use of diesel during these times is especially worrying, as it produces higher levels of harmful emissions, including nitrogen oxides, sulphur dioxide, and particulate matter.

These pollutants can penetrate deep into the lungs and enter the bloodstream, increasing the risk of respiratory and cardiovascular illness, particularly for vulnerable groups such as children, older people, and those with existing health conditions. Fine particulate matter can also travel long distances and accumulate over time, meaning the impacts may extend beyond the immediate area and persist in the long term. In summary, I have reservations regarding the thoroughness of the assessment of these emissions. This issue presents significant implications for public health and environmental protection, especially in relation to EU air quality standards established by Directive 2008/50/EC.

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.

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.

Risk of Fire and Explosion from Fuel Storage

As someone living in the area, I am very concerned about the safety risks associated with this proposed

development. The project involves the storage, handling, and use of highly flammable fuels such as natural gas and diesel, which carry an inherent risk of fire or explosion. In the event of equipment malfunctions, leaks, or operational challenges, these substances may pose an ignition risk, potentially resulting in significant incidents. Considering the intermittent yet high-intensity operation of a peaker plant, the likelihood of such occurrences warrants careful consideration.

The potential consequences are particularly worrying, as any incident could have serious impacts on nearby homes, residents, farmland, and livestock. This raises significant concerns about whether the risks have been fully assessed and whether this location is appropriate for a development of this nature.

Operational Uncertainty and Lack of Enforceable Limits

There are concerns that the Environmental Impact Assessment relies on assumed operational scenarios rather than fully assessing worst-case conditions. As the plant will operate in response to electricity demand, there is uncertainty regarding how frequently or intensively it may run, including periods when diesel will be used, potentially resulting in higher emissions than those modelled. Without a thorough evaluation of the worst-case scenario, it is not possible to confidently rule out the possibility of major environmental impacts.

Conclusion

Due to the concerns mentioned—such as uncertainty about how often operations will occur, overall environmental impacts, and risks related to diesel use—this project is not viewed as proper or sustainable development. There has also been insufficient consideration of the possibility that the actual impacts could be greater than those evaluated. Therefore, we respectfully ask that approval for this application be refused.

Yours Sincerely,

MIKE LAWLOR

Name: MICHAEL LAWLOR

Date: 19 April 2026