OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Michelle Kelly

Lisheenkyle East

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 10 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 am writing to object to the proposed Cashla Peaker Plant as a local parent and resident, deeply concerned about the long term health, safety and environmental impacts this developm our wider community.

I am the parent of seven year old twins, one of whom has asthma. Like man my children's health and the quality of the air they breathe as they grow up. The proposed peaker plant would introduce a new source of industrial air pollution into our area, including emissions known to irritate airways and worsen respiratory conditions. Even small or infrequent increases in pollution can have lasting effects on children's developing lungs, and for a child with asthma, the risk is far greater.

I am particularly concerned that this plant will also store and burn diesel fuel, including guaranteed annual diesel testing. Diesel emissions are among the most harmful to human health. Knowing that pollution events would occur every year — not just in emergencies — causes me real anxiety as a parent responsible for protecting my children's wellbeing.

Beyond my own family, I am very concerned about the impact on local schools and children in this area. Schools are places where children should feel safe and healthy, not exposed to additional pollution, noise, heavy traffic, or accident risks. Increased HGV movements, construction traffic, and road disruption raise serious safety concerns for school travel, pedestrians, cyclists, and buses.

The construction phase is also a major worry. Proposed road closures and traffic disruption would affect daily life for families, school runs, emergency access, farmers, and local businesses. Rural road networks are not designed for prolonged heavy industrial traffic, and the disruption described would place unnecessary strain on an already stretched community.

I am also troubled by the safety risks associated with this development. The storage of large volumes of diesel fuel classifies this site as a major accident hazard. The possibility of fire, explosion, or emergency evacuation — however remote — is not something I believe should be placed so close to homes, farms, and schools.

Finally, I am concerned about the environmental legacy of this project. App infrastructure to operate until 2050 contradicts efforts to protect our environment for future generations. Our children will inherit the consequences of decisions made today.

For these reasons — the health of my children, the safety of our schools, the disruption to our community, and the long term environmental impact — I strongly object to the Cashla P

Human Health & Air Pollution

Cumulative Health Impacts Over Time

The intermittent but high-intensity operation of a peaker plant, combined with periodic diesel use, can result in repeated short-term spikes in air pollution. While individual emission events may appear limited in duration, repeated exposure over time (until at least 2050) creates a cumulative health burden. Pollutants such as nitrogen oxides and fine particulate matter can worsen asthma, trigger respiratory symptoms, and contribute to long-term health impacts, including chronic respiratory disease and cardiovascular conditions. The cumulative effect of these emissions over the operational lifespan of the development has not been fully assessed, particularly in relation to long-term exposure pathways and sensitive populations living nearby.

Water & Groundwater

Long-Term Accumulation of Pollutants and Chemical Residues

The presence of diesel storage tanks, hardstanding areas, drainage systems, and associated infrastructure increases the risk of pollutants entering soil and groundwater over time (until at least 2050). Hydrocarbons (pollutants from gas, diesel) and chemical residues may accumulate gradually, particularly where there are repeated minor leaks, operational losses, or accidental discharges. These impacts may not be immediately visible but can result in long-term degradation of groundwater quality and soil health, affecting both environmental protection and agricultural productivity.

Children & Health

Vulnerability to Diesel-Related Air Pollution

Children are particularly vulnerable to air pollutants due to their developing lungs, higher breathing rates relative to body size, and increased time spent outdoors. The intermittent high-output operation of a peaker plant, particularly where diesel is used during start-up or peak demand periods, may expose children to short but concentrated bursts of pollution. Diesel emissions contain fine particulate matter and nitrogen oxides that can penetrate deep into the lungs, potentially affecting lung development and increasing the risk of respiratory illness.

Local Roads, Safety & Schools

School Safety and Peak-Time Risks

Positioning the site entrance at this location on the L3103 introduces extreme risk to road users. This treacherous section of the road is entirely devoid of a hard shoulder and is physically too narrow for two HGVs to pass one another safely. Furthermore, severely compromised sightlines caused by blind dips and sharp corners make this access point highly perilous. It is imperative that these severe, compounding traffic hazards are urgently mitigated before any development is permitted.

Additional traffic associated with the development may significantly increase risks near schools and residential areas, particularly during peak periods such as morning and afternoon school times. The interaction between heavy vehicles, farm machinery and local traffic creates a heightened risk of accidents, particularly for children and other vulnerable road users. This is especially concerning given the existing constraints and hazards on this section of road.

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.

Community Engagement

Ineffective Engagement and Limited Opportunity to Participate

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, which does not appear to have been achieved in this case.

Planning & Assessment

Absence of Worst-Case Scenario Assessment

The Environmental Impact Assessment relies on assumed or typical operational scenarios rather than assessing worst-case conditions. A peaker plant operates in response to electricity demand, meaning the

frequency, duration, and intensity of operation cannot be guaranteed. This includes the use of diesel during start-up, testing, or operational periods. As a result, actual emissions and environmental impacts may be significantly greater than those modelled. Without a robust worst-case assessment, it cannot be concluded that significant adverse environmental effects will not occur. This creates a fundamental gap in the assessment and undermines its reliability.

Diesel Use Not Fully Assessed or Limited

Diesel use is not limited to emergency scenarios and may include routine testing and operational requirements. This introduces additional emissions, odours, and environmental risks that have not been fully assessed in the Environmental Impact Assessment. The frequency and impact of diesel use remain unclear, creating uncertainty regarding the overall environmental impact of the development.

Protection of Community, Health, and Environment

This proposal raises real and valid concerns for people, public health, agriculture, and the local environment. The complexity of the documentation and limitations in community engagement have made it difficult for the public to fully participate in the decision-making process. Communities should not be exposed to uncertain and potentially significant environmental impacts. I strongly urge that planning permission is not granted.

Yours Sincerely,

Name: Michelle Kelly
Date: 10 April 2026