



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Millie Kennedy

(b) Observer's
postal address

15 Caheroyan Drive, Athenry, Co. Galway, H65HF99

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Coimisiún Pleanála case number for the current application (if available)**

(for example: 300000)

324113

- (b) **Name or description of proposed development**

Cashla Peaker Plant Athenry

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Click or tap here to enter text.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

This submission sets out a formal objection to the proposed Cashla gas-fired peaker power plant in Athenry.

The proposed development is inappropriate in both **location and function**, and poses significant risks to:

- **Public health**, particularly for children and vulnerable populations
- **Air quality**, due to emissions of NOx and fine particulate matter
- **Climate commitments**, through the expansion of fossil fuel infrastructure
- **Sustainable planning**, given Athenry's role as a growing commuter town
- **Community wellbeing**, due to proximity to schools and residential areas

International evidence demonstrates that peaker plants are associated with **elevated asthma rates and respiratory illness**, especially among children living nearby. Irish examples further show that such plants often operate **far more frequently than initially projected**, undermining claims of limited use.

There is also strong concern that the plant will primarily support **data centre demand**, rather than acting as occasional backup generation for households.

The development is therefore:

- **Contrary to Ireland's Climate Action Plan and emissions targets**
- **Inconsistent with EU climate law and air quality directives**
- **Misaligned with proper planning and sustainable development principles**

For these reasons, refusal of planning permission is warranted.

Athenry is designated as a key growth area within commuting distance of Galway City. Its development pattern reflects:

- Expansion of housing and family-oriented communities
- Increased reliance on sustainable planning principles
- Protection of heritage and town character

5. Grounds

The siting of a fossil-fuel power plant in this context is incompatible with the town's strategic direction.

Gas-fired peaker plants emit:

- Nitrogen oxides (NOx)
- Fine particulate matter (PM2.5)
- Volatile organic compounds

These pollutants are strongly linked to adverse health outcomes.

Health Impacts

Peer-reviewed research in environmental health has established that:

- Long-term exposure to PM2.5 increases mortality risk (Pope et al., 2002; Dockery et al., 1993)
- NOx exposure is associated with respiratory disease and asthma exacerbation (WHO, 2021)
- Children are disproportionately affected due to physiological vulnerability

Evidence from Peaker Plants (New York Study)

A 2022 report from the City College of New York, titled:

“The Impact of Peaker Plants on New York City Residents”

found that:

- Communities located near peaker plants experience elevated exposure to harmful pollutants
 - These communities face higher rates of respiratory illness
 - Children in high-exposure areas show significantly increased asthma severity
- Supporting epidemiological research indicates that children living in high-pollution areas may be **up to three times more likely to experience severe asthma outcomes.**

Evidence from Irish gas peaker plants demonstrates a divergence between projected and actual use.

Tawnaghmore Power Station (Co. Mayo)

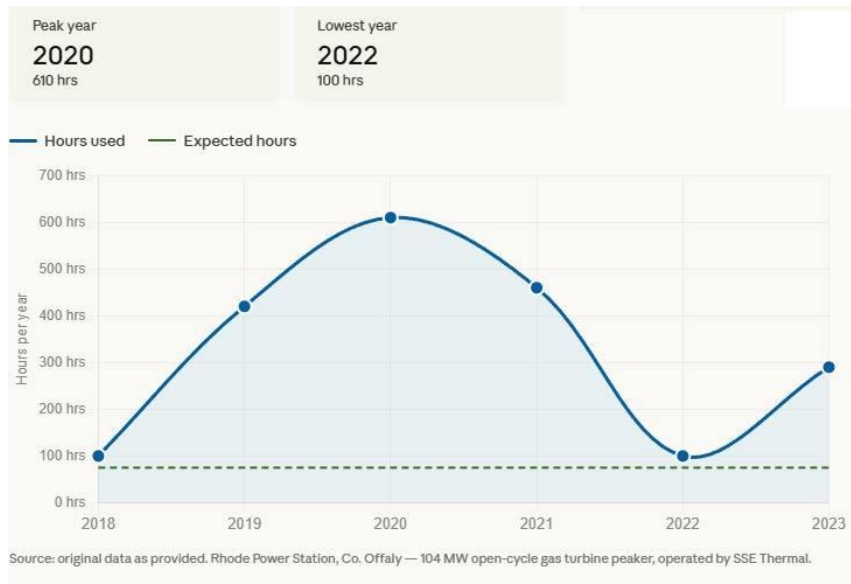
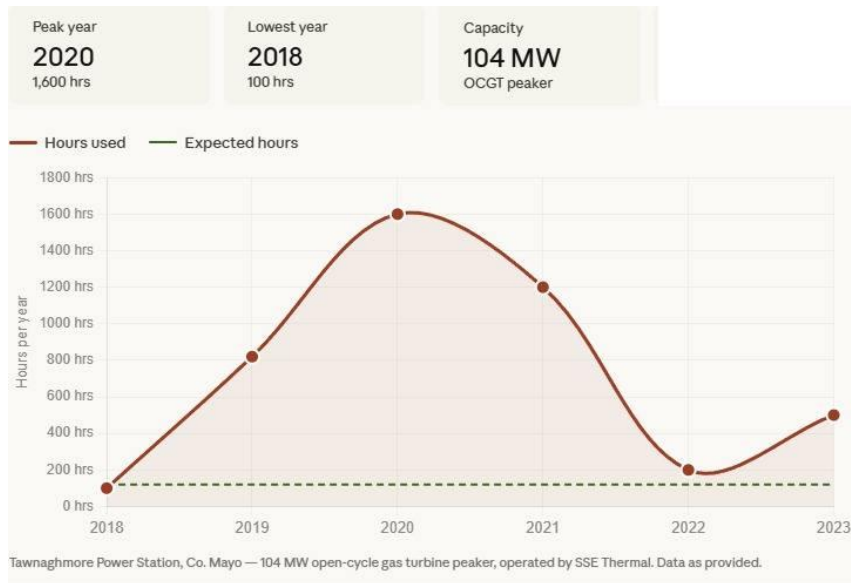
- 104 MW OCGT
- Initially projected: ~100 hours/year

Rhode Power Station (Co. Offaly)

- 2 × 52 MW OCGT

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- Similarly projected for limited annual operation



These examples illustrate that:

- Peaker plants are frequently used beyond initial expectations
- Demand pressures increase operational hours
- Communities are exposed to sustained emissions rather than occasional use

There is growing evidence that gas peaker plants are increasingly used to support:

- Data centres

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- High-demand industrial electricity loads

Ireland has experienced rapid expansion in data centre energy consumption, raising concerns about:

- Grid stability
- Fossil fuel reliance
- Displacement of community-focused energy priorities
- Forecasts by EirGrid indicate this could rise to **over 25% by 2030**.

This level of demand has already:

- Placed significant strain on grid capacity
- Led to constraints on new connections in the Dublin region
- Increased reliance on dispatchable fossil fuel generation

Gas peaker plants are increasingly used to:

- Stabilise supply for large, continuous industrial loads
- Compensate for demand spikes driven by data centres

It is therefore reasonable to conclude that: The proposed development will facilitate high-energy industrial demand, rather than serving as occasional backup for residential users.

This raises a serious planning concern:

- **Local environmental and health impacts are being imposed to support private, energy-intensive infrastructure**

The Board has previously considered **cumulative and indirect impacts** as material considerations. The linkage between this development and data centre expansion must therefore be fully assessed.

Irish Policy

The proposal conflicts with key national policy frameworks, including:

- **Climate Action Plan 2023**
 - Commits to a 51% reduction in greenhouse gas emissions by 2030
 - Emphasises transition away from fossil fuels
- **National Planning Framework (NPF)**
 - Promotes sustainable growth and low-carbon development
- **Clean Air Strategy for Ireland**
 - Aims to reduce harmful air pollution and protect public health

EU Policy

The development is also inconsistent with:

- **European Climate Law**
 - Legally binding target of climate neutrality by 2050

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- **EU Ambient Air Quality Directive (2008/50/EC)**

- Requires reduction of pollutants harmful to human health

- **Fit for 55 Package**

- Targets significant emissions reductions across member states

The construction of new fossil fuel infrastructure is fundamentally at odds with these obligations.

The proximity of the proposed development to schools raises serious concerns:

- Increased exposure of children to air pollution
- Potential long-term health consequences
- Reduced quality of life for families

Planning decisions must prioritise the protection of vulnerable populations.

Heritage and Town Character

Athenry is a historic town with significant cultural value.

The introduction of industrial energy infrastructure risks:

- Visual and environmental degradation
- Reduced attractiveness for residents and visitors
- Conflict with heritage preservation objectives

Conclusion

The proposed development represents:

- **A public health risk**
- **A regressive environmental decision**
- **A misalignment with planning policy**
- **A threat to sustainable community development**

It is respectfully submitted that:

Planning permission Ref: 324113 should be refused in the interests of public health, environmental protection, and proper planning and sustainable development.

Supporting Evidence and Citations

Air Pollution and Health

- Dockery, D.W. et al. (1993)

"An Association between Air Pollution and Mortality in Six U.S. Cities"

New England Journal of Medicine

5. Grounds

- Pope, C.A. et al. (2002)
“Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particulate Air Pollution”
JAMA
- World Health Organization (2021)
Global Air Quality Guidelines

Peaker Plants and Environmental Justice

- City College of New York (2022)
The Impact of Peaker Plants on New York City Residents
https://files.commonsc.gc.cuny.edu/wp-content/blogs.dir/21083/files/2022/05/Final_Tech-Memo.docx.pdf
- Clean Energy Group (2020)
The Peaker Problem

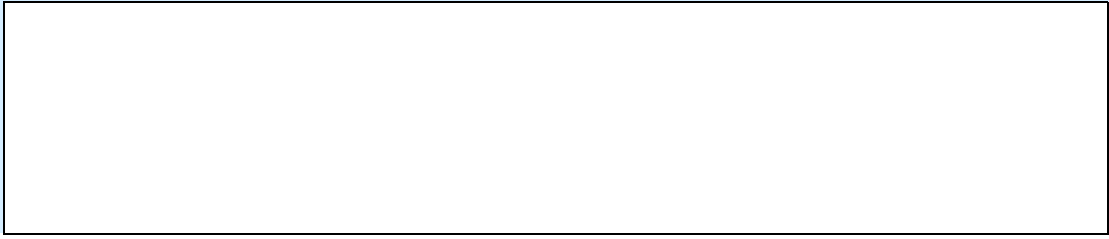
Energy Systems and Peaker Plant Usage

- Denholm, P. et al. (2010)
The Role of Energy Storage with Renewable Electricity Generation
National Renewable Energy Laboratory
- Keane, A. et al. (2011)
Capacity Value of Wind Power
IEEE Transactions on Power Systems

Climate Policy

- Government of Ireland (2023)
Climate Action Plan 2023
- European Commission
European Climate Law
- European Union
Directive 2008/50/EC on Ambient Air Quality

5. Grounds



Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes