

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Niamh O Neill

Clarke St

Athenry

Galway

H65 XH36

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 15 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 3.41km from the proposed site of the Cashla Peaker Plant (Athenry).

I am deeply concerned about the proposed Athenry Peaker Plant due to its potential impact on air quality and the direct risk this poses to my health and that of my young child. As a parent, I cannot support a development that may expose my child to increased pollution during crucial developmental years and potentially contribute to long-term health issues. I respectfully urge decision-makers to prioritise safer, cleaner alternatives that protect the wellbeing of families like mine and the wider Athenry community.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10), are well established as contributors to respiratory irritation, reduced air quality, and long-term environmental

degradation. A peaker plant operates intermittently but at very high output during periods of peak electricity demand, resulting in concentrated bursts of emissions, particularly during start-up and ramp-up phases. Where diesel is used as a backup fuel or during start-up, emission levels may be significantly higher, as diesel combustion produces elevated levels of nitrogen oxides, sulphur dioxide, particulate matter, and other combustion-related pollutants compared to gas. These pollutants can penetrate deep into the lungs and bloodstream, contributing to respiratory and cardiovascular illness. Vulnerable groups, including children, older people, and individuals with pre-existing respiratory conditions, are particularly at risk. Fine particulate matter can travel significant distances and accumulate over time, extending the area and duration of exposure. This creates a risk of both immediate and long-term health impacts and raises concerns under Directive 2008/50/EC on ambient air quality and cleaner air for Europe.

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.

Public Health Protection

Air pollution from a peaker plant can affect human health, particularly during peak operation periods when emissions are highest. The inclusion of diesel use introduces additional pollutants that are widely recognised as harmful and capable of long-range transport and accumulation in the environment. Given the uncertainty around operational frequency, emission levels, and long-term exposure patterns (until at least 2050), a precautionary approach should be applied to protect public health. In the absence of clear and robust evidence demonstrating that no significant harm will occur, the potential risks to human health should be given significant weight in planning decisions.

Water & Groundwater

Risk of Groundwater Contamination from Fuel Storage and Handling

A peaker plant requires the storage and handling of fuels such as diesel, lubricating oils, and other chemical substances, all of which present potential contamination risks. These substances may enter the ground through leaks, spills, or contaminated surface runoff, particularly over the long operational lifespan of the facility (until at least 2050). Even minor but repeated incidents can lead to the gradual accumulation of pollutants in soil and groundwater. Once groundwater contamination occurs, it is extremely difficult and costly to remediate, and impacts can persist for decades. This raises serious concerns under Directive 2000/60/EC, which requires the protection of water bodies and the prevention of deterioration in water quality.

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.

Unsuitability of Location Due to Environmental Sensitivity

Given the environmental sensitivity of the area, including reliance on groundwater and agricultural land use, this site is not appropriate for a development involving diesel storage and industrial processes (until at least 2050). The potential risks to water resources, soil quality, and surrounding land uses are significant, long-term, and difficult to mitigate once realised. A precautionary approach should be applied where environmental risks cannot be fully eliminated.

Farming & Agricultural Impact

Organic Farming

The proposed peaker plant presents a significant risk to the regulatory compliance and economic viability of nearby certified organic farms. Organic certification is governed by strict European regulations and requires the absence of prohibited substances and the maintenance of high environmental quality. Airborne pollutants such as nitrogen oxides, particulate matter, and volatile organic compounds, particularly those associated with diesel combustion, can deposit onto soil, forage crops, and pasture through atmospheric pathways. Organic farms are especially vulnerable to such contamination because even low levels of pollutants may trigger certification concerns.

In addition to airborne risks, there is a potential for contamination through water and soil pathways, including runoff from hardstanding areas, accidental spills, or leaks from fuel storage systems. Organic farming depends on maintaining healthy soil biology, clean water sources, and natural ecological balance. Any disruption to these systems may compromise the integrity of organic production.

The consequences of losing organic certification are severe. Farmers may lose access to premium markets, suffer significant financial loss, and face a mandatory re-conversion period of up to two years. During this time, they must adhere to organic practices without receiving organic prices. This represents a major economic and operational burden. The proposed development therefore poses a direct and disproportionate risk to organic farming systems that has not been adequately assessed.

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.

Exposure During Daily Activities and School Times

Children living or attending school near the site may be exposed to elevated air pollution during peak operation periods, which may coincide with times when children are outdoors, including school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants. This raises concerns about repeated exposure to harmful emissions during critical stages of development.

Cumulative Impact on Child's Development

Fine particulate matter can travel significant distances and accumulate over time, meaning children may be exposed not only during peak events but also through repeated low-level exposure. The cumulative effect of

these exposures is particularly concerning during key stages of physical development, where long-term impacts on lung function and overall health may arise.

Need for Precaution Due to Uncertainty

The long-term health impact on children has not been fully assessed, particularly in relation to repeated exposure to emissions associated with intermittent operation and diesel use. Given the uncertainty and the known vulnerability of children to air pollution, a precautionary approach should be applied to ensure that health risks are avoided.

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.

Major Accident Hazard and Regulatory Concerns

The operation of a gas-fired peaker plant, combined with on-site fuel storage, gives rise to potential major accident hazards. Under the Seveso III Directive, developments involving dangerous substances must demonstrate that risks are properly identified, assessed, and minimised. It is not clear that the likelihood and consequences of major accident scenarios, including fire, explosion, and fuel release, have been fully assessed or adequately demonstrated.

Proximity and Worst-Case Scenario Risks

The proposed site is in proximity to residential dwellings, agricultural lands, and local infrastructure. In this context, even a low-probability but high-impact event could result in serious consequences for public safety, property, and rural economic activity. The Environmental Impact Assessment does not clearly demonstrate that worst-case scenarios, including fire spread, explosion impact zones, and fuel ignition events, have been fully assessed. Without this information, the true scale and severity of potential impacts remain uncertain.

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.

Scale, Integration, and Rural Context

The scale and industrial nature of the proposed development are not consistent with the surrounding rural environment. The introduction of large-scale plant, structures, and associated infrastructure will create a visually dominant feature in the landscape that is out of character with existing development. It has not been

demonstrated that the development can be successfully integrated into its surroundings. This raises concerns under Policy GB1 of the Galway County Development Plan, which requires that developments be designed and located to integrate effectively into the landscape.

Cumulative Visual Impact of Industrial Infrastructure

The visual impact of the development should not be considered in isolation. The proposal includes multiple elements, including plant structures, fuel storage areas, electrical infrastructure, security fencing, lighting, and access roads. When considered together, these elements will create a significant industrial presence within a rural setting. The cumulative visual impact of these components has not been fully assessed and may result in a greater level of visual intrusion than identified in the Environmental Impact Assessment.

Climate Impact

Lock-in of Fossil Fuel Infrastructure

The proposed development represents new fossil fuel infrastructure with an operational lifespan extending to at least 2050. This risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure may delay or displace the development of renewable energy and storage solutions, creating long-term dependency on fossil fuels that is not consistent with climate objectives.

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.

Underestimation of Operational Emissions

The Environmental Impact Assessment may underestimate emissions associated with the development by relying on assumed operational patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during periods of energy system stress. This creates uncertainty regarding total greenhouse gas emissions over time and raises concerns that the climate impact of the development has not been fully assessed.

Availability of Cleaner Alternatives

Cleaner and more sustainable alternatives to fossil fuel generation are available, including renewable energy, energy storage, demand response, and grid flexibility measures. The development of new gas infrastructure may reduce the urgency to deploy these solutions. In the context of the climate crisis, priority should be given to low-carbon alternatives rather than extending reliance on fossil fuels.

Community Engagement

Lack of Clear, Accessible, and Effective Communication

There appears to have been insufficient and ineffective community engagement in relation to this project. Many residents did not receive any direct communication or notification regarding the development. While some individuals report receiving a flyer or attending an information event, the material provided was highly technical and difficult to understand without specialist knowledge. This significantly limits meaningful

participation. Effective consultation requires that information is accessible, clearly explained, and actively communicated to all affected members of the community. In this case, the level of detail and technical complexity of the documentation creates a barrier to understanding, meaning that many people are unable to fully assess the potential impacts of the development.

Failure to Meet Aarhus Convention Standards

Under the Aarhus Convention, the public has a right to access environmental information and to participate effectively in environmental decision-making. This requires not only the provision of information, but that such information is understandable, accessible, and provided in a timely manner. In this case, the consultation process does not appear to meet these standards. The complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, has restricted meaningful public participation. This raises concerns regarding compliance with fundamental principles of transparency, accessibility, and public engagement in environmental decision-making.

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.

Lack of Transparency, Inclusiveness, and Early Engagement

I do not believe that consultation has been clear, inclusive, or effective. For a development of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community. This includes clear communication, accessible materials, and sufficient time for people to understand and respond to the proposal. The lack of meaningful engagement raises concerns regarding fairness, transparency, and the overall integrity of the planning process. Communities should not be placed at a disadvantage due to inaccessible information or limited consultation.

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.

Failure to Properly Assess Cumulative and Long-Term Impacts

The Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods. The long-term (until at least 2050) and cumulative nature of these impacts has not been fully considered, limiting the ability to understand the true environmental burden of the development. This represents a significant gap in the assessment.

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.

Conclusion

For the reasons outlined above, including uncertainty regarding operational frequency, cumulative environmental impacts, and the risks associated with diesel use, I do not believe this development represents proper planning and sustainable development. The potential for impacts to be greater than assessed has not been adequately addressed. I respectfully request that consent for this application be withheld.

Yours Sincerely,

A handwritten signature in black ink, reading "Niamh O'Neill". The signature is written in a cursive, flowing style. The first name "Niamh" is on the top line, and the surname "O'Neill" is on the bottom line, with the "O" being a large, circular loop.

Name: Niamh O'Neill

Date: 15 April 2026