OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Paul Ruane

Castlelambert

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 900m from the proposed site of the Cashla Peaker Plant (Athenry).

I reside in the town land of Castlelambert and I'm hugely concerned about the impact the proposed development will have on me, my family and our future including my neighbours and friends in the wider community. I have lived in the area my whole life and I farm the same land that has been in my family for generations. This is our home and our way of life and I sincerely hope that our families will always have a home in the locality.

I take great pride in producing quality food as a dairy farmer in the local area and I'm concerned about the long term environmental impact the proposed development will have on my land and in turn the sustainability of my business. As well as myself, there are also numerous other farmers in the area who depend on the land for their livelihood.

I wish to object on the following grounds.

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.

Short-Term Exposure

Emissions from a peaker plant, particularly where diesel is used during start-up or high-demand periods, can negatively affect both air quality and human health. Diesel exhaust contains a complex mixture of pollutants, including nitrogen oxides, fine particulate matter, volatile organic compounds, and polycyclic aromatic hydrocarbons, all of which are associated with respiratory illness, reduced lung function, and cardiovascular disease. These emissions may occur in short but intense bursts that are not fully captured by average modelling assumptions used in Environmental Impact Assessments. This creates a scenario where nearby residents may be exposed to higher-than-expected pollution levels, particularly during peak operation periods, in calm weather conditions, or where dispersion is limited. This uncertainty raises serious concerns regarding the reliability of predicted air quality impacts.

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.

Dependence on Groundwater for Domestic and Agricultural Use

This area relies heavily on clean groundwater for domestic consumption, livestock watering, and agricultural production. The introduction of industrial activity involving fuel storage and handling creates an ongoing risk to this essential resource. Any contamination could have serious and long-lasting consequences, including impacts on drinking water quality, livestock health, and agricultural productivity. The potential for irreversible damage to groundwater resources raises serious concerns regarding the suitability of this development.

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

ACRES Compliance

Farmers are required to meet strict environmental standards under schemes such as ACRES and nitrates derogation rules. If emissions, atmospheric deposition, or runoff from this peaker plant, including diesel-related pollutants, increase nitrate levels or environmental pressure, farmers could be pushed out of compliance through no fault of their own. As an ACRES farmer, any increase in pollution linked to this development could directly affect compliance with scheme requirements, leading to penalties, financial loss, or exclusion from environmental programmes. This creates an unfair situation where farmers are held responsible for environmental impacts arising from activities beyond their control.

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.

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.

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.

Emergency Response and Adequacy of Assessment

There is insufficient information provided regarding emergency response planning, including evacuation procedures, coordination with local emergency services, and the ability to respond effectively to a major incident. This is of particular concern in a rural area with constrained road infrastructure. Taken together, the absence of detailed worst-case analysis and robust emergency planning means it has not been demonstrated that risks to human health and safety have been reduced to an acceptable level.

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

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.

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.

Planning & Assessment

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.

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,

Name: Paul Ruane
Date: 04 April 2026