

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

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Galway
H65 XW08

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 22 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

A Chara,

I am submitting this objection due to serious concerns regarding the location and nature of the proposed development, and the potential impacts on my family's health, public safety, and local biodiversity. I reside with my family less than 1 km from the proposed Cashla Peaker Plant, placing our home well within the zone of influence for air quality, noise, light, and traffic impacts associated with the development.

1. Omission of Protected Species (Summer Bat Roost)

A significant deficiency in the application is the failure of the ecological assessment to identify and consider a summer bat roost located within my property, used by Soprano Pipistrelle (*Pipistrellus pygmaeus*), a species afforded strict protection under the Wildlife Acts 1976–2018 and Annex IV of the EU Habitats Directive.

Summer roosts constitute protected breeding or resting places under Article 12 of the Habitats Directive and are sensitive to disturbance, particularly during the active season. As this roost

has not been identified or assessed, the potential effects of the proposed development — including intermittent night-time operation and artificial lighting — on bats using the roost have not been evaluated.

In the absence of this information, the competent authority does not have sufficient evidence to conclude that the proposal will avoid disturbance to bats or adverse effects on a protected roost site.

2. Impact on Human Health and Organic Food Integrity

As the mother of a child attending primary school, I am gravely concerned about the cumulative health burden associated with a peaker plant. Unlike base-load plants, peaker plants are characterised by intense, short-term emission spikes during start-up.

My daughter belongs to a vulnerable receptor group, and high-intensity bursts of nitrogen oxides and fine particulate matter at a distance of less than 1 km present an unquantified risk to her long-term respiratory health.

In addition, we grow a portion of our own food using organic principles. Emissions such as sulphur dioxide and particulates have the potential to contribute to localised soil acidification and the accumulation of airborne contaminants. The application fails to assess how intermittent emissions associated with this development may affect soil quality and food grown for household consumption.

3. Public Safety and Vulnerable Road Users (L3103)

The L3103 is a minor rural road that is entirely unsuitable for the level of HGV traffic associated with the construction and operation of the proposed development.

My family regularly cycles, runs, and walks along part of this road close to our home. The L3103 is narrow and lacks hard shoulders or pedestrian refuges. The introduction of heavy goods vehicles creates a forced-error scenario, whereby drivers must either breach the legal 1.5 m safe passing distance, placing vulnerable road users at risk, or cross into the path of oncoming traffic.

Of particular concern is the applicant's indication that peak traffic movements may occur around 18:00 hrs, coinciding with peak recreational use of the road. Combined with blind dips and sharp corners, the introduction of construction traffic and fuel tankers would create a treacherous environment for school journeys, local residents, amenity users, and agricultural traffic.

4. Increase in Noise Levels and Health Impacts

The proposed development will increase ambient noise levels, particularly when considered cumulatively with existing noise from the M6 and M18 motorways. As regional road usage continues to rise, I am not satisfied that the combined noise impacts have been adequately assessed.

My concerns extend beyond general noise nuisance and relate to quantifiable and significant health risks arising from the operational regime of a peaker plant. The WHO Environmental Noise Guidelines for the European Region (2018) emphasise the importance of protecting human health from night-time noise exposure. However, the potential long-term health impacts of night-time and intermittent noise exposure are not given sufficient consideration in the submitted reports.

The applicant relies primarily on average noise metrics to assess impacts. This approach is misleading for a peaker plant, which operates through sudden and intermittent start-ups rather than continuous operation. These operating characteristics result in loud, abrupt noise events, not a steady background sound.

Humans do not experience sound as an average. The auditory system responds most strongly to sudden and unexpected noise events. By averaging noise levels over extended periods, the assessment obscures the most disturbing aspect of the development: high-noise start-up events that trigger physiological stress responses. As a result, the predicted noise impacts do not reflect the likely lived experience of my family or other nearby residents should this development proceed.

5. Commitment to Biodiversity

Our land functions as an important biodiversity stepping stone within the local landscape and has been a registered site with the All-Ireland Pollinator Plan since 17 June 2021. Through habitat management for pollinators and bats, we provide ecosystem services that align closely with national biodiversity policy objectives.

The noise, air pollution, and industrial character of the proposed development are fundamentally incompatible with the functioning of a site actively managed for biodiversity enhancement under the All-Ireland Pollinator Plan.

Conclusion

This application relies on an incomplete ecological baseline and fails to adequately account for human health, road safety, and the integrity of local food production. In accordance with the Precautionary Principle, where significant gaps in environmental information persist — particularly in relation to protected species and health impacts — planning permission should be refused.

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Rosina Joyce