

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Sharon Mitchell

Moorpark

Athenry

Galway

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 08 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 3.02km from the proposed site of the Cashla Peaker Plant (Athenry).

I am a parent of 3 children in the local area and my biggest concerns are health and my children's safety. Our health with water and contamination, if there was an explosion what evacuation plans are in place to protect me and my children. There was no community engagement or proper access to information. I object to this and outline my concerns below:

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.

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.

Children & Health

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.

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.

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.

Climate Impact

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.

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.

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.

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,

A handwritten signature in black ink, appearing to read 'Sharon Mitchell', with a stylized, cursive script.

Name: Sharon Mitchell

Date: 08 April 2026