

1. Core Position

I object to the proposed **Cashla Peaker Plant** on the basis that it represents **strategic-scale fossil fuel infrastructure located in close proximity to a growing family population**, without sufficient demonstration that it will not adversely affect **human health, safety, or environmental quality**.

2. Human Health – Failure to Demonstrate No Harm

The development introduces:

- Gas combustion emissions (NO_x, particulates)
- Diesel backup fuel (higher pollutant profile)
- Industrial activity within a residential catchment

The EIAR relies on modelling and concludes “no significant impact”, yet:

- No **site-specific public health assessment** is provided
- No **cumulative exposure analysis** for children or vulnerable groups
- No operational emissions mitigation is proposed

This fails to meet the standard required under the **EIA Directive 2014/52/EU** and the **precautionary principle**.

3. Major Accident Risk (COMAH / Seveso)

The proposal involves storage and use of hazardous substances, giving rise to:

- Fire and explosion risk
- Potential high-consequence events

The EIAR:

- Focuses on low probability
- Does not robustly assess **worst-case scenarios** or emergency response capacity

In a family residential context, even low-probability high-impact risks must be rigorously justified. This has not been done.

4. Project Splitting – Unlawful Segmentation Risk

The overall development is divided into:

- Power plant
- Grid connection
- Gas infrastructure

This raises a clear risk of **project splitting**, contrary to EU law.

Under *Holohan v An Bord Pleanála*, all elements must be assessed as a **single integrated project**. The current approach undermines proper cumulative assessment.

5. Climate Policy Conflict

The proposal is:

- New fossil fuel infrastructure
- Without operational emissions mitigation

This conflicts with:

- Ireland's legally binding emissions reduction targets
- National climate policy trajectory

The applicant has not demonstrated that the development is compatible with these obligations.

6. Unsuitable Location

The site is located approximately 2 km from Athenry, a town experiencing:

- Rapid residential growth
- Increasing numbers of young families

This represents an **inappropriate siting of industrial energy infrastructure** in proximity to sensitive receptors, contrary to proper planning and sustainable development principles.

7. Conclusion

The application fails to demonstrate:

- No significant adverse effect on **human health**

- Adequate assessment of **major accident risk**
 - Compliance with **EU law on cumulative assessment**
 - Consistency with **national climate obligations**
 - Suitability of **location in a growing residential area**
-

8. Request to the Board

I respectfully request that An Coimisiún Pleanála:

Refuse permission

on the grounds that the proposed development would:

- Be contrary to the **proper planning and sustainable development of the area**
- Give rise to **unacceptable risks to human health and safety**
- Be **premature in the absence of full and integrated assessment**

Shaun McMullin

Attymon

Athenry

Galway

H65W328