

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Shraddha Murti Prehn

Tober na Bhfinn

Athnery

Galway

H65XE61

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 16 April 2026

Re: Observation to the proposed development of open-cycle gas turbine (OCGT) and generator with ancillary equipment.

Location: Pollnagroagh and Rathmorrissy (Townlands), Athnery, Co. Galway

Applicant: Bord Gáis Energy Limited

Dear Sir/Madam,

My residence is 2.54km from the proposed site of the Cashla Peaker Plant (Athnery).

We came to live here 34 years ago because we wanted to live in clean country air without pollution. My Husband has a life threatening respiratory illness, the proximity of the peaker plant is a real concern for us especially on top of the two motorways that have been built since we moved here. Our house relies on well water and we are worried that the groundwater will be contaminated by the power plant.

We also have concern to road safety and the impacts of large trucks that will supply diesel to the peaker plant. The road is narrow and the population in the area has expanded so the roads are already busy with people going to work and dropping kids to school. With farmers and the local quarry there are already lots of large vehicles on the road and the traffic comes to a halt when these trucks pass by. An increase in large vehicles will cause delays and danger to other users of the road and deter people from cycling or walking.

A big industrial chimney sitting up wind from Athnery won't entice anyone new to want to live here. The price of local property will be affected due to the health concerns of living so close to a power plant. Nobody would

move to an area where with this type of power plant. Its a awful thing to put next to a medieval town that has been growing quickly in the past couple of years.

We understand that planning for power plants has already met the energy supply goals for 2030, so why is are more power plants being considered. New houses these days are not allowed to have chimneys and most of the house in our area have solar panels. It doesn't make sense to ruin the green initiative of the local people by putting a huge chimney that is harmful to the environment and people.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NO_x) and fine particulate matter (PM_{2.5} 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

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.

Local Roads, Safety & Schools

Increased Heavy Traffic and Diesel Transport Risks

The placement of the proposed site entrance on the L3103 raises severe safety concerns due to the inherently hazardous nature of this specific stretch of road. The carriageway is critically narrow, struggling to safely accommodate two passing Heavy Goods Vehicles (HGVs), and completely lacks a hard shoulder to allow for any margin of error. Compounding these dangers are the presence of blind dips and corners, which significantly reduce visibility and sightlines for all road users. These critical safety deficiencies create an unacceptable traffic hazard that must be comprehensively addressed.

In addition, the proposed development will result in increased traffic on local roads, including heavy goods vehicles, construction traffic, and fuel deliveries such as diesel tankers. These roads are rural in nature, often narrow with limited visibility, and are already used by residents, agricultural machinery, and school-related traffic. The introduction of additional heavy vehicle movements significantly increases the risk of collisions and creates a more hazardous environment for all road users.

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.

Community Engagement

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.

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.

Conclusion

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,

Shraddha
Murti
Prehn

Name: Shraddha Murti Prehn
Date: 16 April 2026