

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Susan Murphy

Moanbaun

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 10 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 1.70km from the proposed site of the Cashla Peaker Plant (Athenry).

I wish to lodge a formal objection to the proposed Cashla peaker plant development on the grounds that it is contrary to the proper planning and sustainable development of the area, due to significant deficiencies in environmental assessment, risks to public health, serious road safety concerns, and likely adverse impacts on protected species.

1. Inadequate and Unsound Air Quality Assessment

The Air Quality Impact Assessment submitted in support of the application is fundamentally flawed and does not provide a reliable basis for decision-making.

The assessment is predicated on an assumed operational profile of approximately 100 hours per annum. This assumption is not evidence-based, is not secured by condition, and does not reflect the realistic or potential operational capacity of a peaker plant responding to electricity demand. As such, it materially understates the likely emissions profile.

In addition, the assessment fails to adequately account for:

- Start-up and shut-down cycles, during which emissions are significantly elevated
- Emissions associated with transient and inefficient operating conditions
- The combustion of back-up oil fuel, which would materially increase pollutant output
- The impact of adverse meteorological conditions (including low wind speeds, temperature inversions, and fog), which inhibit dispersion and increase ground-level concentrations

These omissions represent a failure to carry out a complete and precautionary assessment of likely significant effects.

I reside approximately 1 km downwind of the proposed development, in an older dwelling with limited insulation, together with a vulnerable elderly resident (90 years of age). There is therefore a credible pathway for significant adverse effects on human health. The application fails to demonstrate that the proposed development would not give rise to unacceptable impacts on residential amenity and public health.

2. Traffic and Pedestrian Safety – Substandard Road Infrastructure

The proposed development would generate additional vehicular traffic, including heavy goods vehicles, on a local road network that is manifestly substandard.

The roads in question are narrow, winding rural roads with:

- No footpaths
- No hard shoulders
- No formal passing bays

These roads are already constrained and present existing difficulties for two-way traffic, particularly where large vehicles are concerned.

Pedestrians, including elderly residents and other vulnerable road users, are required to walk on the carriageway itself due to the complete absence of pedestrian infrastructure. This places them in direct and unavoidable conflict with vehicular traffic under existing conditions.

The intensification of traffic associated with this development would materially increase this conflict and significantly elevate the risk of collision and serious injury. The introduction of additional heavy goods vehicles on such constrained roads represents a clear and unacceptable danger to pedestrian safety and constitutes a material hazard.

The applicant has failed to demonstrate that the receiving road network can safely accommodate the proposed traffic volumes. Accordingly, the development would give rise to a significant risk to vulnerable road users and is contrary to the interests of traffic and pedestrian safety.

3. Impact on Bats – Failure to Protect Commuting Routes and Foraging Habitat

The proposed development would result in the destruction and fragmentation of an established bat commuting corridor and foraging habitat.

Bats and their habitats are strictly protected under Irish and EU law, including the Habitats Directive. Any interference with established commuting routes or foraging areas requires a high level of assessment and

justification.

The application fails to adequately assess:

- The functional importance of the affected corridor
- The cumulative impact of habitat loss and disturbance
- The likely effect of continuous artificial lighting

The proposal includes 24/7 floodlighting, which is known to significantly disrupt bat behaviour by deterring feeding and movement. This would render the surrounding area unsuitable for bat activity, even where habitat remains.

The combined effects of habitat loss and continuous artificial lighting give rise to a real risk of local population decline or colony loss. In the absence of robust assessment and effective mitigation, the proposal is contrary to the requirements for the protection of European protected species.

Conclusion

The proposed development is characterised by significant deficiencies in environmental assessment, poses a credible risk to human health, creates a material hazard for pedestrians and other vulnerable road users, and is likely to result in adverse impacts on protected species.

Having regard to the precautionary principle and the proper planning and sustainable development of the area, I respectfully request that planning permission be refused.

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

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.

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 'Susan Murphy', with a stylized flourish at the end.

Name: Susan Murphy
Date: 10 April 2026