

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Tom Joe & Kathleen Kelly
Aughrim House
Castlelambert
Athenry
Galway
H65 XP77

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

Date: 13 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 700m from the proposed site of the Cashla Peaker Plant (Athenry).

We, Tom Joe and Kathleen Kelly, write to formally object to the proposed development. As fourth-generation farmers who have lived and worked in Castlelambert, for Kathleen 54 years and for Tom Joe all of his life. Our home and farm are situated just 700m from the proposed site. We submit this objection based on the severe impacts this project will have on residential amenity, public health, road safety, and the local environment.

- **Public Health and Air Quality:** As pensioners who have recently battled chest infections, we are acutely concerned about the respiratory impacts of the emissions and particulate matter (dust) generated by this plant. We have 11 grandchildren who live nearby or visit frequently. Both the elderly and the young are disproportionately vulnerable to respiratory illnesses linked to fossil fuel emissions. The long-term health implications for our family render this location entirely unsuitable for an industrial peaker plant.

- **Negative Impact on Renewable Energy Investments:** We have actively followed Government policy by deeply retrofitting our home and installing solar panels to reduce fossil fuel reliance. The dust and airborne debris from the proposed plant will directly interfere with our solar panels, reducing their efficiency and forcing us to incur financial losses through increased maintenance and electricity costs. Approving a high-emission fossil fuel plant in an agricultural area directly contradicts the State and EU mandate to achieve net-zero emissions.

- **Negative impact on Animal Welfare and Forage**

The applicant has failed to address the impact of atmospheric deposition on local agricultural land. In beef farming, our primary crop is grass. The nitrogen oxides and particulate matter (soot) produced by diesel combustion don't just disappear—they settle on the fields. When our cattle graze, they will be consuming these industrial by products. This is not just an environmental issue; it is a nutritional and health issue for the herd. Additionally, the risk of diesel leaks or contaminated runoff from the site's massive hardstanding areas poses a threat to the local water table. If the water or the soil is compromised, the productivity of my entire farm drops. The economic burden of reduced animal performance and the potential for long-term soil contamination has been completely ignored in this application.

- **Traffic Hazard on the L3103:** Our daily farming operations require driving a tractor along the L3103 past the proposed entrance. This is a substandard rural road with no margins, narrow widths, and blind dips. It is already highly dangerous for a tractor to meet a HGV on these corners. Introducing a massive volume of heavy construction and operational traffic to this specific road creates an unmitigated traffic hazard and severely impacts our ability to safely farm our lands.

- **Light Pollution and M17 Hazard:** The site runs alongside the Rathmorrissy slip road off the M17 towards Athenry and M6 motorway. The proposal includes 18 no. 20-metre high lights and 61 no. 8-metre high lights. This unprecedented level of industrial lighting will cause severe glare and light pollution, blinding motorists navigating the roundabout and slip road at night, thereby creating a significant road safety risk.

- **Cumulative Health Impacts Over Time**

The intermittent but high-intensity operation of a peaker plant, combined with periodic diesel use, can result in repeated short-term spikes in air pollution. While individual emission events may appear limited in duration, repeated exposure over time (until at least 2050) creates a cumulative health burden. Pollutants such as nitrogen oxides and fine particulate matter can worsen asthma, trigger respiratory symptoms, and contribute to long-term health impacts, including chronic respiratory disease and cardiovascular conditions. The cumulative effect of these emissions over the operational lifespan of the development has not been fully assessed, particularly in relation to long-term exposure pathways and sensitive populations living nearby.

- **Unsuitability of Location Due to Environmental Sensitivity**

Given the environmental sensitivity of the area, including reliance on groundwater and agricultural land use, this site is not appropriate for a development involving diesel storage and industrial processes (until at least 2050). The potential risks to water resources, soil quality, and surrounding land uses are significant, long-term, and difficult to mitigate once realised. A precautionary approach should be applied where environmental risks cannot be fully eliminated.

- **Protection of Agricultural Livelihoods**

Farmers are already subject to strict environmental regulation and are required to meet high standards of environmental protection. It is not acceptable that industrial development, including diesel use and associated emissions (until at least 2050), could introduce environmental risks that undermine compliance, damage land quality, or threaten farming livelihoods. Farmers should not be placed in a position where they are penalised for environmental impacts arising from activities outside their control.

- **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.

- **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.

- **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.

- **Impact on Residential Amenity and Long-Term Visual Change**

The development will be visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This may affect residential amenity, enjoyment of the area, and the overall character of the landscape. Given the long operational lifespan of the development (until at least 2050), these visual impacts will be enduring and cannot be easily mitigated. The introduction of industrial lighting, structures, and activity into a rural setting represents a long-term change that should be carefully considered.

- **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.

- **Lack of Clear, Accessible, and Effective Communication**

There appears to have been insufficient and ineffective community engagement in relation to this project. Many residents did not receive any direct communication or notification regarding the development. While some individuals report receiving a flyer or attending an information event, the material provided was highly technical and difficult to understand without specialist knowledge. This significantly limits meaningful participation. Effective consultation requires that information is accessible, clearly explained, and actively communicated to all affected members of the community. In this case, the level of detail and technical complexity of the documentation creates a barrier to

understanding, meaning that many people are unable to fully assess the potential impacts of the development.

- **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.

- **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. For the sake of our health, our safety, and the continued viability of our family land for future generations, we respectfully request that planning permission be refused.

Yours Sincerely,

Tom Joe & Kathleen Kelly

13 April 2026