

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Valerie Timlin  
Derrydonnell North  
Oranmore  
Galway  
H91 YDT0

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

Date: 18 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 4.46km from the proposed site of the Cashla Peaker Plant (Athenry).

Children are the most vulnerable to air pollution. I am objecting due to the facility's proximity to residential areas and schools. The pollutants are linked to respiratory illness, heart disease and strokes.

## **High-Intensity Emissions and Diesel Impacts**

I am concerned about the potential impact of air pollution from this proposed development. Pollutants such as nitrogen oxides (NO<sub>x</sub>) and fine particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) are known to damage air quality, irritate the lungs, and contribute to long-term harm to both human health and the environment. Although the plant would not operate continuously, it may run at extremely high output when required, leading to short but intense bursts of pollution, particularly during start-up and peak demand periods. The possible use of diesel during these times is especially worrying, as it produces higher levels of harmful emissions, including nitrogen oxides, sulphur dioxide, and particulate matter.

These pollutants can penetrate deep into the lungs and enter the bloodstream, increasing the risk of respiratory and cardiovascular illness, particularly for vulnerable groups such as children, older people, and those with existing health conditions. Fine particulate matter can also travel long distances and accumulate over time, meaning the impacts may extend beyond the immediate area and persist in the long term. In summary, I have reservations regarding the thoroughness of the assessment of these emissions. This issue presents significant implications for public health and environmental protection, especially in relation to EU air quality standards established by Directive 2008/50/EC.

### **Risk of Groundwater Contamination from Fuel Storage and Handling**

I am concerned about the risks of soil and groundwater contamination from this proposed peaker plant. The development would involve the storage and handling of fuels such as diesel, along with lubricating oils and other chemicals, all of which could pose a risk to the surrounding environment. There is a real possibility that these substances could leak, spill, or enter the ground through surface runoff over the long lifetime of the facility, potentially up to 2050, and even small but repeated incidents could lead to a gradual build-up of pollution in soil and groundwater.

This is particularly worrying because once groundwater becomes contaminated, it is extremely difficult and costly to remediate, and the impacts can persist for decades. This raises serious concerns about the long-term protection of local water resources and the surrounding environment. There remains uncertainty about whether these risks have been adequately managed, raising substantial worries that the project might cause permanent damage to water quality. This would violate the obligations under EU Directive 2000/60/EC, which mandates the protection of water bodies and prohibits their deterioration.

### **Vulnerability to Diesel-Related Air Pollution**

As a parent living in the area, I am particularly concerned about the potential impact of this proposed development on children's health. Children are particularly susceptible to the effects of air pollution because of their developing respiratory systems, elevated respiration rates, and greater exposure to outdoor environments. Although peaker plants do not function on a continuous basis, they can produce significantly elevated levels of output during initial start-up phases or times of peak energy demand. This may lead to brief yet significant emissions of pollutants, particularly when diesel fuel is utilised. These emissions contain fine particles and nitrogen oxides that can penetrate deep into the lungs, which may affect lung development and increase the risk of respiratory conditions such as asthma. Overall, this raises serious concerns about the health and wellbeing of children and whether these risks have been fully considered.

### **Inadequate Assessment of Traffic Impacts**

The placement of a site entrance at this hazardous location on the L3103 raises serious safety concerns. The road is already constrained by its narrow width, the absence of a hard shoulder, and extremely poor visibility due to blind dips and sharp corners, yet the Environmental Impact Assessment does not appear to fully address the safety implications of introducing an access point at this location. There are also concerns that the cumulative impact of additional traffic has not been properly assessed, including construction traffic, ongoing operational traffic, and fuel deliveries, and the interaction between heavy goods vehicles and existing road users—such as local traffic, school-related movements, and agricultural machinery—has not been examined in sufficient detail. Overall, the lack of a thorough and robust traffic safety assessment creates significant uncertainty as to whether the local road network can safely accommodate this development.

### **Risk of Fire and Explosion from Fuel Storage**

As someone living in the area, I am very concerned about the safety risks associated with this proposed development. The project involves the storage, handling, and use of highly flammable fuels such as natural gas and diesel, which carry an inherent risk of fire or explosion. In the event of equipment malfunctions, leaks, or operational challenges, these substances may pose an ignition risk, potentially resulting in significant incidents. Considering the intermittent yet high-intensity operation of a peaker plant, the likelihood of such occurrences warrants careful consideration.

The potential consequences are particularly worrying, as any incident could have serious impacts on nearby homes, residents, farmland, and livestock. This raises significant concerns about whether the risks have been fully assessed and whether this location is appropriate for a development of this nature.

### **Landscape Character and Policy Conflict**

There are serious concerns that the proposed development would represent 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 buildings, stacks, lighting, and fuel storage—would fundamentally alter the character of the area, introducing a visually dominant feature into what is currently a quiet rural setting. This type of development does not appear consistent with the existing landscape, nor does the area have the capacity to absorb such change without significant adverse effects. These concerns are particularly relevant in the context of the Galway County Development Plan, specifically Policies LCM1, LCM2, and LCM3, which seek to protect landscape character, recognise landscape sensitivity, and ensure that development is appropriate to its setting.

### **Conflict with National and EU Climate Targets**

There are serious concerns regarding Ireland's legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021, as well as wider EU climate frameworks. The continued development of gas-fired generation, including peaker plants, will result in additional carbon dioxide emissions over the lifetime of the project, raising questions about alignment with national carbon budgets and emissions reduction targets. In this context, there is concern that the proposal may undermine the State's ability to meet its climate commitments and transition to a low-carbon energy system.

### **Lack of Transparency, Inclusiveness, and Early Engagement**

There are concerns that consultation in relation to this development has not been clear, inclusive, or effective. For a project of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community, including clear communication, accessible information, and adequate time for people to understand and respond to the proposal. The lack of meaningful engagement raises issues around fairness, transparency, and the overall integrity of the planning process, and creates concern that communities may be placed at a disadvantage due to inaccessible information and limited consultation.

### **Failure to Properly Assess Cumulative and Long-Term Impacts**

There are concerns that the Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and ongoing environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods, yet this interaction has not been fully examined. The long-term nature of the development, potentially extending to at least 2050, further increases the importance of understanding these cumulative effects.

Without a comprehensive assessment, it is difficult to fully understand the overall environmental burden of the project, and this represents a significant gap in the evaluation.

### **Lack of Worst-Case Assessment**

The Environmental Impact Assessment bases its findings on expected operating scenarios instead of evaluating the worst-case possibilities. Because the plant's operation will depend on electricity demand, it's unclear how often or how intensely it might run. This uncertainty also applies to diesel usage, which could produce higher emissions than those estimated. Without a thorough assessment of the most severe potential impacts, it is impossible to guarantee that major environmental effects will not happen.

### **Conclusion**

This proposal presents important concerns regarding people, public health, agriculture, and the surrounding environment. Because the documentation is complex and community engagement has been limited, many individuals have found it challenging to take part in the decision-making process. Communities should not face uncertain or potentially substantial environmental risks. Therefore, it is strongly recommended that planning permission be refused.

Yours Sincerely,

A handwritten signature in black ink that reads "V. Timlin". The signature is written in a cursive style with a large, prominent initial "V".

Name: Valerie Timlin

Date: 18 April 2026