

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

William Flaherty

Carnmore

Oranmore

Galway

H91TW62

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 6.83km from the proposed site of the Cashla Peaker Plant (Athenry).

My name is William Flaherty, and I am from Carnmore. While I may not live directly in the Athenry area, I am very concerned about the potential impacts of the proposed development, particularly in relation to animal health, farming, human health, and environmental protection.

I run a suckler farm, and I also have three nephews farming intensively in the nearby area. Farming is central to our livelihoods and to the wider local economy, and any negative impact on agriculture affects not just one farm, but entire families and future generations.

I am also part of the GLAS scheme, which means I follow strict environmental measures to protect biodiversity, water quality, and the environment. As farmers, we are being asked to meet high environmental standards, yet developments like this risk introducing pollution that is completely outside of our control.

I am extremely concerned that I was never properly informed about this proposed plant. I only became aware

of it through a neighbour who is farming in the Athenry area. Given the scale and potential impact of this development, I believe this is unacceptable. This project has serious potential consequences for my farming operation, my health, and my family, and I should have been properly notified and given the opportunity to engage at an earlier stage.

My main concern is the impact that air pollution from the proposed development could have on animals. Scientific evidence shows that pollutants such as fine particulate matter (PM2.5) and nitrogen oxides can cause respiratory problems, weaken immune systems, and increase the risk of disease in livestock. This leads to more sick animals, increased veterinary costs, and reduced performance.

Pollution does not stay in one place — it spreads and settles on land, grass, and water. This means farms beyond the immediate area, including mine and my nephews' farms, could be affected. Over time, contaminants can build up in soil and be ingested by animals, creating long-term risks for animal health and food production.

I am also concerned about my own health. I suffer from asthma, and any increase in air pollution would be a serious concern for me going forward.

In addition, I have serious concerns about the nature of the land in this area. This is a karst limestone region, which means the ground is highly permeable, with underground channels and direct connections to groundwater systems. Any contamination from emissions, runoff, or accidental events has the potential to travel quickly through the ground and affect water quality over a wide area. This creates a heightened environmental risk that must be carefully considered.

I would also be worried about the risk of fire or explosion associated with this type of industrial development. In a rural setting, emergency response times can be longer, and any such incident could have serious consequences for nearby homes, farms, livestock, and the surrounding environment.

For these reasons, I believe the full impact on agriculture, animal health, human health, water quality, and safety has not been properly considered. The risks extend beyond the immediate location and affect the wider farming community, including those of us who were not even properly informed about the development.

Cumulative Health Impacts Over Time

I have serious concerns about how this proposed peaker plant would operate over time. Although it would run intermittently, it would do so at extremely high intensity, and the potential use of diesel adds to these concerns, as it could result in repeated short-term spikes in air pollution. While individual emission events may be brief, the fact that they could occur repeatedly over many years—potentially up to 2050—raises concerns about ongoing exposure and cumulative health impacts.

Pollutants such as nitrogen oxides and fine particulate matter are known to worsen asthma, trigger respiratory symptoms, and contribute to long-term conditions including chronic respiratory and cardiovascular disease. This is particularly concerning for nearby residents, especially vulnerable groups such as children, older people, and those with existing health conditions. There is still uncertainty regarding whether the lasting and cumulative effects of these emissions have been fully studied, which leads to real concerns that continued exposure during the development's lifetime could affect public health and wellbeing in the future.

Dependence on Groundwater for Domestic and Agricultural Use

I am concerned about the potential risk to groundwater from this proposed development. The area depends heavily on clean groundwater for essential needs, including drinking water, farming, and livestock, making it a vital resource for the community. The introduction of an industrial facility involving the storage and handling of fuels creates an ongoing risk to this resource, and any contamination, even if accidental, could have serious and long-lasting consequences for water quality, livestock health, and agricultural productivity.

What is particularly worrying is that once groundwater becomes contaminated, the damage can be extremely difficult—if not impossible—to reverse. This raises serious concerns about whether this type of development is appropriate for this location. To sum up, significant worries persist that the dangers to groundwater have not been fully assessed, and any consequences could be permanent.

Protection of Agricultural Livelihoods

Farmers work diligently within stringent environmental guidelines and uphold rigorous standards of environmental stewardship, fully recognising the importance of these obligations. There is concern that an industrial development of this nature—particularly one involving diesel use and long-term emissions, potentially until 2050—could introduce risks that undermine that work by affecting land quality and increasing environmental pressures. This situation presents significant challenges for farmers, who should not face penalties for problems caused by factors beyond their control. There are concerns that agricultural risks remain overlooked and the development may affect local farming long-term.

Need for Precaution Due to Uncertainty

There is significant concern regarding the insufficient assessment of long-term health impacts on children, particularly with respect to repeated exposure associated with intermittent plant operation and diesel utilisation. Since children are especially susceptible to air pollution, uncertainty surrounding these effects warrants scrutiny. It is inadequate to presume minimal risk without substantial, transparent evidence. Given these circumstances, it is recommended that a precautionary approach be adopted to prioritise the health and wellbeing of children and to ensure that all potential risks are thoroughly evaluated and mitigated.

Unsuitability of Rural Road Network

There are serious concerns about the proposed site entrance on the L3103, which is an exceptionally dangerous stretch of road where introducing an access point would create an unacceptable level of risk. The road is extremely narrow and cannot safely accommodate two heavy goods vehicles passing at the same time, there is no hard shoulder to allow for safe manoeuvring or recovery, and visibility is severely limited due to blind dips and sharp corners. These are significant existing hazards that already pose a real danger to road users, and the addition of a site entrance would further increase that risk.

There are also concerns regarding the suitability of local roads for this type of traffic. Rural roads are not built to support continuous industrial activity, and when heavy trucks, farm equipment, and regular local vehicles share these routes, it often leads to difficult and dangerous traffic conditions. The introduction of additional industrial traffic, including construction vehicles and diesel deliveries, would further increase the risk and make these roads more dangerous for all users.

Emergency Response and Adequacy of Assessment

There are serious concerns about the lack of clear information on emergency response planning for this proposed development, including how a major incident would be managed, evacuation procedures, coordination with local emergency services, and the overall effectiveness of any response. This is particularly

concerning in a rural area where the road network is already limited and constrained, which could make access and evacuation more difficult in an emergency and increase risks to nearby residents. When considered alongside the absence of detailed worst-case scenario analysis, it is not clear that risks to human health and safety have been reduced to an acceptable level, creating significant concern about the preparedness of the development to respond to a major incident.

Impact on Residential Amenity and Long-Term Visual Change

There are concerns that the proposed development will be clearly visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This has the potential to impact residential amenity, reduce enjoyment of the area, and alter the overall character of the landscape, with a large and visually prominent industrial facility introduced into what is currently a rural setting. Given the long operational lifespan of the development, potentially extending to at least 2050, these impacts would be long-lasting and not easily mitigated. The addition of industrial structures, lighting, and ongoing activity represents a significant and enduring change that requires careful consideration.

Failure to Meet Aarhus Convention Standards

There are concerns that the consultation process for this development does not meet the standards set out under the Aarhus Convention, which provides for the public's right to access environmental information and to participate effectively in environmental decision-making. This requires not only that information is made available, but that it is understandable, accessible, and provided in a timely manner. In this case, the complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, appears to have restricted meaningful public participation. This raises serious concerns regarding transparency, accessibility, and the overall effectiveness of public engagement in the decision-making process.

Reliance on Regulation Does Not Eliminate Risk

The Environmental Impact Assessment depends on forthcoming regulation, licensing, and monitoring to manage environmental effects. Nonetheless, regulatory oversight cannot entirely remove environmental risks or ensure that actual emissions and impacts will match those projected by models. Uncertainty persists regarding the long-term performance of the development, especially under diverse operational scenarios.

Conclusion

Due to the concerns mentioned—such as uncertainty about how often operations will occur, overall environmental impacts, and risks related to diesel use—this project is not viewed as proper or sustainable development. There has also been insufficient consideration of the possibility that the actual impacts could be greater than those evaluated. Therefore, we respectfully ask that approval for this application be refused.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'William Flaherty'. The signature is written in a cursive style with a prominent initial 'W' and 'F'.

Name: William Flaherty

Date: 18 April 2026