OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

William Higgins

Derrydonnell

Oranmore

Galway

H91N9V9

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 19 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 3.41km from the proposed site of the Cashla Peaker Plant (Athenry).

I live 3 km away and work on a farm that owns the next field over from the proposed site and strongly oppose the abhorrent idea of creating such a polluting and harmful power plant so close to schools, houses, businesses and farms. The advances in wind, solar and nuclear energy have been so clear and consistent in the past few years and I would have a solar farm spanning 10 times the acreage before I agree to such a ludicrous proposal. The harmful emissions from the plant would render the field impossible for the animals to graze in, let alone make it a death wish to even consider building a house anywhere near. If this disgusting proposal is given planning permission I would have no choice but to stop using the many fields I currently have animals in on the cashla road and lose my livelihood.

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.

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.

Long-Term Accumulation of Pollutants and Chemical Residues

I am particularly concerned about the risk of pollution to soil and groundwater from this proposed development. The inclusion of diesel storage tanks, hardstanding areas, drainage systems, and other infrastructure increases the likelihood that pollutants could gradually enter the ground over time, potentially up to 2050. Substances such as hydrocarbons from diesel and gas, along with other chemical residues, may build up slowly, particularly where there are repeated small leaks, routine operational losses, or occasional spills, with impacts accumulating over time.

What is especially worrying is that this type of pollution may not be immediately visible but could result in long-term damage to groundwater quality and soil health. This has implications not only for environmental protection but also for local agriculture, which depends on clean soil and water. Overall, there is significant concern that these long-term and cumulative risks have not been fully addressed and could have lasting consequences for the local environment and livelihoods.

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.

Unsuitability of Site Due to Environmental Sensitivity

I do not believe this site is suitable for this type of development. The area is environmentally sensitive, with a strong reliance on clean groundwater and agricultural land, both of which are essential to the local community. Introducing a development involving diesel storage and industrial processes, potentially operating until at least 2050, brings significant long-term risks to water quality, soil health, and surrounding land uses.

These effects are not temporary or easily controlled, and once harm is done, it can be extremely challenging—sometimes even impossible—to completely fix. Because of uncertainty and the risk of permanent environmental damage, it's best to proceed with caution. In summary, there are significant concerns about whether this development is suitable for this area.

Organic Farming

As a local organic farmer, I am very concerned about the potential impact this proposed peaker plant could have on my farm and others in the area. Organic farming is governed by strict European standards and requires high environmental quality, including keeping soil, crops, and water free from contamination. Airborne pollutants from the plant, particularly those linked to diesel such as nitrogen oxides and fine particulate matter, could settle onto land and crops, posing a risk to organic certification even at low levels.

There are also concerns about contamination through water and soil pathways, including runoff or accidental spills from fuel storage. Organic farming relies on healthy soil, clean water, and a balanced ecosystem, and any disruption to these could undermine the integrity of production. The consequences of losing organic certification would be severe, including loss of premium markets, significant financial impacts, and a re-conversion period of up to two years. Overall, there is serious concern that this development poses a disproportionate and inadequately assessed risk to organic farming and sustainable livelihoods in the area.

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.

Exposure During Daily Activities and School Times

As a parent in the area, I am concerned that children living nearby or attending local schools will be exposed to higher levels of air pollution when the plant is operating at peak times, particularly when they are outdoors during school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants and making them more vulnerable to harmful effects. What is especially worrying is the potential for repeated exposure during key stages of development, which could have lasting impacts on their health and wellbeing. Overall, this raises serious concerns as to whether these risks have been fully considered.

Cumulative Impact on Child's Development

As a parent in the area, I am concerned about the impact of fine particulate matter over time. These pollutants can travel long distances and accumulate, meaning children may be exposed not only during peak pollution events but also through ongoing low-level exposure. The cumulative effect of this is particularly worrying, as repeated exposure during key stages of growth and development could have lasting impacts on lung development and overall health. From a community perspective, this raises serious concerns about the long-term safety of this development for children, and it is not clear that these cumulative impacts have been fully considered.

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.

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.

Lock-in of Fossil Fuel Infrastructure

There are serious concerns that the proposed development represents new fossil fuel infrastructure with a long operational lifespan, potentially extending to at least 2050, which risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure of this nature may delay or displace the development of renewable energy and energy storage solutions, leading to continued reliance on fossil fuels over the long term. Overall, there is concern that the proposal is not aligned with current climate objectives and may undermine the transition to a low-carbon energy system.

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.

Availability of Cleaner Alternatives

Although cleaner and more sustainable alternatives to fossil fuels—such as renewable energy, energy storage, demand response, and grid flexibility measures—are available, building new gas infrastructure may lessen the urgency to invest in these solutions. Given the climate crisis, emphasis should be placed on low-carbon and renewable options instead of furthering dependence on fossil fuels; this proposal could delay the shift toward a more sustainable energy system.

Operational Uncertainty and Lack of Enforceable Limits

There are concerns that the Environmental Impact Assessment relies on assumed operational scenarios rather than fully assessing worst-case conditions. As the plant will operate in response to electricity demand, there is uncertainty regarding how frequently or intensively it may run, including periods when diesel will be used, potentially resulting in higher emissions than those modelled. Without a thorough evaluation of the worst-case scenario, it is not possible to confidently rule out the possibility of major environmental impacts.

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,

Name: William Higgins
Date: 19 April 2026