

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

ORLA MCKEOGH
C/o Advocacy committee
Skylark centre
Raheen, Athenry
Galway
H65 Y103

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

Date: 24 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,

On Behalf of the Advocacy committee, we are submitting an observation with the concerns of our community. Attached is an easy read version outlining the main concerns.

Human Health & Air Pollution

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.

Children & Health

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.

Fire Safety & Major Accident Hazards

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.

Planning & Assessment

Absence of Worst-Case Scenario Assessment

There are concerns that the Environmental Impact Assessment relies on assumed or typical operating scenarios rather than fully assessing worst-case conditions. As a demand-led facility, a peaker plant may operate more frequently, for longer periods, or at higher intensity than predicted, and this may include the use of diesel during start-up, testing, or operational phases. As a result, actual emissions and environmental impacts could be significantly greater than those modelled. A comprehensive evaluation of worst-case scenarios is essential to ensure the reliability of the assessment. Without such an analysis, it is not possible to affirm with confidence that major negative environmental impacts will be avoided, and this omission constitutes a critical limitation.

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 1 – Precautionary Refusal Based on Uncertainty and Risk

The proposal raises important concerns about environmental protection, public health, agriculture, road safety, and community welfare. Due to uncertainties regarding how often operations would occur, diesel usage, and overall impacts, this development cannot be considered acceptable. A thorough and cautious assessment is needed to ensure that significant environmental effects are avoided, but such an evaluation has not been conducted. Therefore, I recommend that approval for this development be refused.

Yours Sincerely,

[Signed electronically]

Name: ORLA MCKEOGH

Date: 24 April 2026

See below for attached Easy Read version

OBSERVATION TO AN COIMISIÚN PLEANÁLA

EASY READ VERSION



We are a local Advocacy group.
We advocate on behalf of individuals with disabilities in our community.
We are concerned about how this proposed peaker plant may affect **health, safety** and environment.



Health



Safety



Environment

1 Health Concerns Over Time



- The plant will not run all the time.
- But when it runs, it will run at high intensity.
- It may use diesel fuel, which causes pollution.

We are concerned that:

- Pollution may happen many times until 2050.
- Pollution may build up over time.

Possible health impacts:



People most at risk:



2 Soil and Water Pollution



- The development includes diesel storage and drainage systems.

We are concerned that:

- Small leaks or spills may happen.
- Pollution may slowly enter:



This may cause:



Important:

- This type of pollution may not be seen.
- Damage could last for many years.



3 Impact on Children



- Small pollution particles can travel in the air.
- Children may breathe them in over time.

We are concerned that:

- Long-term exposure may affect children's:



Why this matters:

- Children are still growing.
- Effects may last a lifetime.



4 Emergency Planning Concerns



- There is not enough clear information about emergencies.

We are concerned about:

- What happens in a major incident
- Evacuation plans
- Emergency services response

Extra concern:

- The area is rural.
- Roads are limited and narrow.
- This may make emergency response more difficult.



5 No Worst-Case Scenario Assessment



- The report looks at normal operation only.

We are concerned that:

- The plant may run more often than expected.
- Diesel use may be higher than predicted.
- Pollution levels may be worse.

Without worst-case analysis:

- Risks are not fully understood.
- Safety cannot be guaranteed.



6 Protecting the Community



- The documents are very complex.
- Many people found it hard to understand or take part.

We are concerned about risks to:



We believe:

- Communities should be protected.
- Unclear risks are not acceptable.



Conclusion and Recommendation

Because of concerns about:

- Long-term health impacts
- Environmental damage
- Emergency planning
- Lack of worst-case assessment

We respectfully request that planning permission be REFUSED.

