

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

**Case Reference: 324113**

Albert Dolan TD  
Monivea  
Athenry  
Galway

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

Date: 23 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,

I wish to make an observation in respect of the proposed 300MW Open Cycle Gas Turbine (OCGT) Peaker Plant at Rathmorrissy/Pollnagroagh, Athenry (Case Ref. 324113).

This submission is made by me in my capacity as a Teachta Dála, reflecting concerns that have been brought to my attention by constituents, and also in my capacity as a resident of Athenry. The matters outlined below seek to highlight a number of planning, environmental, and public safety considerations arising from the documentation submitted, and I respectfully request that these be fully considered as part of the decision-making process.

## **Air Quality, Emissions, and Public Health**

I wish to highlight concerns regarding the potential impact of air emissions arising from the proposed development. Pollutants such as nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10) are known to affect air quality and can contribute to respiratory and cardiovascular illness, particularly among vulnerable groups including children, older persons, and those with pre-existing health conditions.

While the plant is intended to operate intermittently, it is proposed to do so at high intensity during start-up and peak demand periods. This raises questions regarding short duration but concentrated emission events. The potential use of diesel during such periods is a particular point that may warrant further examination, given the higher emission profile associated with diesel combustion.

It would be beneficial to have further clarity on the extent to which emissions may disperse beyond the immediate vicinity and whether cumulative localised impacts have been fully assessed. In this context, consideration may also be given to the adequacy of the emissions assessment having regard to EU air quality standards under Directive 2008/50/EC.

### **Cumulative and Long-Term Health Considerations**

Although individual operational periods may be limited in duration, the potential for repeated operation over an extended timeframe, potentially to 2050, gives rise to questions regarding cumulative exposure.

It should be considered whether the long-term and cumulative health implications of intermittent but recurring emission events have been comprehensively assessed. Greater clarity on how such cumulative impacts have been modelled and evaluated would assist in ensuring a full understanding of potential risks.

### **Soil, Groundwater, and Agricultural Considerations**

There are a number of issues that merit further consideration in relation to the protection of soil and groundwater. The inclusion of diesel storage, drainage systems, and fuel handling infrastructure introduces potential pathways for contamination through accidental releases or long-term seepage.

Given the importance of groundwater in the area for domestic use, agriculture, and livestock, it would be beneficial to have further detail on the safeguards in place to prevent contamination and the mitigation measures proposed in the event of an incident.

Consideration may also be given to the potential implications for agricultural activity, particularly where farming operations rely on maintaining high environmental standards. Ensuring that these risks are fully examined is important in the context of protecting both environmental and economic sustainability in the area.

### **Traffic, Road Safety, and Access**

It would be beneficial to have further clarity on whether the Environmental Impact Assessment has fully captured road safety considerations associated with the proposed site access onto the L3103.

This road is relatively narrow, with limited verge space and constrained visibility in places due to bends and gradients. The introduction of construction traffic, operational vehicles, and fuel deliveries, including heavy goods vehicles, raises questions as to whether the existing road network can safely accommodate this level of activity.

Further consideration of the interaction between heavy vehicles and existing road users, including residents, agricultural machinery, and school-related traffic, would assist in ensuring that road safety implications are fully understood.

### **Major Accident Hazards and Emergency Response**

A development of this nature, involving gas-fired generation and onsite fuel storage, inherently requires careful consideration of safety and risk management.

It would be beneficial to have further detail regarding the assessment of potential major accident scenarios, including fire, explosion, or accidental release of hazardous materials, and how these risks have been mitigated in accordance with the Seveso III Directive.

Additional clarity in relation to emergency response planning, evacuation procedures, and coordination with local emergency services would also assist in ensuring that risks to public safety have been fully addressed, particularly given the rural setting and local road constraints.

### **Landscape and Policy Considerations**

The proposed development represents a significant infrastructure project within a predominantly rural and agricultural landscape.

Consideration may be given to the extent to which the scale and visual impact of the development, including structures, stacks, lighting, and associated infrastructure, aligns with the objectives of the Galway County Development Plan, including Policies LCM1, LCM2, LCM3, and GB1.

It would be helpful to have further clarity on how the development integrates into the surrounding landscape and the extent to which visual impacts can be effectively mitigated.

### **Assessment of Worst-Case and Cumulative Scenarios**

It should be considered whether the Environmental Impact Assessment fully addresses worst-case operational scenarios, particularly given the demand-led nature of the facility.

There may be merit in further examining scenarios involving more frequent operation, extended durations, or increased reliance on diesel, and how these could influence emissions, traffic, and environmental impact.

In addition, further assessment of the cumulative interaction of emissions, noise, traffic, and long-term operation would assist in providing a more comprehensive understanding of the overall environmental impact of the development.

### **Conclusion**

The above points are intended to highlight a number of important environmental, safety, and planning considerations associated with the proposed development.

In particular, questions arise in relation to cumulative impacts, long-term exposure, road safety, and the assessment of worst-case scenarios. Given the potential significance of these matters, I respectfully request that they be carefully considered and fully addressed as part of the assessment of this application, so as to ensure that any decision is made on a comprehensive and robust understanding of the potential impacts.

Kind regards,

A handwritten signature in black ink, appearing to read 'Alan Allen', is positioned below the text 'Kind regards,'.