

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Ann-Marie Garry
Ballycar road
Newmarket on Fergus
Clare

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,

Having strong family connections to Athenry I'm deeply saddened by the proposal of the establishment of the peaker plant causing grave concern for the air quality and potential health issues.

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 (NOx) and fine particulate matter (PM2.5 and PM10) 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.

Short-Term Exposure

I'm concerned that emissions from the planned peaker plant could impact the environment, particularly if diesel is used at start-up or during periods of high demand. Diesel exhaust releases various dangerous pollutants, such as nitrogen oxides, fine particles, and other toxic chemicals. These substances are associated with respiratory issues, impaired lung function, and heart disease. What is especially worrying is that these emissions may occur in short but intense bursts rather than in a steady, predictable way, particularly during start-up and peak operation. The average-based modelling used in the assessment seems not to capture this kind of real-world operation completely.

There are worries that residents in nearby areas might face greater pollution levels than expected, especially when the weather is calm and pollutants linger instead of spreading out. There is considerable uncertainty regarding how accurate these air quality forecasts are, which makes it hard for the community to be sure that both public health and the environment are truly safeguarded.

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.

Public Health Protection

There is significant concern within the community about the potential impact of air pollution from this proposed peaker plant on human health, particularly during periods when it is operating at full capacity and emissions are highest. The possible use of diesel is especially worrying, as it introduces additional harmful pollutants that can travel long distances and accumulate in the environment.

There is ongoing uncertainty concerning the operational frequency of the plant, its emission rates, and the extent of public exposure to pollutants through 2050. Because these issues remain unresolved, it is difficult to verify that all risks have been considered. Given these unknowns, it is wise to adopt a careful strategy to protect public health; unless definitive evidence proves no harm, any dangers to residents should be considered as part of the planning process.

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.

ACRES Compliance

As a local farmer, I am very concerned about how this proposed development could affect my ability to meet environmental standards. Farmers in this area already operate under strict requirements, including schemes such as ACRES and nitrates regulations, and we take these responsibilities seriously. However, emissions, airborne pollution, or runoff from this peaker plant—particularly linked to diesel use—could increase nitrate levels or environmental pressure, potentially pushing farms out of compliance through no fault of their own.

As an ACRES participant, any increase in pollution associated with this development could directly impact compliance with scheme requirements, leading to penalties, financial loss, or exclusion from essential programmes. This creates an unfair situation where farmers may be held responsible for environmental impacts arising from an industrial activity outside their control, placing an unjust burden on the farming community.

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.

Derogation Limits

As a derogation farmer, I operate under strict environmental limits and take compliance very seriously, but there is concern that this proposed development could make it much harder to remain within those limits. Additional environmental pressure from nearby industrial activity, including emissions or contamination linked to diesel use, could increase nitrate levels in the area, which is entirely outside my control. This could result in penalties, reduced stocking levels, or even the loss of derogation status, despite full compliance with regulations, leading to serious financial and operational consequences. Overall, this creates an unfair situation where farmers may be penalised for environmental impacts arising from a development beyond their control.

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.

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.

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.

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.

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, consisting of several overlapping, fluid strokes that form a cursive-style name.

Name: Ann-Marie Garry

Date: 19 April 2026