OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Anna Marie Coyle

12 Cluain na Cathrach

Caheroyan

Galway

H65F991

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 15 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,

We are a family of 4, with two young children attending the school, Lisheenkyle NS, close to the proposed peaker plant and we also live not far from the proposed site in Athenry. We chose to live here almost 20 years ago as there were no such plants/ pylons etc in this area. This is our town and we don't wish to bring anything hazardous into it!

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Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10), are well established as contributors to respiratory irritation, reduced air quality, and long-term environmental degradation. A peaker plant operates intermittently but at very high output during periods of peak electricity demand, resulting in concentrated bursts of emissions, particularly during start-up and ramp-up phases.

Where diesel is used as a backup fuel or during start-up, emission levels may be significantly higher, as diesel combustion produces elevated levels of nitrogen oxides, sulphur dioxide, particulate matter, and other combustion-related pollutants compared to gas. These pollutants can penetrate deep into the lungs and bloodstream, contributing to respiratory and cardiovascular illness. Vulnerable groups, including children, older people, and individuals with pre-existing respiratory conditions, are particularly at risk. Fine particulate matter can travel significant distances and accumulate over time, extending the area and duration of exposure. This creates a risk of both immediate and long-term health impacts and raises concerns under Directive 2008/50/EC on ambient air quality and cleaner air for Europe.

Water & Groundwater

Risk of Groundwater Contamination from Fuel Storage and Handling

A peaker plant requires the storage and handling of fuels such as diesel, lubricating oils, and other chemical substances, all of which present potential contamination risks. These substances may enter the ground through leaks, spills, or contaminated surface runoff, particularly over the long operational lifespan of the facility (until at least 2050). Even minor but repeated incidents can lead to the gradual accumulation of pollutants in soil and groundwater. Once groundwater contamination occurs, it is extremely difficult and costly to remediate, and impacts can persist for decades. This raises serious concerns under Directive 2000/60/EC, which requires the protection of water bodies and the prevention of deterioration in water quality.

Farming & Agricultural Impact

ACRES Compliance

Farmers are required to meet strict environmental standards under schemes such as ACRES and nitrates derogation rules. If emissions, atmospheric deposition, or runoff from this peaker plant, including diesel-related pollutants, increase nitrate levels or environmental pressure, farmers could be pushed out of compliance through no fault of their own. As an ACRES farmer, any increase in pollution linked to this development could directly affect compliance with scheme requirements, leading to penalties, financial loss, or exclusion from environmental programmes. This creates an unfair situation where farmers are held responsible for environmental impacts arising from activities beyond their control.

Children & Health

Vulnerability to Diesel-Related Air Pollution

Children are particularly vulnerable to air pollutants due to their developing lungs, higher breathing rates relative to body size, and increased time spent outdoors. The intermittent high-output operation of a peaker plant, particularly where diesel is used during start-up or peak demand periods, may expose children to short but concentrated bursts of pollution. Diesel emissions contain fine particulate matter and nitrogen oxides that can penetrate deep into the lungs, potentially affecting lung development and increasing the risk of respiratory illness.

Local Roads, Safety & Schools

Increased Heavy Traffic and Diesel Transport Risks

The placement of the proposed site entrance on the L3103 raises severe safety concerns due to the inherently hazardous nature of this specific stretch of road. The carriageway is critically narrow, struggling to safely accommodate two passing Heavy Goods Vehicles (HGVs), and completely lacks a hard shoulder to allow for any margin of error. Compounding these dangers are the presence of blind dips and corners, which

significantly reduce visibility and sightlines for all road users. These critical safety deficiencies create an unacceptable traffic hazard that must be comprehensively addressed.

In addition, the proposed development will result in increased traffic on local roads, including heavy goods vehicles, construction traffic, and fuel deliveries such as diesel tankers. These roads are rural in nature, often narrow with limited visibility, and are already used by residents, agricultural machinery, and school-related traffic. The introduction of additional heavy vehicle movements significantly increases the risk of collisions and creates a more hazardous environment for all road users.

Fire Safety & Major Accident Hazards

Risk of Fire and Explosion from Fuel Storage

The proposed development involves the storage, handling, and use of highly flammable fuels, including natural gas and diesel, which present inherent risks of fire and explosion. In the event of equipment failure, leakage, or operational malfunction, these substances could ignite and result in a serious incident. Given the high-intensity and intermittent operation of a peaker plant, the potential for such events cannot be dismissed. The consequences for nearby homes, people, farmland, and livestock could be significant.

Visual Impact & Landscape

Landscape Character and Policy Conflict

The proposed development represents 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 associated infrastructure such as buildings, stacks, lighting, and fuel storage, will fundamentally alter the character of the area. This type of development does not appear consistent with the existing landscape or its capacity to absorb such change. This raises concerns under Policies LCM1, LCM2 and LCM3 of the Galway County Development Plan, which require the protection of landscape character, sensitivity, and capacity, and seek to ensure that development is appropriate to its setting.

Climate Impact

Lock-in of Fossil Fuel Infrastructure

The proposed development represents new fossil fuel infrastructure with an operational lifespan extending to at least 2050. This risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure may delay or displace the development of renewable energy and storage solutions, creating long-term dependency on fossil fuels that is not consistent with climate objectives.

Community Engagement

Lack of Clear, Accessible, and Effective Communication

There appears to have been insufficient and ineffective community engagement in relation to this project. Many residents did not receive any direct communication or notification regarding the development. While some individuals report receiving a flyer or attending an information event, the material provided was highly technical and difficult to understand without specialist knowledge. This significantly limits meaningful participation. Effective consultation requires that information is accessible, clearly explained, and actively communicated to all affected members of the community. In this case, the level of detail and technical complexity of the documentation creates a barrier to understanding, meaning that many people are unable to fully assess the potential impacts of the development.

Planning & Assessment

Absence of Worst-Case Scenario Assessment

The Environmental Impact Assessment relies on assumed or typical operational scenarios rather than assessing worst-case conditions. A peaker plant operates in response to electricity demand, meaning the frequency, duration, and intensity of operation cannot be guaranteed. This includes the use of diesel during start-up, testing, or operational periods. As a result, actual emissions and environmental impacts may be significantly greater than those modelled. Without a robust worst-case assessment, it cannot be concluded that significant adverse environmental effects will not occur. This creates a fundamental gap in the assessment and undermines its reliability.

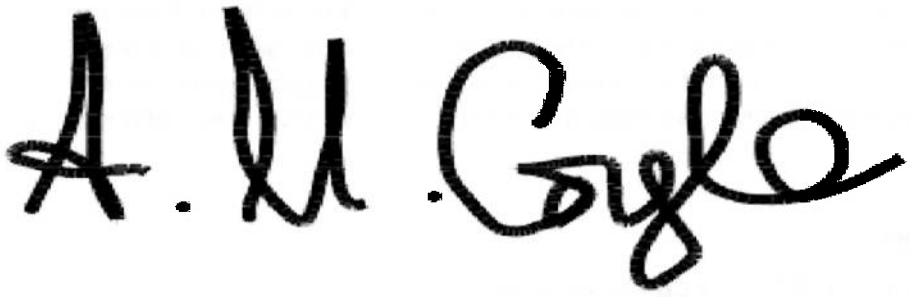
Operational Uncertainty and Lack of Enforceable Limits

There is no clear or enforceable limit on how often or how long the plant will operate. As a demand-led facility, operation may be more frequent or prolonged than assumed in the Environmental Impact Assessment. This includes diesel use during start-up and operation. If this occurs, impacts such as emissions, noise, and traffic may be significantly greater than predicted. This uncertainty raises concerns regarding the accuracy of the assessment.

Conclusion

This proposal raises real and valid concerns for people, public health, agriculture, and the local environment. The complexity of the documentation and limitations in community engagement have made it difficult for the public to fully participate in the decision-making process. Communities should not be exposed to uncertain and potentially significant environmental impacts. I strongly urge that planning permission is not granted.

Yours Sincerely,



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