OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

ANNE KEARY

Cloran

Athenry

Galway

H65Y640

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 10 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 worked in Lisheenkyle N.S, from 1980-2021, as principal from 1996 to 2021.This is the nearest school to the proposed plant.
In the mid 1980's there was a serious incident of pollution in the school well.
The water was discoloured and had a distinctively acidic smell. The school was forced to close. A local farmer supplied a bulk tank of water daily for drinking and handwashing so the school could re-open .The source was never discovered. There were no farmers making silage so it was a complete mystery.
It continued for about 6 days. At the time we were told that it was not possible to trace the source due to the karst landscape underground. There were also other less serious incidents prior to the local water scheme becoming available. The exact dates of closure would be recorded in the relevant roll-book. The EIA section dealing with water contamination needs close scrutiny.
As a former principal of the school I am well aware of the extent of traffic using the L3103 during drop off and pick-up times. This is one of the primary access routes to Lisheenkyle N.S. and preschool.
I am also extremely concerned with the location of the proposed plant. The junction of 2 motorways means that every tourist travelling to Galway will be greeted by this enormous plant and a 30m chimney. This also means that in the event of any emergency the primary access roads to Galway would be closed and emergency vehicles would have great difficulty gaining access.

Human Health & Air Pollution

Cumulative Health Impacts Over Time

The intermittent but high-intensity operation of a peaker plant, combined with periodic diesel use, can result in repeated short-term spikes in air pollution. While individual emission events may appear limited in duration, repeated exposure over time (until at least 2050) creates a cumulative health burden. Pollutants such as nitrogen oxides and fine particulate matter can worsen asthma,

trigger respiratory symptoms, and contribute to long-term health impacts, including chronic respiratory disease and cardiovascular conditions. The cumulative effect of these emissions over the operational lifespan of the development has not been fully assessed, particularly in relation to long-term exposure pathways and sensitive populations living nearby.

💧 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

Organic Farming

The proposed peaker plant presents a significant risk to the regulatory compliance and economic viability of nearby certified organic farms. Organic certification is governed by strict European regulations and requires the absence of prohibited substances and the maintenance of high environmental quality. Airborne pollutants such as nitrogen oxides, particulate matter, and volatile organic compounds, particularly those associated with diesel combustion, can deposit onto soil, forage crops, and pasture through atmospheric pathways. Organic farms are especially vulnerable to such contamination because even low levels of pollutants may trigger certification concerns.

In addition to airborne risks, there is a potential for contamination through water and soil pathways, including runoff from hardstanding areas, accidental spills, or leaks from fuel storage systems. Organic farming depends on maintaining healthy soil biology, clean water sources, and natural ecological balance. Any disruption to these systems may compromise the integrity of organic production.

The consequences of losing organic certification are severe. Farmers may lose access to premium markets, suffer significant financial loss, and face a mandatory re-conversion period of up to two years. During this time, they must adhere to organic practices without receiving organic prices. This represents a major economic and operational burden. The proposed development therefore poses a direct and disproportionate risk to organic farming systems that has not been adequately assessed.

👶 Children & Health

Exposure During Daily Activities and School Times

Children living or attending school near the site may be exposed to elevated air pollution during peak operation periods, which may coincide with times when children are outdoors, including school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants. This raises concerns about repeated exposure to harmful emissions during critical stages of development.

🚚 Local Roads, Safety & Schools

Unsuitability of Rural Road Network

The proposed site entrance is located on an exceptionally dangerous section of the L3103. Establishing an access point at this specific location introduces an unacceptable level of risk due to several compounding hazards:

- Severely Restricted Width: The road is currently too narrow to safely permit two Heavy Goods Vehicles to pass simultaneously.

- Absence of a Hard Shoulder: There is no safe refuge or margin for error for manoeuvring vehicles.

- Critically Poor Visibility: The immediate area is affected by blind dips and blind corners, severely compromising driver sightlines.

These immediate dangers constitute a severe threat to public safety and require urgent and mandatory remediation.

In addition to these existing hazards, local roads are not designed to accommodate sustained industrial traffic. The interaction between heavy goods vehicles, farm machinery, and everyday residential traffic creates a complex and potentially dangerous road environment. The introduction of additional industrial traffic, including diesel deliveries and construction vehicles, further compounds these risks.

🚨 Fire Safety & Major Accident Hazards

Emergency Response and Adequacy of Assessment

There is insufficient information provided regarding emergency response planning, including evacuation procedures, coordination with local emergency services, and the ability to respond effectively to a major incident. This is of particular concern in a rural area with constrained road infrastructure. Taken together, the absence of detailed worst-case analysis and robust emergency planning means it has not been demonstrated that risks to human health and safety have been reduced to an acceptable level.

👁 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.

Scale, Integration, and Rural Context

The scale and industrial nature of the proposed development are not consistent with the surrounding rural environment. The introduction of large-scale plant, structures, and associated infrastructure will create a visually dominant feature in the landscape that is out of character with existing development. It has not been demonstrated that the development can be successfully integrated into its surroundings. This raises concerns under Policy GB1 of the Galway County Development Plan, which requires that developments be designed and located to integrate effectively into the landscape.

🌍 Climate Impact

Conflict with National and EU Climate Targets

Ireland has legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021 and 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. This raises concerns regarding consistency with national carbon budgets and the State's ability to meet its climate targets.

Underestimation of Operational Emissions

The Environmental Impact Assessment may underestimate emissions associated with the development by relying on assumed operational patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during periods of energy system stress. This creates uncertainty regarding total greenhouse gas emissions over time and raises concerns that the climate impact of the development has not been fully assessed.

Community Engagement

Failure to Meet Aarhus Convention Standards

Under the Aarhus Convention, the public has a right to access environmental information and to participate effectively in environmental decision-making. This requires not only the provision of information, but that such information is understandable, accessible, and provided in a timely manner. In this case, the consultation process does not appear to meet these standards. The complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, has restricted meaningful public participation. This raises concerns regarding compliance with fundamental principles of transparency, accessibility, and public engagement in environmental decision-making.

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.

Inadequate Assessment and Planning Concerns

There are serious concerns regarding environmental impact, safety risks, and the adequacy of the assessment process. The Environmental Impact Assessment does not fully address cumulative, long-term, or worst-case impacts and relies on assumptions that may not reflect real-world operation. These issues create uncertainty regarding the true impact of the development. On this basis, I ask that permission for the proposed development be denied.

Yours Sincerely,

[Signed electronically]

Name: ANNE KEARY

Date: 10 April 2026