OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Brian Leen

Lisheenkyle East,

Oranmore,

Galway

H91RHD6

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 16 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 strongly object to this proposed development primarily due to my concerns for the health and wellbeing of my family, including my young children, as well as that of my neighbours and community. The risk of damage to our health due to air pollutants emanating from this plant is too great to ignore and the development should not be allowed to proceed on these grounds alone. I also fear for the health of cattle, sheep, horses and other animals farmed in the area. There is no doubt that they will also be gravely affected by the toxic fumes.

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.

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.

Public Health Protection

Air pollution from a peaker plant can affect human health, particularly during peak operation periods when emissions are highest. The inclusion of diesel use introduces additional pollutants that are widely recognised as harmful and capable of long-range transport and accumulation in the environment. Given the uncertainty around operational frequency, emission levels, and long-term exposure patterns (until at least 2050), a precautionary approach should be applied to protect public health. In the absence of clear and robust evidence demonstrating that no significant harm will occur, the potential risks to human health should be given significant weight in planning decisions.

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

Protection of Agricultural Livelihoods

Farmers are already subject to strict environmental regulation and are required to meet high standards of environmental protection. It is not acceptable that industrial development, including diesel use and associated emissions (until at least 2050), could introduce environmental risks that undermine compliance, damage land quality, or threaten farming livelihoods. Farmers should not be placed in a position where they are penalised for environmental impacts arising from activities outside their control.

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

Major Accident Hazard and Regulatory Concerns

The operation of a gas-fired peaker plant, combined with on-site fuel storage, gives rise to potential major accident hazards. Under the Seveso III Directive, developments involving dangerous substances must demonstrate that risks are properly identified, assessed, and minimised. It is not clear that the likelihood and consequences of major accident scenarios, including fire, explosion, and fuel release, have been fully assessed or adequately demonstrated.

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

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

Lack of Transparency, Inclusiveness, and Early Engagement

I do not believe that consultation has been clear, inclusive, or effective. For a development of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community. This includes clear communication, accessible materials, and sufficient time for people to understand and respond to the proposal. The lack of meaningful engagement raises concerns regarding fairness, transparency, and the overall integrity of the planning process. Communities should not be placed at a disadvantage due to inaccessible information or limited consultation.

Planning & Assessment

Failure to Properly Assess Cumulative and Long-Term Impacts

The Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods. The long-term (until at least 2050) and cumulative nature of these impacts has not been fully considered, limiting the ability to understand the true environmental burden of the development. This represents a significant gap in the assessment.

Lack of Worst-Case Assessment

The Environmental Impact Assessment relies on assumed operational scenarios rather than assessing worst-case conditions. Given that the plant will operate in response to electricity demand, there is no certainty regarding how frequently or intensively it will operate. This includes diesel use, which may result in higher emissions than those modelled. In the absence of a robust worst-case assessment, it cannot be concluded that significant environmental impacts will not occur.

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,

Name: Brian Leen
Date: 16 April 2026