

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Brian and Olivia Qualter

Derrydonnell North

Oranmore

Galway

H91E0F3

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,

I am writing this statement to formally record our strong objection to the proposed Gas and Diesel Peaker Powerplant in Athenry and how this development will directly affect my family and the surrounding community.

Our family of five resides in Derrydonnell North, Oranmore, just 4.4 kilometres from the proposed development. This area is the cornerstone of our daily lives; our children attend Presentation College and Clarin College in Athenry, both situated within 3.13 kilometres of the site, while my parents' farm lies only 2 kilometres away. Furthermore, we are frequent patrons of local amenities, regularly utilizing the Lisheenkyle playground, the community astroturf facilities, and the Athenry Golf Club for our recreational pursuits.

The scale of the proposed industrial infrastructure, which includes 30-metre chimney stacks, is a major cause for alarm. We are deeply concerned that long-term exposure to the resulting air pollutants and noise emissions will have a detrimental impact on our health and well-being in the years to come.

Aside from the immediate problems, I am very worried about the future for my children and grandchildren. We

have a duty to protect nature and the local feel of our community for the people who will live here after us. I am afraid this project will leave behind environmental and social problems that will be a burden for the next generation, taking away the healthy, safe, and quiet country life they should have.

My families biggest fear is what this plant means for Ireland's energy future. This isn't just a temporary measure; it's a long-term commitment to using fossil fuels. Since the plant is planned to run for 40 years, it will still be operating long after 2050—the year Ireland is legally required to be carbon neutral.

Considering these serious risks, I urge An Coimisiún Pleanála to conduct a comprehensive assessment and consider the long term impacts on health, property and community well-being.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NO_x) and fine particulate matter (PM_{2.5} 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.

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.

Dependence on Groundwater for Domestic and Agricultural Use

This area relies heavily on clean groundwater for domestic consumption, livestock watering, and agricultural production. The introduction of industrial activity involving fuel storage and handling creates an ongoing risk to this essential resource. Any contamination could have serious and long-lasting consequences, including impacts on drinking water quality, livestock health, and agricultural productivity. The potential for irreversible damage to groundwater resources raises serious concerns regarding the suitability of this development.

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

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.

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.

Cumulative Impact on Child's Development

Fine particulate matter can travel significant distances and accumulate over time, meaning children may be exposed not only during peak events but also through repeated low-level exposure. The cumulative effect of these exposures is particularly concerning during key stages of physical development, where long-term impacts on lung function and overall health may arise.

Need for Precaution Due to Uncertainty

The long-term health impact on children has not been fully assessed, particularly in relation to repeated exposure to emissions associated with intermittent operation and diesel use. Given the uncertainty and the known vulnerability of children to air pollution, a precautionary approach should be applied to ensure that health risks are avoided.

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.

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

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.

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.

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.

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,

Olivia Qualter
BRIAN
Qualter

Name: Brian and Olivia Qualter

Date: 15 April 2026