OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Catherine Joyce

Ballydavid South

Athenry

Galway

H65 R583

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 17 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 submitting this objection to the proposed peaker power plant because I have serious concerns about its impact on public health, road safety, energy policy, and the long term environmental direction being taken.
I live approximately 4 kilometres from the proposed site, and I have two children so air pollution is my primary concern. While the development may be described as a "peaker" plant, it is still a fossil fuel power station designed to emit nitrogen oxides, fine particulate matter and other pollutants associated with respiratory and cardiovascular harm. Even at this distance, emissions from an open cycle gas turbine stack can affect surrounding communities, particularly during start up cycles and when diesel fuel is used. I do not believe the potential cumulative impact on people living several kilometres away has been adequately considered.
There is between 2,000 – 3,000 primary and secondary school students within 5km of this proposed peaker plant site. Schools should be places of safety and wellbeing, yet this proposal introduces new pollution and traffic risks into their vicinity. Children's health and safe access to education must be prioritised over new fossil fuel infrastructure.
I am also concerned about road traffic safety and access, especially during the lengthy construction phase and throughout the operational life of the plant. Construction traffic, heavy vehicles, maintenance access, and fuel deliveries will rely on local and regional road networks that were not designed for sustained industrial

use. There is already a high road accident rate on the roads close to the proposed site and therefore adding additional pressure here would be a huge mistake and a massive concern. Overall, it raises safety concerns for residents, commuters, cyclists, agricultural traffic, and emergency access, and risks ongoing congestion and disruption.

From a broader perspective, I object to the continued reliance on fossil fuels at a time when Ireland is legally committed to reducing emissions and transitioning to a low carbon energy system. Approving new gas and diesel fired power infrastructure locks communities into decades of fossil fuel dependency and diverts investment away from cleaner alternatives such as battery storage, demand management, and renewable based solutions that are already available.

Related to this, I am concerned that the proposal does not represent the best or most modern technology. Open cycle gas turbines are significantly less efficient than combined cycle plants or non combustion alternatives and produce higher emissions per unit of electricity generated. The plans do not appear to have basic technology requirements such as scrubbers included, for example. Describing the plant as "future ready" does not address the fact that it will operate on fossil fuels for the foreseeable future using relatively inefficient technology.

Finally, I strongly question the presentation of operating hours. While minimum annual figures such as diesel testing hours are emphasised, real world experience with peaker plants of similar scale shows that actual operation is often far more frequent, particularly under grid pressure and increasing demand. I believe this creates a misleading impression of limited use, while in reality the plant may run regularly and burn substantial quantities of fossil fuels.

For all of these reasons — health, safety, climate responsibility, technology choice and transparency — I object to the proposed peaker plant and request that permission be refused and will support my argument in the upcoming paragraphs.

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.

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.

School Safety and Peak-Time Risks

As someone who lives locally and extensively uses this road, I am concerned about the proposed location of the site entrance on the L3103. This section of road is already extremely dangerous, as it is narrow, has no hard shoulder, and does not provide sufficient space for two heavy goods vehicles to pass safely. Visibility is also poor due to blind dips and sharp bends, meaning drivers often cannot see oncoming traffic in time, and introducing a site entrance at this location would significantly increase the risk to all road users.

There are strong concerns that adding traffic—particularly large vehicles—would worsen these existing hazards, especially near homes and schools during busy periods such as morning and afternoon times. The interaction between heavy goods vehicles, farm machinery, and everyday local traffic creates a higher risk of accidents, particularly for children and other vulnerable road users. Overall, this is not a suitable location for this level of traffic, and the associated safety risks for the community are a critical concern.

Lock-in of Fossil Fuel Infrastructure

There are serious concerns that the proposed development represents new fossil fuel infrastructure with a long operational lifespan, potentially extending to at least 2050, which risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure of this nature may delay or displace the development of renewable energy and energy storage solutions, leading to continued reliance on fossil fuels over the long term. Overall, there is concern that the proposal is not aligned with current climate objectives and may undermine the transition to a low-carbon energy system.

Underestimation of Operational Emissions

There are concerns that the Environmental Impact Assessment may underestimate the emissions associated with the proposed development by relying on assumed operating patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during times of pressure on the energy system. This creates uncertainty around the total level of greenhouse gas emissions over the lifetime of the project and raises concerns that the full climate impact of the development has not been adequately assessed.

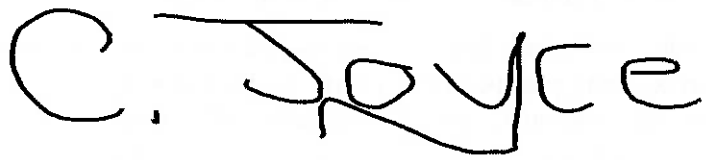
Operational Uncertainty and Lack of Enforceable Limits

There are concerns that the Environmental Impact Assessment relies on assumed operational scenarios rather than fully assessing worst-case conditions. As the plant will operate in response to electricity demand, there is uncertainty regarding how frequently or intensively it may run, including periods when diesel will be used, potentially resulting in higher emissions than those modelled. Without a thorough evaluation of the worst-case scenario, it is not possible to confidently rule out the possibility of major environmental impacts.

Conclusion

Due to the concerns mentioned—such as uncertainty about how often operations will occur, overall environmental impacts, and risks related to diesel use—this project is not viewed as proper or sustainable development. There has also been insufficient consideration of the possibility that the actual impacts could be greater than those evaluated. Therefore, we respectfully ask that approval for this application be refused.

Yours Sincerely,



Name: Catherine Joyce
Date: 17 April 2026