

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Dhana Ribbons  
Cullairbaun, Athenry  
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H65FT27

To: An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Date: 18 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 live in the middle of Athenry town. The town is one of the fastest growing towns in the west of Ireland. My genuine concern is the close proximity of this proposed plant to the town and how it will affect my personal health. The prevailing winds will carry the emissions into the town and also the town itself is growing outwards to the proposed plant. The town itself is a heritage town and this proposed plant will destroy the local landscape and the amenity of the town. This proposed Peaker plant is also a surplus to requirements as our government have met the target of Peaker plants in Ireland at this moment. There is no logical reason to put this plant only for financial gain for the developer. As a community we are trying to eliminate fossil fuels, no chimneys in house, be more sustainable but yet this proposed plant is going against all the information we are being given from the government.

## **Short-Term Exposure**

I'm concerned that emissions from the planned peaker plant could impact the environment, particularly if diesel is used at start-up or during periods of high demand. Diesel exhaust releases various dangerous

pollutants, such as nitrogen oxides, fine particles, and other toxic chemicals. These substances are associated with respiratory issues, impaired lung function, and heart disease. What is especially worrying is that these emissions may occur in short but intense bursts rather than in a steady, predictable way, particularly during start-up and peak operation. The average-based modelling used in the assessment seems not to capture this kind of real-world operation completely.

There are worries that residents in nearby areas might face greater pollution levels than expected, especially when the weather is calm and pollutants linger instead of spreading out. There is considerable uncertainty regarding how accurate these air quality forecasts are, which makes it hard for the community to be sure that both public health and the environment are truly safeguarded.

### **Dependence on Groundwater for Domestic and Agricultural Use**

I am concerned about the potential risk to groundwater from this proposed development. The area depends heavily on clean groundwater for essential needs, including drinking water, farming, and livestock, making it a vital resource for the community. The introduction of an industrial facility involving the storage and handling of fuels creates an ongoing risk to this resource, and any contamination, even if accidental, could have serious and long-lasting consequences for water quality, livestock health, and agricultural productivity.

What is particularly worrying is that once groundwater becomes contaminated, the damage can be extremely difficult—if not impossible—to reverse. This raises serious concerns about whether this type of development is appropriate for this location. To sum up, significant worries persist that the dangers to groundwater have not been fully assessed, and any consequences could be permanent.

### **Protection of Agricultural Livelihoods**

Farmers work diligently within stringent environmental guidelines and uphold rigorous standards of environmental stewardship, fully recognising the importance of these obligations. There is concern that an industrial development of this nature—particularly one involving diesel use and long-term emissions, potentially until 2050—could introduce risks that undermine that work by affecting land quality and increasing environmental pressures. This situation presents significant challenges for farmers, who should not face penalties for problems caused by factors beyond their control. There are concerns that agricultural risks remain overlooked and the development may affect local farming long-term.

### **Need for Precaution Due to Uncertainty**

There is significant concern regarding the insufficient assessment of long-term health impacts on children, particularly with respect to repeated exposure associated with intermittent plant operation and diesel utilisation. Since children are especially susceptible to air pollution, uncertainty surrounding these effects warrants scrutiny. It is inadequate to presume minimal risk without substantial, transparent evidence. Given these circumstances, it is recommended that a precautionary approach be adopted to prioritise the health and wellbeing of children and to ensure that all potential risks are thoroughly evaluated and mitigated.

### **Inadequate Assessment of Traffic Impacts**

The placement of a site entrance at this hazardous location on the L3103 raises serious safety concerns. The road is already constrained by its narrow width, the absence of a hard shoulder, and extremely poor visibility due to blind dips and sharp corners, yet the Environmental Impact Assessment does not appear to fully address the safety implications of introducing an access point at this location. There are also concerns that the cumulative impact of additional traffic has not been properly assessed, including construction traffic, ongoing operational traffic, and fuel deliveries, and the interaction between heavy goods vehicles and existing

road users—such as local traffic, school-related movements, and agricultural machinery—has not been examined in sufficient detail. Overall, the lack of a thorough and robust traffic safety assessment creates significant uncertainty as to whether the local road network can safely accommodate this development.

### **Major Accident Hazard and Regulatory Concerns**

I am concerned about the potential for major accidents associated with this proposed development. A gas-fired peaker plant, combined with on-site fuel storage, introduces real risks, including fire, explosion, and the release of fuel. According to the requirements of the Seveso III Directive, any development involving hazardous substances must present clear evidence that relevant risks have been appropriately identified, assessed, and minimized. In this instance, it appears that full compliance may not have been achieved. Locally, there is concern regarding whether the probability and impact of serious incidents have been comprehensively evaluated or clearly demonstrated, which raises ongoing questions about the adequacy of risk management and the safety of nearby residents.

### **Scale, Integration, and Rural Context**

There are serious concerns that the scale and industrial nature of the proposed development are not in keeping with the surrounding rural environment. Building large-scale plants, structures, and infrastructure would result in a prominent addition to the landscape that does not match the area's current appearance. There is no evidence showing this development could blend into its environment or that its visual effects could be properly reduced. This raises concerns in relation to the Galway County Development Plan, particularly Policy GB1, which requires that developments be designed and located in a manner that allows them to integrate effectively into the landscape.

### **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.

### **Failure to Meet Aarhus Convention Standards**

There are concerns that the consultation process for this development does not meet the standards set out under the Aarhus Convention, which provides for the public's right to access environmental information and to participate effectively in environmental decision-making. This requires not only that information is made available, but that it is understandable, accessible, and provided in a timely manner. In this case, the complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, appears to have restricted meaningful public participation. This raises serious concerns regarding transparency, accessibility, and the overall effectiveness of public engagement in the decision-making process.

### **Absence of Worst-Case Scenario Assessment**

There are concerns that the Environmental Impact Assessment relies on assumed or typical operating scenarios rather than fully assessing worst-case conditions. As a demand-led facility, a peaker plant may

operate more frequently, for longer periods, or at higher intensity than predicted, and this may include the use of diesel during start-up, testing, or operational phases. As a result, actual emissions and environmental impacts could be significantly greater than those modelled. A comprehensive evaluation of worst-case scenarios is essential to ensure the reliability of the assessment. Without such an analysis, it is not possible to affirm with confidence that major negative environmental impacts will be avoided, and this omission constitutes a critical limitation.

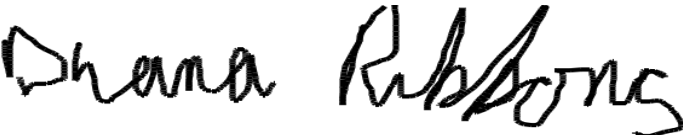
### **Reliance on Regulation Does Not Eliminate Risk**

The Environmental Impact Assessment depends on forthcoming regulation, licensing, and monitoring to manage environmental effects. Nonetheless, regulatory oversight cannot entirely remove environmental risks or ensure that actual emissions and impacts will match those projected by models. Uncertainty persists regarding the long-term performance of the development, especially under diverse operational scenarios.

### **Conclusion**

This proposal presents important concerns regarding people, public health, agriculture, and the surrounding environment. Because the documentation is complex and community engagement has been limited, many individuals have found it challenging to take part in the decision-making process. Communities should not face uncertain or potentially substantial environmental risks. Therefore, it is strongly recommended that planning permission be refused.

Yours Sincerely,

A handwritten signature in black ink that reads "Dhana Ribbons". The signature is written in a cursive, slightly slanted style.

Name: Dhana Ribbons

Date: 18 April 2026