OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Emmett Larkin

Lisheenkyle east

Lisheenkyle

H65N510

Galway

H65N510

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 19 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 my family and my strong objections to the proposed peaker gas and diesel power plant in Athenry. I would like to outline the direct impact this plant will have on my family and community. We are very concerned about our health and impact to our daily lives!

As parents, my partner and I have strong views and concerns, the burning of diesel and gas will have on our family health and the community. Who will be liable for any health risk brought upon the community? We are very close to the proposed plant site and have no need or want for it! It is our children, familys and friends that will breathe in the toxic fumes from this plant, that will tower over the town and surrounding communities!

The local farmers and other businesses will be directly effected by these fumes and emissions too. Our food/crops/land quality will all suffer. We will be subject to these poisonings for no reason. There is no current need for this proposed plant!
The building and preparation for the plant will block our roads, disrupt our daily travel, delay our kids getting to school and ourselves getting to work. This will in turn cost each household more in fuel, which adds to our

stress and wellbeing.
Air quality is one of the most important things we must provide our children. These plants are being closed down in other countries like the USA. We should not be building plants to burn fossil fuels, when our country can support wind/solar/water energy sources, which are renewable and safe for families and communities. Our family and community objection to this plant ! It's is not needed and will directly effect us all.

High-Intensity Emissions and Diesel Impacts

I am concerned about the potential impact of air pollution from this proposed development. Pollutants such as nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10) are known to damage air quality, irritate the lungs, and contribute to long-term harm to both human health and the environment. Although the plant would not operate continuously, it may run at extremely high output when required, leading to short but intense bursts of pollution, particularly during start-up and peak demand periods. The possible use of diesel during these times is especially worrying, as it produces higher levels of harmful emissions, including nitrogen oxides, sulphur dioxide, and particulate matter.

These pollutants can penetrate deep into the lungs and enter the bloodstream, increasing the risk of respiratory and cardiovascular illness, particularly for vulnerable groups such as children, older people, and those with existing health conditions. Fine particulate matter can also travel long distances and accumulate over time, meaning the impacts may extend beyond the immediate area and persist in the long term. In summary, I have reservations regarding the thoroughness of the assessment of these emissions. This issue presents significant implications for public health and environmental protection, especially in relation to EU air quality standards established by Directive 2008/50/EC.

Risk of Groundwater Contamination from Fuel Storage and Handling

I am concerned about the risks of soil and groundwater contamination from this proposed peaker plant. The development would involve the storage and handling of fuels such as diesel, along with lubricating oils and other chemicals, all of which could pose a risk to the surrounding environment. There is a real possibility that these substances could leak, spill, or enter the ground through surface runoff over the long lifetime of the facility, potentially up to 2050, and even small but repeated incidents could lead to a gradual build-up of pollution in soil and groundwater.

This is particularly worrying because once groundwater becomes contaminated, it is extremely difficult and costly to remediate, and the impacts can persist for decades. This raises serious concerns about the long-term protection of local water resources and the surrounding environment. There remains uncertainty about whether these risks have been adequately managed, raising substantial worries that the project might cause permanent damage to water quality. This would violate the obligations under EU Directive 2000/60/EC, which mandates the protection of water bodies and prohibits their deterioration.

ACRES Compliance

As a local farmer, I am very concerned about how this proposed development could affect my ability to meet environmental standards. Farmers in this area already operate under strict requirements, including schemes such as ACRES and nitrates regulations, and we take these responsibilities seriously. However, emissions, airborne pollution, or runoff from this peaker plant—particularly linked to diesel use—could increase nitrate levels or environmental pressure, potentially pushing farms out of compliance through no fault of their own.

As an ACRES participant, any increase in pollution associated with this development could directly impact compliance with scheme requirements, leading to penalties, financial loss, or exclusion from essential

programmes. This creates an unfair situation where farmers may be held responsible for environmental impacts arising from an industrial activity outside their control, placing an unjust burden on the farming community.

Organic Farming

As a local organic farmer, I am very concerned about the potential impact this proposed peaker plant could have on my farm and others in the area. Organic farming is governed by strict European standards and requires high environmental quality, including keeping soil, crops, and water free from contamination. Airborne pollutants from the plant, particularly those linked to diesel such as nitrogen oxides and fine particulate matter, could settle onto land and crops, posing a risk to organic certification even at low levels.

There are also concerns about contamination through water and soil pathways, including runoff or accidental spills from fuel storage. Organic farming relies on healthy soil, clean water, and a balanced ecosystem, and any disruption to these could undermine the integrity of production. The consequences of losing organic certification would be severe, including loss of premium markets, significant financial impacts, and a re-conversion period of up to two years. Overall, there is serious concern that this development poses a disproportionate and inadequately assessed risk to organic farming and sustainable livelihoods in the area.

Vulnerability to Diesel-Related Air Pollution

As a parent living in the area, I am particularly concerned about the potential impact of this proposed development on children's health. Children are particularly susceptible to the effects of air pollution because of their developing respiratory systems, elevated respiration rates, and greater exposure to outdoor environments. Although peaker plants do not function on a continuous basis, they can produce significantly elevated levels of output during initial start-up phases or times of peak energy demand. This may lead to brief yet significant emissions of pollutants, particularly when diesel fuel is utilised. These emissions contain fine particles and nitrogen oxides that can penetrate deep into the lungs, which may affect lung development and increase the risk of respiratory conditions such as asthma. Overall, this raises serious concerns about the health and wellbeing of children and whether these risks have been fully considered.

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.

Cumulative Impact on Child's Development

As a parent in the area, I am concerned about the impact of fine particulate matter over time. These pollutants can travel long distances and accumulate, meaning children may be exposed not only during peak pollution events but also through ongoing low-level exposure. The cumulative effect of this is particularly worrying, as repeated exposure during key stages of growth and development could have lasting impacts on lung development and overall health. From a community perspective, this raises serious concerns about the long-term safety of this development for children, and it is not clear that these cumulative impacts have been fully considered.

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.

Increased Heavy Traffic and Diesel Transport Risks

As someone who lives locally and uses this road, I am concerned about road safety in relation to the proposed entrance on the L3103. This stretch of road is already extremely narrow, with no hard shoulder, making it difficult for two heavy goods vehicles to pass safely and leaving no margin for error. Visibility is also poor due to blind dips and sharp bends, meaning drivers often cannot see oncoming traffic in time. The proposed development would increase traffic levels, including heavy goods vehicles, construction traffic, and fuel deliveries such as diesel tankers, all of which require space and clear sightlines that this road does not provide.

Given that these rural roads are used by residents, farm machinery, and school-related traffic, the addition of significant industrial traffic would increase the risk of accidents and create a more hazardous environment. Overall, there is strong concern that the existing road infrastructure is not suitable for this level of traffic and that the associated safety risks have not been adequately addressed.

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.

Unsuitability of Rural Road Network

There are serious concerns about the proposed site entrance on the L3103, which is an exceptionally dangerous stretch of road where introducing an access point would create an unacceptable level of risk. The road is extremely narrow and cannot safely accommodate two heavy goods vehicles passing at the same time, there is no hard shoulder to allow for safe manoeuvring or recovery, and visibility is severely limited due to blind dips and sharp corners. These are significant existing hazards that already pose a real danger to road users, and the addition of a site entrance would further increase that risk.

There are also concerns regarding the suitability of local roads for this type of traffic. Rural roads are not built to support continuous industrial activity, and when heavy trucks, farm equipment, and regular local vehicles share these routes, it often leads to difficult and dangerous traffic conditions. The introduction of additional industrial traffic, including construction vehicles and diesel deliveries, would further increase the risk and make these roads more dangerous for all users.

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.

Risk of Fire and Explosion from Fuel Storage

As someone living in the area, I am very concerned about the safety risks associated with this proposed development. The project involves the storage, handling, and use of highly flammable fuels such as natural gas and diesel, which carry an inherent risk of fire or explosion. In the event of equipment malfunctions, leaks, or operational challenges, these substances may pose an ignition risk, potentially resulting in significant incidents. Considering the intermittent yet high-intensity operation of a peaker plant, the likelihood of such occurrences warrants careful consideration.

The potential consequences are particularly worrying, as any incident could have serious impacts on nearby homes, residents, farmland, and livestock. This raises significant concerns about whether the risks have been fully assessed and whether this location is appropriate for a development of this nature.

Emergency Response and Adequacy of Assessment

There are serious concerns about the lack of clear information on emergency response planning for this proposed development, including how a major incident would be managed, evacuation procedures, coordination with local emergency services, and the overall effectiveness of any response. This is particularly concerning in a rural area where the road network is already limited and constrained, which could make access and evacuation more difficult in an emergency and increase risks to nearby residents. When considered alongside the absence of detailed worst-case scenario analysis, it is not clear that risks to human health and safety have been reduced to an acceptable level, creating significant concern about the preparedness of the development to respond to a major incident.

Landscape Character and Policy Conflict

There are serious concerns that the proposed development would represent 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 buildings, stacks, lighting, and fuel storage—would fundamentally alter the character of the area, introducing a visually dominant feature into what is currently a quiet rural setting. This type of development does not appear consistent with the existing landscape, nor does the area have the capacity to absorb such change without significant adverse effects. These concerns are particularly relevant in the context of the Galway County Development Plan, specifically Policies LCM1, LCM2, and LCM3, which seek to protect landscape character, recognise landscape sensitivity, and ensure that development is appropriate to its setting.

Cumulative Visual Impact of Industrial Infrastructure

It is noted that the visual impact of the proposed development appears to have been evaluated independently, rather than within the context of its overall effects. The project includes multiple elements, such as plant

structures, fuel storage areas, electrical infrastructure, security fencing, lighting, and access roads, which together would create a substantial industrial presence within a rural setting. The cumulative visual impact of these components does not appear to have been fully assessed, and as a result, the overall level of visual intrusion may be significantly greater than that identified in the Environmental Impact Assessment.

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.

Conflict with National and EU Climate Targets

There are serious concerns regarding Ireland's legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021, as well as wider 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, raising questions about alignment with national carbon budgets and emissions reduction targets. In this context, there is concern that the proposal may undermine the State's ability to meet its climate commitments and 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.

Availability of Cleaner Alternatives

Although cleaner and more sustainable alternatives to fossil fuels—such as renewable energy, energy storage, demand response, and grid flexibility measures—are available, building new gas infrastructure may lessen the urgency to invest in these solutions. Given the climate crisis, emphasis should be placed on low-carbon and renewable options instead of furthering dependence on fossil fuels; this proposal could delay the shift toward a more sustainable energy system.

Lack of Clear, Accessible, and Effective Communication

There are concerns that community engagement in relation to this project has been insufficient and ineffective. Many residents did not receive any direct communication or notification about the proposed development, and 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 limits meaningful public participation, as effective consultation requires information to be accessible, clearly explained, and actively communicated to all affected members of the community. In this case, the complexity and level of technical detail in the documentation creates a barrier to understanding, meaning that many

people cannot fully assess the potential impacts of the development.

Lack of Transparency, Inclusiveness, and Early Engagement

There are concerns that consultation in relation to this development has not been clear, inclusive, or effective. For a project of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community, including clear communication, accessible information, and adequate time for people to understand and respond to the proposal. The lack of meaningful engagement raises issues around fairness, transparency, and the overall integrity of the planning process, and creates concern that communities may be placed at a disadvantage due to inaccessible information and limited consultation.

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.

Over-Reliance on Mitigation Measures and Uncertainty of Outcomes

There are concerns that the Environmental Impact Assessment relies heavily on mitigation measures to reduce environmental impacts. However, mitigation does not eliminate impacts, and its effectiveness over time is uncertain, particularly over the long operational lifespan of the development, potentially extending to at least 2050. There is insufficient evidence to demonstrate that these measures will perform as predicted under real-world conditions. This creates uncertainty as to whether impacts will remain within acceptable limits, particularly in relation to emissions, noise, and overall environmental protection.

Complexity of EIAR and Barriers to Public Understanding

There are concerns that, while the development is presented within a single Environmental Impact Assessment Report, the scale, volume, and complexity of the documentation make it extremely difficult for the public to understand the project as a whole. The high level of technical detail, combined with the way the information is structured, creates a significant barrier to meaningful engagement. Although the material is not formally divided into separate reports, the practical effect is similar to fragmentation, as it is not easy to assess the cumulative impacts across all aspects of the development. This raises concerns regarding transparency and accessibility within the planning process.

Failure to Properly Assess Cumulative and Long-Term Impacts

There are concerns that the Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and ongoing environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods, yet this interaction has not been fully examined. The long-term nature of the development, potentially extending to at least 2050, further increases the importance of understanding these cumulative effects. Without a comprehensive assessment, it is difficult to fully understand the overall environmental burden of the project, and this represents a significant gap in the evaluation.

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

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,

Name: Emmett Larkin
Date: 19 April 2026