OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Marie Conneely

Barretts Park

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 08 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 strongly object to the proposed plant in Rathmorrissey. We have four inhabitants with chronic asthma - two teenagers who are particularly susceptible to air pollution and this development would be detrimental to their health. Both teenagers are committed sports people who spend a large proportion of their time outside practicing camogie, hurling and football and the idea that a large smoke emitting structure would be located anywhere near is unacceptable. They both participate in sports in school (Presentation College Athenry) which again, involves being outside training. The participation in sport is a breathing intensive activity - the use of diesel projected emissions so close in proximity are of grave concern to us as a family and we are no way confident that the required protections would be provided. We would also have very serious concerns about the environmental impact of this development and the impact on the ground water. We are a farming family and pollution of this kind could have a serious impact on out ability to meet our environmental obligations as the activity of this proposed structure would be beyond our control. I would like to emphasise that we as a family , and I as an individual are horrified that such a proposal would be considered here.

Human Health & Air Pollution

Short-Term Exposure

Emissions from a peaker plant, particularly where diesel is used during start-up or high-demand periods, can negatively affect both air quality and human health. Diesel exhaust contains a complex mixture of pollutants, including nitrogen oxides, fine particulate matter, volatile organic compounds, and polycyclic aromatic hydrocarbons, all of which are associated with respiratory illness, reduced lung function, and cardiovascular disease. These emissions may occur in short but intense bursts that are not fully captured by average modelling assumptions used in Environmental Impact Assessments. This creates a scenario where nearby residents may be exposed to higher-than-expected pollution levels, particularly during peak operation periods, in calm weather conditions, or where dispersion is limited. This uncertainty raises serious concerns regarding the reliability of predicted air quality impacts.

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

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.

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.

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

Scale, Integration, and Rural Context

The scale and industrial nature of the proposed development are not consistent with the surrounding rural environment. The introduction of large-scale plant, structures, and associated infrastructure will create a visually dominant feature in the landscape that is out of character with existing development. It has not been demonstrated that the development can be successfully integrated into its surroundings. This raises concerns under Policy GB1 of the Galway County Development Plan, which requires that developments be designed and located to integrate effectively into the landscape.

Climate Impact

Conflict with National and EU Climate Targets

Ireland has legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021 and 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. This raises concerns regarding consistency with national carbon budgets and the State's ability to meet its climate targets.

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

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.

Diesel Use Not Fully Assessed or Limited

Diesel use is not limited to emergency scenarios and may include routine testing and operational requirements. This introduces additional emissions, odours, and environmental risks that have not been fully assessed in the Environmental Impact Assessment. The frequency and impact of diesel use remain unclear, creating uncertainty regarding the overall environmental impact of the development.

Precautionary Refusal Based on Uncertainty and Risk

The proposal raises significant concerns in relation to environmental protection, public health, farming, road safety, and community wellbeing. The level of uncertainty regarding operational frequency, diesel use, and cumulative impacts means that the development cannot be considered acceptable. In the absence of a complete and precautionary assessment, it cannot be concluded that significant environmental effects will not arise. I respectfully request that permission for this development be refused.

Yours Sincerely,

Marie Conneely

Name: Marie Conneely
Date: 08 April 2026