

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Niall and Helen Feeney

Castlelambert

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 04 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,

As concerned residents in the local area, I have huge concerns regarding the proposed power plant based on emission that will affect my own health. I (Helen), have been suffering from asthma from a young age and I am on 2 inhalers daily, Atrovent inhaler and Seritide, plus an antihistamine. In addition, since 2003 I have been living with Chron's disease which is an inflammatory bowel disease with no cure. Every 6 weeks I have to self inject myself with a prescription drug called Wezenla. Based on the research I have done on Peaker Plants run on Fossil fuels (Gas and Diesel) has caused me grave concern and anxiety. The research is based on a study conducted by the City of New York University in 2022 and the ill effects the emissions have had on people living in close proximity to these type Peaker Plant.

I (Niall) have been suffering with Panic attacks and depression for the last 2 years and the thought of this Plant burning diesel and Gas in close proximity of me gives me huge concern for my own health, both physical and mental. Reading the reports submitted, all data shared are simulated as there is no plant of this size currently in Ireland. I can not understand why we would consider such a high emitting plant, which is the Open Cycle Power plant, burning 48,000 litres of Diesel when running on diesel per HOUR. These power plants are the least efficient and highest polluting type of Electricity Generation. Furthermore, I am an active member of Derrydonnell/Athenry Gunclub and I have hunted in the proposed site since 1990. The proposed site has always been an active hunting ground and was full of wildlife with Fox, Woodcock, Pheasant and Snipe. I have observed that this wildlife habitat's with 20 acres of Furr's and other bushes had been reclaimed to Green Pasture field in 2024. Any survey done after this date should be Null and Void as it would not give an accurate report on the wildlife living in this area. I note badgers are a protected species in Ireland and have observed many sets in this field over the years, these sets have now been destroyed and the Badgers will have moved off from their Habitat and no doubt some have died during this reclamation works.

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.

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

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.

Planning & Assessment

Over-Reliance on Mitigation Measures and Uncertainty of Outcomes

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 (until at least 2050). There is insufficient evidence to demonstrate that mitigation measures will perform as predicted under real-world conditions. This creates uncertainty regarding whether impacts will remain within acceptable limits, particularly in relation to emissions, noise, and environmental protection.

Operational Uncertainty and Lack of Enforceable Limits

There is no clear or enforceable limit on how often or how long the plant will operate. As a demand-led facility, operation may be more frequent or prolonged than assumed in the Environmental Impact Assessment. This includes diesel use during start-up and operation. If this occurs, impacts such as emissions, noise, and traffic may be significantly greater than predicted. This uncertainty raises concerns regarding the accuracy of the assessment.

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,

Niall and Helen Feeney

Name: Niall and Helen Feeney

Date: 04 April 2026