



Not Here Not Anywhere  
[www.notherenotanywhere.com](http://www.notherenotanywhere.com)  
I:@notherenotanywherenhna  
F:@notherenotanywherenhna  
*For a fossil free future for Ireland*

An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1 D01 V902

23 April, 2026

**Planning Application Reference:** PA07.324113

**Applicant:** Bord Gais Energy

**Location:** located in Pollnagroagh and Rathmorrissy (Townlands), Athenry, Co. Galway

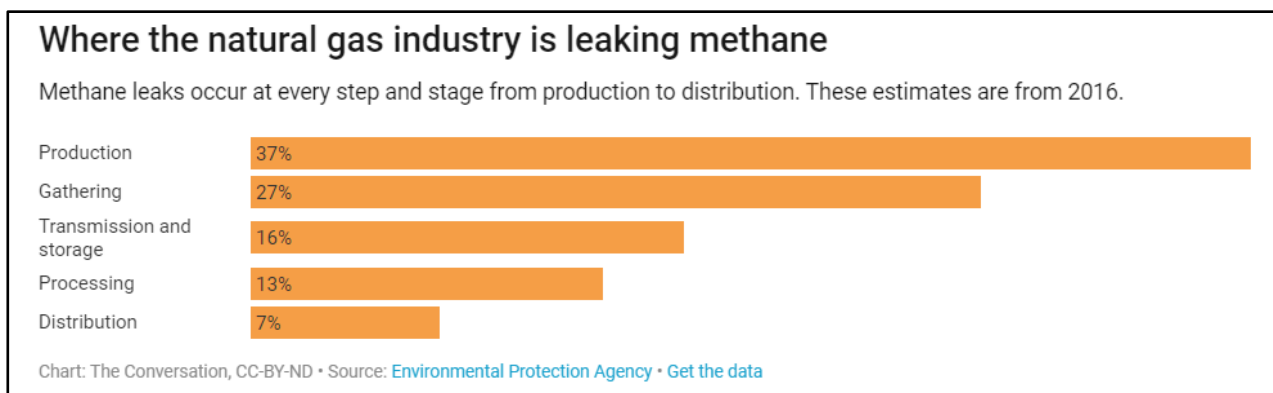
This submission is made on behalf of Not Here Not Anywhere (NHNA), a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland and across the world. We advocate for fair society-wide energy usage and a just transition to renewable energy systems.

NHNA welcomes Ireland's commitment to transition to net zero by 2050 and the urgent adaptation of our energy supply. We recognise that the transition to renewables must be carried out in a way that guarantees nationwide energy security. However, we argue that the development of new fossil fuel infrastructure to facilitate this transition is not a viable solution.

### **International climate agreements**

At COP26 in Glasgow in 2021, Ireland became a core member of the international Beyond Oil and Gas Alliance (BOGA), committing to align oil and gas production with the objectives of the Paris Agreement. In signing on to this international coalition, the government recognised that oil and natural gas demand need to decline by 75% and 55% respectively between 2020 and 2050 to achieve net zero, with nations of the global North pioneering this transition (Beyond Oil and Gas Alliance [BOGA], 2021; International Energy Agency, 2021). In this light, we urge An Coimisiún Pleanála to reject the application made for a new gas power station proposed by Bord Gais Energy.

COP26 also saw our government aligning with a global partnership to cut methane emissions by 30% by 2030. Methane is a potent greenhouse gas, with a Global Warming Potential 86 times that of CO<sub>2</sub> over a 20 year period (Myhre et al., 2013, p714, Table 8.7). Natural gas is frequently portrayed as a ‘clean alternative’ to coal and oil, as burning it emits less CO<sub>2</sub> than oil and coal. However, research emerging on the significant amount of methane leaked in the production and transport of natural gas disproves these claims (Borunda, 2020; Environmental Defence Fund, n.d). Leakage is an inherent part of the natural gas system as highlighted in the below graph (The Conversation, 2018) adapted from the US Environmental Protection Agency’s 2018 inventory report on GHG emissions (EPA, 2018).



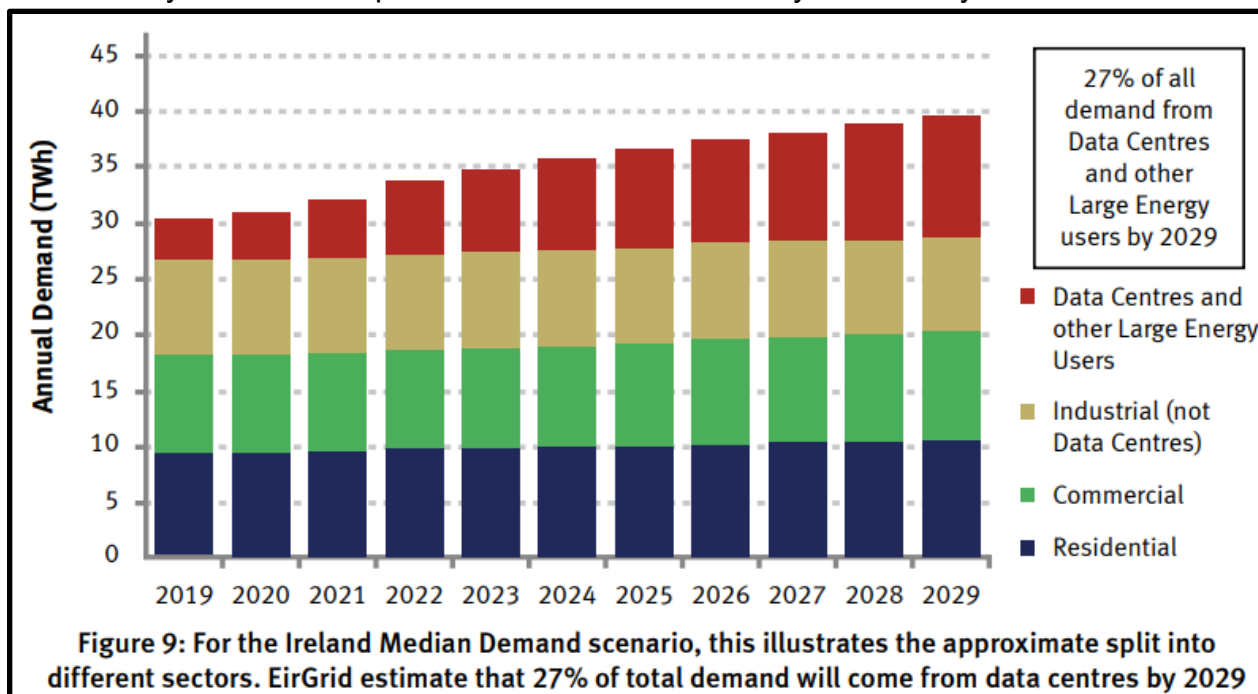
We cannot justify accompanying the transition to renewable energy with new gas-fueled power plants. McMullin and Price (2019, p6) emphasise the need for “extremely rapid and immediate absolute reductions in near-term fossil fuel usage, at a year-on-year rate of c. 20%, falling effectively to zero within 10-15 years (c. 2030-2035)” to achieve Paris-aligned climate targets. Further, we reiterate that the current application is not made in isolation. When considering a new gas plant, the cumulative impact of all potential new gas plants in Ireland must also be considered.

### **National and regional climate targets**

The application by Bord Gais Energy claims this new gas plant will be used only as a back-up energy source and only in the transition to renewables. However, the expansion of fossil fuel infrastructure inevitably leads to economic reliance on these dirty energy sources, and a ‘lock-in’ effect to fossil fuels (Borunda, 2020; McMullin & Price, 2019). It is crucial that Ireland does not further lock-in its dependence on fossil fuels if we are to meet our climate targets under the Paris Agreement and the Climate Action and Low Carbon Development (Amendment) Bill 2021 - which legally obliges us to achieve a 51% reduction of our 2018 emissions levels by 2030 and net-zero by no later than 2050. Fundamentally, the climate risks of locking Ireland into new fossil fuel infrastructure far outweigh any potential energy security risks related to gas supply.

## Data centres and energy security

This application emphasises the contribution of the proposed gas plant to energy security, but we must acknowledge that Ireland's energy security is greatly undermined by the recent and rapid growth of data centres in Ireland. Eirgrid (2020) estimates that data centres may account for up to 27% of Ireland's electricity demand by 2029.



Currently, many companies claim to operate data centres powered by 100% renewable energy. However, the energy is largely sourced indirectly through Renewable Energy Certificates or Purchase Power Agreements (Chernicoff, 2016). If we continue to allow companies to virtually purchase clean energy where it is cheapest to create, while actually using and increasing demand for dirty energy in Ireland, we allow them to profit while our real emissions continue to rise. We cannot continue to increase Ireland's energy demand so dramatically, only to continue building fossil fuel infrastructure to cater to this demand. As outlined in our policy briefing, a moratorium on data centre development is imperative until an appropriate regulatory framework is in place (Not Here Not Anywhere, n.d.).

## Climate commitments

We recognise that implementing a complete transition to renewables does not come without challenges. But, in the context of the climate emergency, increasing our use of and reliance on fossil gas cannot be the solution to Ireland's energy security. We encourage An Coimisiún Pleanála to review current energy, and consider the adaptations possible in order to bring about more efficient and more sustainable energy demand and consumption. Rather than focusing solely on sufficient infrastructure to guarantee energy

security, there is an onus on all individuals and all communities to reflect on and readjust our energy demand. An Coimisiún Pleanála plays an integral role in bringing about this transition. We urge An Coimisiún Pleanála to demonstrate their commitment to The Paris Agreement and the Climate Action and Low Carbon Development (Amendment) Act 2021 by prohibiting the development of new fossil fuel infrastructure and realising energy security through efficient and sustainable energy demand and the expansion of renewable energy supply.

### **Methane leakage and emissions**

Methane has a Global Warming Potential 86 times that of CO<sub>2</sub> over a 20 year period and leakage has been demonstrated to add considerably to the total volume of natural gas used during the operational phase of power plants (Myhre et al., 2013, p714, Table 8.7). The best estimate of methane leakage is 2.5% for gas power plants (Howarth et al., 2012, p2, Table 1; Hayhoe et al., 2002).

Figures for previous gas plants indicated that using leakage rates from Howarth et al., 2012, p2, Table 1 and Hayhoe et al., 2002, total CO<sub>2</sub>eq emissions from the operational phase of the gas plant were 66% higher using standard “best estimates” for leakage rates, or 300% higher using a high estimate.

We would also like to highlight the risk of actual emissions being considerably higher than the scenario proposed in the Planning and Environmental Report by the applicant. If the power plant was to be in operation for 6 or 8 or 10 hours a day this would lead to 3x, 4x or 5x the GHG emissions. From this, it is clear that the proposed development could have a significant impact on the environment and is likely not in alignment with the Climate Act 2021.

### **Conclusion**

We urge An Coimisiún Pleanála to reject the application made for the new gas power station proposed by Bord Gais Energy for the following reasons:

- New fossil fuel infrastructure, such as the proposed development, is not in line with Ireland’s international climate commitments
- New fossil fuel infrastructure of this type threatens our national and local climate targets

- The likely underestimation of methane leakage from the proposed development will be detrimental to local residents and to the climate

Yours sincerely,

Aideen O'Dochartaigh

21 Moyola Park

Newcastle

Galway

On behalf of

Not Here Not Anywhere

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