

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Pat Morrissey

Castlelambert

Athenry

Galway

H65K268

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 24 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 have lived in this area and seen how it has changed over the last 40 years.

When the construction of the m6 motor way was in progress the entire road network around athenry and especially Castlelambert was destroyed. Traffic was reduced to 30km/h due to extensive erosion of the roads due to heavy articulated and sand trucks constantly travelling. The people of the area did not object as we knew it was going to be short term but this project that is planned is going to make this a constant traffic route for heavy vehicle delivering fuel in the future to to keep this plant functions.

The road networks are simple not suited or designed to take this volume of traffic.

Public Health Protection

There is significant concern within the community about the potential impact of air pollution from this proposed peaker plant on human health, particularly during periods when it is operating at full capacity and emissions are highest. The possible use of diesel is especially worrying, as it introduces additional harmful pollutants that can travel long distances and accumulate in the environment.

There is ongoing uncertainty concerning the operational frequency of the plant, its emission rates, and the extent of public exposure to pollutants through 2050. Because these issues remain unresolved, it is difficult to verify that all risks have been considered. Given these unknowns, it is wise to adopt a careful strategy to protect public health; unless definitive evidence proves no harm, any dangers to residents should be considered as part of the planning process.

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.

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.

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.

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.

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.

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.

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.

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

Due to the concerns mentioned—such as uncertainty about how often operations will occur, overall environmental impacts, and risks related to diesel use—this project is not viewed as proper or sustainable development. There has also been insufficient consideration of the possibility that the actual impacts could be greater than those evaluated. Therefore, we respectfully ask that approval for this application be refused.

Yours Sincerely,

Pat M.

Name: Pat Morrissey

Date: 24 April 2026