

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Regina O'Donoghue

fionnuisce

derrydonnell north

oranmore

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 10 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 living with my husband and two children in the Derrydonnell area for the past nine years. both my children are attending school in the surrounding area and my father who lives locally has a diagnosis of chronic obstructive airways disease, for which he takes inhalers daily. I am particularly conscious of the high risk of contamination from the diesel storage on site into the local groundwater.. from spills or contaminated surface run off.

I really cant understand why this should be going ahead just outside a town that is home to thousands and has seven schools with in the town itself. . in my opinion this is not an appropriate site.

## **Human Health & Air Pollution**

### **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.

## **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.

### **Long-Term Accumulation of Pollutants and Chemical Residues**

The presence of diesel storage tanks, hardstanding areas, drainage systems, and associated infrastructure increases the risk of pollutants entering soil and groundwater over time (until at least 2050). Hydrocarbons (pollutants from gas, diesel) and chemical residues may accumulate gradually, particularly where there are repeated minor leaks, operational losses, or accidental discharges. These impacts may not be immediately visible but can result in long-term degradation of groundwater quality and soil health, affecting both environmental protection and agricultural productivity.

## **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.

### **Exposure During Daily Activities and School Times**

Children living or attending school near the site may be exposed to elevated air pollution during peak operation periods, which may coincide with times when children are outdoors, including school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants. This raises concerns about repeated exposure to harmful emissions during critical stages of development.

## **Local Roads, Safety & Schools**

### **School Safety and Peak-Time Risks**

Positioning the site entrance at this location on the L3103 introduces extreme risk to road users. This treacherous section of the road is entirely devoid of a hard shoulder and is physically too narrow for two HGVs to pass one another safely. Furthermore, severely compromised sightlines caused by blind dips and

sharp corners make this access point highly perilous. It is imperative that these severe, compounding traffic hazards are urgently mitigated before any development is permitted.

Additional traffic associated with the development may significantly increase risks near schools and residential areas, particularly during peak periods such as morning and afternoon school times. The interaction between heavy vehicles, farm machinery and local traffic creates a heightened risk of accidents, particularly for children and other vulnerable road users. This is especially concerning given the existing constraints and hazards on this section of road.

## **Fire Safety & Major Accident Hazards**

### **Proximity and Worst-Case Scenario Risks**

The proposed site is in proximity to residential dwellings, agricultural lands, and local infrastructure. In this context, even a low-probability but high-impact event could result in serious consequences for public safety, property, and rural economic activity. The Environmental Impact Assessment does not clearly demonstrate that worst-case scenarios, including fire spread, explosion impact zones, and fuel ignition events, have been fully assessed. Without this information, the true scale and severity of potential impacts remain uncertain.

### **Emergency Response and Adequacy of Assessment**

There is insufficient information provided regarding emergency response planning, including evacuation procedures, coordination with local emergency services, and the ability to respond effectively to a major incident. This is of particular concern in a rural area with constrained road infrastructure. Taken together, the absence of detailed worst-case analysis and robust emergency planning means it has not been demonstrated that risks to human health and safety have been reduced to an acceptable level.

## **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 Transparency, Inclusiveness, and Early Engagement**

I do not believe that consultation has been clear, inclusive, or effective. For a development of this scale and

potential impact, there should have been proactive, transparent, and early engagement with the local community. This includes clear communication, accessible materials, and sufficient time for people to understand and respond to the proposal. The lack of meaningful engagement raises concerns regarding fairness, transparency, and the overall integrity of the planning process. Communities should not be placed at a disadvantage due to inaccessible information or limited consultation.

## **Planning & Assessment**

### **Complexity of EIAR and Barriers to Public Understanding**

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 in its entirety. The level of technical detail, combined with the structure of the documentation, creates a barrier to meaningful engagement. Although not formally divided across separate EIARs, the practical effect is like fragmentation, as the public cannot easily assess cumulative impacts across all aspects of the development. This raises concerns regarding transparency and accessibility in the planning process.

### **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.

### **Protection of Community, Health, and Environment**

This proposal raises real and valid concerns for people, public health, agriculture, and the local environment. The complexity of the documentation and limitations in community engagement have made it difficult for the public to fully participate in the decision-making process. Communities should not be exposed to uncertain and potentially significant environmental impacts. I strongly urge that planning permission is not granted.

Yours Sincerely,



Name: Regina O'Donoghue

Date: 10 April 2026