

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Teresa Sheridan
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H65Y430

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 15 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 granting permission for this Peaker plant to be built. It has been proven in other countries that they produce toxins and are not safe for humans or the environment and so are being CLOSED down! There is a large population downwind with multiple schools, this cannot be allowed. I want my grandchildren to grow up in a healthy safe environment. The excess traffic will also cause more pollution and road safety hazards on our small roads. Please don't allow this huge mistake to be allowed to be constructed.

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NOx) and fine particulate matter (PM2.5 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.

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.

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.

Public Health Protection

Air pollution from a peaker plant can affect human health, particularly during peak operation periods when emissions are highest. The inclusion of diesel use introduces additional pollutants that are widely recognised as harmful and capable of long-range transport and accumulation in the environment. Given the uncertainty around operational frequency, emission levels, and long-term exposure patterns (until at least 2050), a precautionary approach should be applied to protect public health. In the absence of clear and robust evidence demonstrating that no significant harm will occur, the potential risks to human health should be given significant weight in planning decisions.

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.

Dependence on Groundwater for Domestic and Agricultural Use

This area relies heavily on clean groundwater for domestic consumption, livestock watering, and agricultural production. The introduction of industrial activity involving fuel storage and handling creates an ongoing risk to this essential resource. Any contamination could have serious and long-lasting consequences, including impacts on drinking water quality, livestock health, and agricultural productivity. The potential for irreversible damage to groundwater resources raises serious concerns regarding the suitability of this development.

Unsuitability of Location Due to Environmental Sensitivity

Given the environmental sensitivity of the area, including reliance on groundwater and agricultural land use, this site is not appropriate for a development involving diesel storage and industrial processes (until at least 2050). The potential risks to water resources, soil quality, and surrounding land uses are significant, long-term, and difficult to mitigate once realised. A precautionary approach should be applied where environmental risks cannot be fully eliminated.

Farming & Agricultural Impact

ACRES Compliance

Farmers are required to meet strict environmental standards under schemes such as ACRES and nitrates derogation rules. If emissions, atmospheric deposition, or runoff from this peaker plant, including diesel-related pollutants, increase nitrate levels or environmental pressure, farmers could be pushed out of compliance through no fault of their own. As an ACRES farmer, any increase in pollution linked to this development could directly affect compliance with scheme requirements, leading to penalties, financial loss, or exclusion from environmental programmes. This creates an unfair situation where farmers are held responsible for environmental impacts arising from activities beyond their control.

Organic Farming

The proposed peaker plant presents a significant risk to the regulatory compliance and economic viability of nearby certified organic farms. Organic certification is governed by strict European regulations and requires the absence of prohibited substances and the maintenance of high environmental quality. Airborne pollutants such as nitrogen oxides, particulate matter, and volatile organic compounds, particularly those associated with diesel combustion, can deposit onto soil, forage crops, and pasture through atmospheric pathways. Organic farms are especially vulnerable to such contamination because even low levels of pollutants may trigger certification concerns.

In addition to airborne risks, there is a potential for contamination through water and soil pathways, including runoff from hardstanding areas, accidental spills, or leaks from fuel storage systems. Organic farming depends on maintaining healthy soil biology, clean water sources, and natural ecological balance. Any disruption to these systems may compromise the integrity of organic production.

The consequences of losing organic certification are severe. Farmers may lose access to premium markets,

suffer significant financial loss, and face a mandatory re-conversion period of up to two years. During this time, they must adhere to organic practices without receiving organic prices. This represents a major economic and operational burden. The proposed development therefore poses a direct and disproportionate risk to organic farming systems that has not been adequately assessed.

Derogation Limits

As a derogation farmer, I operate under strict limits and must comply with detailed environmental regulations. Any additional environmental pressure from nearby industrial activity, including emissions or contamination associated with diesel use, could increase nitrate levels and push farms beyond permitted limits. This may result in penalties, reduced stocking capacity, or loss of derogation status, despite full compliance with regulations. This creates an unfair burden on farmers who are already operating under strict controls.

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.

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.

Cumulative Impact on Child's Development

Fine particulate matter can travel significant distances and accumulate over time, meaning children may be exposed not only during peak events but also through repeated low-level exposure. The cumulative effect of these exposures is particularly concerning during key stages of physical development, where long-term impacts on lung function and overall health may arise.

Need for Precaution Due to Uncertainty

The long-term health impact on children has not been fully assessed, particularly in relation to repeated exposure to emissions associated with intermittent operation and diesel use. Given the uncertainty and the known vulnerability of children to air pollution, a precautionary approach should be applied to ensure that health risks are avoided.

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.

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.

Unsuitability of Rural Road Network

The proposed site entrance is located on an exceptionally dangerous section of the L3103. Establishing an access point at this specific location introduces an unacceptable level of risk due to several compounding hazards:

- **Severely Restricted Width:** The road is currently too narrow to safely permit two Heavy Goods Vehicles to pass simultaneously.
- **Absence of a Hard Shoulder:** There is no safe refuge or margin for error for manoeuvring vehicles.
- **Critically Poor Visibility:** The immediate area is affected by blind dips and blind corners, severely compromising driver sightlines.

These immediate dangers constitute a severe threat to public safety and require urgent and mandatory remediation.

In addition to these existing hazards, local roads are not designed to accommodate sustained industrial traffic. The interaction between heavy goods vehicles, farm machinery, and everyday residential traffic creates a complex and potentially dangerous road environment. The introduction of additional industrial traffic, including diesel deliveries and construction vehicles, further compounds these risks.

Inadequate Assessment of Traffic Impacts

The placement of a site entrance at this hazardous location on the L3103 introduces significant and clearly identifiable safety risks, including restricted road width, lack of a hard shoulder, and severely limited visibility

due to blind dips and corners. Despite these known constraints, the Environmental Impact Assessment does not adequately assess the safety implications of this access point.

The cumulative impact of construction traffic, operational traffic, and fuel deliveries has not been fully assessed. This includes the interaction of heavy goods vehicles with existing rural traffic, school-related movements, and agricultural use. The absence of a detailed and robust traffic safety assessment creates uncertainty regarding whether the local road network can safely accommodate the proposed development.

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.

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.

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

Landscape Character and Policy Conflict

The proposed development represents 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 associated infrastructure such as buildings, stacks, lighting, and fuel storage, will fundamentally alter the character of the area. This type of development does not appear consistent with the existing landscape or its capacity to absorb such change. This raises concerns under Policies LCM1, LCM2 and LCM3 of the Galway County Development Plan, which require the protection of landscape character, sensitivity, and capacity, and seek to ensure that development is appropriate to its setting.

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.

Cumulative Visual Impact of Industrial Infrastructure

The visual impact of the development should not be considered in isolation. The proposal includes multiple elements, including plant structures, fuel storage areas, electrical infrastructure, security fencing, lighting, and access roads. When considered together, these elements will create a significant industrial presence within a rural setting. The cumulative visual impact of these components has not been fully assessed and may result in a greater level of visual intrusion than identified in the Environmental Impact Assessment.

Impact on Residential Amenity and Long-Term Visual Change

The development will be visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This may affect residential amenity, enjoyment of the area, and the overall character of the landscape. Given the long operational lifespan of the development (until at least 2050), these visual impacts will be enduring and cannot be easily mitigated. The introduction of industrial lighting, structures, and activity into a rural setting represents a long-term change that should be carefully considered.

Climate Impact

Lock-in of Fossil Fuel Infrastructure

The proposed development represents new fossil fuel infrastructure with an operational lifespan extending to at least 2050. This risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure may delay or displace the development of renewable energy and storage solutions, creating long-term dependency on fossil fuels that is not consistent with climate objectives.

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.

Underestimation of Operational Emissions

The Environmental Impact Assessment may underestimate emissions associated with the development by relying on assumed operational patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during periods of energy system stress. This creates uncertainty regarding total greenhouse gas emissions over time and raises concerns that the climate impact of the development has not been fully assessed.

Availability of Cleaner Alternatives

Cleaner and more sustainable alternatives to fossil fuel generation are available, including renewable energy, energy storage, demand response, and grid flexibility measures. The development of new gas infrastructure may reduce the urgency to deploy these solutions. In the context of the climate crisis, priority should be given to low-carbon alternatives rather than extending reliance on fossil fuels.

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.

Failure to Meet Aarhus Convention Standards

Under the Aarhus Convention, the public has a right to access environmental information and to participate effectively in environmental decision-making. This requires not only the provision of information, but that such information is understandable, accessible, and provided in a timely manner. In this case, the consultation process does not appear to meet these standards. The complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, has restricted meaningful public participation. This raises concerns regarding compliance with fundamental principles of transparency, accessibility, and public engagement in environmental decision-making.

Ineffective Engagement and Limited Opportunity to Participate

While documentation has been made available, the approach to community engagement has not ensured meaningful or effective participation. Many residents were not directly informed of the development, and engagement appears to have relied on passive methods rather than proactive outreach. Opportunities to engage were limited and may not have reached all affected individuals, particularly those without the time, resources, or technical background to interpret the material. Effective consultation requires early, inclusive, and accessible engagement with the community, which does not appear to have been achieved in this case.

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

Absence of Worst-Case Scenario Assessment

The Environmental Impact Assessment relies on assumed or typical operational scenarios rather than

assessing worst-case conditions. A peaker plant operates in response to electricity demand, meaning the frequency, duration, and intensity of operation cannot be guaranteed. This includes the use of diesel during start-up, testing, or operational periods. As a result, actual emissions and environmental impacts may be significantly greater than those modelled. Without a robust worst-case assessment, it cannot be concluded that significant adverse environmental effects will not occur. This creates a fundamental gap in the assessment and undermines its reliability.

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.

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.

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.

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.

Conclusion

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,

T. Sheridan

Name: Teresa Sheridan

Date: 15 April 2026