OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Albert and Jennifer Healy

Rathmorrissey

Athenry

Galway

H65 C654

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 23 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,

We wish to formally object to the proposed Peaker plant development in Athenry by Bord Gáis Energy. Our objection is based on serious concerns regarding public health, the impact on the quality of life, noise pollution, environmental impact, safety, community wellbeing, and inconsistencies with national policy. We also have privacy and CCTV concerns. Further, the impact on property values and the local economy has been a cause for concern.

For over twenty years we have resided in very close proximity to the proposed development site—less than a five-minute walk away—on a private road where access is restricted. Bord Gáis Energy vehicles have already accessed the proposed development site via this road. This may constitute a trespass and has disrupted the privacy and daily lives of those living here. If permission is granted, we are concerned that this disruption will become permanent and intensify.

This plant has the potential to have disastrous consequences for local residents and the wider community as a whole. As parent's living in the area, we are particularly concerned about the potential impact of this proposed development on children's health and any future grandchildren we may have. We fear for the

Children in my area who are particularly vulnerable to air pollution due to their developing lungs and higher breathing rates relative to body size. 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. It is a concern to us that our grown children will decide to relocate to avoid our grandchildren experiencing any health problems as a result of this development. Pollutants such as nitrogen oxides (NOx) and fine particulate matter (PM2.5 and PM10) are known to damage air quality, irritate the lungs, and contribute to long-term harm to both human health and the environment. Fine particulate matter can also travel long distances and accumulate over time, meaning the impacts may extend beyond the immediate area and persist in the long term. We have reservations regarding the thoroughness of the assessment of these emissions. This issue presents significant implications for public health and environmental protection, especially in relation to EU air quality standards established by Directive 2008/50/EC.

Locating this type of industrial infrastructure near residential areas exposes children to avoidable health risks, including asthma exacerbation and potential long-term developmental effects. Given the proximity of this development to residential areas, there are serious concerns about its impact on local schools. I fear that when we have grandchildren they will not be sent to the local schools such as LisheenKyle National School or the Athenry's primary schools to protect their health. The presence of such infrastructure may deter families from sending children to local schools due to health concerns, thereby undermining community cohesion and wellbeing. Elderly residents and those with pre-existing health conditions would also face disproportionate risk. The proposal fails to sufficiently demonstrate how these vulnerable groups will be protected. Evidence from international studies highlights these risks. In New York City, communities located near a cluster of peaker plants operated by the New York Power Authority—particularly in the South Bronx areas of Mott Haven and Melrose—have recorded disproportionately high rates of childhood asthma. In the Mott Haven and Melrose sections surrounding these plants, the asthma ER visit rate for children aged 5 to 17 is nearly triple the citywide average, leading to the area being commonly referred to as "Asthma Alley." Further evidence is provided by a study published in the American Journal of Respiratory and Critical Care Medicine, which found that the closure of a similar polluting facility resulted in a 20% reduction in respiratory-related emergency visits within the first month. Additional research has reported reductions of up to 41% in children's emergency asthma visits following the shutdown of comparable facilities. There is also growing evidence linking proximity to industrial air pollution with broader developmental impacts, such as ADHD, anxiety, and impaired cognitive functioning in children. These findings raise serious concerns about exposing the residents of Athenry—particularly young families—to similar risks. This is very concerning and should not be glossed over.

Further, the introduction of this large-scale industrial infrastructure in close proximity to the residential area where we reside is likely to negatively affect property values. The perceived risks associated with pollution, noise, and safety has the consequence of deterring prospective buyers in the event of a sale of local property and reduce demand. This, in turn, undermines the financial security of homeowners including ourselves. Additionally, the development risks damaging the appeal of Athenry as a desirable place to live, with potential knock-on effects for the local economy and community vitality.

We live in very close proximity to the proposed plant and the likely installation of CCTV and security infrastructure raises concerns regarding privacy and data protection. We are concerned that cameras may

inadvertently capture footage of private property or residents going about their daily lives. There is insufficient clarity regarding data management practices, including who has access to footage, how long it is retained, and what safeguards are in place to prevent misuse.

Another area of contention concerns noise pollution regarding the actual construction of the development and from the proposed plant itself. Peaker plants are known for rapid start-up cycles, which can generate sudden and disruptive noise. This type of intermittent but intense noise can significantly affect quality of life, particularly during evenings or nighttime periods. Chronic exposure to such disturbances has been associated with sleep disruption, increased stress levels, and negative impacts on mental health. One example is the Lorain Renewable Natural Gas Facility in Oberlin, Ohio, USA. Residents reported a loud, constant humming sound similar to an industrial vacuum cleaner. The noise was described as pervasive, reverberating inside homes and preventing sleep. Long-term residents have also stated they could no longer enjoy their gardens or outdoor spaces because of the noise. The proposal in our local area does not convincingly demonstrate that noise impacts will be mitigated to an acceptable level.

Further we are 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 which we heavily depend on 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.

The proposed structures would also impact the landscape of our local area as they represent a significant visual intrusion into the local landscape. The project includes one emissions stack with a height of up to 30m (approx. 100 ft). This industrialisation is out of character with the existing rural and residential setting and would negatively impact the visual amenity enjoyed by the authors of this objection and other residents. We are very concerned as such changes are permanent and cannot be easily mitigated once constructed. Such a structure would significantly detract from the visual amenity of the area and undermine the character and heritage value of Athenry, with potential knock-on effects for tourism. There are also 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. There is no evidence showing this development could blend into its environment or that its visual effects could be properly reduced. This raises concerns in relation to the Galway County Development Plan, particularly Policy GB1, which requires that developments be designed and located in a manner that allows them to integrate effectively into the landscape. It is noted that the visual impact of the proposed development appears to have been evaluated independently, rather than within the context of its overall effects. The project includes multiple elements, such as plant structures, fuel storage areas, electrical

infrastructure, security fencing, lighting, and access roads, which together would create a substantial industrial presence within a rural setting. The cumulative visual impact of these components does not appear to have been fully assessed, and as a result, the overall level of visual intrusion may be significantly greater than that identified in the Environmental Impact Assessment. There are concerns that the proposed development will be clearly visible from surrounding homes, roads, and farmland, resulting in a permanent change to the visual environment. This has the potential to impact residential amenity, reduce enjoyment of the area, and alter the overall character of the landscape, with a large and visually prominent industrial facility introduced into what is currently a rural setting. Given the long operational lifespan of the development, potentially extending to at least 2050, these impacts would be long-lasting and not easily mitigated. The addition of industrial structures, lighting, and ongoing activity represents a significant and enduring change that requires careful consideration.

Another area of concern is the inherent safety risks, including the potential for fire or explosion and the impact that this may have on residents including the authors of this objection who live in such close proximity to this proposed development. While such risks may be statistically low, their consequences can be severe, particularly in proximity to homes. 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. It is not clear that adequate emergency response plans, evacuation procedures, and safety buffers have been sufficiently detailed or guaranteed. We direct attention to situations where loss of life has occurred due to lack of consideration of these issues: Enron Power Station (UK, 2001): An explosion in a transformer room at this gas-fired facility resulted in 3 fatalities and one serious injury; Sentinel Energy Project (California, USA, 2017): A high-pressure valve failure at this Peaker plant resulted in the death of an employee; Kleen Energy Plant (Connecticut, USA, 2010): A massive natural gas explosion occurred during a "gas blow" (purging pipes with high-pressure gas). The blast killed 6 workers, injured at least 50 others, and caused structural damage to nearby homes. 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 in relation to the proposed development. Residents in Athenry should not be exposed to industrial-level hazards in a residential setting.

We have concerns in relation to increased heavy traffic and diesel transportation risks. As residents who use this road, we are worried 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 to road users, residents and school children have not been adequately addressed.

There are serious concerns that the proposed development represents new fossil fuel infrastructure with a long operational lifespan, potentially extending to at least 2050, which risks locking in carbon-intensive energy generation at a time when national and EU policy require rapid decarbonisation. Investment in gas-fired infrastructure of this nature may delay or displace the development of renewable energy and energy storage

solutions, leading to continued reliance on fossil fuels over the long term. Overall, there is concern that the proposal is not aligned with current climate objectives and may undermine the transition to a low-carbon energy system.

There are concerns that community engagement in relation to this project has been insufficient and ineffective. Many residents including the authors of this objection did not receive any direct communication or notification about the proposed development, and 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 limits meaningful public participation, as effective consultation requires information to be accessible, clearly explained, and actively communicated to all affected members of the community. In this case, the complexity and level of technical detail in the documentation creates a barrier to understanding, meaning that many people cannot fully assess the potential impacts of the development.

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.

We also express a major concern regarding the risk of future expansion. Approval of this project may set a precedent for further industrial energy developments in the area. There is a legitimate concern regarding incremental expansion or the addition of related infrastructure over time, leading to gradual industrialisation beyond what is currently proposed. This proposed Peaker plant has the potential of destroying the community we grew up and live in. The proposed development offers minimal long-term employment opportunities once operational. While it may contribute to national grid stability, the direct benefits to the local community appear limited. This creates an imbalance where local residents bear the environmental and social costs without receiving proportional advantages.

This proposal presents important concerns regarding people, public health, agriculture, and the surrounding environment. Communities should not face uncertain or potentially substantial environmental and health risks.

Conclusion

The proposal raises important concerns about environmental protection, public health, agriculture, road safety, and community welfare. Due to uncertainties regarding how often operations would occur, diesel usage, and overall impacts, this development cannot be considered acceptable. A thorough and cautious assessment is needed to ensure that significant environmental effects are avoided, but such an evaluation has not been conducted. Therefore, I recommend that approval for this development be refused.

Yours Sincerely,

Albert Healy
Jennifer Healy

Name: Albert and Jennifer Healy
Date: 23 April 2026