OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Conor Kelly

16 Kernot St

East Geelong

VIC

Australia

3219

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 22 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,

To Whom It Concerns,

My name is Conor Kelly and I am currently residing in Australia. However, my family home and strong personal ties remain in Athenry, where my father and two brothers live and work locally.

My father John Kelly is still actively engaged in farming, and both of my brothers Aidan & Brendan live near the proposed development, along with their families. Between them, there are eight grandchildren growing up in the area. My father's farm is part of a long-standing family livelihood, and it is intended that his sons will continue this farming into the future. My father and brothers are located approximately 600 metres from the proposed site and would therefore be directly exposed to any environmental or safety impacts arising from the development.

One of my brothers is a local veterinary practitioner and has significant concerns regarding the potential impact of this development on farming and animal health. There are serious concerns regarding the risk of groundwater contamination and what this may mean for livestock. There is uncertainty as to whether animals could become ill because of contaminated water sources, and whether such contamination could enter the food chain.

This raises broader concerns not only for farming families but also for food safety and public health. The potential for unknown or long-term impacts on animal health and agricultural produce is particularly worrying in an area where farming is a central part of the local economy and way of life.
In addition, I am concerned about the potential impact of air pollution on the health and wellbeing of my family, particularly given their proximity to the proposed development. As a medical doctor, I am fully aware of the range of health issues that can be associated with environmental exposures of this nature, including respiratory and long-term health effects. Children living and growing up in the area may be exposed over extended periods, and the long-term implications of this are not clear. I am also concerned about the risk of fire and explosion events associated with the proposed development. Given the proximity of homes and farms to the site, the potential consequences of such an event could be severe.
I also hope to return to Athenry in the future and build a home locally, potentially within approximately 600 metres of the proposed site. This raises serious concerns for me in terms of what this development could mean for my own family, particularly in relation to health, environmental quality and long-term safety. The prospect of building a home and raising a family in such proximity to a development of this nature is deeply concerning and calls into question the suitability of the location.
Furthermore, I question whether the site is suitable for a development of this nature, particularly given the reliance of the local community on groundwater and the rural agricultural setting.
While I am currently living abroad, my long-term connection to Athenry remains strong, and my family's wellbeing and livelihood are directly tied to this area.
Thank you for taking my objection into consideration.
Please don't hesitate to contact me further if any further concerns or queries.
Kind regards
Dr Conor Kelly
Emergency Physician, FACEM, MB BCh BAO, NUI Galway
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High-Intensity Emissions and Diesel Impacts

I am concerned about the potential impact of air pollution from this proposed 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. Although the plant would not operate continuously, it may run at extremely high output when required, leading to short but intense bursts of pollution, particularly during start-up and peak demand periods. The possible use of diesel during these times is especially worrying, as it produces higher levels of harmful emissions, including nitrogen oxides, sulphur dioxide, and particulate matter.

These pollutants can penetrate deep into the lungs and enter the bloodstream, increasing the risk of respiratory and cardiovascular illness, particularly for vulnerable groups such as children, older people, and those with existing health conditions. 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. In summary, I 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.

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.

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.

Risk of Fire and Explosion from Fuel Storage

As someone living in the area, I am very concerned about the safety risks associated with this proposed development. The project involves the storage, handling, and use of highly flammable fuels such as natural gas and diesel, which carry an inherent risk of fire or explosion. In the event of equipment malfunctions, leaks, or operational challenges, these substances may pose an ignition risk, potentially resulting in significant incidents. Considering the intermittent yet high-intensity operation of a peaker plant, the likelihood of such occurrences warrants careful consideration.

The potential consequences are particularly worrying, as any incident could have serious impacts on nearby homes, residents, farmland, and livestock. This raises significant concerns about whether the risks have been fully assessed and whether this location is appropriate for a development of this nature.

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.

Lock-in of Fossil Fuel Infrastructure

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.

Lack of Clear, Accessible, and Effective Communication

There are concerns that community engagement in relation to this project has been insufficient and ineffective. Many residents 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.

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.

Reliance on Regulation Does Not Eliminate Risk

The Environmental Impact Assessment depends on forthcoming regulation, licensing, and monitoring to manage environmental effects. Nonetheless, regulatory oversight cannot entirely remove environmental risks or ensure that actual emissions and impacts will match those projected by models. Uncertainty persists regarding the long-term performance of the development, especially under diverse operational scenarios.

Conclusion

This proposal presents important concerns regarding people, public health, agriculture, and the surrounding environment. Because the documentation is complex and community engagement has been limited, many individuals have found it challenging to take part in the decision-making process. Communities should not face uncertain or potentially substantial environmental risks. Therefore, it is strongly recommended that planning permission be refused.

Yours Sincerely,

Name: Conor Kelly
Date: 22 April 2026