

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Edel & Sean Monahan

Gloves south

Athenry

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,

My name is Edel Monahan (née Gardiner). I am originally from Clarke Street, Athenry, located just over 3km from the site of the proposed peaker plant, and I maintain strong and ongoing ties to the local area. I have close family living locally, including my two sisters and their families. I am married to Sean Monahan, a full-time dairy and sheep farmer, and farming is central to our livelihood and to our family's future.

I have close family living in the immediate vicinity of the proposed development. My niece and her husband, along with their two young children, live in Pollnagroagh, approximately 800 metres from the site. Given their proximity, they would be directly exposed to any emissions or environmental impacts arising from the development.

These children will attend local schools within approximately 2km of the site and will participate in outdoor activities and sport within the area. I am deeply concerned about the potential impact of air pollution on their health and wellbeing, both now and into the future. I worry for them, and I know that their parents share these concerns.

My niece and her husband are also actively engaged in farming in the area, and their livelihood, like ours, depends on a safe and stable rural environment. In addition to concerns regarding air quality and health, I am also concerned about the visual impact of this industrial development on the surrounding countryside. This is a rural agricultural landscape, and the introduction of large-scale infrastructure will fundamentally alter its

character and setting. I am further concerned about the impact on local roads, which are narrow and not designed for increased traffic or heavy vehicles. Increased traffic levels will affect safety, particularly for farming activity, pedestrians and children using these roads daily.

I also visit Athenry regularly and remain closely connected to the community. Through daily interaction with family, friends and the wider community, I have become increasingly aware of the level of concern and uncertainty surrounding this proposed development. Many people I have spoken with were not aware of the project until recently.

While the Athenry Peaker Plant Concern Group has made efforts to inform the community, it is my understanding that engagement by the applicant has been limited, with many residents beyond a 2km radius not adequately informed or consulted.

My own children will continue in farming, will live locally, and will raise their families in this area. I am particularly concerned about the potential impact of air pollution on their health and wellbeing, both now and into the future. For this reason, I am also deeply concerned about the risk of groundwater contamination and the potential impact on agricultural land and water sources. Clean water is essential for livestock, food production and the long-term sustainability of farming enterprises.

In addition, I am concerned about the risk of fire and explosion events associated with the storage and use of fuels at the proposed development. Even if considered low probability, the potential consequences could be severe for nearby homes, farms and the wider community.

Athenry is a beautiful heritage town with a strong sense of identity and community. The surrounding rural landscape forms an important part of its setting and character. The introduction of an industrial development of this nature raises serious concerns regarding its compatibility with the town's heritage, rural character and long-term amenity.

I object to this development and set out my concerns below

Human Health & Air Pollution

High-Intensity Emissions and Diesel Impacts

Air pollutants, including nitrogen oxides (NO_x) and fine particulate matter (PM_{2.5} 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.

Water & Groundwater

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

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.

Local Roads, Safety & Schools

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.

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.

Visual Impact & Landscape

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

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

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.

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,

Edel Monahan

Name: Edel & Sean Monahan
Date: 10 April 2026