

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Niks Gurins, Chelsey Healy and Lauren Healy

Rathmorrissety

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 Rathmorrissety (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.

We reside 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. We fear for the children in our area who are particularly vulnerable to air pollution due to their developing lungs and higher breathing rates relative to body size. 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. We fear that when we have children we will not want to send them to the local schools such as LisheenKyle National School or the Athenry primary schools to protect their health. We may also have to consider relocating to another area to avoid health risks to ourselves and our future children to avoid negative impacts that this plant poses. 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. 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. We are very 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. 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, 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. This is very concerning and should not be glossed over.

We are deeply concerned about the potential risk to groundwater from this proposed development. The area depends heavily on clean groundwater for essential needs, including drinking water, farming, and livestock, making it a vital resource for the community. The introduction of an industrial facility involving the storage and handling of fuels creates an ongoing risk to this resource, and any contamination, even if accidental, could have serious and long-lasting consequences for water quality, livestock health, and agricultural productivity. What is particularly worrying is that once groundwater becomes contaminated, the damage can be extremely difficult—if not impossible—to reverse. This raises serious concerns about whether this type of development is appropriate for this location. To sum up, significant worries persist that the dangers to groundwater have not been fully assessed, and any consequences could be permanent.

Further, as residents who live in very close proximity to the proposed plant the likely installation of CCTV and security infrastructure raises concerns regarding privacy and data protection. 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.

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 including our home, 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.

Additionally, 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 serious concerns regarding Ireland's legally binding obligations to reduce greenhouse gas emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021, as well as wider 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, raising questions about alignment with national carbon budgets and emissions reduction targets. In this context, there is concern that the proposal may undermine the State's ability to meet its climate commitments and transition to a low-carbon energy system. There are concerns that the Environmental Impact Assessment may underestimate the emissions associated with the proposed development by relying

on assumed operating patterns. As a demand-led facility, the plant may operate more frequently or for longer periods than predicted, particularly during times of pressure on the energy system. This creates uncertainty around the total level of greenhouse gas emissions over the lifetime of the project and raises concerns that the full climate impact of the development has not been adequately assessed.

We also have concerns regarding the lack of clear, accessible and effective communication. 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. We are concerned that the consultation process for this development does not meet the standards set out under the Aarhus Convention, which provides for the public's right to access environmental information and to participate effectively in environmental decision-making. This requires not only that information is made available, but that it is understandable, accessible, and provided in a timely manner. In this case, the complexity of the Environmental Impact Assessment documentation, combined with limited direct communication, appears to have restricted meaningful public participation. This raises serious concerns regarding transparency, accessibility, and the overall effectiveness of public engagement in the decision-making process. Effective consultation requires early, inclusive, and accessible engagement with the community, and it does not appear that this standard has been achieved in this case. Consultation in relation to this development has not been clear, inclusive, or effective. For a project of this scale and potential impact, there should have been proactive, transparent, and early engagement with the local community, including clear communication, accessible information, and adequate time for people to understand and respond to the proposal. The lack of meaningful engagement raises issues around fairness, transparency, and the overall integrity of the planning process, and creates concern that communities may be placed at a disadvantage due to inaccessible information and limited consultation.

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.

Another area of concern is the inherent safety risks, including the potential for fire or explosion. 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 serious concerns about the proposed site entrance on the L3103, which is an exceptionally dangerous stretch of road where introducing an access point would create an unacceptable level of risk. The road is extremely narrow and cannot safely accommodate two heavy goods vehicles passing at the same time, there is no hard shoulder to allow for safe maneuvering or recovery, and visibility is severely limited due to blind dips and sharp corners. These are significant existing hazards that already pose a real danger to road users, and the addition of a site entrance would further increase that risk. There are also concerns regarding the suitability of local roads for this type of traffic. Rural roads are not built to support continuous industrial activity, and when heavy trucks, farm equipment, and regular local vehicles share these routes, it often leads to difficult and dangerous traffic conditions. The introduction of additional industrial traffic, including construction vehicles and diesel deliveries, would further increase the risk and make these roads more dangerous for all users. There are strong concerns that adding traffic—particularly large vehicles—would worsen these existing hazards, especially near homes and schools during busy periods such as morning and afternoon times. The interaction between heavy goods vehicles, farm machinery, and everyday local traffic creates a higher risk of accidents, particularly for children and other vulnerable road users. Overall, this is not a suitable location for this level of traffic, and the associated safety risks for the community are a critical concern.

Further, 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.

There is also 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 including the authors of this objection 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.

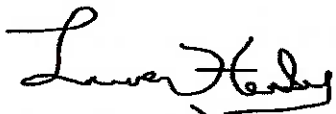
Conclusion

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,

Chelsey Healy





Name: Niks Gurins, Chelsey Healy and Lauren Healy

Date: 23 April 2026