OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

Patrick and Lorraine Kelly

Elm House

Castlelambert

Athenry

Galway

H65YR82

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 17 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, Patrick and Lorraine Kelly , are the owners and occupier of a residential dwelling and associated lands in the immediate vicinity of the proposed development. As such, our property constitutes a sensitive residential receptor within the meaning of the Environmental Impact Assessment Report (EIAR) and is therefore particularly vulnerable to the potential impacts arising from the construction and operation of the proposed development.

We are writing to formally object to this development and to ask An Coimisiún Pleanála to refuse planning permission in its entirety.

I have serious concerns regarding the scale, nature, and proximity of the proposed development and its associated infrastructure, particularly in the context of its potential impacts on residential amenity, including noise, traffic, visual intrusion, and general disturbance. These concerns are heightened by the fact that elements of the proposed infrastructure are in proximity to my dwelling, giving rise to a significant risk of adverse effects on my quality of life and enjoyment of my home.

Our home is situated approximately 600 metres from the proposed peaker plant site, placing it well within the zone of identified sensitive receptors in the applicant's own EIAR. The EIAR explicitly defines residential properties as "high sensitivity receptors where people are likely to spend the majority of their time", thereby confirming the vulnerability of my home.
Notwithstanding the applicant's repeated attempts to characterise impacts as "not significant", it is clear from the EIAR itself that residential receptors will be exposed to noise, visual intrusion, and disturbance.

The most significant impacts arise not from the plant itself, but from this infrastructure, which brings the effects of the development directly to my home.

This submission is not about abstract policy. It is about my family's health, my children's safety, and a community that deserves better than to have a large-scale industrial diesel facility placed on its doorstep without proper scrutiny of the consequences.
We have two daughters, one attends the Presentation college Athenry and one attends Lisheenkyle national school, both schools are within 2.5km of the proposed development, meaning our children will be always be exposed to these emissions. Myself and one of our daughters suffer with bad asthma, and this causes us great concern for the future if this development is granted.

We have a farm which we rear beef cattle. The studies that have been done on the emissions from the proposed development will greatly affect my animals, and in effect my livelihood. Significant negative associations were found between PM2.5 and feed intake, weight gain, body weight, and water intake efficiency in both grain-finished and grass-finished beef steers. For grass-finished steers, PM2.5 had significantly negative effects on feed intake ($P < 0.001$). All emissions from the plant such as NO2, SO2, CO, PM2.5 and PM10 have significant linear effects on cattle feed intake and body weight over two years of study PubMed Central — confirming that combustion pollutants as a group directly suppress beef cattle performance. Cattle are particularly susceptible to pulmonary pathologies because of their respiratory anatomy, which may make them prone to morbidities and mortalities related to airborne particulates.

We have a well on our farm that we use to supply the farm and also use for drinking water. Unfortunately with the Karst ground we have huge concerns for contamination.

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.

Dependence on Groundwater for Domestic and Agricultural Use

I am 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.

Protection of Agricultural Livelihoods

Farmers work diligently within stringent environmental guidelines and uphold rigorous standards of environmental stewardship, fully recognising the importance of these obligations. There is concern that an industrial development of this nature—particularly one involving diesel use and long-term emissions, potentially until 2050—could introduce risks that undermine that work by affecting land quality and increasing environmental pressures. This situation presents significant challenges for farmers, who should not face penalties for problems caused by factors beyond their control. There are concerns that agricultural risks remain overlooked and the development may affect local farming long-term.

Exposure During Daily Activities and School Times

As a parent in the area, I am concerned that children living nearby or attending local schools will be exposed to higher levels of air pollution when the plant is operating at peak times, particularly when they are outdoors during school drop-off, break times, and after-school activities. During physical activity, children breathe more rapidly, increasing their intake of pollutants and making them more vulnerable to harmful effects. What is especially worrying is the potential for repeated exposure during key stages of development, which could have lasting impacts on their health and wellbeing. Overall, this raises serious concerns as to whether these risks have been fully considered.

School Safety and Peak-Time Risks

As someone who lives locally and extensively uses this road, I am concerned about the proposed location of the site entrance on the L3103. This section of road is already extremely dangerous, as it is narrow, has no hard shoulder, and does not provide sufficient space for two heavy goods vehicles to pass safely. Visibility is also poor due to blind dips and sharp bends, meaning drivers often cannot see oncoming traffic in time, and introducing a site entrance at this location would significantly increase the risk to all road 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.

Proximity and Worst-Case Scenario Risks

There are serious concerns about the location of this proposed development, given its proximity to residential homes, agricultural land, and local infrastructure. In this context, even a low-probability event could have serious consequences for public safety, property, and the local rural economy. While such incidents may be unlikely, the potential impact of events such as fire, explosion, or fuel-related incidents could be significant, particularly given how close the development is to where people live and work. The Environmental Impact Assessment does not clearly demonstrate that worst-case scenarios have been fully examined, with limited detail on potential fire spread, explosion impact zones, and fuel ignition risks. Without this information, the true scale and severity of potential impacts remain unclear, giving rise to significant concern about the level of risk associated with the development.

Cumulative Visual Impact of Industrial Infrastructure

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.

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.

Ineffective Engagement and Limited Opportunity to Participate

There are concerns that, 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, and it does not appear that this standard has been achieved in this case.

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.

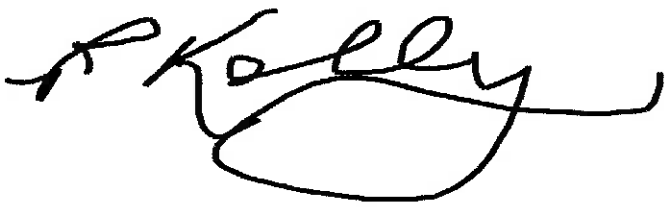
Diesel Use Not Fully Assessed or Limited

Diesel is used beyond emergencies, including routine tests and operations. This leads to extra emissions, odours, and environmental risks not fully covered by the Environmental Impact Assessment. The frequency and impact of diesel use are unclear, making the total environmental effect uncertain.

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,



Name: Patrick and Lorraine Kelly
Date: 17 April 2026