OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 324113

shirley hanley

22 Gort Na Ri

athenry

RAHEEN

Galway

H65 HD79

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 24 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,

Personal Objection Statement – Proposed Peaker Power Plant in Athenry

I am writing this statement to formally record my strong objection to the proposed gas and diesel peaker power plant in Athenry, located within 5km of my home. I want to clearly outline how this development would directly affect my family and our wider community.

As a parent of young children, my most immediate and serious concern is the impact this plant could have on their health and wellbeing. My children attend school and play sports in the area surrounding the proposed development. They spend a significant amount of time outdoors, and under this proposal, they would be breathing air potentially affected by emissions from the plant every single day of their childhood.

This is not an abstract concern. Children are more vulnerable to air pollution than adults, and exposure to emissions from gas and diesel combustion—such as nitrogen oxides and particulate matter—has been linked to respiratory problems, asthma, and long-term health issues. The idea that this infrastructure would operate

so close to where children live, learn, and play is deeply troubling.

I am asking decision-makers to consider a simple but important question: would this development be considered acceptable if it were located beside your own children's school or home?

Beyond my own family, this proposal raises serious concerns for the wider community. Athenry is a growing town with a strong sense of community, where families have chosen to live because of its environment and quality of life. Introducing a fossil fuel-based peaker plant into this setting risks undermining that quality of life through potential impacts on air quality, noise, and the overall environment.

There is also a broader concern about the long-term direction this represents. At a time when Ireland is working toward reducing emissions and transitioning to cleaner energy, the development of new fossil fuel infrastructure—particularly one that relies on both gas and diesel—seems contrary to those goals.

In summary, this proposed development presents real and immediate concerns for the health of my children, the wellbeing of our community, and the environmental future of the area. For these reasons, I strongly object to the proposed peaker power plant in Athenry.

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.

Short-Term Exposure

I'm concerned that emissions from the planned peaker plant could impact the environment, particularly if diesel is used at start-up or during periods of high demand. Diesel exhaust releases various dangerous pollutants, such as nitrogen oxides, fine particles, and other toxic chemicals. These substances are associated with respiratory issues, impaired lung function, and heart disease. What is especially worrying is that these emissions may occur in short but intense bursts rather than in a steady, predictable way, particularly during start-up and peak operation. The average-based modelling used in the assessment seems not to capture this kind of real-world operation completely.

There are worries that residents in nearby areas might face greater pollution levels than expected, especially when the weather is calm and pollutants linger instead of spreading out. There is considerable uncertainty regarding how accurate these air quality forecasts are, which makes it hard for the community to be sure that

both public health and the environment are truly safeguarded.

Cumulative Health Impacts Over Time

I have serious concerns about how this proposed peaker plant would operate over time. Although it would run intermittently, it would do so at extremely high intensity, and the potential use of diesel adds to these concerns, as it could result in repeated short-term spikes in air pollution. While individual emission events may be brief, the fact that they could occur repeatedly over many years—potentially up to 2050—raises concerns about ongoing exposure and cumulative health impacts.

Pollutants such as nitrogen oxides and fine particulate matter are known to worsen asthma, trigger respiratory symptoms, and contribute to long-term conditions including chronic respiratory and cardiovascular disease. This is particularly concerning for nearby residents, especially vulnerable groups such as children, older people, and those with existing health conditions. There is still uncertainty regarding whether the lasting and cumulative effects of these emissions have been fully studied, which leads to real concerns that continued exposure during the development's lifetime could affect public health and wellbeing in the future.

Public Health Protection

There is significant concern within the community about the potential impact of air pollution from this proposed peaker plant on human health, particularly during periods when it is operating at full capacity and emissions are highest. The possible use of diesel is especially worrying, as it introduces additional harmful pollutants that can travel long distances and accumulate in the environment.

There is ongoing uncertainty concerning the operational frequency of the plant, its emission rates, and the extent of public exposure to pollutants through 2050. Because these issues remain unresolved, it is difficult to verify that all risks have been considered. Given these unknowns, it is wise to adopt a careful strategy to protect public health; unless definitive evidence proves no harm, any dangers to residents should be considered as part of the planning process.

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.

Long-Term Accumulation of Pollutants and Chemical Residues

I am particularly concerned about the risk of pollution to soil and groundwater from this proposed development. The inclusion of diesel storage tanks, hardstanding areas, drainage systems, and other infrastructure increases the likelihood that pollutants could gradually enter the ground over time, potentially up to 2050. Substances such as hydrocarbons from diesel and gas, along with other chemical residues, may build up slowly, particularly where there are repeated small leaks, routine operational losses, or occasional

spills, with impacts accumulating over time.

What is especially worrying is that this type of pollution may not be immediately visible but could result in long-term damage to groundwater quality and soil health. This has implications not only for environmental protection but also for local agriculture, which depends on clean soil and water. Overall, there is significant concern that these long-term and cumulative risks have not been fully addressed and could have lasting consequences for the local environment and livelihoods.

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.

Unsuitability of Site Due to Environmental Sensitivity

I do not believe this site is suitable for this type of development. The area is environmentally sensitive, with a strong reliance on clean groundwater and agricultural land, both of which are essential to the local community. Introducing a development involving diesel storage and industrial processes, potentially operating until at least 2050, brings significant long-term risks to water quality, soil health, and surrounding land uses.

These effects are not temporary or easily controlled, and once harm is done, it can be extremely challenging—sometimes even impossible—to completely fix. Because of uncertainty and the risk of permanent environmental damage, it's best to proceed with caution. In summary, there are significant concerns about whether this development is suitable for this area.

Derogation Limits

As a derogation farmer, I operate under strict environmental limits and take compliance very seriously, but there is concern that this proposed development could make it much harder to remain within those limits. Additional environmental pressure from nearby industrial activity, including emissions or contamination linked to diesel use, could increase nitrate levels in the area, which is entirely outside my control. This could result in penalties, reduced stocking levels, or even the loss of derogation status, despite full compliance with regulations, leading to serious financial and operational consequences. Overall, this creates an unfair situation where farmers may be penalised for environmental impacts arising from a development beyond their control.

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.

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.

Scale, Integration, and Rural Context

There are serious concerns that the scale and industrial nature of the proposed development are not in keeping with the surrounding rural environment. Building large-scale plants, structures, and infrastructure would result in a prominent addition to the landscape that does not match the area's current appearance. 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.

Failure to Meet Aarhus Convention Standards

There are concerns 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.

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.

Lack of Transparency, Inclusiveness, and Early Engagement

There are concerns that 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.

Over-Reliance on Mitigation Measures and Uncertainty of Outcomes

There are concerns that the Environmental Impact Assessment relies heavily on mitigation measures to reduce environmental impacts. However, mitigation does not eliminate impacts, and its effectiveness over time is uncertain, particularly over the long operational lifespan of the development, potentially extending to at least 2050. There is insufficient evidence to demonstrate that these measures will perform as predicted under real-world conditions. This creates uncertainty as to whether impacts will remain within acceptable limits, particularly in relation to emissions, noise, and overall environmental protection.

Failure to Properly Assess Cumulative and Long-Term Impacts

There are concerns that the Environmental Impact Assessment does not adequately assess cumulative impacts, including the combined effects of emissions, noise, traffic, diesel use, and ongoing environmental disturbance over time. These impacts may interact and intensify, particularly during peak operational periods, yet this interaction has not been fully examined. The long-term nature of the development, potentially extending to at least 2050, further increases the importance of understanding these cumulative effects. Without a comprehensive assessment, it is difficult to fully understand the overall environmental burden of the project, and this represents a significant gap in the evaluation.

Lack of Worst-Case Assessment

The Environmental Impact Assessment bases its findings on expected operating scenarios instead of evaluating the worst-case possibilities. Because the plant's operation will depend on electricity demand, it's unclear how often or how intensely it might run. This uncertainty also applies to diesel usage, which could produce higher emissions than those estimated. Without a thorough assessment of the most severe potential impacts, it is impossible to guarantee that major environmental effects will not happen.

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: shirley hanley
Date: 24 April 2026