

To Whom it may concern,

Re. ABP- 320095

We live less than 300 metres away from the proposed development, and wish to continue voicing our objections to the planning application **reference 320095** submitted by Coolpowra Flex Gen Ltd concerning the proposed development of the Oldstreet Power Station in the Coolpowra area of Gortanumera based on the following key observations.

Please note that given the enormity of the files across three planning applications, covering different sections of the proposed project, it is difficult to pen every concern that we have or that we might not yet have reviewed given the enormity of the files:

1. **Lack of notification & consultation with nearby residents:** We would suggest that the agents (Halston Environmental and Planning Limited) for the applicant, in their continuous generation of 1000+ pages of EIARs, are not honouring the intent of EIA and the associated EIARs. Having to review further documentation and submit our objections once again only perpetuates the issue and the anger we face as local residents without the expertise across all aspects of the development and hence greatly welcome and commend the work being done by the eastgalway gasplant concern group.
2. **Policy/Legal Conflicts:** Ireland is legally required to reduce our fossil fuel emissions by 2030 as part of the Paris Agreement. However, it is expected that Ireland will only achieve a 29% reduction in greenhouse gas emissions instead of our target of 51%. If we fail, the country will face a significant financial penalty. It does not make sense to build a gas plant for this reason.

It is widely recognised that the Corrib gas field (where we receive most of our gas) is nearing depletion. Moving forward with this development means the State will have invested in a power plant that cannot operate (this is known as a “stranded asset”). Research has shown that if that happens, the financial burden will likely fall on taxpayers.

3. **Infrastructure Network and Traffic Impact** –According to the EIAR there will be 140-150 construction workers on site, with 200 vehicles will enter the site between am and pm, proposing a new access route does not alleviate or solve any of the issues objected to previously. The new site has been in agricultural use for many years, it is a rural setting situated in a rolling landscape where the local road was formed on an Esker. At times it is difficult for a single car/van to navigate these roads, and now you propose that it is suitable for vehicles of considerable size to access the site. Has an independent Traffic Assessment Plan (TAP) or Traffic and Transport Assessment (TTA) evaluating the impact of a proposed development on local roads been carried out?
4. **Project Splitting and Cumulative Effect:** The assessment of the cumulative and combined effects of multiple energy projects within a 10-12km radius (e.g. proposed extension of the Tynagh Power Plant) of local residences is essential. The fragmented approach in assessing these projects undermines the integrity of the planning process and fails to provide a holistic evaluation of the true impact of the community and environment. It also flies in the face of national policy such as (i) the Department of Health’s Health Ireland Framework (2024) vision where *“everyone can enjoy physical and mental health and wellbeing to their full potential”* and where one of the key goals is to *“Protect the Public from threats to health and wellbeing”*. And (ii) the Galway Development Plan 2023-2028 where it is the Council’s policy objective:
“that the Settlement Hierarchy will facilitate the rural generated housing requirements of the local rural community while also making the villages within this category as attractive places to live whilst still experiencing rural living. The balance between reinforcing and strengthening sustainable rural communities whilst protecting the rural countryside from over development will be a key priority of this plan”.
5. **Air Quality Emissions and subsequent impact on health and wellbeing:** Climate and health harming pollutants which can be released during gas processing include: carbon monoxide, nitrogen oxides, sulfur dioxides, volatile organic compounds, hazardous air pollutants, greenhouse gases, and fine & coarse particulate matter.

As noted by the Union of Concerned Scientists, gas plants are **“stationary”** emissions sources– they release pollutants at a fixed location over long periods of time. The pollutants do not disperse evenly into the air immediately; based on factors such as wind and weather conditions, emissions can remain concentrated in certain areas close to gas-fired power

plants. The implications of this on health outcomes not only to humans but also to Birds and Habitats, is not drawn out in the NIS prepared by the Moore Group.

In addition to these concerns, we have also noted that the *EastGalway Gasplant Concern Group* have mapped fossil fuel power plants to a report of deaths from respiratory system disease in Ireland produced by the *Irish Thoracic Society*. When combined with prevailing winds, there seems to be a high concentration of serious respiratory illness downwind of fossil fuel power plants.

6. **Light & Noise Pollution & impact on Water Quality**, *all of which should be reflected upon within the context of the 'EU Zero Pollution Action Plan':*

The lights that shine from the Oldstreet Power Substation are already very bright, and further development of the site is only going to exacerbate the problem. We already know that light pollution is already a threat to Ireland's biodiversity. Over 50% of invertebrates and 30% of vertebrates are nocturnal and need natural darkness.

Noise pollution also causes untold stress to humans and to animals and the recognition of noise exposure as a prominent environmental determinant of public health has grown substantially. The level of noise during the construction phase, alongside operation noise, is of considerable concern particularly given the suggested operational hours outlined during the construction phase.

Water Quality. We and our neighbours surrounding the proposed development are not served by a public/group water scheme and groundwater/rain is the only source of water supply, as are agricultural animals reliant on same, any possible risk, even if considered small as per the NIS report, will have major health implications. For ourselves, extended family, and residents in the local area the primary source of income is from agriculture and any potential harm to the local environment will have major implications.

We would also query, and would welcome clarity, as to whether or not discussions have been had with Irish water in terms of extending the existing public main should the need arise, and if not what is the proposed plan should our water sources become contaminated?

7. **Environmental Concerns:** Construction and operation of a proposed development this size will undoubtedly disrupt local wildlife habitats, leading to a loss of biodiversity.

The proposed development is located within the vicinity of 40 SPAs, SPCs, NHAs and PHNAs, as protected under the EU Habitats Directive (92/43/EEC) & EU Birds Directive (79/409/EEC, as amended by Directive 2009/147/EC) and the European Communities (natural habitats) Regulations 1997, as amended by the European Communities (Birds and Natural Habitats) Regulations 2011.

The law states that you must be sure “*beyond all reasonable scientific doubt*” that developments that are planned will not have a significant adverse impact on EU protected sites. There are many errors in the environmental report provided by the developer meaning we cannot be confident of this.

8. **Safety** is of huge concern to our family, extended family, neighbours and wider community. Has there, for example, been a response or observation made by the Galway/Tipperary Fire service in terms of their response plan regarding the 224 lithium ion batteries which present a significant fire risk, with examples of such fires around the world burning for days? Whilst there is a total of ten fire stations location in population centres around the County of Galway, nine of these are unmanned.

The recent incidence of more than a dozen animal believed to have killed on farms in South Galway when a bolt of lightning struck a steel electricity mast during a recent storm is also a stark reminder of the significant risks local residents and communities have to be cognisant of when considering proposed developments such as this. Surely the Oldstreet substation at Coolpowra is enough risk for our community to accept. Why should we also accept additional explosive risk of gas, lithium-ion and 23m litres of diesel when we are told such extreme weather events are likely to increase?

9. **The proposed development is NOT in keeping with the character of the area** no matter what measures are taken “*to minimise potential impact on sensitive receptors*”, something of this extraordinary scale cannot just “*blur into grey skies*”..

And whilst the plan highlights that *“Various design layout options were developed to minimise potential impact on sensitive receptors) and accord with the natural features of the site (e.g., topography). Extensive consideration was also given in relation to devising suitable access to the proposed development and mitigating potential impacts”* again those who will be most impacted by it were not consulted or asked their opinion of the various layout options or designs etc.

The proposed development we feel is also disproportionate when you consider existing developments and other proposed developments already within the area (e.g. Tynagh Powerplant approx. 10km. Shannonbridge approx. 30km and Rochfortbridge approx. 100km). The Galway County Development Plan also outline one of its strategic aims is to *“To protect and enhance the visual qualities of rural areas through the sensitive design of associated development”* this is not a sensitive design. Even the architect’s themselves outline *“buildings such as this (which are also usually more urban)”*.

10. **Impact on Property Values:** We would ask that a robust study is completed in detail of the effect on Housing in the affected area. Informally we have been advised that house values may have dropped by as much as 25-30%.

In conclusion we strongly object to the planning application 320095 and request its refusal by ABP. The development poses significant risks to the local community, environment and water resources and its approval would be detrimental to us, our children, our grandchildren, and our neighbours health and well-being.

I would also request that ABP satisfies itself that the process culminating in this submission is also compliant with the ***Aarhus Convention, 1998***, on access to information, public participation in decision making and access to justice in environmental matters.

Joe and Teresa McClearn