

To whom it may concern,

Re: Proposed 400kV Gas insulated SwitchGear electricity substation and high voltage transmission lines/cables and electric plant

I will be living less than 300 metres away from the proposed development, and continue to formally object to the planning application reference 320094 submitted by Coolpowra Flex Gen Ltd concerning the proposed development of the Oldstreet Power Station in the Coolpowra area of Gortanumera despite the significant additional information from the applicant with regards to this case

Please note that given the enormity of the files across three planning applications, covering different sections of the proposed project, and the more recent additional information submitted it is difficult to pen every concern that we have or that we might not yet have reviewed given the enormity of the files, and my lack of expertise in a number of areas of concern in this proposed development.

Despite the additional information I would still like to reiterate the following objections as outlined before and expanded upon given recent changes locally and available research:

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.

2. Infrastructure Network and Traffic Impact –the new access point does not alleviate any concerns, infact it only brings in closer to my own dwelling. As highlighted previously there are two other possible access routes to the site off the N65. There is no mention however within the report of the potential impact or increased traffic on these alternative routes during the construction phase; routes that are already typically single track carriageways with only privately owned surfaced driveways or hardened verges or field access points where cars or commercial vehicles may pass each other. It is not unusual for cars to have to reverse considerable distances to enable a car or commercial vehicle to pass. According to the EIAR there will be 140-150 construction workers on site, with 200 vehicles will enter the site between am and pm. And what assurances can the company/contractor provide that this will not impact on alternative access routes leading to the site?

One would also beg the question given the recent Irish Independent Headline whereby “Generators to combat power shortages are stuck at Dublin Port as they are too heavy for M50” is it not fair to assume that the proposed 3-metre wide L8763 local road at Gortlusky might struggle to carry the same loads. And given the proposed operational working hours, there is no way that local residents can even possibly work around these times to ensure safe and convenient travel.

Recent changes in our local village have already seen a change in traffic patterns and a development such as this will undoubtedly exacerbate the situation. If not done so already given

recent changes to the local village, I would call on a traffic assessment (TTA) to be carried out, as per Traffic Infrastructure Ireland <https://cdn.tii.ie/publications/PE-PDV-02045-01.pdf>

3. 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 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 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".

4. 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.

5. 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 also 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 (Hahad et al. 2024), 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. ***I have had to endure several months of construction work recently with works being carried out by ESB at Gortlusk, with works beginning early in the morning until late in the evening, having an enduring impact on my health and wellbeing and that of my horses.***

Water Quality. As you will be aware, we 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.

I 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?

6. 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.

Bit by bit, we are losing green spaces that once sheltered wildlife, supplied food and removed carbon from the atmosphere. If viewed as just one development we ignore the greater scheme of things whereby for example, *“every year, Europe loses 1,500km² to construction. Between January 2018 and December 2023, we lost approximately 9,000km² – an area the size of Cyprus. This is close to 30km² destroyed every week, the equivalent of 600 football pitches every single day. Nature accounts for the majority of these losses, at about 900km² a year. But our research shows agricultural land accounts for 600km² a year, with grave consequences for food security and health on the continent”*

7. Safety is of huge concern for both myself and for my friends, family and neighbours. Has there 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, 9 of these are unmanned.

The recent incidence of more than a dozen animals believed to have been 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?

8. The proposed development is certainly not in keeping with the character of the area and we feel it 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 outlined 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)”*.

9. **Impact on Property Values:** We would also request 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 I continue to whole heartedly object to the planning application 320094 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 my health and wellbeing and that of my friends and neighbours.

This proposal is fundamentally incompatible with national and local net-zero commitments. Any planning authority with a climate action plan or sustainability strategy should be challenged to explain how approving new gas infrastructure is consistent with those stated goals.

I would also request that the developer be required to demonstrate that no technically feasible, cost-comparable clean alternative can meet the same need — and that without this evidence, the precautionary principle should apply.

The environmental decisions made today will shape the quality of the environment inherited by future generations. For that reason, and for the reasons outlined throughout this submission, I remain concerned about the potential impacts of this development on my family, my home and the surrounding environment.

I respectfully request that An Coimisiún Pleanála take these concerns into account when determining this application.

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.

Thank you for considering my concerns – Mary Quirke