

## **Observations on application 320094**

15<sup>th</sup> June 2026

Dear An Comisiún Pleanála,

Further to our initial observation on application 320094 (Proposed 400kV Gas insulated SwitchGear electricity substation and high voltage transmission lines/cables and electric plant) we would like to add the following observations, in light of the additional information provided:

### **Road Infrastructure (N65)**

- New access onto a national secondary road contrary to the DoECLG 2012 "avoid additional access points" policy.
- The project would be in breach of Galway County Council Policy NR 1, NNR 2, & DM Standard 28 which all seek to safeguard road travel
- Failed sight distances on land outside the applicant's control
- Unanalysed collision record
- Traffic count below comparable N65 figures.
- Unsafe for 500 extra vehicles at peak hour traffic on a restricted route according to Galway County Council.
- Abnormal-load deliverability. These roads aren't suited to abnormal loads e.g. N65 and L8763 which is an esker ridge road.

### **Scale and visual impact**

As local residents within 1km of the proposed site the gas plant (inclusive of three chimneys, 45m high) will visually impact the surrounding rural area and will be visible for miles.

### **Carbon budget / sectoral ceiling inconsistency.**

- Applicant understates overall emissions, MUCH worse than 616,000 T CO<sub>2</sub>/yr.
- True emissions take a material portion of electricity Sectoral Emissions
- Ceiling for Carbon Budget 2 (2030) is 3MT, and also likely for Carbon Budget 3
- The granting of this project would materially contravene the climate action plan that has already achieved it's 2GW gas target, but requires limits on carbon budgets (particularly contravenes s.15 Climate Act, via s.15(1)(a) and (d)).

## Needs Case

- The need case for project rests on policy which is now five years old without account any account progress, the 2GW of new gas plant target will be achieved without this plant according to EirGrid
- International Energy Association warn against the building of new gas plants, citing concerns over stranded assets, locking into fossil fuel volatility, and climate goals.
- Rejected from 3-straight SEM capacity auctions by EirGrid and CRU. Took a court case against them as a result
- This project will not support Ireland's grid needs.
- It is not close to being EU Taxonomy compliant as suggested by the applicant
- Cumulative GHG: Combined with the existing/approved Tynagh plants ~10 km away, the cumulative emissions are a large share of the 2030 electricity ceiling. This region of Portumna/Killimor/Tynagh would end up hosting over **50%** the country's sectoral emissions ceiling in 2030.
- The gas pipeline to serve the generator is referenced but not assessed in the EIAR (and the route has changed). Significantly Galway County Council found "a full and robust cumulative assessment... is not evident."
- A new fossil peaker with a 25+ year life risks lock-in and stranding against a decarbonising grid — a material consideration the EIAR does not weigh. Galway County Council's refusal stands as a competent-authority finding. GCC refused on traffic hazard (Reason 1) and Appropriate Assessment (Reason 2) — both standalone, both unremedied; now sit with An Coimisiún Pleanála.
- An Coimisiún Pleanála have already stated that the site is in an unzoned area, and would need significant justification to prove it's suitable which the applicant has not done. Galway County Council has zoned the Strategic Economic Corridor for these projects. This site is 40km away from that corridor.
- Alternative sites investigations were not carried out despite An Coimisiún Pleanála's request
- Locational necessity - the applicant's reliance on "the only existing intermediate substation" describes convenience, not necessity; building a new 400 kV GIS itself shows a pre-existing node was not required — a new connection can be established anywhere along the line as applicant has shown in the Castlelost project.

## Project-splitting / interdependency.

- The projects (application 320094 and 320095, and in addition of 320916) are related yet put forward in separate applications. There is no

environmental reporting done on the gas pipeline connection which is a requirement.

- Cumulative with Oldstreet works. Substation extension works are underway immediately north, at the catchment divide the applicant itself identifies within the site — an in-combination effect (drainage, land-take) the environmental report has not assessed this project.

### **Fire safety**

- A qualitative approach has been taken by the applicant where quantitative assessment is required. The fire risk assessment uses qualitative procedural steps. There are no quantitative methods for a site of this kind near this community (well below UL 9540A / NFPA 855 standards).
- ALARP / COMAH deferrals. Major-accident and ALARP matters deferred rather than assessed at the planning stage.
- firewater management and its in-combination effects (with the OCGT, the watercourses, the European sites) are not assessed — the AA/NIS covers only the access road.
- Site has hydrological connections to Shannon SAC & SPA, Lough Derg SAC & SPA, and has not been assessed accordingly in the AA or NIS.

### **Public consultation**

- No public consultation since the beginning of this process.

Please note as we have already submitted an observation on this applicant we anticipate that the €50 submission fee will be refunded.

Kind regards,

Padraig and Louise Gohery

Coolpowra,

Portumna,

Co. Galway

H53N2N3