

A Chara,

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

My family and I, who live less than 500 metres away from the proposed development, wish to voice our objections again to the planning application reference 320094-24 submitted by Coolpowra Flex Gen Ltd concerning the proposed development of the Oldstreet Power Station in the Coolpowra area of Gortanumera. We believe many of our original objections still stand and are outlined again below, alongside other areas of concern in light of the proposed new access point, and revised documentation.

Please note that given the enormity of the files, both old and new, and the technical nature of the material, much of which is not within our scope of expertise, 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. Consultation:** We would suggest that the agents (Halston Environmental and Planning Limited) for the applicant, in their continuous generation of significant pages of EIARs, are still not honouring the intent of EIA and the associated EIARs. EPA (2022) Guidance on the information to be contained in Environmental Impact Assessment Reports: states:

"Furthermore, there are increased social and legal emphases on the need for meaningful public participation in decisions relating to environmental issues. In this context, it is more important than ever to ensure that information is available in a format that is clear, concise and accessible to the greatest number of people – and certainly to a wider audience than the professional experts and officials who are involved in EIA".

This guidance is wholly aligned with the Aarhus Convention (The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters), made at Aarhus, Denmark, 25 June 1998.

We note in the new application that *"Significant additional information includes proposals for an alternative construction access arrangement and associated site boundary revisions. A new NIS associated with the proposed alternative construction access and an addendum EIAR is included with this application".* ***If this is the case, and given the large boundary change, should it not trigger an entirely new application?***

2. SF6 Gas: An Extraordinary Climate Threat

Sulfur hexafluoride (SF6) is used as an insulator in high-voltage switchgear and is the most potent greenhouse gas known, with **23,500 times the global warming potential of CO₂**. Despite its small atmospheric prevalence, it has an outsized climate impact. [IEEE](#)

SF6 gas can escape into the atmosphere as leaks due to aging over the 20–35 year lifetime of equipment, and is additionally released during manufacturing, installation, maintenance, servicing, and decommissioning. [US EPA](#)

Given the extraordinary potency of this gas, has a full lifecycle emissions assessment been submitted? Has the developer committed to SF6 leak monitoring and containment protocols? Are SF6-free alternatives available and have they been considered? Given the vast amount of material presented we cannot determine if these requirements were met, and if not it would render the plans non-compliant.

3. EMF Health Concerns: Precautionary Principle

The World Health Organization's International Agency for Research on Cancer (IARC) has classified extremely low-frequency electromagnetic fields (ELF-EMF) as potentially carcinogenic to humans. Over 1,200 research studies on wildlife, flora, and fauna impacts document a broad range of effects near electrical infrastructure, including altered behaviour, endocrine disruption, and reproductive changes in animals near power lines. [Ehsciences](#)

Consistent epidemiological evidence suggests that chronic low-intensity ELF magnetic field exposure is associated with an increased risk of childhood leukaemia. [Nh](#)

Kaiser Permanente studies found that prenatal EMF exposure was associated with increased miscarriage risk, as well as ADHD, obesity, and asthma. [Ehsciences](#)

While the science remains contested, the planning system routinely applies the precautionary principle where evidence of potential harm exists. No development of this scale should proceed without an **independent**, peer-reviewed health impact assessment covering all residents within a defined radius.

As a family with two young children, born prematurely, we are particularly concerned given that recent studies have shown that children are particularly at risk of harm from polluted air, given that their lungs, heart, brain, respiratory, immune and nervous systems are still developing (HEAL 2022). Given that the company has not consulted or engaged with any of the local community they can't possibly know the health impacts that people are concerned about.

We would also having increased concerns re. ***The Mortality Cost of Carbon*** (Bressler 2021), and would welcome assurances from The Bord that this has been considered in this proposed development, and the 'likely' implications of same.

4. **Infrastructure Network and Traffic Impact** – whilst noted a proposed change of access, it is unlikely to change any of the issues flagged in the original observations. In addition, we already have road works in place for several months on the N65, which tells its own story regards the condition of this road re. lack of verge, speed limit, lack of width for vehicles making turns etc. Again, we would like to highlight that this new access point was residential previously, surely there are implications to be considered when 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 about the impact to the local village, Kilimor. Have traffic implications been considered/studied? The village is already experiencing significant traffic issues during peak traffic times including school times and on pension days as the local post office has now moved into the only shop in the centre of the village.
 - And what assurances can the company/contractor provide that this will not impact on alternative access routes leading to the site?
5. **Compliance Issues with Renewable Energy Plans under the SEA Directive:** The governments renewable energy initiatives were implemented post July 21, 2004 under the Strategic Environmental Assessment Directive 2001/42/EC (SEA). However given the vast amount of material presented we cannot determine if these requirements were met, and if not it would render the plans non-compliant. It is our understanding that any development plans must include a proper SEA assessment to be lawful.

6. **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"*.

We would also question the impact such a proposal might have on initiatives such as those by Failte Ireland, whereby they plan to make East Galway a tourism destination as part of Ireland Hidden Heartland – Portumna's tourism plan?

7. **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.

Take for example the following:

A study published in the European Journal of Internal Medicine showcases the effect of a 750 MW power plant in San Paolo, Italy, home to around 74000 residents.

- *They find that PM10 particles in the air increased from 36.4 to 41.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), while NOx levels were also reported to have increased from 24 to 25.3 $\mu\text{g}/\text{m}^3$.*

- *This increase is correlated with an increase in hospital visits among the elderly, with the impact increasing as the residences grew closer to the power plant.*

A study on the effect of a combined-cycle gas-fired power plant in Qom similarly compares the health outcomes of people living in a 5, 10, and 15km radius from the power plant.

- *Using pollution data from different monitoring stations, as well as including controls for the effect of wind, they find that emissions have the greatest health impact in a town 2.5km north, and 7.5km west of the power station.*
- *They find that the power plant causes 2 extra deaths per year.*
- *Emissions from the power plant account for 21% of all cases of chronic cough and bronchitis.*
- *The total health cost of the emissions from the plant are projected to be \$4.7 million USD.*

8. **Light and Noise Impact:** 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. Whilst we recognise that we do not have any protection in place for those who are subject to light trespass on their own properties or indeed limits of the amount of light emitted, we need to be cognisant of the fact that our nightscape is disappearing rapidly, yet it is a valuable asset; preserving it helps us save energy, enhances our biodiversity and benefits our mental and physical wellbeing.

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 (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. We have already experienced several months of this with the recent works by the ESB at Coolpowra, and the constant drilling in the early hours of the morning and into late evening, not to mention the heavy machinery & trucks accessing Coolpowra and increased use as a result on alternative roads.

9. **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 their primary source of income is from agriculture and any potential harm to the local environment will have major implications. **We would also query whether discussions have been had with Irish water in terms of extending the existing public main should the need arise?**

10. **Safety** is of huge concern to our family. **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. Nor is this risk drawn out in the NIS prepared by the Moore Group, and the potential implications to Birds and Habitats.
11. **Not in keeping with the character of the area.** 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)”*.

Bit by bit, we are losing green spaces that once sheltered wildlife, supplied food and removed carbon from the atmosphere. Europe is turning grey. But how much is changing, and how fast? 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”*

Scientists have long studied the impact of the large-scale destruction of nature in places like the Amazon rainforest. But in Europe, we heard repeatedly that we have relatively little nature left. Our research shows the grave impacts of cumulative small-scale losses of nature and cropland: “It’s a slow-burning issue,” says Jan-Erik Petersen, ecosystem expert at the EEA. “It just accumulates over time.” (<https://greentogrey.eu/publications/>)

12. **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 my family and I strongly object to the planning application 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 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.

We would also request, if not done so already, that An Coimisiun Pleanala requires the developer to provide:

1. A full independent **EIA** if not already submitted, based on the new access point and boundaries
2. An **SF6 lifecycle emissions and leakage management plan**
3. A **Traffic management** plan through Killimor Village
4. An independent **health impact assessment** (EMF, noise) with modelled exposure at nearest residences
5. A **property impact assessment & health impact assessment** for proximate homes
6. The full **site alternatives report** demonstrating this location was the least harmful option, particularly in light of such close proximity to Tynagh power plant
7. Legally binding **biodiversity net gain** and habitat restoration commitments

Bit by bit, we are losing green spaces that once sheltered wildlife, supplied food and removed carbon from the atmosphere. Europe is turning grey. If viewed as just one development we ignore the greater scheme of things. 1% of Irish farms now grow horticultural crops forcing Ireland to import over 80% of its fruit and vegetables. This steep reduction in acreage is primarily driven by economic, systematic and environmental pressures, such as these type of developments.

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

Rachel & Shane McClearn

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- [*https://greentogrey.eu/publications/*](https://greentogrey.eu/publications/)