An Bord Pleanála

Inspector's Report

ABP-321420-24

Development	Battery Energy Storage System (BESS) comprising 56 battery containers, power stations and associated building, roads, and drainage works
Location	Tawlaght & Srabragan, Lough Allen, Co. Roscommon
Planning Authority	Roscommon County Council
Planning Authority Reg. Ref.	2360265
Applicant(s)	Arigna LDES Limited
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Lough Allen Conservation Assoc C/O Sean Wynne
Date of Site Inspection	24th March 2025
Inspector	Ian Boyle

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Appendices

1.0 Site Location and Description

1.1. The appeal site is in rural area in the townlands of Tawlaght and Srabragan, County Roscommon. It is on the western side of Lough Allen, approximately 4km northeast of Arigna Village. The site is roughly 18km north of Carrick-on-Shannon and 45km east of Sligo town, respectively. The R280 (Drumshanbo Road) runs in a general north - south direction, a short distance to the west of the site.

1.2. The site was formerly used as a coal fired power station which operated between 1959 until 1993, after which the plant was closed-down and decommissioned. There previous access roads and tracks, some of which are overgrown, leading to the former power station facility off the R280 and other works. The other works comprise of hardstand, storage areas, fence lines, and other infrastructure associated with the former power station facility. The property, for the most part, has been cleared of its previous use however and a large expanse of the land now comprises grasses, trees, scrub and bare ground.

1.3. The site is relatively low lying with a downwards slope across the land moving from west towards the east in the direction of the Lough Allen. There is an existing 110kV substation to the northwest of the site. The substation is accessed directly from the R280. The nearest dwelling lies beyond this facility, roughly 100m from the northwestern boundary of the property. The surrounding area comprises primarily farming and sporadic low-density one-off houses.

1.4. There appears to be a scattered presence of Rhododendron throughout the site, which is an invasive plant species, particularly in the wooded area along the access track to the north. There is also evidence of Rhododendron towards the south and west parts of the property, including where the now decommissioned power station previously had been stationed. In some places, Himalayan Balsam was observed, which is also an invasive plant species.

1.5. There are no European Sites directly affecting or in proximity to the site. The nearest designated site is Cuilcagh - Anierin Uplands SAC (Site Code: 000584), which is on the far side of the lough, roughly 4.4km to the east. There is an existing drain running into the waters of Lough Allen at the northeastern corner of the site.

1.6. The site has a stated area of c. 1.6ha.

2.0 **Proposed Development**

Description of Proposed Development

2.1. The application was made to the Planning Authority on 13th December 2023.

2.2. The proposed development is for the construction of a Battery Energy Storage System (BESS) compound, comprising the following main components:

- 56 battery containers and Medium Voltage Power Station (MVPS) enclosures.
- A single storey building for the storage of control equipment and materials (i.e., an Independent Power Producer (IPP) Building).
- Internal access roads, drainage, civil engineering works, landscaping, lighting, car parking, security fencing, welfare facilities and associated site works.

2.3. The proposed surface finish for the site is a combination of existing surface finishes and self-draining, clean stone, and stone and/or gravel for internal access roads.

2.4. The BESS is designed to provide system support services to the electricity grid.

Further Information

2.5. The Planning Authority requested further information on 15th February 2024, including details in relation to the following:

- Envisaged lifespan for the development and a method statement for the end-of-life management and future disposal of the infrastructure constructed on the site.
- An emergency response plan which considers all potential emergencies including regarding fire, explosion and accidental spillages.
- A comprehensive landscaping scheme.
- Site access details and confirmation of whether written consent is required from other landowners where works are required outside the application site (red line boundary) to achieve safe vehicular access and adequate sightlines.
- Invasive Species Management Plan.
- Predicted noise levels and potential impact on noise sensitive receptors.
- Ecological Impact Assessment.

- Lighting Assessment (Light Spillage Report).

2.6. The Applicant responded with further information on 7th October 2024, including an Emergency Response Plan, Landscape Masterplan, Traffic Survey Report, Ecological Impact Assessment (EcIA), Noise Impact Assessment, and Lighting Assessment Report and Drawings.

2.7. The further information was deemed significant by the Planning Authority and revised public notices were arranged (readvertised 18th October 2024).

3.0 Planning Authority Decision

3.1. Decision

3.1.1. The Planning Authority issued a Chief Executive Order Deciding to Grant Permission on 13th November 2024, subject to 19 no. conditions.

3.1.2. Notable conditions include:

- Condition 2: Duration of permission is for 25 years after which the facility is required to decommissioned, unless a further planning permission is granted.
- Condition 3: Within 6 months of the permanent cessation of the facility, structures onsite are to be removed, and the site reinstated in accordance with an agreed restoration plan.
- Condition 4: Use, management and disposal of end-of-life batteries.
- Condition 5: Updated Emergency Response Plan required.
- Condition 6: Invasive Species Management Plan.
- Condition 7: Ecological Impact Assessment (EcIA) mitigation measures to be implemented.
- Condition 8: Roads and traffic requirements.
- Condition 9: Environmental Noise Impact Assessment mitigation measures to be implemented.
- Condition 10: Preliminary Construction Management Plan.
- Condition 11: Operational noise requirements.

- Condition 12: Security fencing and CCTV
- Condition 16: Final lighting specifications to be in accordance with a Lighting Assessment Report and agree with the Planning Authority.
- Condition 19: Development contribution (€2,900).

3.2. Planning Authority Reports

3.2.1. Planning Reports

The main issues raised are as follows:

- The Roscommon County Development Plan 2022-2028 under Policy Objective CAEE 8.6 seeks 'to facilitate proposals for energy storage systems and infrastructure, which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area'.
- Roscommon County Council has a commitment to reduce greenhouse gas emissions. The proposal is consistent in principle with planning policy and would reinforce and facilitate a stable supply of energy provision in the area.
- The site is located in Landscape Character Area 1 (Lough Allen and Arigna foothills) which has a 'very high landscape value' as per the Council's Landscape Character Assessment. There are no protected views or scenic routes in the vicinity of the site.
- The applicant will retain trees and hedgerows along the external boundaries of the site which will help screen the development. Subject to adequate landscaping, the proposal would not have an adverse impact on the visual amenities of the area.
- Having regard to the temporary nature of potential construction impacts, and the mitigation proposed, it is not considered the proposed development would have a significant impact on traffic or other road users. Parking requirements onsite post-construction would be minimal as the site would not be staffed.
- The proposed means of access to the site from the R280 (submitted as further information) is acceptable.

- Water will be delivered by mobile tankers and stored in an underground tank. A rainwater harvesting tank is a backup source.
- A surface water attenuation tank will take run-off, prior to discharge to Lough Allen, via an existing land drain. A wastewater holding tank will serve the WC facilities and will be emptied bi-annually. Appropriate design calculations have been submitted.
- The Emergency Response Plan is acceptable.
- The Landscaping Scheme is acceptable.
- The Ecological Impact Assessment (EclA) identifies Himalayan Balsam and Rhododendron on site (Invasive Species). The Applicant should be required under condition to prepare a management plan for eradicating these species.
- The Noise Impact Statement is acceptable and while high frequency noise is considered an issue for other similar installations elsewhere, it is not expected to be an issue in this case given the separation distances to the nearest sensitive receptors.
- The EcIA notes that existing woodland in the area has recolonised the site following closure of the former ESB coal-fired power station. The Planning Authority considers the EcIA acceptable.
- The lighting and light spillage report has considered the potential impact of lighting on local fauna and nearby residents and includes appropriate controls to ensure minimal spill and shows that there would be no impact on residents or wildlife in the immediate vicinity
- The main risk to the environment would be during the construction phase due to the potential contamination of watercourses from silt, fuel etc. The Applicant has submitted a Construction and Environmental Management Plan (CEMP) which recommends mitigation and best practice for the construction and operational phases.
- No flood risk issues arise.
- No Appropriate Assessment issues arise.
- No EIA issues arise.

3.2.2. **Other Technical Reports**

Roads Department: No objection, subject to standard conditions.

Roscommon Fire Service: No objection, recommends additional information.

3.3. **Third Party Observations**

The main issues raised are as follows:

- Residential amenity, visual and noise impacts.
- Devaluation of property.
- Asbestos contamination risk to surface water quality / Lough Allen and drinking water supply.
- Risk of fire and explosion, radiation from batteries and electromagnetic interference.
- No economic gain.
- Proposed location is not suitable and a site in an industrial area would be better.
- An alternative location beside a renewable energy facility would be preferable.
- Impact on the landscape and loss of tourism and recreational value of the area.
- Emergency Response Plan (ERP) is missing.
- No proposal to appoint a community liaison person.
- Removal of trees would lead to flood risk increasing.
- No Appropriate Assessment (AA) completed.
- No Environmental Impact Assessment Report (EIAR) completed.
- Presence of invasive plant species on the site, such as Japanese Knotweed.
- Light pollution impacts on residential amenity and wildlife.
- Future potential for the facility to expand is a concern.

4.0 Planning History

4.1. There is no recent planning history on the site. However, it is noted that part of the was formerly used as a coal fired power station by the ESB. The plant operated between 1959 until 1993, after which time the plant was shutdown and decommissioned to coincide with the closure of the nearby Arigna coal mine.

5.0 Policy Context

5.1. Local Policy

Roscommon County Development Plan 2022-2028

Background

The Roscommon County Development Plan 2022-2028 ('County Development Plan' / 'CDP') was adopted at a Special Planning Meeting on the 8th March 2022. The CDP is in effect since 19th April 2022.

The following chapters and sections are considered particularly relevant in the assessment of this appeal case:

Chapter 5: Rural Development and Natural Resources

- Section 5.7 is in relation to 'Renewable Energy'. It states that rural areas have the potential to be harnessed for renewable energy projects, including wind, hydro and solar energy.'

The CDP states that 'the Council will support renewable energy projects in rural areas, subject to ensuring the protection of landscape sensitivities, residential amenity, views or prospects, public rights of way, wildlife, habitats, special areas of conservation, protected structures, bird migration paths etc.'

Chapter 8: Climate Action, Energy and Environment

Section 8.5 is in relation to 'Integrating Climate Action into County Roscommon'. It is stated that in line with the Climate Action Plan and Project Ireland 2040, Roscommon County Council is committed to transitioning to a low carbon and climate resilient county.

The following Policy Objectives are considered particularly relevant in this assessment of this appeal case:

- Policy Objective CAEE 8.2 is to support the National Climate Change Strategy by actively seeking to implement the policy objectives throughout this Plan which contribute to positive climate actions, including those related to renewable energy, sustainable transport, air quality, flooding and the promotion of urban and rural green initiatives.
- Policy Objective CAEE 8.4 seeks to encourage and facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development
- Policy Objective CAEE 8.6 is to facilitate proposals for energy storage systems and infrastructure, which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area.

Other Relevant Chapters:

Chapter 6: Economic Development

Chapter 7: Infrastructure, Transport and Communications

Chapter 10: Natural Heritage

Chapter 12: Development Management Standards

Roscommon County Council Renewable Energy Strategy 2022-2028

This Renewable Energy Strategy has been developed as a planning framework to support and underpin the Core Strategy and Policy Objectives of the Roscommon County Development Plan 2022-2028. The primary aim of the Strategy is to ensure that the county continues to address climate change through facilitating appropriately located renewable energy developments and through supporting energy efficiency in all sectors of the economy.

5.2. National Policy

Climate Action and Low Carbon Development (Amendment) Act, 2021

5.2.1. The Climate Action and Low Carbon Development Act, 2021 was signed into law in July 2021. The Act strengthens the provisions of the 2015 Act by adding a specific decarbonisation target of climate neutrality by 2050 at the latest, with the addition of recognition of the importance of protecting biodiversity. This brings Ireland's approach into line with the EU commitment to climate neutrality by 2050 as enshrined in the European Climate Law of 2021, and in line with many other climate laws.

5.2.2. The Act establishes national climate objectives that the State shall pursue and achieve by no later than the end of the year 2050, including the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It contains a number of objectives for the purpose of achieving that aim including the preparation of an updated Climate Action Plan. The preparation of local authority climate action plans is a key element.

The Climate Action Plan 2025 (CAP25)

5.2.3. Climate Action Plan 2025 (CAP25) is the third statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021.

5.2.4. The Plan lays out a roadmap of actions which is intended to lead to Ireland meeting its national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

5.2.5. CAP25 places an emphasis on innovative technologies including energy utilisation and storage, and states that the Electricity Storage Policy Framework (ESPF), published in July 2025, highlights the crucial role that electricity storage can play in accelerating the deployment of renewable electricity generation and ensuring grid stability. Action EL/25/2 of CAP25 is to 'publish the long duration energy storage procurement recommendations paper'.

The Climate Action Plan 2024 (CAP24)

5.2.6. CAP 24 sets out the actions Ireland need to take to stop climate change and ensure greater energy security, stable prices, job creation, and regional development. It provides a commitment to adopt the Electricity Storage Policy Framework (Action: EL/24/16). Electricity storage is recognised as a key technology under several aspects of the renewable transition. These include major roles in offering demand-side flexibility, increasing grid-scale renewables, and contributing to the decarbonisation of the energy sector, thus, making electricity storage a vital component in reaching the 2030 targets.

The National Development Plan 2021 – 2030

5.2.7. The National Development Plan 2021-2030 (NDP) was published in October 2021 in tandem with the National Planning Framework (NPF). It seeks to drive Ireland's long term economic, environmental and social progress over the next decade, in accordance with the spatial planning context of the NPF.

5.2.8. The key role of the NDP is to set out public capital investment over the next 10 years in order to achieve various National Strategic Outcomes. It constitutes a revised plan with increased emphasis on supporting the transition to a low carbon society. It sets out a major national investment project across all sectors, supporting investment measures that are necessary to meet climate ambitions.

Policy Statement on Security of Electricity Supply, 2021

5.2.9. This document includes several updates to national policy in the context of the 2020 Programme for Government commitments relevant to the electricity sector, planning authorities and service providers.

5.2.10. It states that the Government identifies the need for significant investment in storage capabilities and electricity storage, among a range of other technologies. This will help to support the growth of renewable energy and security of Ireland's electricity supply.

Project Ireland 2040: The National Planning Framework

5.2.11. 'Project Ireland 2040: The National Planning Framework (NPF)' is a planning framework to guide development and investment over the coming years, up to 2040.

5.2.12. The NPF contains National Strategic Outcomes (NSOs) and National Policy Objectives (NPOs). The following NSO and NPOS are considered particularly relevant in this assessment of this appeal case:

- **NPO 21** 'Enhance the competitiveness of rural areas by supporting innovation and diversification of the rural economy into new sectors and services, including those addressing climate change and sustainability'.
- **NPO 23** Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with other industries including energy and the bio-economy, while protecting the natural landscape and built heritage which are vital to rural tourism.
- **NPO 53** Support the circular and bio-economy including greater use of renewable resources.
- **NPO 55** Promote renewable energy use and generation at appropriate locations.

5.3. Other National and Regional Policy

- The National Planning Framework, 2025
- Climate Action Plan 2025 (CAP25)
- Electricity Storage Policy Framework for Ireland, 2024
- Ireland's Long-term Strategy in Greenhouse Gas Emission Reduction, 2023
- Ireland's Transition to a Low Carbon Energy Future 2015-2030
- National Renewable Energy Action Plan (NREAP), 2009
- National Biodiversity Action Plan 2023-2030
- Flood Risk Management Guidelines for Planning Authorities 2009
- Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region, 2020-2032, and particularly Chapter 5: Growth Ambition 5 – Infrastructure, Enabling our Region (8.2 Electrical Grid Network).
- NFCC Guidance for Grid Scale Battery Energy Storage Systems (BESS) – Fire and Rescue Services'.

5.4. Natural Heritage Designations

5.4.1. The appeal site is not directly affected by, or adjacent to, any designated European Sites.

5.4.2. The nearest European Site is the Cuilcagh - Anierin Uplands SAC (Site Code: 000584), which is approximately 4.2km to the east, on the far side of Lough Allen. The Boleybrack Mountain SAC (Site Code: 002032) is roughly 11.3km to the north. The Lough Arrow SAC (Site Code: 001673) is roughly 13.9km to the west. The Bricklieve Mountains and Keishcorran SAC (Site Code: 001656) is roughly 18.5km to the west.

5.4.3. The proposed Natural Heritage Area (pNHA) Lough Allen, South End and Parts (Site Code: 000427) is roughly 2.2km to the east of the site at its nearest point.

5.5. EIA Screening

5.5.1. The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended. No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination.

5.5.2. Refer to Appendices C and D of this report, respectively, for further details.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. The Commission received a single third party appeal from Lough Allen Conservation Association. The main grounds of appeal are:

- The application lacks expert reports. No response has been received from the EPA, Inland Fisheries, Irish Water (Uisce Éireann) or the HSA.
- No Emergency Safety Plan was submitted as part of the application.
- The disposal of spent batteries has not been considered. Batteries must be disposed of safely and the storage of old batteries on the site is not acceptable.

- Impact on the natural environment due to toxic gas emissions, fire, explosion, and contamination of the land, homes, and animals. No habitats assessment (or Ecological Impact Assessment) has been completed. Concerns regarding birds and nests in the area.
- The risk of fire wastewater runoff into Lough Allen has not been examined.
- Emergency access to the site is inadequate.
- Fire walls should be built between battery containers (cites Liverpool as a relevant case study / example).
- Only water can assist in reducing heat generated by burning batteries.
- No prior liaison with Uisce Éireann regarding water storage and the required capacity for firefighting purposes.
- Local firefighting services lack resources and training to deal with a potential fire at the proposed development (cites Beijing Mall as a relevant case study / example).
- The proposed development should be subject to the COMAH Regulations, and the application is a breach of the Seveso Directive.
- The proposed fire safety system is not fit for purpose (cites Dunnstown site, in County Kildare as a relevant a case study / example).
- Failure to show any communication with EirGrid or ESB regarding the suitability of the site for the proposed development.
- The Applicant did not share further information with objectors to allow them the opportunity to review the material in a timely manner.
- The application does not comply with the Aarhus Convention.
- No dispersal model completed to indicate the likely effect on area(s) due to fire or an explosion occurring.
- The Planning Authority failed to include planning conditions as part of their decision to grant permission to address the requirement for water provision onsite.

- Failure to comply with the Planning and Development Regulations, 2001 (as amended) (application is invalid).
- An EIAR should have been prepared as the site previously accommodated a power station.
- The proposed development is a class of development for EIA screening purposes under Schedule 5, Part 2, Paras. 3(a), (b) and (c) of the Planning Regulations.
- The application is invalid because a 'Stage 1 AA Screening' has not been completed.

6.1.2. Note: The appeal includes several other documents in the form of appendices which are available on the file. They include academic papers, case studies, expert reports and hazard assessments of other projects, and UK fire guidance on BESS installations – I confirm that the latter has been considered as part of the assessment of this appeal case, including the 'NFCC Guidance for Grid Scale Battery Energy Storage Systems (BESS) – Fire and Rescue Services'.

6.2. Further Responses

The Applicant

6.2.1. The Applicant was requested by ACP to provide further information in accordance with s.132(1) of the Planning and Development Act, 2000 (as amended).

6.2.2. The request included details of the following:

- proposed method of connecting to the electricity grid (Item 1),
- Fire Risk Management Plan / Fire Risk Assessment (Item 2),
- Emergency Response Plan (Item 3),
- proposals to address the potential for environmental impact due to run-off of fire water into adjoining watercourses, including Lough Allen (Item 4),
- proposed means of accessing a dedicated firefighting water supply (Item 5),
- compliance with the Article 6 of the Habitats Directive (Appropriate Assessment (Item 6), and

- clarifications to the CEMP originally submitted as part of the original application (Item 7).

6.2.3. The Applicant provided a response on 20th August 2025 addressing each item. The response also included a series of supporting reports and assessments, including a Fire Risk Assessment (Appendix A), revised engineering drawings and drainage details (Appendix B), confirmation of feasibility from Uisce Éireann (Appendix C), letter from Moore Group expanding on EcIA and AA Screening lodged with the original application (Appendix D) and an updated CEMP (Appendix E).

Lough Allen Conservation Association

6.2.4. The Commission received a further submission from Lough Allen Conservation Association (24th September 2025). The submission is in response to the Applicant's further information.

6.2.5. The main issues raised are as follows:

- Lack of community engagement.
- Queries who the owner of the site is.
- The total megawatt / battery size of the proposed development is not clear.
- Concerns re: a dedicated water supply for firefighting purposes.
- Cites example of a fire incident in Claregalway, County Galway concerning a battery manufacturing facility.
- Queries whether the batteries to be used in the proposed facility will be 'new' batteries or second life batteries.
- Impact on ecology and biodiversity, including Lough Allen, in case of a fire or emergency, including from smoke, fumes, fire water runoff, other airborne emissions.
- Potential issues may arise where there is a delay in fire detection and suppression systems, electrical faults, hindered access for emergency response vehicles.

7.0 **Assessment**

Appeal Issues

Having examined the application details and all other documentation on file, including the grounds of appeal, and having inspected the site, and in having regard to the relevant national, regional and local policy and guidance, I consider the main issues in relation to this appeal are as follows:

- Land Use
- Fire Safety and Emergency
- Ecology and Biodiversity
- Traffic and Access
- Other Issues

7.1. **Land Use**

7.1.1. The proposed development is for the construction of a Battery Energy Storage System (BESS). It comprises 56 battery containers and series of medium voltage power station enclosures (MVPS). The application also includes a single storey building (control centre / administrative office) for storing ancillary control equipment and materials and new internal access roads, drainage, landscaping, lighting, car parking, security fencing, welfare facilities and associated site works.

7.1.2. The proposed vehicular access is from the north of the site, via an existing, partially overgrown track. The track leads to an existing public road / laneway which in turns travel westwards a short distance before connecting to the R280 (Drumshambo Road). There is a vehicular turning area in the northern section of the site, and a low berm runs along the eastern site boundary between the main facility and Lough Allen which is to the east. The proposed surface finish for the site is a combination of existing surface finishes and self-draining clean stone and stone / gravel for the internal access roads. The BESS is designed to provide system support services to the electricity grid. [Section 2.1 of the Applicant's Fire Risk Assessment Report also identifies that each battery container is for 4.9 MWh and includes thermal and fire-safety design features.]

7.1.3. The site is roughly 1.6ha. It was formerly used as an ESB coal-fired power station which operated between 1959 until 1993. After this, the plant was formally shutdown and decommissioned to coincide with the closure of the nearby Arigna coal mine. The property has since mostly been cleared and recolonised by grasses, scrub, undergrowth and trees. The site is relatively low-lying, and it was evident during my site inspection that there is a downwards slant across the land moving from west (higher ground) towards the east (lower ground).

7.1.4. The surrounding area comprises mainly agricultural land and sporadic one-off housing. There is an existing 110 kV ESB substation to the northwest of the site and the nearest dwelling lies beyond this facility, roughly 100m from the northwestern boundary of the appeal site. The shoreline of Lough Allen runs along the eastern boundary of the property. The lough is visible from within the appeal site itself, but also from numerous other vantage points in the wider surrounding vicinity. I note that the potential impact of the proposed development on the natural environment, including that of fire wastewater runoff and upon waterbodies, is raised by the Appellant as a particular concern. [This issue is discussed in more detail under Sections 7.2 and 7.3 below.]

7.1.5. The locational context of the site would minimise energy loss during the transfer process from the existing nearby substation to the proposed BESS. The short distance between the two facilities would also mean that limited infrastructure and physical works would be needed to route cables, circuits and transmission lines between the substation and BESS premises. During my physical inspection of the site and the surrounding area, I observed the presence of a large wind farm a short distance to the northwest. The wind farm is sitting on an elevated site and, as an energy generator, it is likely that the nearby Arigna substation is taking energy from this facility and enabling the transfer process to the national grid.

7.1.6. I have considered the proposed facility in the context of national and regional and planning policy. The relevant policy is set out under Section 5 of my report above. I am satisfied the development as proposed is consistent with such policies and objectives, in principle, and that it would help contribute to the country's obligations regarding its transition to a low climate resilient society by helping to address climate change and a move away from fossil fuel usage.

7.1.7. In particular, I note in the government document entitled 'Electricity Storage Policy Framework for Ireland (2025)' where it is stated under Section 3.8 that 'the next challenge, beyond the immediate term, is to ensure the development of sufficient electricity storage systems to meet the third Carbon Budget. To do so, it is the view of the Irish Government that large quantities of electricity storage are required to be added to the electricity grid in the near-term (2030-2040)'. The document goes on to say that Electricity Storage Systems (ESS) have an important role to play in facilitating several CAP and Sectoral Emissions targets, including supporting onshore and offshore wind and solar generation energy targets for 2030 (see Page 8 of the Framework for specific targets).

7.1.8. In relation to local policy, I consider that the two key documents relevant in the assessment of this appeal are the Roscommon County Development Plan 2022-2028 (CDP) and the Roscommon County Council Renewable Energy Strategy 2022-2028 (RCCRES). I note for the Commission's attention that Policy Objectives CAEE 8.2, CAEE 8.4, and CAEE 8.6 from the CDP are particularly relevant. They seek to achieve positive climate actions and objectives, to encourage various forms of renewable energy development, and to facilitate proposals for energy storage systems (BESS), respectively, subject to satisfying the principles of proper planning and sustainable development. [The full text of each Policy Objective is included under Section 5.1 of my report above.]

7.1.9. The Renewable Energy Strategy similarly seeks to ensure that the county continues to address the challenges presented by climate change through facilitating appropriately located renewable energy developments and by supporting energy efficiency in all sectors of the economy.

7.1.10. Therefore, the overall local policy thrust is to support and facilitate appropriate levels of renewable energy generation, including the provision of battery storage infrastructure, to meet renewable energy targets and to facilitate a reduction in CO2 emissions in accordance with EU and national legislation, policy and guidance.

7.1.11. In summary, I conclude that the proposed land use, a battery energy storage system, is in appropriate location / setting and consistent in principle with relevant national, regional and local planning policy. This is subject to meeting other relevant planning considerations, which are addressed below in Sections 7.2 – 7.5 of my report.

7.2. Fire Safety and Emergency

7.2.1. The third party appeal cites fire safety as a concern, and particularly the potential for an emergency incident or accident taking place on the site during the operational phase of the development. The Appellant raises several concerns in this regard; these are summarised above under Section 6.1 of my report, 'Grounds of Appeal'.

7.2.2. As noted above, the Applicant provided further information to ACP on 20th August 2025, including a detailed Fire Risk Assessment and Emergency Response Plan (prepared by Ryan & Associates, Consulting Engineers). I have reviewed the FRA and ERP and consider that the documents provide a comprehensive evaluation and review of the potential for fire hazard, fire risk, and that they set out appropriate mitigation and response protocol as part of the proposed development.

7.2.3. I also note that the Commission engaged the services of an external consultancy, EDP (Environmental Health and Safety Consultants), to provide an independent expert opinion on the proposed fire safety measures to be implemented as part of the proposal, and whether these would be appropriate and effective. The report is entitled 'Independent Expert Opinion on Fire Safety Measures Provided at Tawlaght & Srabragan, Lough Allen, Co. Roscommon', and is dated 31st October 2025. A full copy of the document is provided as Appendix F at the rear of this report.

7.2.4. I confirm that the EDP Report has been used to assist in my assessment of this appeal case and review of the Applicant's Fire Risk Assessment, Emergency Response Plan, and other documents, as relevant.

Dedicated Water Supply for Firefighting Purposes

7.2.5. The application makes provision for two 180m³ fire water storage tanks which have a combined capacity of 360m³. This exceeds the NFCC minimum water requirement for 1,900 litres/min for 2 hours, or 228m³ in the case of the proposed development. I note that the Applicant confirms that this water supply is specifically for firefighting purposes in case of a fire or emergency situation occurring.

7.2.6. The EDP Report states that this would support adequate manual firefighting resources on the site and that other key elements, such as water flow rate, hydrant positioning, mechanical protection and environmental management, are sufficient. The proposed development is therefore compliant with NFCC guidance principles,

assuming the tanks, hydrants, and access are maintained and remain fully operational.

Fire / Hazard Identification and Mitigation

7.2.7. I note that the Applicant's FRA under Section 3 identifies the principal risks and fire hazards associated with the BESS facility. This includes thermal runaway[1], propagation risk, gas emissions, electrical faults and cooling system failures, arcing faults, thermal overload, overheating, oil spills, electrical shock hazards, general operational risks and environmental risks.

7.2.8. The FRA also examines the likelihood and consequence of a fire event occurring on the site, as well as potential environmental impacts caused by the release of smoke, toxic gas and firewater runoff. The latter is a particular concern – and was raised as an issue as part of ACP's request for further information – given the proximity of Lough Allen to the appeal site, and presence of an existing open drainage running across the site and into this waterbody.

7.2.9. Section 4.2 provides a risk rating for each scenario and the mitigation proposed in each circumstance. This includes various battery management systems (BMS) with integrated fire detection, container insulation, suppression systems, aerosols, fire separation / spacing to prevent propagation, maintenance and adherence to relevant engineering specifications, fire compartmentalisation, and firewater containment systems. I also note that Appendix C.1 of the FRA outlines the proposed early fire detection and early warning strategy for the proposed battery containers. Appendix C.2 details the various proposed fire suppression methods.

7.2.10. The EDP Report confirms that this section of the FRA is in accordance with NFCC Guidance for Battery Energy Storage Systems (BESS) in terms of fire safety and mitigation. It also states that the measures and protocols outlined by the Applicant comprehensively cover the essential NFCC guidance for fire prevention, detection, suppression, ventilation and explosion mitigation for grid-scale BESS facilities.

7.2.11. In relation to the Independent Power Producer (IPP) Building, the EDP Report confirms that has been designed in accordance with the relevant building codes and that the appropriate fire detection and suppression systems are built-in as part of the

[1]Thermal runaway is a process where an increase in temperature leads to further increases in temperature, partic ularly in chemical reactions and electrical systems.

overall facility. This would further help to reduce any fire related risk for the facility and protect critical equipment. I am therefore satisfied that this issue has been addressed.

Dispersion Modelling

7.2.12. The Appellant points out in their submission that no dispersion modelling has been undertaken by the Applicant to assess the likely effects on the receiving area were a potential fire or explosion to occur. I further note that the Roscommon CFO identified in their original submission to the PA that this analysis was not undertaken.

7.2.13. The Applicant was also requested by the Commission's Section 132 letter (i.e., request for further information) to address this, but I note that the FRA does not provide any such modelling. Fire dispersion modelling can be important tool used to predict how smoke, heat and gases might spread in the air after a fire incident starts; it is particularly relevant in more built-up, suburban areas, however, where a place is more densely populated and urbanised in nature.

7.2.14. I acknowledge that the Applicant's Fire Risk Assessment qualitatively assesses the potential consequences of fire and explosion in Sections 4.1 – 4.3. It identifies the various risk levels associated with the proposed facility, which includes a 'very low likelihood, potential high consequence' for full container fires, and that deflagration panels would provide overpressure relief for certain other explosion events. However, a quantitative graphic modelling exercise has not been completed for the dispersal of smoke, gas, or explosion into the atmosphere, and no estimate of how far such emissions might travel has been made available.

7.2.15. The EDP Report finds that the Applicant's assessment relies on qualitative risk ratings, instead of computational or empirical dispersion models. EDP go on to say that by using an exclusively qualitative approach to fire risk assessment – without incorporating any quantitative data or modelling – that this may present a potential issue in terms of accuracy, consistency, and a comprehensive understanding of the true safety levels associated with the proposed development. However, I note that the EDP Report also states that with further justification the Applicant could potentially demonstrate that a requirement for dispersion modelling may not be necessary in this instance, due to the rural location of the site and other relevant factors.

7.2.16. I note that the surrounding area is mainly characterised by a low population density and a general absence of sensitive receptors, such as residential properties, commercial buildings, or public infrastructure within close physical proximity to the appeal site. Therefore, unlike an urban area, and given the distances from third party lands to the proposed BESS structures, including battery containers and other equipment, the potential risk associated with smoke, heat radiation, or airborne contaminants would be comparatively less. Having regard to this, it is my opinion that the issue can be dealt with by condition. Alternatively, the Commission may prefer to request the Applicant to complete a dispersion modelling assessment prior to making a Decision, together with a revised FRA, where appropriate.

Disposal of Spent Batteries

7.2.17. The Applicant's Fire Risk Assessment does not explicitly identify whether the batteries to be used in the facility would be either new 'first-life' or used 'second-life' units. While second-life batteries can often be a cheaper alternative, new batteries typically provide advanced performance, better longevity, and higher inherent safety qualities.

7.2.18. The Planning Authority's Decision to Grant Permission includes a condition (No. 4) requiring that first generation (new) batteries only must be used in the development and that prior to the commencement of construction a battery method statement must be prepared and submitted for the written agreement of the Planning Authority detailing how end-of-life batteries are intended to be managed and disposed of. The inclusion of such a condition would prohibit the possibility of the Applicant / facility operator from using second-life batteries as part of the BESS facility.

7.2.19. I am satisfied that this issue has been addressed, and that a similar condition should be attached to any decision granting permission.

Emergency Response Plan

7.2.20. The Applicant has completed an Emergency Response Plan (ERP) as part of their FRA (Appendix E refers). I confirm that I have read the ERP as part of my assessment of the file and note that this sets out the defining procedures and responsibilities for effective emergency management.

7.2.21. The ERP states that it aims to protect life, minimise damage to property and the environment, and ensure timely notification and an efficient response from trained personnel. I note that the EDP Report considers that the ERP is suitable and sufficient and, if correctly implemented, would help to ensure an effective response to a fire-related incident.

7.2.22. The ERP also includes a range of controls for the containment, storage and control of spent firefighting water, which is important for environmental reasons. The measures would help to prevent any contaminated runoff or pollutants from affecting terrestrial habitats or other sensitive, ecological receptors in the area, including watercourses, such as Lough Allen. (See Section 7.3 below for further details in this regard).

7.2.23. I am satisfied that this issue has been addressed.

Conditions

7.2.24. The EDP Report concludes that the measures proposed by the Fire Risk Assessment, Emergency Response Plan, and Water Management Plan are suitable, sufficient and proportionate to the scale and nature of the proposed development. The report also states that the design and other protocols proposed would provide an appropriate level of resilience against potential environmental pollution arising from fire-related incidents or a fire suppression response / activity.

7.2.25. The report identifies some information gaps in the FRA, although it is considered that these can be addressed by way of condition and future compliance submission(s) (Section 4 refers). This includes, for example, confirmation that the spacing distance between individual battery containers can meet NFCC guidance – it is noted that the proposed spacing between containers (4.5m apart) is not within the typical guidance recommendations (6m) – that specifications for the fire suppression system meet manufacturing standards, that construction and compartmentation materials used as part of the facility comply with the relevant fire resistance guidance, that consideration be given to fire and explosion dispersion modelling, and for an explosion protection document / hazardous area (zone) to be completed.

7.2.26. Section 13 of my report below includes a list of recommended conditions, in the event the Commission is minded to grant permission.

7.3. **Ecology and Biodiversity**

7.3.1. I note the concerns raised by the Appellant in relation to potential impacts on the natural environment and ecology due to the possible release of toxic gas emissions, fire, explosion, and contamination of the land, homes, and animals. The Appellant states that an assessment of the ecology in the area has not been completed as part of the application and for this reason there must be concerns regarding birds that use the area in terms of feeding, foraging and shelter.

7.3.2. I confirm that the Applicant's further information response to the PA was accompanied by an Ecological Impact Assessment (EcIA), prepared by Moore Group (Environmental Consultants, dated 12th September 2024). The EcIA provides a review of the relevant policy and legislation, including the EU Habitats Directive, EU Birds Directive, and Wildlife Acts 1976 – 2021, sets how the desk-based and field studies were undertaken to inform the assessment, describes the existing natural environment, including habitats, provides an assessment of potential impacts, and outlines proposed mitigation measures for the project. I have read and reviewed the EcIA as part of my assessment of the appeal case and, in my opinion, the report provides an accurate and thorough assessment of the ecological features present within the zone of influence for the proposed development.

7.3.3. The EcIA confirms that habitats under the footprint of the proposed development were recorded as having 'low' to 'moderate' ecological value. The areas of mature mixed broadleaf/conifer woodland, parts of which have semi-natural character, were considered to have the highest value, and are therefore classed as 'moderate local' ecological value. The EcIA states that it is proposed to offset the loss of woodland due to the proposed development by planting at least 0.6ha of new native woodland in the surrounding available areas. Species will include native broadleaved trees, such as Common Alder, Birch, Hawthorn and Larch, and will be planted in areas where vegetative screening and soft landscaping is required.

Otters

7.3.4. I note that the EcIA found that there are no otter habitats in the study area and that there is no potential for otters on the appeal site given the results of the survey work. The lakeshore at the site has been embanked with loose fill, and there is no suitable habitat for otter holts or couches. No signs of otter were recorded during the

fieldwork exercises completed as part of the EcIA. Therefore, there would be no direct or indirect impact on otters as a result of the proposed development.

Badgers

7.3.5. I note that no badger setts were recorded in the study area and that the EcIA states that there is no potential for badgers on the site. The entire footprint of the site was surveyed. No setts were recorded as part of the fieldwork undertaken. I do not consider that there would be any direct or indirect impact on badgers as a result of the proposed development.

7.3.6. Bats

7.3.7. The EcIA states that a total of 28 bat passes or contacts were recorded during the survey period undertaken with 19 positive identifications. The level of activity with three bat species recorded is considered to be relatively low and normal for a mixed woodland habitat providing feeding and commuting areas.

7.3.8. The EcIA also notes that species encountered were also typical of a woodland environment with the majority being Soprano pipistrelles, which are typical of denser woodlands and species which can forage in these types of habitats. The Common pipistrelles species was recorded on the path along the lakeshore which is also typical feeding activity for bats. The EcIA notes that there were no records of Daubenton's bats over the lake, but that the low number of Leisler's Bat logged was unusual – the latter could be attributed to lower roost availability in the general area, however. I note that no permanent bat roosts were found on the site.

7.3.9. There would be no impacts on commuting bats due to the proposed development, and the loss of feeding and commuting habitat is not considered to be significant and would be replaced by replenished native woodland. I further note that the EcIA states that the potential for negative effects on commuting and feeding bats from site lighting would be relatively low and can be avoided by a sensitive lighting design.

7.3.10. The appropriate design of luminaire and lighting fixtures should be done by using accessories such as hoods, cowls, louvers and shields to direct the light to the intended areas only. This can be done via condition.

Birds

7.3.11. I note that a single amber status bird was identified during the fieldwork undertaken (Black-Headed Gull). However, the majority of bird species were green status, and included Raven, Wood Blackbird and Jackdaw, among others (see Table 3 of the EcIA for full list). The EcIA states that there would be no significant impacts on birds.

7.3.12. Therefore, there would be no direct or indirect impact on birds as a result of the proposed development.

Spent Firewater & Runoff

7.3.13. The Commission requested the Applicant to address the issue of spent firewater and the potential for firewater runoff leaving the site and impacting sensitive receptors, including waterbodies, via a Section 132 letter (i.e., request for further information).

7.3.14. The Applicant provided a response via a technical note provided by Moore Group (Environmental Consultants, dated 18th August 2025). I note that the proposed development has been designed with a firewater containment strategy and includes a geomembrane lining underneath the battery compound to prevent environmental contamination from firefighting runoff. It also includes an underground combined firewater and surface water attenuation tank, which has a capacity of c. 556m^3, drainage interceptors, and bunding system.

7.3.15. In the event of a fire occurring, the BESS facility has been fitted with a penstock closing valve and all cooling related spent firewater will be retained within the site for subsequent disposal by a permitted contractor to a licensed waste facility. In addition to this, there is no hydrological link to any sensitive European sites in proximity to the site, thus, meaning any residual environmental risk would be negligible. [Section 8.0 and Appendix B below are relevant and provide a full assessment of the proposed development for the purposes of Appropriate Assessment.]

7.3.16. I further note that the EDP Report provides a short review of the Moore Group Technical Note. It states that the assessment sets out a thorough approach to environmental protection, thus, embedding firewater management as a key component of the overall fire safety strategy. EDP go on to say that the control measures proposed by the Applicant meet the regulatory requirements under the

relevant EU environmental management frameworks and that it demonstrates the Applicant's commitment to safeguarding water quality and the ecological integrity of the area.

7.3.17. In conclusion, I consider that the proposed development is acceptable in terms of ecology and biodiversity, subject to the implementation of the recommended mitigation measures outlined in the EcIA and CEMP.

7.4. Traffic and Vehicular Access

Traffic and Access

7.4.1. The proposed development seeks to use a single entrance point to access the subject lands. The entrance is via the existing access at the northern end of the site and leads off a public road that is connected to the R280. It will be used for both the construction and operational phases of the development and is shown on the Proposed Site Layout Plan (Drwg. No. 0405-P-1010). I can also confirm that I used this access point as part of my inspection of the subject lands and surrounding area during my site inspection.

7.4.2. The Applicant confirms that there is no intention to utilise the other existing access road to the west of the site, and which currently serves the existing Arigna 110Kv substation. I note that this road is largely overgrown, circuitous, and would be away from the proposed vehicle turning area in the northern section of the site. It would be a less favourable means of accessing the site for these reasons.

7.4.3. The application is supported by a traffic survey and technical note (prepared by Traffic Transport and Road Safety Associates Limited, dated 14th August 2024). The document addresses issues relating to predicted traffic volumes, vehicle speeds on the R280, and sight distances requirements.

7.4.4. I note that the vehicular movements generated by the development would be relatively low for both the construction and operational phases of the development. The survey states that the maximum average daily trip generation is forecast to be 22 one-way movements in month seven of the construction programme (i.e. the busiest month). This equates to a percentage impact on the R280 of 1.14%, which is well below the '10% of the traffic flow on the adjoining road' threshold value set out in the Department of Transport 'Traffic Management Guidelines'. I consider also that

operational traffic volumes would be negligible given the facility requires only the presence of two operatives onsite for one day a week.

7.4.5. The Planning Authority (Roads Department) raised no objection to the proposal, subject to the inclusion of standard conditions, including prevention of surface water runoff from the site onto public roads, for services and cables to be placed underground, that any damage caused by proposed development to existing roads must be reinstated / repaired, and for the Applicant to obtain a road opening licence, as appropriate, for the works along, on or adjacent the public road network.

7.4.6. Furthermore, Condition 8 of the Council's Decision to Grant Permission requires the preparation of a Traffic Management Plan for the construction phase of the development. This would assist in minimising disruption to the public road network during the works and in managing vehicle passing movements. It also requires the facility operator to provide a detailed programme of deliveries, including dates and times for such trips, the number of loads, weights, potential road closure and diversion routes, and whether support vehicles would be needed.

7.4.7. I am satisfied that the proposed means of vehicular access to the site for the construction and operational phases is acceptable, and the predicted traffic volumes generated by the proposed development would not lead to any significant traffic safety issues or be prejudicial to public health.

Fire Tender and Emergency Vehicle Access

7.4.8. The proposed development makes adequate provision for emergency vehicle access. This is vital to ensure a timely and unimpeded fire service response can be facilitated in case of a fire incident of emergency occurring on the site.

7.4.9. The EDP Report states that the proposed site layout is able to accommodate emergency vehicle access and turning areas for along approximately 90% of the site perimeter and that this aligns with NFCC recommendations for a fire service vehicle attending the premises. There is no extreme gradient across the site and a flat vehicle turning area is provided in the northern section of the site next to the battery container area. I further note that EDP confirms that the layout for the development demonstrates sound adherence to NFCC principles, thus, ensuring robust perimeter access, compatible access road dimensions and effective vegetation management.

7.4.10. The EDP Report concludes that final verification should be undertaken directly with the Roscommon CFO so as to confirm vehicle compatibility and operational standards. This can be achieved under condition, in my opinion.

7.5. Other Issues

COMAH

7.5.1. I note the third party assertation that the proposed development should be subject to the COMAH Regulations[2] and as the application has not addressed this is a breach of the Seveso Directive. The Seveso Directive is a European regulation aimed at preventing and controlling major industrial accidents involving dangerous or hazardous substances. However, the proposed development, which is for a Battery Energy Storage System, is not subject to the provisions of the COMAH Regulations. As a result, the proposal does not trigger a requirement for a COMAH-based assessment, or its notification to the Health and Safety Authority (HSA). Simiarly, there is no formal requirement for the EPA or IFI to provide a submission on the application, which is a concern raised by the Appellant.

7.5.2. I note that the proposed development is still subject to general safety, environmental, fire, and emergency measures and protocols, however. These issues are addressed by the relevant sections of my report, including under Sections 7.2 and 7.3, and the EDP Report (Appendix E).

Aarhus Convention

7.5.3. The Appellant states that if the proposed development were permitted, that this would undermine the public consultation process as directed by the Aarhus Convention. However, I do consider that the application violates or somehow undermines the principles set forth in the Convention and outline my position as follows.

7.5.4. The Aarhus Convention supports the rights of individuals to access information, participate in decision-making and to seek justice in environmental matters. In the context of this planning application, it is my opinion that all relevant environmental

[2] Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, S.I. No. 209 of 2015

information has been made publicly available, and sufficient measures have been taken to ensure meaningful public participation can happen during the decision-making process.

7.5.5. Moreover, the Appellant has taken the opportunity to make submissions to both the Planning Authority and An Coimisiún Pleanála and this information has been thoroughly considered during the assessment stage for the application. I further note that the Roscommon County Development Plan 2022-2028 was subject to a full Strategic Environmental Assessment (SEA). This process was undertaken to integrate environmental considerations and potential impacts into the preparation of the CDP and to help ensure proper planning and sustainable development. This process involved undertaking detailed public consultation and examining topics such as biodiversity, water quality and heritage. The findings are documented in SEA Report, which is publicly available.

7.5.6. In summary, I do not consider that the proposed development is against the principles of proper planning and sustainable development and that it is consistent with the relevant statutory planning policies and objectives. This includes the Roscommon County Development Plan 2022-2028, the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region, 2020-2032, and the National Planning Framework.

Engagement with Utility Providers

7.5.7. The Appellant states that the application is deficient as no prior liaison was undertaken with Uisce Éireann regarding water storage and the required capacity for firefighting purposes. They also state that the Applicant has failed to communicate with EirGrid or ESB regarding the suitability of the site for the proposed BESS facility.

7.5.8. I note that the application has made provision for an adequate firefighting water supply on the site. The Applicant addressed this issue in their further information (FI) submission to ACP. The proposed water infrastructure component serving the facility is in accordance with the relevant guidance, which is the 'NFCC Guidance for Grid Scale Battery Energy Storage Systems (BESS) – Fire and Rescue Services'. As noted above, under Section 7.2, the application includes two 180m³ fire water storage tanks which have a combined capacity of 360m³. This exceeds the NFCC

minimum water requirement for 1,900 litres/min for 2 hours, or 228m³ in the specific case of this development proposal. This water is for firefighting purposes in an emergency situation. I am satisfied that this addresses the third party concern that only water can assist in reducing the heat generated by burning batteries.

7.5.9. Furthermore, and in relation to the issue of water supply, I note that the Applicant's FI includes a confirmation of feasibility letter (CoF) from Uisce Éireann (UÉ) (dated 30th July 2025). The letter states that UÉ has reviewed a pre-connection enquiry from the Applicant for a new water connection to serve the facility and that this would feasible, subject to upgrading the UÉ network. The correspondence also notes that the nearest UÉ owned watermain is roughly 220m from the connection point and that to enable a connection to the development a new waterpipe and infrastructure extension covering this distance would be necessary (i.e., 220m).

7.5.10. In terms of engaging with other utility providers, I note that the Applicant has confirmed they have consulted with EirGrid and that following discussions a preferred grid connection approach has been agreed. This involves connecting to the Carrick-on-Shannon-Arigna-Corderry 110Kv overhead powerline (OPL), which is a short distance to the southwest of the site, and a new loop in/out gas insulated switchgear (GIS) substation. I am therefore satisfied that adequate information has been provided in terms of a proposed grid connection and that EirGrid have been consulted in this regard.

7.5.11. Additionally, the subject site, and adjoining lands which are traversed by the OPL are owned and controlled by the Applicant and no third party consent is required to facilitate a connection (see blue line boundary on relevant drawings). I also do not consider that there is any formal requirement for the Applicant to consult with ESB regarding the suitability of the site for the development, and that the relevant authority (EirGrid) has been approached for input.

7.5.12. In summary, I conclude that the Applicant has properly engaged with the relevant utility providers and that the third party concern in this regard does not warrant a refusal decision.

Invasive Plant Species

7.5.13. As noted above, the application is accompanied by an Ecological Impact Assessment (EcIA), which identifies the presence of two invasive plant species on and around the subject lands, namely Himalayan Balsam and Rhododendron. I also observed during my physical inspection of the site, and its surrounding vicinity, evidence of Rhododendron, which was widespread, and particularly so alongside the existing site access at the northern end of the property. Invasive plant species can reduce native plant diversity, affect the natural regeneration of native species and reduce biodiversity. When an invasive species takes hold in an area, the variety of flora and fauna drops and ecosystems can become less resilient to disease, disturbances, etc.

7.5.14. The Applicant's FI submission to the PA recognises this and set out a series of preliminary measures to address the issue. This includes no earth movement or vehicle parking taking place in the infected areas, to minimise disturbance, and a potential spread of the species. It is also proposed that the development area, and areas adjoining the site, be resurveyed before any construction works take place and to identity potential remediation and control of same.

7.5.15. I note that the Applicant refers to a preliminary ISMP which has been prepared by a consultant specialising in this field (Pages 11 – 12 of the FI Response refer). The EcIA under Section 6.1.4 notes the mitigation measures for the invasive plant species. However, having regard to the above, I recommend that a final Invasive Species Management Plan (ISMP) should be required to be completed by the Applicant, prior to commencement of development, if the Commission is minded to grant permission.

7.5.16. The ISMP would be an important tool to help ensure the spread of invasive species can be prevented and controlled, and that proper waste disposal and site management practices will be implemented.

Procedural

7.5.17. I note the concerns raised by the Appellant that the further information by the Applicant to the PA was not circulated to the parties prior to a Decision being made. The contention being that certain stakeholders were unfairly excluded from participating in the application process.

7.5.18. I note that Article 35 of the Planning Regulations provides that where a Planning Authority receives further information – following a request for such information under Article 33 – that it should consider whether or not it constitutes 'significant further information'. Where FI is considered to be 'significant' this triggers a process requiring that prescribed bodies and persons who originally made a submission or observation be informed of such, for revised notices to be published / erected onsite, as appropriate, as well as other certain prerequisites.

7.5.19. However, the question of 'significant further information' can only be determined by the relevant Planning Authority – in this case Roscommon County Council – on an individual basis, using professional judgement, and in having regard to the particular circumstances of the application. Therefore, I do not consider that the Commission need concern itself with the approach adopted by the Council in this regard and that this does not warrant a reason for refusal.

8.0 **AA Screening**

8.1. The application is accompanying by AA Screening, prepared by Moore Group (Environmental Consultants).

8.2. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on any European Sites, including the:

- Cuilcagh - Anierin Uplands SAC (Site Code: 000584),
- Boleybrack Mountain SAC (Site Code: 002032),
- Lough Arrow SAC (Site Code: 001673),
- Lough Arrow SPA (Site Code: 004050), and
- Bricklieve Mountains and Keishcorran SAC (Site Code: 001656)

8.3. in view of the conservation objectives of these sites and is, therefore, excluded from further consideration. Appropriate Assessment is not required.

8.4. For further information, please refer to Appendix B of this report.

9.0 Environmental Impact Assessment

9.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Appendices C and D of this report).

9.2. Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

10.0 Water Framework Directive

10.1. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any waterbody (rivers, lakes, groundwaters, transitional and coastal), either qualitatively or quantitatively, or on a temporary or permanent basis, or otherwise jeopardise any waterbody in reaching its WFD objectives. Therefore, it can be excluded from further assessment.

10.2. See Appendix E at the rear of this report for further information.

11.0 Recommendation

11.1. I recommend that planning permission be granted for the reasons and considerations set out below.

12.0 Reasons and Considerations

Having regard to the:

- provisions of the Roscommon County Development Plan 2022-2028, including Section 5.7 ‘Renewable Energy’, which states rural areas have the potential to be harnessed for renewable energy projects, and Policy Objectives CAEE 8.2 (‘National Climate Change Strategy’), CAEE 8.4 (‘to facilitate the various forms of renewable energy’), and CAEE 8.6 (‘to facilitate proposals for energy storage systems and infrastructure),

- brownfield nature of the site, which previously was used as a coal-fired power station before being decommissioned,
- provisions of the Climate Action Plan 2025 (CAP25),
- location, nature, size and scale of the proposed facility and established character and pattern of development in the vicinity,
- nature of the receiving landscape and absence of any specific conservation amenity designation for the subject lands,
- location and proximity of the proposed development to the regional road network, including the R280,
- mitigation measures proposed for construction and operational phases,
- submissions on file including those from prescribed bodies, the appellant, and the Planning Authority, and
- documentation submitted with the application, including the Fire Risk Assessment, Emergency Response Plan, Ecological Impact Assessment, Construction Environmental Management Plan and Appropriate Assessment Screening Report,

it is considered that, subject to compliance with the conditions set out below, the proposed development would:

- be in accordance with the provisions of the Roscommon County Development Plan 2022-2028 and Roscommon County Council Renewable Energy Strategy 2022-2028, and with national, regional and local planning policy,
- be in accordance with CAP25,
- be acceptable in terms of traffic safety and convenience,
- be acceptable in terms of the protection of groundwater and surface water,
- not give rise to a risk of fire safety, serious pollution, or be prejudicial to public health, and
- not seriously injure the amenities of the area or property in the vicinity,

the proposed development would therefore be in accordance and with the proper planning and sustainable development of the area.

13.0 **Conditions**

1.	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars received by the planning authority on the 15th February 2024 and by An Coimisiún Pleanála on 20th August 2025, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars. **Reason**: In the interest of clarity.
2.	a) The permission shall be for a period of 30 years from the date of the first commissioning the battery energy storage system. All structures, including the battery container units, control building, and all other permitted equipment and ancillary structures, shall then be removed and the site reinstated unless, prior to the end of that period, planning permission shall have been granted for their retention for a further period. b) Prior to the commencement of development, a detailed Site Restoration and Decommissioning Plan providing for the removal of the battery container units, and all other ancillary structures, and a timescale for its implementation, shall be submitted to and agreed in writing with the planning authority. c) On decommissioning of the facility, the battery arrays and all ancillary structures shall be dismantled and removed permanently from the site. The site shall be restored in accordance with the agreed Site Restoration Plan, and all decommissioned structures shall be removed from the site within 6 months of decommissioning. **Reason**: To enable the planning authority to review the operation of the battery energy storage system over the stated time period, having regard to

	the circumstances then prevailing, and in the interest of landscape restoration.
3.	a) The mitigation measures contained in the Ecological Impact Assessment and Construction Environmental Management Plan shall be fully implemented. b) An Ecological Clerk of Works (ECoW) with suitable experience shall be appointed to ensure all mitigation measures outlined in the Ecological Impact Assessment and Construction Environmental Management Plan shall be carried out. c) The ECoW shall submit a report to the planning authority demonstrating compliance with mitigation measures and ecological considerations both during and post the construction phase. **Reason**: To protect the integrity of European Sites and in the interest of environmental protection and public health and safety.
4.	a) Details of the materials, colours and textures of all the external finishes of the proposed development shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. b) The inverter/transformer stations, battery storage, control units and all fencing shall be dark green in colour, or a similar muted colour agreed in writing with the planning authority. c) Only first generation (new) batteries shall be used in the development. Prior to commencement of development a method statement shall be submitted for the written agreement of the Planning Authority detailing how end-of-life batteries shall be managed and disposed of. End-of-life battery management shall thereafter be undertaken in accordance with the details agreed. **Reason**: In the interest of visual amenities of the area and of environmental management.

5.	a) Prior to the commencement of development, the applicant shall submit a final Fire Risk Management Plan (FRMP), which shall be carried out by a suitably qualified individual for the review of the Planning Authority and with input from the Chief Fire Officer. The Plan shall include: i) Provision of details confirming the spacing between battery containers meet NFCC guidance or if a reduction of spacing is justified by design. [Standard minimum spacing is 6m, unless an alternative is supported by design evidence.] ii) Confirmation that the fire suppression system specifications meet the manufacturers' UL 9540A test certificates for aerosol suppression and other systems. iii) Final details confirming that construction and compartmentation materials meet relevant fire resistance requirements. iv) Fire and explosion consequence dispersion modelling. v) An Explosion Protection Document or hazardous area (zone) classification as required under ATEX Directive 2014/34/EU. b) No works shall commence onsite until the Applicant has received the written agreement of the Planning Authority with regard to this assessment. c) The measures contained in the Fire Risk Management Plan shall be fully implemented. **Reason**: In the interests of public safety and biodiversity.
6.	The measures contained in the Emergency Response Plan shall be fully implemented. **Reason**: In the interests of public safety and biodiversity.
7.	Prior to the commencement of development, the applicant shall submit a final Invasive Species Management Plan (ISMP), which shall be carried out by a suitably qualified individual for the review of the Planning Authority. No

	works shall commence onsite until the Applicant has received the written agreement of the Planning Authority with regard to this assessment. **Reason**: In the interests of public safety and biodiversity.
8.	a) All mitigation measures detailed in Section 6 of the in the Environmental Noise Impact Assessment Report and other supporting documentation received by the Planning Authority on 7th October 2024 shall be implemented in full. Prior to commencement of development, final design specifications for the proposed acoustic barrier shall be agreed in writing with the Planning Authority. b) During the operational phase of the proposed development, noise levels, as measured at the nearest noise sensitive location shall not exceed :- i. An Leq,1h value of 55 dB(A) during the period 0800 to 2200 hours from Monday to Saturday inclusive. ii. An Leq, 15 min value of 45 dB(A) at any other time. The noise at such time shall not contain a tonal component. At no time shall the noise generated on site result in an increase in noise level of more than 10 dB(A) above background levels at the boundary of the site. c) All sound measurement shall be carried out in accordance with ISO Recommendation 1996:2007: Acoustics - Description and Measurement of Environmental Noise. **Reason**: In the interests of environmental protection and management and to protect amenities in the vicinity.
9.	Prior to commencement of development, the following shall be submitted for the written agreement of the Planning Authority: a) A Traffic Management Plan for the construction phase of the development, which shall include measures to minimise disruption to the public road network and prevent damage and make provision for repair of same. Where necessary, the plan shall facilitate vehicle

	passing movements on the local road network and include details of the proposed methods for notification of general road users, and local residents, during the construction phase. b) A detailed programme of deliveries shall be provided, including dates and times, number of loads, weights, road closure and diversion routes, support vehicles etc. The programme of deliveries shall be developed following consultation with all relevant services and utility providers and prior to deliveries taking place. c) Details of all proposed haul routes, supported by a pre-development condition survey of delivery routes with a video survey and photographs and a detailed survey of all node locations. In the event that the Planning Authority determines that a proposed delivery route is not in a suitable condition, the developer shall be required to upgrade the road or junction in advance of delivery operations, to a specification agreed with Roscommon County Council's Roads Section and Boyle Municipal District Coordinator. In the event haul routes include use of the National Road Network, the applicant/developer shall consult with TII prior to finalising the proposed haul routes. d) A copy of the agreed Traffic Management Plan, programme for deliveries and agreed haul routes shall be submitted for the records of the Planning Authority prior to commencement of development. The development shall thereafter be undertaken in accordance with the agreed details. **Reason**: To prevent damage to the public road in the interests of traffic safety and public safety.
10.	a) Comprehensive details of the proposed public lighting system to serve the development shall be submitted to, and agreed in writing with, the planning authority, prior to commencement of development.

	b) The agreed lighting system shall include a recommended strategy for reducing the impact of lighting on bats and be fully implemented and operational before the proposed development is occupied. c) CCTV cameras shall be fixed and angled to face into the site and shall not be directed towards adjoining property or the road. d) Each fencing panel shall be erected such that for a minimum of 300 millimetres of its length, its bottom edge is no less than 150 millimetres from ground level. e) All service cables associated with the proposed development, such as electrical and telecommunication cables, shall be located underground. **Reason**: In the interest of visual and residential amenity, to allow wildlife to continue to have access to and through the site and to minimise impacts on drainage patterns.
11.	a) The site shall be landscaped in accordance with a comprehensive scheme of landscaping prepared by a suitably qualified person, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development and which is consistent with the details down in the Proposed Site Layout Plan (version submitted as part of further information to An Coimisiún Pleanála on 20th August 2025) (Drwg. No. 0405-P-1010). b) All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority. **Reason**: In the interest of residential and visual amenity.
12.	Prior to the commencement of development, the developer or any agent acting on its behalf, shall prepare a Resource Waste Management Plan (RWMP) as set out in the EPA's Best Practice Guidelines for the Preparation

	of Resource and Waste Management Plans for Construction and Demolition Projects (2021) including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times. **Reason**: In the interest of proper planning and sustainable development.
13.	Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services. **Reason**: In the interest of public health and to ensure a proper standard of development.
14.	The Planning Authority shall be notified of any change of ownership or transfer to a new operator. Such notification shall be made within two months of the date of change of ownership or transfer. **Reason**: In order to facilitate the continuance of planning conditions and in the interests of ensuring the orderly development of the area.
15.	Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority. **Reason**: In order to safeguard the amenities of property in the vicinity.
16.	The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the

	Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme. **Reason**: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Ian Boyle
Senior Planning Inspector

27th November 2025

Appendix A: Consideration of Local Authority Conditions

Condition	Summary of Condition	Included / Excluded in Schedule of Conditions (Section 12.0 above)
1	Plans and Particulars	Included
2	Permission Duration & Decommissioning	Included, but wording amended to require a decommissioning plan. Also, duration of permission for the facility extended from 25 years to 30 years, which is in accordance with the standard ACP BESS condition.
3	Decommissioning	Included, wording amended so can be amalgamated with PA Condition 2
4	First generation batteries only	Included
5	Emergency Response Plan (ERP)	Excluded; unnecessary as an ERP was provided as part of Applicant's Section 132 Response to ACP
6	Preparation of a detailed ISMP	Included
7	EcIA measures to be implemented	Included
8	Traffic Management	Included
9	Environmental Noise Impact Assessment measures to be implemented	Included
10	CEMP measures to be implemented	Included
11	Noise limits	Included
12	CCTV	Included
13	PA to be notified of a change of ownership	Included
14	Construction working times	Included
15	Adherence to landscaping measures outlined on the Proposed Site Layout Plan	Excluded, full Landscape Master Plan required. Note the site is in Landscape Character Area 1 (Lough

		Allen and Arigna foothills) of the CDP which has a 'very high landscape value' as per the Council's Landscape Character Assessment.
16	Lighting system design and spec.	Included
17	Prevention of surface water runoff	Included
18	Damage to existing road to be reinstated	Excluded, unnecessary
19	Financial Contribution	Included

Appendix B: AA Determination (Template 2)

[Template 2: Standard AA Template and AA Determination]

Screening for Appropriate Assessment - Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	The proposed development is for the construction of a Battery Energy Storage System (BESS). See Sections 2.1 – 2.4 above.
Brief description of development site characteristics and potential impact mechanisms	The appeal site is rural area in the townlands of Tawlaght and Srabragan, County Roscommon. It is on the western side of Lough Allen approximately 4km northeast of Arigna Village. The site is roughly 18km north of Carrick-on-Shannon and 45km east of Sligo town, respectively. The R280 (Drumshanbo Road) runs in a general north - south direction, a short distance to the west of the site. The site comprises a former coal fired power station which closed and was and decommissioned in 1993. There is evidence of previous access roads and tracks leading to the former power station facility off the R280 and other works comprising of hardstand, storage areas and other types of infrastructure associated with the former power station facility. The site is relatively low lying with a downwards slope towards the east in the direction of the Lough Allen. It has been largely cleared of its previous industrial use, however, and mainly comprises grasses, trees, scrub and bare ground. Section 4.2 of the Applicant's EcIA (AA) provides a detailed description of the habitats on the site. It also notes that two invasive species are on and around the site, including Himalayan Balsam and Rhododendron. The surrounding area comprises primarily farming and sporadic low-density one-off houses. There are no European Sites directly affecting or in proximity. The nearest designated site is Cuilcagh - Anierin Uplands SAC (Site Code: 000584), which is on the far side of the lough, roughly 4.4km to the east. There is no hydrological link to this SAC. The site has a stated area of c. 1.6ha.
Screening report	Yes. The Applicant provided further information to the Planning Authority on 7th October 2024, which included an Ecological Impact Assessment (EcIA) under Appendix D. The EcIA addresses the issue of Appropriate

	Assessment and how the proposed development responds to the Habitats Directive (Council Directive 92/43/EEC).
Natura Impact Statement	No
Relevant submissions	The Commission has received a single third party appeal, which *inter alia* raises the following concerns: - The application lacks expert reports. No response has been received from the EPA, Inland Fisheries, Irish Water (Uisce Éireann) or the HSA. - Impact on the natural environment due to toxic gas emissions, fire, explosion, and contamination of the land, homes, and animals. No habitats assessment (or Ecological Impact Assessment) has been completed. Concerns regarding birds and nests in the area. - The application is invalid because an AA Screening Report was not completed.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

European Site (code)	**Qualifying interests[1] Link to conservation objectives (NPWS, date)**	**Distance from proposed development (km)[3]**	**Ecological connections[2]**	**Consider further in screening[3] Y/N**
Cuilcagh - Anierin Uplands SAC (Site Code: 000584)	- Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] - Natural dystrophic lakes and ponds [3160] - Northern Atlantic wet heaths with Erica tetralix [4010] - European dry heaths [4030] - Alpine and Boreal heaths [4060] - Species-rich Nardus grasslands, on siliceous	Approx. 4.2km to the east, on the far side of Lough Allen.	No. There is no connectivity to the habitats or species for which this site is designated.	No

[3] The distances stated are the closest linear distance between the appeal site and boundary of the European Site, as made available by the NPWS.

	substrates in mountain areas (and submountain areas, in Continental Europe) [6230] - Blanket bogs (* if active bog) [7130] - Transition mires and quaking bogs [7140] - Petrifying springs with tufa formation (Cratoneurion) [7220] - Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] - Siliceous rocky slopes with chasmophytic vegetation [8220] - Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]			
Boleybrack Mountain SAC (Site Code: 002032)	- Natural dystrophic lakes and ponds [3160] - Northern Atlantic wet heaths with Erica tetralix [4010] - European dry heaths [4030] - Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] - Blanket bogs (* if active bog) [7130]	Approx. 11.3km to the north	No. There is no ecological or hydrological connection.	No
Lough Arrow SAC (Site Code: 001673)	- Hard oligo-mesotrophic waters with benthic	Approx. 13.9km to the west.	No. There is no ecological or	No

	vegetation of Chara spp. [3140]		hydrological connection.	
Lough Arrow SPA (Site Code: 004050)	- Little Grebe (Tachybaptus ruficollis) [A004] - Tufted Duck (Aythya fuligula) [A061] - Wetland and Waterbirds [A999]	Approx. 13.9km to the west.	No. There is no ecological or hydrological connection.	No
Bricklieve Mountains and Keishcorran SAC (Site Code: 001656)	- Turloughs [3180] - Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] - Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) [6510] - Calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii) [8120] - Euphydryas aurinia (Marsh Fritillary) [1065] - Austropotamobius pallipes (White-clawed Crayfish) [1092]	Approx. 18.5km to the west.	No. There is no ecological or hydrological connection and the physical distance to this European Site is	No
Conclusion: There is no connectivity with any European sites. Significant adverse effects have been ruled out in AA Screening.				
Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites:				
There are no significant impacts predicted from the proposed development on any European Sites.				
Step 4 Conclude if the proposed development could result in likely significant effects on a European site:				

I conclude that the proposed development would not result in likely significant effects on any European Sites, including the Cuilcagh - Anierin Uplands SAC (Site Code: 000584). The proposed development would have no likely significant effect in combination with other plans and projects on any European site. No further assessment is required for the project. No mitigation measures are required to come to these conclusions.

Inspector: _____ **Date**: _____

Appendix C: EIA Pre-Screening (Form 1)

Case Reference	ABP-321420-24
Proposed Development Summary	The proposed development is for the construction of a Battery Energy Storage System (BESS) compound comprising: • 56 battery containers and Medium Voltage Power Station (MVPS) enclosures. • A single storey building for the storage of ancillary control equipment and materials. • New internal access roads, drainage, civil engineering works, landscaping, lighting, car parking, security fencing, welfare facilities and associated site works.
Development Address	The appeal site is in rural area in the townlands of Tawlaght and Srabragan, County Roscommon. It is on the western side of Lough Allen approximately 4km northeast of Arigna Village. The site is roughly 18km north of Carrick-on-Shannon, and 45km east of Sligo town, respectively.
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape	☒ Yes, it is a 'Project'. Proceed to Q2. ☐ No, No further action required.

including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in <u>Part 1</u>, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified **in Part 1.** **EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.**	
☒ No, it is not a Class specified in Part 1. Proceed to Q3.	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☒ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. **No Screening required.**	**Note**: The development of a Battery Energy Storage System (BESS) is not a specified class of development in Part 1 or Part 2 of Schedule 5 of the Regulations. However, the proposed development has been assessed in relation to other classes which may apply. See below.
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. **EIA is Mandatory. No Screening Required**	**NA**
☐ Yes, the proposed development is of a Class but is sub-threshold. **Preliminary examination required. (Form 2)** **OR**	<u>Class 1 of Part 2 of Schedule 5 'Rural Restructuring'</u>: "Projects for the restructuring of rural land holdings, where the length of field boundary to be removed is above 4 kilometres, or where re-contouring is above 5 hectares, or where the area of lands to be restructured by removal of field boundaries is above 50 hectares."

If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	**Note**: These regulations do not apply as the works are not expected to give rise to significant environmental effects and are below the relevant thresholds. The following is noted in this regard: • The internal areas of the site have been largely cleared of hedgerow and is a brownfield site. It was formerly used as a coal fired power station until 1993. Therefore, whilst there are some small areas of hedgerow proposed to be removed this is in small sections only and well below the 4km threshold specified above. • No re-contouring is required as part of the proposed development. • The total site area is c. 1.6ha and well below the 50 hectares threshold specified above. <u>Class 10 (dd) of Part 2 of Schedule 5 'All private roads':</u> 'All private roads which would exceed 2000m in length.' Note: The proposed development includes the laying hard standing areas and access tracks. It also includes the reinstatement/repair of the existing access road out to the old R280 public road, as required. The internal site access tracks will be constructed and surfaced using a permeable gravel surface. There is a clear distinction between access tracks and roads for the purposes of the EIA Directive, with the directive only applying to the latter. It is not considered that the internal access tracks serving the proposed facility would constitute 'private roads'. No Schedule 7A information has been provided as part of the application.

Appendix D: EIA Preliminary Examination (Form 2)

Case Reference	ABP-321420-24
Proposed Development Summary	The proposed development is for the construction of a Battery Energy Storage System (BESS) compound comprising: • 56 battery containers and Medium Voltage Power Station (MVPS) enclosures. • A single storey building for the storage of ancillary control equipment and materials. • New internal access roads, drainage, civil engineering works, landscaping, lighting, car parking, security fencing, welfare facilities and associated site works.
Development Address	The appeal site is in rural area in the townlands of Tawlaght and Srabragan, County Roscommon. It is on the western side of Lough Allen approximately 4km northeast of Arigna Village. The site is roughly 18km north of Carrick-on-Shannon, and 45km east of Sligo town, respectively
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	As noted above, the site was formerly used as a coal fired power station which operated between 1959 until 1993, after which the plant was closed-down and decommissioned. There are former old access tracks leading to the former power station off the R280. Other works comprise of hardstand and storage areas associated with the former power station facility. The property for the most part has been cleared of its previous use, however, and a large expanse now comprises grasses, trees, scrub and bare ground. During the construction works phase, the proposed development would generate a certain amount of

	demolition waste as there are some existing structures and buildings on the site. These are proposed to be removed as part of the application. However, given the relatively modest size of the proposed development, on a brownfield site, I do not consider that the demolition waste arising would be significant in a local, regional or national context. I further note that the construction site compound, which includes designated parking, would be located at least 30m from Lough Allen. Self-contained portable toilets with integrated waste holding tanks are made available and maintained by the appointed contractor. These will be removed from the site on completion of the works. A bunded containment area will be provided with the compound for the storage of fuels, lubricants and oils. In summary, the proposed size, scale and quantum of development sought under this application is not exceptional in the context of its receiving environment.
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	The site, and its surrounding area, is not a particularly sensitive environment. The site is a brownfield site in a rural setting and previosily accommodated a coal-powered power station. The site is not within, or immediately adjoining, any protected area(s). There are no waterbodies on the site and there are no hydrological links between the subject site and any European designated site. The subject site is not directly located within, or in proximity, to any European Sites. The nearest N2000 Site is the Cuilcagh - Anierin Uplands SAC (Site Code: 000584), which is approximately 4.2km to the east of the site, on the far side of Lough Allen. Other notable designated Sites include: • The Boleybrack Mountain SAC (Site Code: 002032), which is roughly 11.3km to the north.

	• The Lough Arrow SAC (Site Code: 001673), which is roughly 13.9km to the west. • The Bricklieve Mountains and Keishcorran SAC (Site Code: 001656), which is roughly 18.5km to the west. The proposed Natural Heritage Area (pNHA) Lough Allen, South End and Parts (Site Code: 000427) is roughly 2.2km to the east of the site at its nearest point.
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	**Having regard to the characteristics of the development and the sensitivity of its location, consider the potential for SIGNIFICANT effects, not just effects.** There is no real likelihood of significant effects of this nature associated with the proposed development. The EcIA accompanying the application notes the following in relation to fauna species and habitats: **Fauna** Otters: There are no otter habitats in the study area and no potential for otters on the site. The lakeshore at the site has been embanked with loose fill, and there is no suitable habitat for otter holts or couches. No signs of otter were recorded during survey. Badgers: There are no badger setts in the study area and no potential for badgers on the site. The entire footprint of the site was surveyed, and no setts were recorded. Bats A total of 28 bat passes or contacts were recorded during the survey period with 19 positive identifications. The level of activity with three bat species recorded is considered to be relatively low and normal for a mixed woodland habitat providing feeding and commuting areas. The EcIA notes that species encountered were also typical of woodland with the majority being Soprano

	pipistrelles typical of denser woodland and ability of forage such closed habitats. The Common pipistrelles were recorded on the path along the lakeshore which is also typical feeding activity. There were no records of Daubenton's bats over the lake. A low number of Leisler's was a surprising, but as the EcIA notes this may be attributed to lower roost availability in the general area. There are no permanent bat roosts on the site. Birds A single amber status bird was identified during the fieldwork undertaken by the appointed ecologist (Black-Headed Gull). **Habitats** The EcIA confirms that habitats under the footprint of the proposed development were recorded as having 'low' to 'moderate' ecological value. The areas of mature mixed broadleaf/conifer woodland, parts of which have semi-natural character, were considered to have the highest value, and classed as 'moderate local' ecological value.
Conclusion	
Likelihood of Significant Effects	**Conclusion in respect of EIA**
There is no real likelihood of significant effects on the environment.	**EIA is not required.** The proposed development has been subject to preliminary examination for environmental impact assessment. Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	NA
There is a real likelihood of significant effects on the environment.	NA

Inspector: _____ **Date**: _____

DP/ADP: _____ **Date**: _____

(only where Schedule 7A information or EIAR required)

Appendix E: WFD Impact Assessment – Stage 1 Screening

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Bord Pleanála ref. no.	ABP-321420-24	**Townland, address**	The site is in rural area in the townlands of Tawlaght and Srabragan, County Roscommon. It is on the western side of Lough Allen approximately 4km northeast of Arigna Village. The site is roughly 18km north of Carrick-on-Shannon, and 45km east of Sligo town, respectively.
Description of project		The proposed development is for the construction of a Battery Energy Storage System (BESS) and ancillary site works. See Section 2.0 above for further details.	
Brief site description, relevant to WFD Screening,		There is an existing drain to Lough Allen at the northeastern corner of the site. The proposed development is setback from Lough Allen. However, as noted within the application, it requires a Surface Water Management Plan to ensure there would be no significant effect on the water quality of Lough Allen, particularly in terms of meeting the requirement of the Water Framework Directive (2000/60/EC) and the requirement of meeting good water quality in lake waterbodies. It is noted that according to the EcIA submitted that Lough Allen was assigned a 'Moderate' quality statue in the most recent round of EPA lake waterbody assessment SW 2016-2021. It is a coarse fishing lake with species including Bream, skimmer bream, roach, hybrids, pike and perch.	

Proposed surface water details	A surface water attenuation tank is proposed to take surface water runoff from the operations building, prior to discharging to Lough Allen via an existing open land drain. The tank has a capacity of 6m^3. The drain is approximately 36m in length and will be provided with a full-length perforated pipe and inspection chambers at each end. It will also be surrounded with a minimum of 500mm clean stone, which would provide further treatment and filtering before final discharge offsite.
Proposed water supply source & available capacity	There is currently no available water supply within the main body of the proposed site. Water is therefore proposed to be delivered to the site by tanker and stored in an underground storage system. A rainwater harvesting tank is also proposed as a backup source for the development. The application states that there would be an annual water demand of roughly 2,912 litres, which would due to the presence of two operatives onsite for one day a week.
Proposed wastewater treatment system & available capacity, other issues	A wastewater holding tank is proposed to serve the proposed welfare facilities which will be emptied bi-annually. The buildings onsite will be unmanned, save for infrequent inspections and routine maintenance resulting in low rates of foul flow. The application states that appropriate design calculations have been submitted in this regard (Refer to Appendix B for Greenfield Runoff, Appendix C for Runoff Volume Calculations and Appendix D for Met Éireann Rainfall Data). I note that the Planning Authority have considered the proposed services arrangement to be acceptable.
Others?	NA

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	**Distance to (m)**	**Water body name(s) (code)**	**WFD Status**	**Risk of not achieving WFD Objective e.g.at risk, review, not at risk**	**Identified pressures on that water body**	**Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)**
1. Lough Allen (lake waterbody)	Directly east of the site.	Allen (IE_SH_26_716)	Moderate	At risk	Not identified	Yes, this waterbody directly adjoins the site on its eastern boundary. There is an existing land drain running though the site into the lake.
2. Arigna (Roscommon) River (river waterbody)	1.2km to the north.	IE_SH_26A020300 (Arigna Roscommon)_010	Good	Not at risk	Not identified	No. The site drains towards the east into Lough Allen.

3. Arigna (Roscommon) River (river waterbody)	2.6km to the south.	IE_SH_26_716 (Arigna Roscommon)_010	Moderate	At risk	Not identified	No. The site drains towards the east into Lough Allen
4. Lough Allen Uplands (Groundwater Body)	Underlying the site.	IEGBNI_SH_G_002	Good	Not at risk	Not identified	Yes, underlying the site.

Step 3: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.

CONSTRUCTION PHASE

No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	**Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.**
1.	Surface	SHANNON (Upper)_040 (IE_SH_26S020500)	Downstream pathway / overland drain entering the lake.	Runoff, siltation, pH (concrete), hydrocarbon spillages and leaks.	Standard construction practices and mitigation. See	No	**No. Screened out.** Good construction management practices and

				Potential risk of contaminants which enter the groundwater to flow laterally towards the receiving waterbody.	CEMP (Section 5.17).		mitigation will minimise the risk of pollution from construction activities.
4.	Ground	No data to display	Underlying the site	Introduction of contaminants to flow paths, which could lead to potential negative effects in terms of the hydrological and hydrogeological flow regime and effect groundwater quality.	Standard construction practices and mitigation. See CEMP (Section 5.17).	No	**No. Screened out.** As per above.
OPERATIONAL PHASE							
1.	Surface	SHANNON (Upper)_040 (IE_SH_26S020500)	Downstream pathway / overland drain entering the lake.	Surface water runoff from roads and the impermeable areas may contain potentially	Only clean surface water discharge will leave the site.	No	**No. Screened out.**

				contaminating compounds (petroleum hydrocarbons, metals, and suspended sediments) which could enter the watercourse.	A surface water attenuation tank is proposed to take surface water runoff from the operations building, prior to discharge to Lough Allen via the existing land drain. The drain will be provided with a full-length perforated pipe and include inspection chambers at each end. It will also be surrounded with a minimum of 500mm clean stone, which would provide further treatment and filtering before final discharge.		

4.	Ground	No data to display	Underlying the site	Introduction of contaminants to underground flow paths, which could lead to potential negative effects in terms of the hydrological and hydrogeological flow regime and effect water quality.	Bunding systems will be implemented to prevent environmental contamination, including that of leakages to groundwater.	No	**No. Screened out.**
DECOMMISSIONING PHASE							
1.	Surface	SHANNON (Upper)_040 (IE_SH_26S020500)	Downstream pathway / overland drain entering the lake.	Runoff, siltation, pH (concrete), hydrocarbon spillages and leaks. Potential risk of contaminants which enter the groundwater to flow laterally towards the receiving waterbody.	Standard construction practices and mitigation. See CEMP (Section 5.17).	No	**No. Screened out.** Good construction management practices and mitigation will minimise the risk of pollution from construction activities.

4.	Ground	No data to display	Underlying the site	Introduction of contaminants to flow paths, which could lead to potential negative effects in terms of the hydrological and hydrogeological flow regime and effect groundwater quality.	Standard construction practices and mitigation. See CEMP (Section 5.17).	No	**No. Screened out.**

Appendix F: Independent Expert Opinion on Fire Safety Measures Provided at Tawlaght & Srabragan, Lough Allen, Co. Roscommon

See Report ‘R321420_App1’.