

DOCUMENT INTENT

Please consider this an observation submitted in response to the Newspaper Notice in the Connacht Tribune on 14/05/2026 related to Appeal Reference Number **ABP-320916-24**.

Project Description:

Long duration energy storage facility within an outdoor compound and a synchronous condenser positioned within a building and located within a second outdoor compound, together with all ancillary works. Environmental Impact Assessment Report and Natura Impact Statement submitted with application.

ABP/ACP Reference:

ABP-320916-24

Planning Authority Case Reference:

2460845

Observation Submitted By:

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H53H7V2

Date:

June 2026

Note:

This proposed development is co-located and functionally connected with two other proposed developments, namely, Reserve Gas-Fired Generator (ABP-320095-24); and the Gas-Insulated Switchgear substation and HV cables (ABP-320094-24).

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Executive Summary

This document is submitted as an observation on file reference ABP-320916-24. This document will identify a host of issues that remain with the proposed development plans, which upon review, will confirm to the reader that planning permission in this instance is not warranted. This document will address issues including but not limited to:

- Absence of important site investigation and failure to incorporate site investigation findings in the proposed design.
- Understated cut and fill calculations that will have serious environmental and HGV traffic consequences.
- Realignment works to water courses not being in accordance with environmental policy and a complete absence of consultation with relevant authorities.
- Proposed new access road being in contravention of local and national policy.
- Complete omission of a traffic impact analysis on the local village (Killimor).
- Road safety issues on projects proposed access route.
- Significant omissions in the Appropriate Assessment and the Natura Impact Statement and Project Splitting concerns.

GROUND INVESTIGATION COMMENTARY

The absence of any substantial ground investigation within the applicant's initial submission, quite correctly drew a further information request from the planner.

It is of note that the ground investigation works now submitted were carried out between September and December 2024. This was just a few months after the submission of the initial planning application and close to eighteen months before the further information request from the planner. As a result, much of the requested further information has not been provided. It is noted that significant concerns remain regarding the ground investigation carried out to date and the results of that which has been carried out.

A summation of the issues is as follows. Greater detail of this summary is provided thereafter.

1. No site investigation has been carried out in the new site area where the proposed new access road is to be constructed.
2. Much of the site investigation results does little to allay concerns about the minimal foundation design proposed.
3. Recommended testing regarding rock breaking in the geophysical report has not been carried out.
4. Site flooding concerns remain.
5. The cut & fill calculation appears to be deeply flawed.

The above is evaluated in greater detail below.

Lack of Site Investigation within Additional Site Area

There is a **complete absence** of any site investigation works on the newly proposed access road¹. This proposed access is within an extended site boundary area of approx. 70 acres. The site extension is north-east of the original site boundary and much closer to an operational peat bog. The suggested road construction is not based on any factual information about the site. Given that the proposed transformer for this development will weigh more than 500 ton, one would think that standard road construction details are unlikely to apply. Making that assumption in the complete absence of any ground investigation is not good practice. There is enormous scope for design creep in this instance. By way of example, the EIAR² suggests there may or may not be a requirement for capping in the road make-up. It is a standard TII detail that road construction contains a capping layer beneath the sub-base³. Furthermore, the undulating nature of the land in question, creates significant areas of fill as identified on the drawings provided⁴. Chainage 812m of the proposed road shows a fill area of just under 6.6m. In this instance, not only will capping be required, but meters of imported fill will also be needed. Considering this unusual, but obvious, road make-up necessity, the EIAR provided does not appear to have analysed the required road make-up in any great detail.

¹ Drawing AGP24105_01 – Dec '24

² Page 2-14 of EIAR Addendum – Jan 2026

³ Drawing RCD/700/6 "Access Road/Service Road" - TII Standard Construction Details - Series 700

⁴ CPA-HAL-NR-XX-PL-3000

Proposed Foundation Concerns

"Notwithstanding Article 23(6) of the PDR's, the scale of the foundations and the structural requirements for the proposed development as set out in Section 2.5.1.2 of the submitted EIAR are considered insufficient for developments of the size and scale proposed. Provide further clarity on same."

The developer directs the planner to section 2.1 of the latest EIAR in response to the above request for further information. Therein⁵, the developer confirms that detailed analysis of the proposed foundations has not yet been carried out.

"Typical preliminary pad sizes for industrial buildings are in the order of 1.8m x 1.8m x 0.6m, with final dimensions confirmed at detailed design stage following completion of structural analysis and geotechnical verification."

The developer's assumptions regarding the adequacy of pad foundations are made without analysis of anticipated loading and the capacity of the ground to support it. Contrary to this assumption, much of the ground investigation provided suggests that the proposed pad foundations will not be sufficient.

- The plate bearing tests provided⁶ all confirm the current ground to be of poor bearing capacity and at the very least, requiring significant ground stabilisation to be built upon. The developer has not offered any stabilisation processes for consideration in its submission. The best of the plate bearing results suggest suitability for moderate loads only. Loading information for the proposed development does not appear to be provided. We know that equipment more than 500 ton is proposed for the site. This is exceptionally heavy loading over a relatively small area. Pad foundations are not the best solution for spreading loads. There appears to be large scope for the proposed foundations to require significant change.
- Notwithstanding the above, plate bearing tests 05, 09, 10 and 12 show incredibly poor results. The results are poor to the extent that soil stabilisation is unlikely to be successful and piling may be required.
- Dynamic probes⁷ 07, 11, 15, 16, 26, 27, 31, and 32 all show questionable ground at depths of 1.5m up to 3.2m below existing ground level.
- Boreholes⁸ 01 to 05 show questionable ground up to depths of 2m.
- Made ground⁹ of up to 2.8m deep was encountered at trial pits 07, 08, 14, 17, 21 and 29.

The above suggest pad foundations will not be appropriate. The developer has failed to allay the concerns raised over the proposed foundations.

⁵ Section 2.1.1.2 of EIAR Addendum – Jan 2026

⁶ Appendix 6 to of EIAR Addendum – Jan 2026 – Plate Test Records

⁷ Appendix 4 to of EIAR Addendum – Jan 2026 – Dynamic Probe Records

⁸ Appendix 5 to of EIAR Addendum – Jan 2026 – Rotary Core Records

⁹ Appendix 9 of EIAR Addendum – Jan 2026 - Section 2.2.5 of Apex Geophysics Document AGP24105_01

Failure to Address Site Investigation Concerns

“Please undertake comprehensive site investigations that adequately inform consideration of the baseline environment and understanding of existing subsoil, geology and hydrogeology e.g. the geographical profile of the site, identification of bedrock, characteristics of the overlying soils and depth of water table etc”

While the developer has carried out additional site investigation works, it does not appear to have taken some worrisome results into consideration for the proposed development. It is notable that the proposed structure and its levels have not altered at all despite:

- The recommendation from “Apex Geophysics” geophysical investigation report stating that trial excavations should be carried out on bedrock in order to determine its excavation requirements¹⁰. i.e. will it be dug out, ripped out, mechanically broken out or blasted out. The developer has confirmed that site investigation works ceased in October 2024. This recommendation was made in December 2024, so no such trial investigation was carried out.
- That same report identifies rock that would require heavy breaking/blasting ranging from 41.8mOD to 52.8mOD. Most of the proposed buildings have a finished floor level of 51-52mOD¹¹. Therefore, the potential for encountering this hard rock is likely during construction. Noise and vibration pollution implications have not been considered in the developer’s EIAR and have not been adequately screened out.
- Groundwater monitored¹² in all the boreholes show a water table of 1.5m to 2.27m below ground level. The developer is suggesting a cut of 1.2m across the site¹³. That may be insufficient in many areas for reasons explained further on. Therefore, excavations below the water table are very possible. No details on groundwater management, including pumping have been provided. The photo below is included in the initial 2024 EIAR Vol 3 appendix 14. At its own admission, ground conditions are waterlogged. Despite this, no changes have been suggested for the development.

¹⁰ Appendix 9 of EIAR Addendum – Jan 2026 - Section 4 of Apex Geophysics Document AGP24105_01

¹¹ Drawing CPA-HAL-MP-XX-DR-PL-1000 – “MASTER PLAN SITE LAYOUT”

¹² Appendix 7 to of EIAR Addendum – Jan 2026 – Groundwater Monitoring

¹³ Tables 7.1 to 7.5 of EIAR Addendum – Jan 2026



Plate 8: Waterlogged conditions in low lying land in southern extent of site (Field 12) with drumlin in background (Field 13), looking east.

- Flooding concerns remain even after the updated Flood Risk Assessment.¹⁴ Table 18 is of particular interest. It clearly acknowledges that the proposed site is not an area deemed suitable by the Galway County Development Plan 2022-2028.

Table 18 – Requirements of Part 1 of the Justification Test

Requirement		Site Specific Response
Part 1		
	The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of the flood risk guidelines.	According to the Galway County Development Plan 2022 – 2028 the application area is not zoned. The area can be described as rural with agricultural lands dominating and with linear ribbon development along the L8763. The zoning objective for Rural Areas (RA) is to protect and promote in a balanced way, the development of agriculture, forestry and rural-related enterprise, biodiversity, the rural landscape and the built and cultural heritage. Residential development is permitted within RA, subject to compliance with the Rural Settlement Strategy.

Section 4.4 of the latest flood risk assessment identify 4 structures that will require Section 50 permissions. Despite this, no engagement has taken place with Inland Fisheries Ireland or other state bodies that will have significant impact on flooding assessment. The photos below highlight the flooding concerns that exist on the proposed site.

¹⁴ Appendix 8.2 to of EIAR Addendum – Jan 2026 – Stage 3 Flood Risk Assessment Report



A view towards the immediate west of site, with applicant's lands at middle foreground



A view towards the northwest of site, where the drains are at high levels.



View of the site facing east, where the 400MW BESS is proposed to situate.



View of the site just south of the existing substation, where the 1,155 MW OCGTs are proposed to situate.



View of the proposed staggered junction on the proposed new access road over the elevated L8763 esker ridge.

Cut & Fill Calculation Errors

“The information collected from the site investigation should then be used to inform the extent of the earthworks and the cut & fill involved in the construction stages and are key considerations to identify potential environmental impact on soils, geology and hydrogeology”

The cut & Fill calculation appears to be flawed. The ground investigation¹⁵ carried out suggests that generally, the top 1m of soil on the site is unsuitable for construction. It is classed as “Predominantly soft sandy gravelly clay or loose clayey sand/gravel”. This rises to depths of 1.8m in places.

¹⁵ Appendix 9 of EIAR Addendum – Jan 2026 - Section 3.4 of Apex Geophysics Document AGP24105_01

3.4 Integrated Interpretation

The combined geophysical and direct investigation data are plotted on Drawings AGP24105_R1 to AGP24105_R7 and have been interpreted as indicating the following subsurface layers:

- **Layer 1** - a thin upper layer of predominantly soft sandy gravelly clay or loose clayey sand/gravel soils ranging from 0.3 to 1.8 m thick (average 1.0 m).

Such material is not suitable for general construction works so is certainly not suitable for this proposed development considering the large loading involved.

With this in mind, the developer's cut and fill calculations appear to be much too low.

It is noteworthy that the cut & fill requirements of the proposed new access track have not been considered in this calculation. That proposed road has a footprint of approx 7,763m² (1,109m * 7m). Drawing CPA-HAL-NR-XX-PL-3000 shows cuts of up to 2m being required and areas of fill of up to 6.69m being required. This is a significant oversight in the cut & fill calculation.

The road construction required is complex. Between chainage 700 and chainage 812, the proposed road will rise by 6.59m from existing ground levels. Between chainage 0 and chainage 50, the proposed road level will rise by 6.35m. This proposed road elevation rises to the top of a local esker which bring with it increased environmental considerations.

53.846	56.710	58.986	59.250
52.660	52.945	56.082	59.250
SAG K=6 43.881m	GRADIENT 2% 43.631m	CREST K=10 34.139m	GRADIENT 2% 15.000m
700.000	750.000	800.000	812.706

*Proposed Road Long section detailed on Drawing CPA-HAL-NR-XX-PL-3000. Proposed 6.59m increase to existing levels. There is approx 2,580m³ of fill required in this small area alone. (112m long * 7m wide * 3.3m avg. depth). It is not accounted for in the latest EIAR Addendum.*

DATUM = 50m				
PROPOSED LEVELS	59.340	57.862	56.618	
EXISTING LEVELS	49.340	53.023	53.372	
HORIZONTAL	STRAIGHT 25.00m	CURVE 25.00m		
VERTICAL	GRADIENT 1:12.5m	GRABT 1:12.5m	GRADIENT 1:12.5m	8m
CHAINAGE	0.000	50.000	100.000	

Proposed Road Long section detailed on Drawing CPA-HAL-NR-XX-PL-3000. Proposed 6.35m increase to existing levels. There is approx 1,110m³ of fill required in this small area alone. (50m long * 7m wide * 3.18m avg. dept). It is not accounted for in the EIAR Addendum.

Section 7.3.3.1 of the latest EIAR¹⁶ details the cut and fill calculations for the various areas. The details are summarized in the table below.

Reference	Area sqm	Cut Volume	Cut Depth (Vol/Area)	Fill Volume	Fill Depth (Vol/Area)
Table 7.1	59,049.15	43,340.37	0.73m	37,886.99	0.64m
Table 7.2	14,579.66	8,622.63	0.59m	533.10	0.04m
Table 7.3	37,159.75	15,044.02	0.40m	20,055.52	0.54m
Table 7.4	8,138.25	1,829.70	0.22m	579.90	0.07m
Table 7.5	<u>7,596.42</u>	<u>906.80</u>	<u>0.12m</u>	<u>2,124.28</u>	<u>0.28m</u>
Total	126,523.23	69,743.52	0.55m	61,179.79	0.48m

The proposed cut & fill quantities do not make any sense. There are multiple issues that immediately undermine them. Some examples are offered below.

- As noted already, site investigation carried out suggests that generally, the top 1m of soil on the site is unsuitable for construction. This rises to depths of 1.8m in places. If we take an average depth of unsuitable soil being 1m deep across the site, that would be a cut volume of 126,523.23m³. The developer's cut & fill calculation assumes an average cut site wide of 0.55m, coming to 69,743.52m³ in total. That does not synchronise with the site investigation results. It appears to be undermeasured by at least 56,779.71m³.
- Table 7.1 of the EIAR¹⁷ deals with the cut and fill requirements for the 400 kV GIS, OCGT & Fuel Storage area. The table states that a footprint of 59,049.15m² will require fill of 37,886.99m³. That is an average of 0.64m fill to that footprint. That calculation appears very inaccurate.

Existing ground level in the area appears to be approx 49.3mOD (An average of R3, R5 & R7 in the Site investigations¹⁸). Finished floor level for this building is stated to be 51mOD on the drawings provided¹⁹. That is a required average fill of 1.7m between the existing ground level and the finished floor level. However, the top 1m of soil

¹⁶ Page 7-6 & 7-7 of EIAR Addendum – Jan 2026

¹⁷ Page 7-6 of EIAR Addendum – Jan 2026

¹⁸ Drawing AGP24105, AGP24105_R3, AGP24105_R5, AGP24105_R7 – All Dec '24

¹⁹ CPA-HAL-OC-XX-DR-PL-1101 – Mar '24

sitewide is soft and unsuitable. Upon its removal, an average fill of 2.7m will be required in this area. The results of the corrected calculations are shown on the Table 1.0 below.

- Table 7.2 of the EIAR²⁰ relates to the Synchron and adjacent parking area. According to R2 within the site investigation²¹, the existing ground level is approx. 52mOD. The proposed finish ground level is stated to be 53.1mOD²² approx. That is a required 1.1m of fill to the area. However, when the top 1m of poor ground is considered, 2.1m of fill is required to this area. The EIAR had calculated fill of just 0.04m to this area. That is less than 2 inches. The results of the corrected calculations are shown on the Table 1.0 below.
- Table 7.3 of the EIAR²³ deals with the cut and fill requirements for the LDES area. The table states that a footprint of 37,159.75m² will require fill of 20,055.52m³. That is an average of 0.54m fill to that footprint. That calculation appears very inaccurate.

Existing ground level in the area appears to be approx 52.5mOD (An average of R1, & R6 in the Site investigations).²⁴ Finished floor level for this building is stated to be 53mOD²⁵ on the drawings provided. That is a required average fill of just 0.5m between the existing ground level and the finished floor level. However, the top 1m of soil sitewide is soft and unsuitable. Upon its removal, an average fill of 1.5m will be required in this area. The results of the corrected calculations are shown on the Table 1.0 below.

- Table 7.4 of the EIAR²⁶ relates to the AGI area. According to R4 within the site investigation²⁷, the existing ground level is approx. 53.5mOD. The proposed finish ground level is stated to be 54.5mOD approx²⁸. That is a required 1m of fill to the area. However, when the top 1m of poor ground is considered, 2m of fill are required to this area. The EIAR had calculated fill of just 0.07m to this area. That is less than 3 inches. The results of the corrected calculations are shown on the Table 1.0 below.
- Table 7.5 of the EIAR²⁹ relates to the original access road. The existing ground level and the proposed finished level will likely vary, following the local topography. However, we do know that the top 1m of ground site wide is considered poor according to the site investigation results. We can therefore assume a minimum of 1m fill required for this road in replacing the excavated poor surface soil. The EIAR had calculated fill of just 0.28m to this area. That appears incredibly unlikely. Assuming a basic access track rather than an asphalt road, according to TII standards³⁰, one can expect at least 150mm sub-base (UGMA or Clause 804 stone) on top of a minimum 300mm of capping. That is a recommended minimum fill of 450mm beneath the road surface. See detail below for reference. The developer's EIAR calculation is 170mm less than

²⁰ Page 7-6 of EIAR Addendum – Jan 2026

²¹ Drawing AGP24105, AGP24105_R2

²² Drawing CPA-HAL-MP-XX-DR-PL-1000 – “MASTER PLAN SITE LAYOUT”

²³ Page 7-7 of EIAR Addendum – Jan 2026

²⁴ Drawing AGP24105, AGP24105_R1, AGP24105_R6 – All Dec '24

²⁵ CPA-HAL-SB-XX-DR-PL-3201 – Mar '24

²⁶ Page 7-7 of EIAR Addendum – Jan 2026

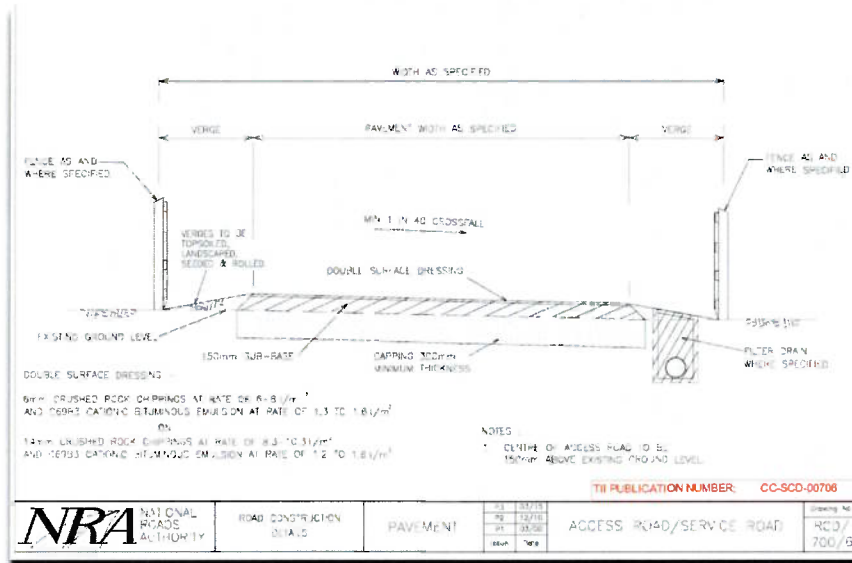
²⁷ Drawing AGP24105, AGP24105_R2

²⁸ Drawing CPA-HAL-MP-XX-DR-PL-1000 – “MASTER PLAN SITE LAYOUT”

²⁹ Page 7-7 of EIAR Addendum – Jan 2026

³⁰ Drawing RCD/700/6 “Access Road/Service Road” - TII Standard Construction Details - Series 700

TII recommended minimum fill depth, even before the poor 1m of soil is taken into account.



EIAR Table Ref	Location	EIAR Stated Area (M2)	EIAR Stated Fill Volume (M3)	EIAR Fill Depth (Vol/Area) (M)	EIAR Fill Deliveries Required (Vol/8m3) (Nr.)	Calculated Fill Depth (M)	Calculated Fill Volume (M3)	Calculated EIAR Fill Deliveries (Nr.)	Calculated HGV Increase on EIAR Estimate (Nr)	Notes
Table 7.1	400KV GIS, OCGT & Fuel Storage Area	59,049.15	37,886.99	0.64	4,736	2.7	159,432.71	19,929	15,193	Existing Ground to proposed finished floor level is 1.7m. However top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 2.7m of fill to the whole area rather than the 0.64m calculated in the EIAR. This will require an additional 15,193 fill deliveries via HGVs.
Table 7.2	Syncon & Adjacent Parking Area	14,579.66	533.10	0.04	67	2.1	30,617.29	3,827	3,761	Existing Ground to proposed finished floor level is 1.1m. However the top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 2.1m of fill to the whole area rather than the 0.04m calculated in the EIAR. This will require an additional 3,761 fill deliveries via HGVs.
Table 7.3	LDES	37,159.75	20,055.52	0.54	2,507	1.5	55,739.63	6,967	4,461	Existing Ground to proposed finished floor level is 0.5m. However top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 1.5m of fill to the whole area rather than the 0.54m calculated in the EIAR. This will require an additional 4,461 fill deliveries via HGVs.
Table 7.4	AGI	8,138.25	579.90	0.07	72	2	16,276.50	2,035	1,962	Existing Ground to proposed finished floor level is 1.0m. However the top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 2.0m of fill to the whole area rather than the 0.07m calculated in the EIAR. This will require an additional 1,962 fill deliveries via HGVs.
Table 7.5	Access Road (Original)	7,596.42	2,124.28	0.28	266	1	7,596.42	950	684	The levels of the Access Road will vary, but site investigation results suggest a minimum 1m of surface material must be removed before competent ground is encountered. That 1m of excavated material will need to be replaced with fill to prevent the road being constructed below existing ground level or else it will be subject to flooding. That will require a minimum 1.0m of fill to the whole area rather than the 0.28m calculated in the EIAR. This will require an additional 684 fill deliveries via HGVs.
		126,523.23	61,179.79		7,647		269,662.54	33,708	26,060	

Table 1.0

Table 1.0 above demonstrates an enormous shortfall in the EIAR required fill calculations. The EIAR estimates a total fill requirement of 61,179.79m³. After careful review of the site investigation and the proposed construction drawings, the actual fill requirements appear to be approx. 269,662.54m³. That is an additional fill volume of 208,482.75m³. The EIAR fill volume appears to be undermeasure by approx. 341%.

The calculations above, based on removal of 1m of poor overlying ground, show a shortfall in the fill calculation of 208,482.75m³.

The assumed minimum cut of just 1m may even be optimistic. The developer actually states an assumed cut of 1.2m³¹ but does not appear to factor that in its calculations. Analysis of the site investigation results suggests the levels of cut & fill may be far higher than the 1m used for calculation purposes on the above table.

- Dynamic probes 07, 11, 15, 16, 26, 27, 31, and 32 all show questionable ground at depths of 1.5m up to 3.2m below existing ground level.
- Boreholes 01 to 05 show questionable ground up to depths of 2m.
- Made ground of up to 2.8m deep was encountered at trial pits 07, 08, 14, 17, 21 and 29.

Considering the above, the cut and fill quantities provided cannot be relied upon. This could have significant impact on multiple elements, not least project environmental impact and the movements of HGV's to and from the site.

³¹ Tables 7.1 to 7.5 of EIAR Addendum – Jan 2026

TREANANEARLA STREAM COMMENTARY

The absence of any substantial details regarding the proposed diversion of the Treananearla stream in the applicant's initial submission, quite correctly drew a further information request from the planner. Several issues remain despite the response being provided.

A summation of the issues is as follows. Greater detail of this summary is provided thereafter.

1. Watercourses within the proposed site extension have been overlooked.
2. Requested information has not been provided.
3. Stream realignment justification does not satisfy environmental obligations.
4. Fisheries value of stream remains undetermined
5. Method Statement deficiencies are apparent
6. Absence of consultation with Inland Fisheries Ireland

The above is evaluated in greater detail below.

Overlooking Affected Watercourses

“Submit a suitably scaled drawing clearly identifying and labelling all existing watercourses and drainage ditches running from outside and through the site to include direction of flow. Figures 6.3 and 8.3 of the submitted EIAR and submitted layout drawings are considered insufficient in this regard”

While the developer has submitted a drawing (CPA-HAL-MP-XX-DR-PL-10000), it is not sufficient. It is notable that the submitted drawing does not identify or include the details of the newly proposed site access road. It appears that multiple watercourses have been overlooked on the drawing. The developer has acknowledged at least two watercourses being affected by the newly proposed access road³². Those site extension or watercourses are not identified on the drawing. The developer has therefore failed to provide the required information.

The need for care here is immense. The County Galway Local Authority Renewable Energy Strategy (LARES) notes the importance of the watercourses within the proposed site.

“Areas of Iconic and Special sensitivity are deemed to be of particular value within County Galway.....”.

Lough Derg Environs, Slieve Aughty Landscape and the Shannon Environs Landscape are of the ‘Special’ sensitivity category. Given this sensitivity and the importance placed on the EU Council Directive 2000/60/EC (Water Framework Directive) in this strategy document - any attempt to interfere with the watercourses in the extended site area or to move the

³² Section 14.2.1 of EIAR Addendum – Jan 2026

Treananearla stream (as proposed by the applicant) must be refused as they feed to Kilcrow River and by extent, the sensitively designated Lough Derg.

The presence of drainage ditches and water courses within the site create a major risk to the surrounding aquatic and terrestrial biodiversity. The objective of the EU Water Framework Directive (WFD) is to protect and prevent deterioration. The proposal to develop at this site with multiple water courses present as well as plans to reroute part of the Treananearla Stream, breaches these objectives and creates an increased risk to the Kilcrow river and the River Shannon.

The Eurasian Otter (*Lutra lutra*) is protected by Irish law (wildlife act amended 2000) and classified as Annex II and IV species of the EU habitats Directive (92/43/EEC), affording strict protection inside and outside of protected areas.

Considering the feeding range of the otter (2-15km) and the proximity of otter records to the site, particularly on the Kilcrow river (NPWS records, OPW records), less than 4 kms for the proposed development, it is probable that the otter uses the Treananearla Stream and connected drainage ditches within the proposed site as a feeding ground. The direct flow from the site to the Kilcrow river (2 km from the development) via the Treananearla Stream and other watercourses provides a direct pathway of point and/or diffuse sources of pollution during construction and operational phases of the proposed development. This creates a risk of direct impact from point source input due to spillage of fuel or chemicals and indirect impacts due to consumption of contaminated prey items or reduction in prey populations (salmonoids and eels) associated with reduced water quality. As a biodiversity indicator species, the presence of the Otter in this location on the Kilcrow river indicates healthy fish populations and in turn healthy macroinvertebrate populations on which they feed.

Failure to Provide Requested Information

“Submit a separate suitably scaled drawing clearly identifying the existing course of the Treananearla stream and the extent of the stream to be realigned including length of same.”

The developer has not provided the required information. The developer refers to the same drawing (CPA-HAL-MP-XX-DR-PL-10000) as mentioned in section 1.d.iii.1 of the further information. Therefore, no “*separate*” drawing has been provided. The drawing offers no lengths of the stream realignment as was requested. Again, it is notable that the submitted drawing does not identify and include the details of the newly proposed site access road.

Failure to Achieve Environmental Standards

“Submit a detailed justification for the proposed realignment”

In reviewing the submitted “*justification*” it is apparent that the stream realignment is driven by an exercise in cost saving. There is little environmental justification offered.

A primary justification cited is the proximity needed for the proposed facilities to operate at adequate capacity. Given that the Treananearla stream is approximately 5m wide, it is difficult to understand how accommodating the stream has any impact on proximity. When explaining its intentions for the new proposed access track (within the new site extension area), the developer outlined its intention to bridge over the two watercourses affected so as to mitigate any environmental impact on those watercourses³³. No such mitigation measures appear to have been considered regarding the proposed Treananearla stream relocation. Even with the proposed realignment, the developers drawing CPA-HAL-OC-XX-DR-PL-1910 (see below) shows that they would also intend to form a bridge over the stream in multiple locations. The developer's position is internally inconsistent which raises cause for concern.



"*Land Take Efficiency*" is offered as a justification. This is an internal financial justification which should not influence proper environmental planning.

Reference is made to Figures 3.1 to 3.3 of the 2024 EIAR as reasonable alternatives having been reviewed to realigning the stream. It is apparent that stream realignment concerns was not a high priority for the developer. We can determine this by reviewing Figure 3.1 referenced. This early design iteration carefully worked around the existing Treananearla stream. It appears that no realignment would be required under this design.

Figure 3.1 Site Layout Iteration (example 1)



This site layout was rejected internally by the developer for reasons unknown. While some reference is made to the repositioning indoors of specific items of equipment, no explanation

³³ Section 3.2.5.2 of EIAR Addendum – Jan 2026

is offered for the sudden relocation of the layout which interfered drastically with the Treananearla Stream.

Figure 3.2 Site Layout Iteration (example 2)



It is critical to bear Figure 3.1 above in mind, because it is difficult to reconcile with the “justifications” put forward by the developer in its response to the Further Information request.

The developer states “Options to reduce the extent of realignment were considered” – Figure 3.1 of the 2024 EIAR showed a stream realignment was not actually required. One must ask why this option was ignored.

The developer goes on to state “However, localised crossing structures or culverts would introduce additional in-channel works, increase hydraulic and ecological constraints and create a long-term maintenance liabilities”.

The developer seems to be suggesting that it was less intrusive to realign approx. 330m of the stream than it was to form a bridge. This argument is not solid, particularly when the developer still intends to form bridges elsewhere over the stream as noted above on drawing CPA-HAL-OC-XX-DR-PL-1910 extract. It should be noted that bridging over watercourses in the newly proposed access road area is cited as being the best course to avoid any environmental impact³⁴. The developer’s position is not consistent on this matter which is most concerning.

Crucially, the developer has stated that “The realignment of the Treananearla stream has been developed to ensure that the proposal is consistent with the EIA “avoid-reduce-remedy” hierarchy”.

The site layout alteration from Figure 3.1 to Figure 3.2 of the 2024 EIAR clearly demonstrates that the developer ignored its responsibility to “avoid” unnecessary environmental impacts on the Treananearla stream. Figure 3.1 illustrated a development that was positioned south of the Treananearla stream, thus avoiding its realignment. The subsequent alteration to the site layout shows a clear breach of the developer’s responsibilities under environmental impact mitigation.

³⁴ Section 3.2.5.2 of EIAR Addendum – Jan 2026

Unsubstantiated Fisheries Value Claims

“Provide evidence by way of aquatic survey or fisheries assessment including methodology and details of author to support conclusion that the Treananearla Stream has no fisheries value”

The developer has failed to address this request.

The developer has acknowledged that the Treananearla stream was assessed for its “*potential to provide foraging habitat and prey resources for the otter*” rather than confirming its fisheries value. The developer states that river habitat surveys and fisheries assessments were “*carried out utilising elements of the approaches*” in the River Habitat Survey Methodology and Fishery Assessment Methodology. This suggests an entire survey was not carried out. It does not detail which “*elements*” were utilised. It does not provide the additional information sought by the planner. The EIAR refers to the Treananearla Stream as being “*shallow*”.³⁵ The photos below disprove that assertion.



Aerial photo of the Treananearla stream within the proposed site at almost full capacity.



The connection to the Treananearla Stream, from the Sub-Station site, as shown on the left, is recent and has not been accounted for in the EIAR.

It is of note that section 6.3.3.1 of the most recent EIAR refers to a fisheries survey carried out at Ballyshrute Bridge in 2012 as ground for its assertion that no fisheries value is present in the Treananearla stream. Ballyshrute Bridge is approximately 15 minutes' drive from the proposed site. The survey was 14 years ago. This is not sufficient justification. A typical cycle for determining fisheries value of a stream is every 3 years. The EU Water Framework

³⁵ Section 8.5.1.1 of EIAR Addendum – Jan 2026

Directive of 2000 places responsibility on the developer and planner to ensure that fisheries value has been determined. That has not occurred to date in this instance.

Deficiencies in Method Statement

“Proposed mitigation in Table 8.11 details the new channel will be dug in accordance with an agreed specification and best practice and the water will be diverted. Please provide clarity on this specification to include a Method Statement and detailed drawings for the works proposed.”

The developer has failed to adequately address the above request. No detailed drawing has been provided as per the planner’s clear request. No detailed Method Statement has been provided as per the planner’s clear request. There are multiple concerns in section 8.5 of the latest EIAR, which addresses the construction works envisaged for the stream realignment. The developer has stated³⁶ that the stream realignment will be the first works on site and will take place in the months of August/September to coincide with low stream flows. Elsewhere, the developers programme of works shows a start date of October 2026. Both statements are incompatible. Are we to assume the developer will wait until August to start if works were in fact ready to commence in say December?

The first line of Section 8.5.1.1 is telling where the developer states *“In order to facilitate the site layout (for the Proposed Development as Amended) realignment of the local drainage network is required at two separate channels”*. Such a statement is the complete antithesis of the EIA Avoid-Reduce-Remedy policy which would require the site layout to be altered around the existing environmental constraints. As noted previously, and as demonstrated in Figure 3.1 of the 2024 EIAR, the stream realignment works are avoidable.

The suggested construction process included the installation of new culverts and the decommissioning of existing culverts. This is contrary to the developer’s justification for the stream realignment when it stated *“However, localised crossing structures or culverts would introduce additional in-channel works, increase hydraulic and ecological constraints and create a long-term maintenance liabilities”*. Again, the developers suggested plan is inconsistent.

The developer states in its construction plan that the Treananearla stream has *“no potential for fisheries value”*. This has not been determined in any fashion and is a baseless statement. The developers stated plan for the realigned streams depths and widths have had no input from fisheries or the OPW. Its suitability is in no way confirmed by the adequate bodies.

³⁶ Section 8.5.1 of EIAR Addendum – Jan 2026

Absence of Consultation with Inland Fisheries Ireland

“You are advised to consult with the IFI regarding the works proposed including proposals for stream crossings and demonstrate evidence of such consultation in the response”

The developer has failed to consult with IFI as requested. It appears that no effort was made to contact the IFI. This is concerning and problematic for a host of reasons.

The developer has stated on multiple occasions that the Treananearla stream has no fisheries value. However, in absence of consulting the IFI, this has not been verified. The developer's only reference to a fisheries study is on at Ballyshrute Bridge (15-minute drive away on the Kilcrow river) in 2012. This is not a sufficient basis to assume no fisheries value in Treananearla stream.

The developer has put forward a construction methodology that includes the realignment of over 300m of a Lough Derg tributary, with the decommissioning of existing culverts, construction of new culverts and the construction of bridges. All of this has been put forward without consulting the IFI or the OPW. The Flood Risk Assessment has identified 6 watercourse crossings that are subject to Section 50 approval³⁷. No advance consultation has occurred regarding these crossings. There is no assurance provided that the construction methodology is remotely appropriate.

³⁷ Section 6.1 Appendix 8.2 to of EIAR Addendum – Jan 2026 – Stage 3 Flood Risk Assessment Report

TRAFFIC IMPACT ASSESSMENT

The many concerns raised about the proposed site access, quite correctly drew a further information request from the planner.

"A number of concerns have been raised by Galway County Council, Transport Infrastructure Ireland and the public in relation to proposed site access arrangements including works to the national and local road network. Having regard to these concerns, please clarify proposed site access arrangements proposed for construction and operation stages to include for all necessary consents as required from landowners. You are advised that if a new arrangement is proposed that provides for amendments to site boundaries it will be necessary to submit a revised EIAR. The Appropriate Assessment Screening Report and a Natura Impact Statement should also be reviewed in respect of same."

Despite the response issued, several concerns remain. A summation of the issues is as follows.

1. Contravention of TII & National Policy
2. Contravention of Local Authority Policy & Existing Precedence
3. Flawed Traffic Impact Analysis
4. Inaccurate HGV Calculations
5. Local Road Network Incapable of Accepting Proposed Equipment
6. Road Collision Blackspot
7. Lack of Consultation with Appropriate Stakeholders
8. Continued Intention to Utilise N65/L8763 Junction

The above is evaluated in greater detail below.

Contravention of TII & National Policy

The developer has amended its site boundary to include for a new site entrance off the N65 for the construction phase and potentially the operational stage. The developer's intention to relocate the site entrance elsewhere on the N65 does not address the objection raised by TII to Galway County Council at initial planning stage. The extract below is from their objection dated 09th August 2024 as submitted to Galway County Council during the planning process:

"The Authority has examined the above application and considers that it is at variance with official policy in relation to control of development on/affecting national roads, as outlined in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), as the proposed development by itself, or by the precedent which a

grant of permission for it would set, would adversely affect the operation and safety of the national road network for the following reason(s):

Official policy in relation to development involving access to national roads and development along such roads is set out in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January, 2012). The proposal, if approved, would create an adverse impact on the national road where the maximum permitted speed limit applies and would, in the Authority's opinion, be at variance with the foregoing national policy in relation to control of frontage development on national roads."

TII's objection related to the adverse impact caused by increased use of an existing junction (N65/L8763). The developer's latest proposal would see a new entrance formed on the N65. This proposal is equally, if not more so, at odds with the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012). Section 2.5 of that document states:

"Lands adjoining National Roads to which speed limits greater than 60 kmh apply: The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant."

The developer has suggested that the proposed project should be considered under exceptional circumstances (section 2.6 of DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012)) as it is a "Developments of National and Regional Strategic Importance". That is simply not the case. In the first instance, the Government's stated 2 GW flexible gas target has, on available information, already been met or exceeded; the developer has not demonstrated any remaining strategic need this project addresses. Notwithstanding this, the proposed development fails to meet all criteria outlined in section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012) which addresses "Exceptional Circumstances".

In considering whether exceptional circumstances arise in the development plan and local area plan context, the planning authority and the NRA should take the following matters into account:

(1) the relevance and appropriateness of proposed development in supporting the aims and objectives of the National Spatial Strategy and Regional Planning Guidelines;

As noted above, the stated national target for gas fired power plants has already been exceeded. Battery Energy Storage Systems are not a strategic national infrastructure. None of the proposed developments are relevant to the aims and objectives of the National Spatial Strategy and Regional Planning Guidelines.

(2) the requirements of other planning guidelines issued under section 28 of the Act including the Retail Planning Guidelines (2005), which include a general presumption against large retail centres being located adjacent or close to existing, new or planned national roads, including motorways;

Not applicable — but no other section 28 guideline supports an exceptional-circumstances case for this development either.

(3) the nature of proposed development and the volume of traffic to be generated by it,

The construction programme is 28 months and will involve hundreds of vehicle movements every day when accessing and egressing from the N65. The volume of traffic generated is enormous. There will also be increased operational traffic which would continue for decades.

(4) any implications for the safety, capacity and efficient operation of national roads;

New access to the N65 should bring with it enormous safety concerns. As noted in greater detail further on, the developer has confirmed that the site haul route is via the N65 from the Loughrea side. Over the past 10 years, according to the RSA Map of Collisions³⁸, the N65 between Loughrea and Portumna has tragically accounted for 3 fatal collisions and 10 collisions resulting in serious injury. That means this stretch of the N65 suffers a statistically high number of fatal/serious collisions under current traffic loads.

(5) any plans for future upgrades of national roads and other transport infrastructure/services;

There are no stated plans to further upgrade the existing road network in the area. The condition of the existing road network is key. The proposed generator for this GIS development would exceed 500 ton. The existing road network and its structures cannot support these loads.

(6) the suitability of the location compared to alternative locations;

The unsuitability of this location is evident. Crucially, the developer has failed to put forward any alternative locations that were considered during the design process. The site appears to have been selected for reasons of land ownership and proximity to the existing substation rather than on planning merit. There are no other positives to be put forward for this site

³⁸ <https://www.rsa.ie/road-safety/statistics/collisions>

location. It is a greenfield site rather than brownfield. It requires a new access onto a national road which contravenes local and national policy. It has been rejected by the local authority on road safety and environmental grounds. The TII have noted the unsuitability of the site. One need only look at the locations proposed for other developments of this nature to see the absolute unsuitability of this location. e.g. the redevelopment of Moneypoint.

(7) the pattern of existing development in the area;

The proposed development is completely out of sync with existing developments in the area. The local area is predominantly rural with farmsteads.

(8) satisfactory details of the proposed demand management measures;

The details provided are entirely unsatisfactory. By way of simple example, one should refer to the TII's own submission to Galway County Council in August 2024 at planning stage for the BESS facility.

"The Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site."

(9) acceptable funding and delivery proposals for any road improvements required, and,

There has been no plan outlined for any road improvements or the funding thereof apart from general repairs caused by construction traffic.

(10) the precedent that could be created for cumulative development in the area and the potential implications for the national road network.

This point is key. I would refer to the developer's own submission to the CRU's "Large Energy Users Connection Policy"³⁹. Therein the developer refers to this proposed project:

"Our Future Projects

In line with the growth of the future market outlook above, Lumcloon Energy is in the process of expanding operations through two dispatchable power generation projects, namely, Coolpowra and Castlelost.

³⁹ CRU202504 Lumcloon Energy Ltd response

With the intention of supporting the data centre industry, the CRU and the SOs, both projects have flexible combined power delivery of up to 1,710 MW (excluding storage):

- Coolpowra Flex Gen

Upon the estimated completion in Q3 of 2029, the Coolpowra project will deliver up to 1,155MW of generation capacity to the Oldstreet substation (a 400kV grid connection).

Generation configuration uses three, non-islanded, turbines terminated through overhead transmission lines.”

The developer goes on to state:

“The construction and operation will provide direct support in providing either on site, or proximate, generation to data centres”

The planner will note the reference to Castlelost along with this proposed development. That development (similar to Coolpowra but much smaller) received planning permission in September 2022⁴⁰. Since then, the developer has sought planning permission for a data centre covering 600 acres at the same site. That permission was granted by Westmeath County Council in June 2026⁴¹, less than 4 years after the initial development planning being approved.

The developer is on record as having data centre intentions for this project. The developer has followed through on that intention on the other project referenced. Approval of this application will set a precedent and almost certainly result in a subsequent application for a data centre and result in cumulative developments that will impact the road network.

Contravention of Local Authority Policies & Precedence

The Planning Authority, via the Galway County Development Plan 2022-2028, apply the policies as set out in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Therefore, the points made above all apply in this instance also.

Several Planning Applications have been lodged with the Galway Planning Department to form a new entrance at the exact location that the developer now intends to form a new access point. I refer to planning decisions⁴² on the following:

Reference Number 06/1200 dated 30/03/2006

Reference Number 08/2697 dated 04/09/2008

⁴⁰ Planning File Number 21515 with Westmeath County Council

⁴¹ Planning File Number 2560344 with Westmeath County Council

⁴² As recorded on the Galway County Council planning register

File Number	Application Status	Decision Due Date	Decision Date	Decision Code	Received Date	Applicant Name	Development Address	Development Description	Local Authority Name
054009	WITHDRAWN				20/10/2005	M & H Noone	Ballynaheskeragh	for the construction of a dormer extension to rear of existing dwelling and to install a septic tank...	Galway Co.Co.
061200	APPLICATION FINALISED	17/07/2006	11/07/2006	REFUSED	30/03/2006	M & H Noone	Derrada South	to construct an extension to existing derelict dwelling and to install an 'Envirocare' treatment sys. .	Galway Co.Co.
082697	APPLICATION FINALISED	23/12/2008	19/12/2008	REFUSED	04/09/2008	M & H Noone	Darrada South	to renovate existing derelict dwelling and raise roof level of same to provide increased living spac...	Galway Co.Co.

In both instances, the inappropriateness of forming a new entrance onto the N62 (now N65) was cited as grounds for refusal.

Flawed Traffic Impact Analysis

The TII's submission to Galway County Council on 09/08/2024 states:

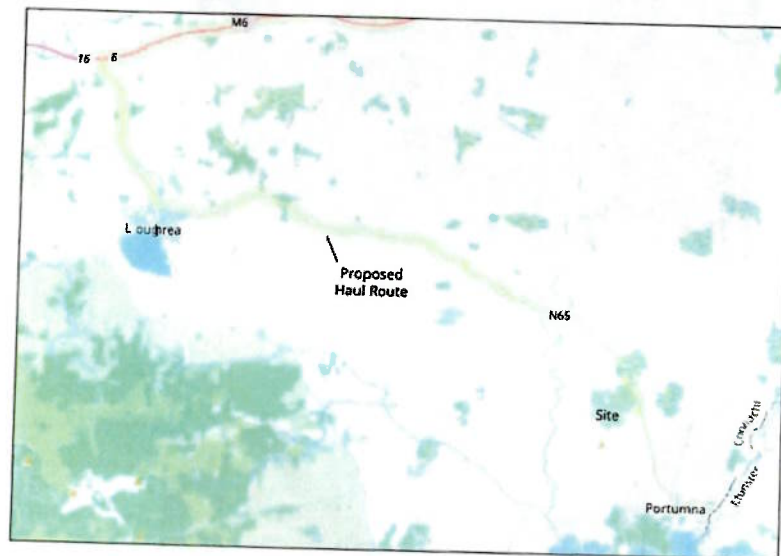
"The Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site."

With the above in mind, I refer the planner to the developer's EIAR Addendum and its complete sidestepping of any traffic impact on the village of Killimor some 3.5km away from the proposed site and directly on the proposed haul route.

While the developer has noted the virtues of the proposed haul route avoiding travelling through the towns of Loughrea and Portumna⁴³, it has completely ignored any impact on the village of Killimor. The oversight goes as far as ignoring Killimor on the traffic associated maps as can be seen below.

⁴³ Section 13.4 of EIAR Addendum – Jan 2026

Figure 13.1 Site Location



The closing paragraph of section 13.4 of the latest EIAR doubles down on this oversight. This is very curious given the regular references to Killimor when detailing the site location in other areas of the EIAR.

Loughrea is located approximately 25km to the north-west of the Coolpowra site and Portumna is located approximately 5km to the south of the proposed development lands. The traffic consultant was informed that the intended haul route (as shown on Figure 13.1) is via the M6 to Junction 16 (Kiltullagh) and N65 and therefore does not pass through either Loughrea or Portumna. Should permission be granted for the development, a

It makes no sense to address Loughrea (25Km from site) and Portumna (5Km from site) while at the same time ignoring Killimor (just 3.5Km from site). For the avoidance of any doubt, the N65, and the proposed haul route travels directly through the village of Killimor. Some notable traffic sources in the village include:

- Killimor National School which has approx 150 students plus staff.
- Arrabawn Co Op Killimor which has agri and hardware supplies
- Local Pharmacy
- Local Shop & Post Office
- Local Bar & Restaurant

Of particular importance is the local pharmacy, shop, post office, bar and restaurant. These businesses span approx 30m-40m of the main street through Killimor on both sides of the road. The N65 effectively operates as a single lane carriageway here for the majority of the day due to the footfall into these businesses and the absence of off-street parking. Some photos to support this point are offered below.



Google Streetview above



Jeep & Trailer pull in to allow car and lorry through before moving on itself down centre of the roadway. Photos taken at 13:00 on 12/05/26.





Killimor is just 3.5km from the proposed site location and directly on the proposed haul route. The developer has offered no traffic impact analysis for the village.

Inaccurate HGV Calculations

Further to the possible impact on the village of Killimor and the proposed Haul route as a whole, the asserted HGV volume on the proposed haul route is suspect. The EIAR⁴⁴ states that the anticipated number of HGV's accessing the site will be 30 per day. No supporting calculations to this number are offered. A construction period of 28 months is put forward (560 working days).

Therefore, 16,800 HGV deliveries are expected (560 days * 30 HGV deliveries). That would equate to a HGV accessing or egressing the site, via a new junction on the N65, every 10 minutes. (600-minute working day / 60 HGV movements per day (30 HGVs coming **and** going from site)).

However, as already examined in some detail, a very basic check on the volumes involved in the project immediately cast doubt on these numbers. I refer to the cut & fill analysis previous in this document. The developer's calculations refer to 61,179.79 cu. m. of fill being required. That equates to 7,647 HGV deliveries (8cu. m. per load). As per the table below, it appears that the imported fill is underestimated by a huge amount. That underestimation has a direct impact on the HGV estimation put forward by the EIAR.

⁴⁴ Section 11.4.1.1 of EIAR Addendum – Jan 2026

Table Ref	Location	EIAR Stated Area (M2)	EIAR Stated Fill Volume (M3)	EIAR Fill Depth (Vol/Area) (M)	EIAR Fill Deliveries Required (Vol/8m3) (Nr.)	Calculated Fill Depth (M)	Calculated Fill Volume (M3)	Calculated EIAR Fill Deliveries (Nr.)	Calculated HGV Increase on EIAR Estimate (Nr)	Notes
Table 7.1	400kV GIS, OCGT & Fuel Storage Area	59,049.15	37,886.99	0.64	4,736	2.7	159,432.71	19,929	15,193	Existing Ground to proposed finished floor level is 1.7m. However top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 2.7m of fill to the whole area rather than the 0.64m calculated in the EIAR. This will require an additional 15,193 fill deliveries via HGVs.
Table 7.2	Syncon & Adjacent Parking Area	14,579.66	533.10	0.04	67	2.1	30,617.29	3,827	3,761	Existing Ground to proposed finished floor level is 1.1m. However the top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 2.1m of fill to the whole area rather than the 0.04m calculated in the EIAR. This will require an additional 3,761 fill deliveries via HGVs.
Table 7.3	LDES	37,159.75	20,055.52	0.54	2,507	1.5	55,739.63	6,967	4,461	Existing Ground to proposed finished floor level is 0.5m. However top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 1.5m of fill to the whole area rather than the 0.54m calculated in the EIAR. This will require an additional 4,461 fill deliveries via HGVs.
Table 7.4	AGI	8,138.25	579.90	0.07	72	2	16,276.50	2,035	1,962	Existing Ground to proposed finished floor level is 1.0m. However the top 1m of existing is unsuitable according to Site Investigation and will have to be removed. That will require 2.0m of fill to the whole area rather than the 0.07m calculated in the EIAR. This will require an additional 1,962 fill deliveries via HGVs.
Table 7.5	Access Road (Original)	7,596.42	2,124.28	0.28	266	1	7,596.42	950	684	The levels of the Access Road will vary, but site investigation results suggest a minimum 1m of surface material must be removed before competent ground is encountered. That 1m of excavated material will need to be replaced with fill to prevent the road being constructed below existing ground level or else it will be subject to flooding. That will require a minimum 1.0m of fill to the whole area rather than the 0.28m calculated in the EIAR. This will require an additional 684 fill deliveries via HGVs.
		126,523.23	61,179.79		7,647		269,662.54	33,708	26,060	

After analysing the site investigation information, and reviewing the proposed construction drawings, one finds that at least 269,662.54 of fill is required. A typical HGV carries 8m³ in a single load. Therefore, rather than 7,647 deliveries of fill being required, over 33,708 will be. That is 26,060 additional HGV deliveries to site. That would be an additional 26,060 HGVs travelling through Killimor and then access and egressing a new entrance formed on the N65. That would be an additional 26,060 HGV deliveries for just the fill element of the works. We have no data to check if the remaining HGV estimates are solid or not. We also know that the cut and fill requirements for the proposed new access road have not been taken into consideration in the EIAR. As per Table 7.5 in that document, only the original road alignment has been considered.

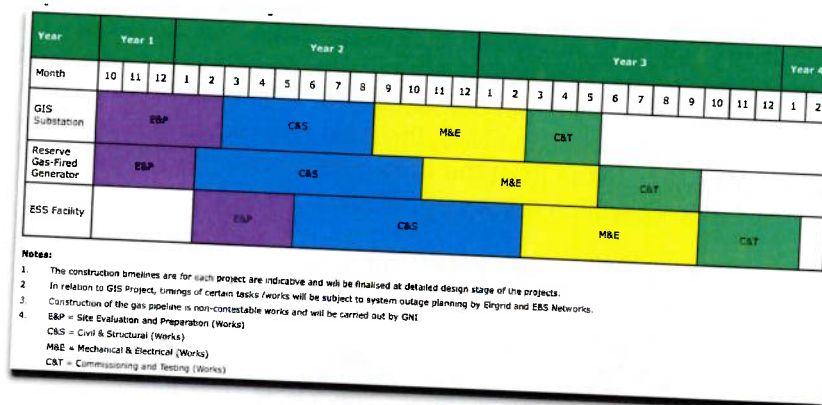
In the absence of the required data (and ignoring the omission of the new road requirements), if we are to assume that the remaining HGV estimates are sound, we now know that a minimum of 42,860 HGV deliveries is required for this project (16,800 as per the EIAR information + 26,060 shortfall in fill calculation).

42,860 HGV deliveries equate to 85,720 HGV movements as the vehicle has to come **and** go from site.

85,720 HGV movements over a 28-month programme averages at 153 HGV movements per day (85,720 / 560 working days).

That would equate to a HGV accessing or egressing the site, via a new junction on the N65, **every 3.9 minutes**. (600-minute working day / 153 HGV movements per day).

The developer's assertion that on **average** 30 HGVs will attend site each day also needs scrutiny with regards to the proposed programme of works. While the programme suggests a 28-month construction programme, in reality, the heavy construction works (C&S below) are confined to a 12-month period (month 2 year 2 until month 2 year 3).



The early stages E&P and late stages C&T works will have minimal HGV requirements. The M&E works could entail some large deliveries, but not very frequently. The C&S stage is where one would expect the majority of the HGV movements. Imported fill, disposal off site, concrete deliveries, reinforcement and steel deliveries, building cladding, drainage supplies and much more will all occur in the C&S period.

If say 90% of HGV movements occurred within this 12-month period, that would be 15,120 HGV deliveries over a 12-month period (16,800*90%). That equates to 30,240 HGV movements as the vehicle will have to access and egress the site.

There are 240 working days in a 12-month period. That equates to 63 HGV deliveries per day and 126 HGV movements in the day. That would be a HGV movement accessing and egressing the N65 and travelling through the village of Killimor **every 4-5 minutes** for a 12-month period. That is taking the developers figures at face value as per the calculation below.

33,600 HGV Movements X 0.9 (Assuming 90% deliveries in the 12-month C&S period) = 30,240 HGV Movements

30,240 HGV Movements / 240 Working Days = 126 HGV Movements per day

600 Minute (Typical 8am -6pm working day) / 126 HGV Movements = **HGV Movement every 4.76 Minutes**

However, as detailed previously, those figures appear incorrect. If the developer's figures are closer to 85,720 (using the cut & fill correction as a basis as no other data is available), **HGV movements every 1-2 minutes may occur** over this proposed 12-month period.

85,720 HGV Movements X 0.9 (Assuming 90% deliveries in the 12-month C&S period) = 77,148 HGV Movements

77,148 HGV Movements / 240 Working Days = 321 HGV Movements per day

600 Minute (Typical 8am -6pm working day) / 321 HGV Movements = **HGV Movement every 1.87 Minutes**

The above raises serious concerns about the reliability of the stated traffic impact and as a result traffic safety. It raises serious road safety concerns given how many additional turning movements would be introduced onto the N65, which already has a high collision rate. It raises serious concerns about the impact of traffic in the village of Killimor which has been overlooked in analysis to date. It also raises concerns about the accuracy of the construction programme put forward. The HGV requirements outlined above indicate that significant construction period overrun is almost certain.

Poor Local Road Network

Section 3.2.3.1 of the EIAR refers to pavement condition. While the developer refers to a simple pre and post condition survey, I would draw the planner's attention to a recent incident on the N65 within a couple of kilometres of the proposed site. After an accident which resulted in a vehicle colliding with an underpass on the N65, the road was reduced to single lane traffic for years. The below headline was taken from the Irish Independent on 28/05/26. At the time of writing, the single lane traffic operation remains in place.

Stop-go lights on Galway's N65 to be removed after two years of traffic delays



Temporary lights on N65 at Killimor.

Emma F. Smith
Local Democracy Reporter
May 2022 6:11 AM

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This should offer substantial evidence regarding the poor nature of the pavement structure. Further to this point I would cite a recent article in "TRANSFORMERS MAGAZINE | Volume 4, Issue 4" (Dated October 2017). The article focuses on the Moneypoint 400kV GIS substation, so is very comparable with the proposed Coolpowra development. The article states "The focus of this article is to outline the development of this project and its timelines along with the key technical issues unique to the Irish 400 kV system that had to be considered and managed in the selection of the transformer".

In section 2.1.3 regarding Transport and Delivery, the article states "Due to the size of the transformer – 11 m (L) x 4 m (W) x 4.7 m (H), the location of the substation and the condition of rural roads in Ireland, this transformer could not be delivered by road."

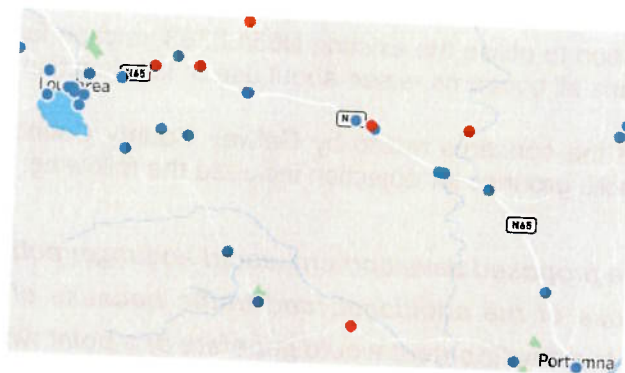
Given the N65 was partially closed for over 2 years, because of poor pavement conditions after a single car collision, one must question its ability to sustain a transformer delivery and the many other heavy deliveries required.

Road Safety History

Section 3.2.3.2 of the EIAR refers to road safety. A material increase in traffic impact is apparent for this proposed development. The developer states that "Road safety impact is typically assessed in terms of the collision record on the local road network in the vicinity of the development".

However, no such data is then offered.

The developer has confirmed that all site HGV traffic will come to site via the N65 on the Loughrea side⁴⁵. Over the past 10 years, according to the RSA Map of Collisions (extract below)⁴⁶, the N65 between Loughrea and Portumna has tragically accounted for 3 fatal collisions (red dots below) and 10 collisions resulting in serious injury (Blue dots below). That mean this stretch of the N65 suffers a statistically high number of fatal/serious collisions.



Further to the above, I would refer to section 1.5 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) which states:

"Proper planning is central to ensuring road safety: The creation of new accesses to

⁴⁵ Figure 13.1 in EIAR Addendum – Jan 2026

⁴⁶ <https://www.rsa.ie/road-safety/statistics/collisions>

and intensification of existing accesses to national roads gives rise to the generation of additional turning movements that introduce additional safety risks¹ to road users. Therefore, from a road safety perspective, planning authorities, the NRA, road authorities and the Road Safety Authority must guard against a proliferation of roadside developments accessing national roads to which speed limits greater than 50-60 kmh apply as part of the overall effort to reduce road fatalities and injuries.”

As noted in the HGV calculation section previously, if the current works programme is to be achieved, HGV turning movements every couple of minutes or less will be required.

Lack of Consultation with Appropriate Stakeholders

In its submission to Galway County Council on the 09/08/2024, the TII noted the following:

“Any proposals involving works on the National Road Network must be submitted to TII in consultation with the Roads Authority for consideration via a Design Report as detailed in TII Publications DN-GEO-03030 prior to submission of a planning application. TII has not received nor approved a design report for the proposed alterations to the National Road Network. TII advises that this issue should be resolved prior to any decision for the subject development.”

The new proposed access to the N65 does not appear to have had any prior consultation with the TII.

Continued Intention to Utilise N65/L8763 Junction

The developer's intention to utilise the existing N65/L8763 junction for the operation stage of the development means all concerns raised about use of that junction thus far, remain valid.

One should note that the concerns raised by Galway County Council previously⁴⁷, remain. Galway County Council's grounds for objection included the following:

“It is considered, the proposed development would endanger public safety by reason of traffic hazard because of the additional road traffic because of the additional traffic turning movements the development would generate at a point where the proposed site entrance on to the road network is also deemed unsatisfactory owing to the restricted forward sight distances available at the road frontage, precluding the provision, and maintenance of, a safe and satisfactory means of vehicular access.”

⁴⁷ Galway County Council's Refusal of Proposed LDES Development

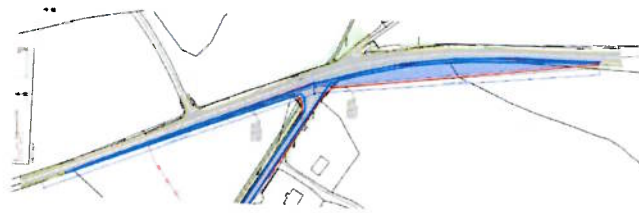
According to the developer's own EIAR⁴⁸, there will be approximately 20 operatives working on the development during the operations period of the development. That will be an additional 40 vehicle movements on the junction per day. The current rush hour usage is identified at 3 vehicles per day as per Appendix 13 of the initial 2024 EIAR. Based on a 7-person daytime operations crew, that usage will increase to at least 10 vehicles at rush hour. That will be over a 300% increase in usage of the junction at its busiest time.

It remains of note that the developer (section 3) continues to make the case that the withdrawal of landowner consent for access at the N65/L8763 junction is irrelevant as it was in place of the planning application. The developer argues that was all that was needed. It raises concerns regarding the developer's attitude towards obtaining planning permission. It appears to be one based on ticking boxes and avoiding issues on technicalities rather than considering what clearly is a large traffic safety concern.

Further to this, the developer goes on to argue⁴⁹ a number of points which create serious concerns about their approach to road safety.

- The developer's latest EIAR makes the case that sightlines at the N65/L8763 junction can still be achieved despite landowner consent for access having been withdrawn. This argument is incorrect.

Page 3-8 item (a) suggests that maintenance of hedgerows to the north of the junction will provide adequate visibility. This is demonstrably incorrect. It is probably best proven by utilising the developer's own drawing, CPA-HAL-OC-XX-DR-PL-1010D. Note the length of sightline deemed required to the north of the junction, and the land take associated with that.



The Development Management Standards which govern the Policies and Objectives of the Galway County Development Plan with regard to roads and transportation are set out in Chapter 15 and are detailed as follows:

"DM Standard 28: Sight Distances Required for Access onto National, Regional, Local and Private Roads

Vehicular entrances and exit points must be designed by the developer as part of a planning application with adequate provision for visibility so that drivers emerging from the access can enjoy good visibility of oncoming vehicles, cyclists and pedestrians. Where a new entrance is proposed, the Planning Authority must consider traffic conditions and available sight lines. Road junction visibility requirements shall comply with Geometric Design of Junctions (priority junctions,

⁴⁸ Section 13.5.1.3 of EIAR Addendum – Jan 2026

⁴⁹ Pages 3-8 & 3-9 of EIAR Addendum – Jan 2026

direct accesses, roundabouts, grade separated and compact grade separated junctions; DN-GEO-03060) for rural roads and Design Manual for Urban Roads and Streets for urban roads (including any updated/ superseding document). Where substantial works are required in order to facilitate the provision of adequate sight distances lands within the sight distance triangles shall be within the control of the applicant and shall be subject of a formal agreement with the adjacent landowner which ensures certainty that the applicant is in a position to comply with the relevant condition and or standard.

Exit Visibility Check

Visibility splays shall be measured a minimum distance of 2.4m from the edge of the carriageway ('x' distance) or as determined by Galway County Council. In limited instances this may be reduced to 2.4m and to 2.0m in difficult circumstances on urban roads.

Site visibility requirements shall be provided within the development boundary of the site or on lands in the control of the applicant or lands in public ownership. Letter of consent from adjoining property owners will be required in order to achieve sightlines, and these works to be carried out in advance of commencement of construction.

Entry Visibility Check

A vehicle turning into the proposed industrial development shall be visible to an approaching vehicle for a distance of Y in order to avoid a rear end collision.

A vehicle turning right into the proposed development shall have a forward visibility to the centre of the opposite lane for a distance of Y to ensure they can safely cross the path of an on-coming vehicle.

The Sight Distances required for Access onto National Regional and Local Roads are set out below:

Design Speed

Design Speed + Sight Distances

Design Speed and Sight Distances	Sight Distance required for the following Design Speed on the Major Road in kph						
Design Speed	100	85	70	60	50	42	30
Y Distance on Major Road	215	160	120	90	70	50	35

Table 15.3: Sight Distances required for Access onto National, Regional and Local Roads"

It is evident at the junction of N65/L8763 cannot offer unobstructed sight line of 215m in each direction without the implementation of roadside boundary amendments. The existing sight line is clearly impeded by both hedging, concrete post and rail fencing system and road signage in place to the south and north.

Refer to Photos 01 and 02 that illustrate the available sight lines from the road junction entrance. Local roadways (L8763 and L8760) that are offset from the main road (N65) provide for additional traffic at this location along the N65 route.

From Photo 01, the local road serving Capira (L-8760) is visible across the N65.

Capira (L-8760)



Photo 01: View to the south with ESB pole, concrete post and rail impeding the sight line.



Photo 02: View to the north with hedging and signage and other road furniture impeding the sight line.



Photo 03: View of road junction between N65 and L-8763



Photo 04: View to the south illustrates the curvature of the road and fence limiting the sight line from the road junction.



Photo 05: View to the north illustrates the continuous white line and road alignment.

- Page 3-8 item (b) suggests that even in the absence of sightline maintenance, the project impact would be temporary in nature and have minor traffic impact. This statement is difficult to accept. This statement is made in the knowledge that access for construction period may still be applicable. A 28-month construction period followed by decades of operations can in no way shape or form be described as short term.

- Page 3-8 item (c) suggest that the local authority has the jurisdiction to compel landowners to carry out works to achieve sightlines. One should note the available sightlines to the south of the junction as shown on the photo below.



The landowner in question can do little more to assist sightlines than what is provided. Is the developer suggesting that the land should be CPO'd by the local authority to offer sightlines? This merely adds to the obvious conclusion that the proposed site is entirely unsuitable.

- Page 3-8 section (c) goes on to state that the approval by Galway CC of an Eirgrid planning application sets a precedence for the use of the junction. Again, the disregard for traffic safety concerns is striking. Notwithstanding the in no way comparable nature of the Eirgrid project and this proposed project, any error in overlooking traffic safety concerns associated with the Eirgrid development does not set a precedence to ignore all future concerns.
- Page 3-9 section (c) concludes with citing the permission to trim hedgerows all year round if in the interest of road safety. As demonstrated by the photos above, both north and south facing at the junction, this argument does not address the substance of the concern. Hedge maintenance will in no way achieve the required sightlines.
- On page 3-9 section (d) the developer suggests the speed limit on the N65 could be reduced to 80/60kph and thus the required sightlines could be reduced. This merely highlights the inappropriateness of the proposed site location.
- Page 3-9 section (d) makes reference to section 24 of GCC's report on if planning were approved. Item 19 (iii) and (iv) of this section is of note. With regards to the junction of the N65/L8763, the developer has failed to demonstrate the consent of local landowners to achieve the required sightlines for access/egress. Such consent was withdrawn by landowners during the planning process when they learned of the developer's true intentions for the site.

Conclusions

- The proposed new entrance off the N65 is in violation of TII and Galway County Council Policy.
- The proposed new entrance off the N65 contravenes the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).
- The proposed Haul route for the project is along a route that has a statistically high fatal and/or serious collision rate.
- The proposed traffic analysis completely ignores the impact of the development on the local village of Killimor

- The stated HGV movements for the project appear to be substantially less than will be required.
- The operations phase of the development intends to utilise the N65/L8763 junction which would increase rush hour usage by over 300% and does not offer adequate sightlines. Local landowner consent to enhance sightlines is not provided.
- Advanced consultation with TII does not appear to have occurred despite TII raising this as an issue in August 2024 with the initial application.

Individually each of these would warrant refusal; together they are decisive.

Deficiencies in the Appropriate Assessment & Natura Impact Statement

An Appropriate Assessment (AA) is a rigorous ecological evaluation required by the EU Habitats Directive to determine if a proposed plan or project will adversely affect the integrity of a European protected site. A Natura Impact Statement (NIS) is a scientific report required in Ireland when an Appropriate Assessment (AA) Screening shows a proposed project or plan could potentially impact European protected habitats.

The size and location of this project necessitated an AA, after which a NIS was deemed required. Despite the two documents being prepared, key works which may impact the local environment have been overlooked. It is a fundamental error in the submission as a whole.

Project Gas Main

The latest EIAR submitted regularly refers to the project Gas Main as being a matter for Gas Networks Ireland.

13.8.1.1 Gas Pipeline Connection

As part of the Reserve Gas-Fired Generator project, natural gas will be supplied to the site from the Gas Networks Ireland (GNI) transmission system. GNI will separately manage the process of delivering the underground natural gas pipeline to the proposed site. The traffic and transport impact of the delivery of the pipeline (utility works) is considered to be negligible as any utility works of this type involving for example road crossings, would be undertaken in accordance with the terms of an agreed road opening licence, and appropriate Temporary Traffic Management, which should be designed and operated in accordance with prevailing national guidance.^[12, 13, 14]

The initial AA dated May 2024 included the following extract when referencing the proposed gas main:

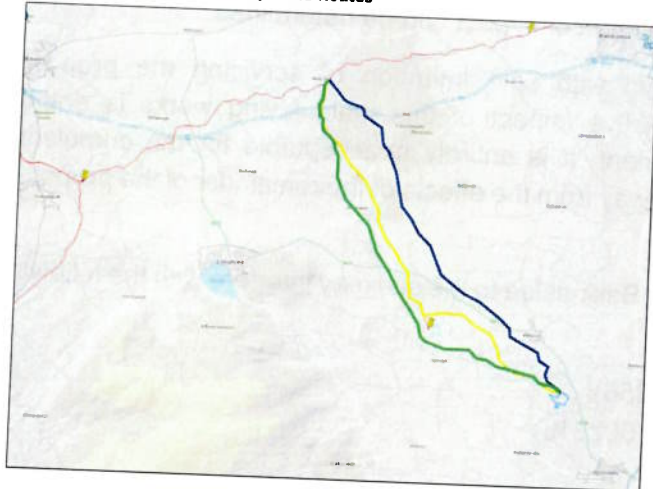
- An underground gas pipeline, designed to operate at pressures of 16bar or higher, will be established by Gas Networks Ireland (GNI) through a separate planning application.
- This pipeline will be directed to the proposed AGI at the development site from the nearest connection point on the gas transmission network.
- The selection and assessment of potential routes of the gas line to the development site will be included in EIAR which will be prepared to support the planning application(s).

This of course amounts to project splitting which is grounds for refusal in its own right. The High Court in *O'Grianna v An Bord Pleanala* [2014] IEHC 632 held that a development and its enabling connection works constitute a single project for environmental assessment purposes and cannot lawfully be split into two independent parts. The gas main here exists solely to serve the proposed development; its environmental effects must therefore be assessed as part of the same project, not deferred to a separate Gas Networks Ireland process.

Notwithstanding the project splitting, since the submission of the 2024 application, there has been extensive developments on the proposed gas main route.

In the initial EIAR, the potential gas main routes were outlined on the drawing below⁵⁰. The indicative route suggested a gas supply from the existing main in New Inn.

Figure 1.3 Indicative Gas Pipelines Routes

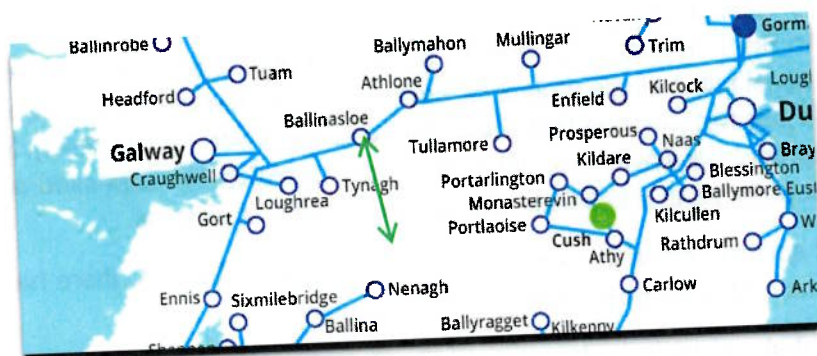


Section 7.1.1.1 of the 2024 EIAR stated the following:

The indicative route for an associated gas pipeline has been considered as part of this assessment. This will commence at New Inn, just north of the M6 Motorway and approximately 23.5 km north-west of the development site. The pipeline will be established by Gas Networks Ireland (GNI) through a separate planning application, and this will complete a full assessment of the preferred route associated full assessment.

⁵⁰ Figure 1.3 in the 2024 EIAR Submission

At the developer's request, GNI commenced a process in selecting the preferred gas main route. A public meeting was held in Kiltormor on 20/05/2025. At that public meeting, GNI explained that the preferred gas main route would now be via Ballinasloe. At that meeting, GNI confirmed that they had advanced the route selection works at the request of the developer. The developer's aim was to mitigate delays if and when planning permission was awarded. Presently, the route selection has been advanced to a stage where GNI are discussing Terms and Conditions with local landowners about laying the main through their lands. An indicative route is offered on drawing below in green arrow. The route will be approx 25km. It's indicative as the developer has not furnished updated information.



Despite all these substantial developments, the developer's latest EIAR has not in any way shape or form informed the planner of these changes. Furthermore, the proposed route is now well enough established that a full assessment of impact can be determined.

This proposed gas main would be laid with sole intention of servicing the proposed development in Coolpowra. The cumulative impact of this main laying works is entirely associated with the proposed development. It is entirely unacceptable for the cumulative impact of the gas main works to be split away from the effects of the remainder of the proposed development.

At a basic desktop level, a gas main from Ballinasloe to the site may interfere with the following SAC's:

- Ardgraique Bog (SAC Code 002356)
- Glenloughaun Esker (SAC Code 002213)

It may interfere with the following SPA's:

- River Suck Callows (SPA Code 004097)

It may interfere with the following watercourses (many other watercourses will likely be impacted):

- River Suck
- Kilcrow River
- Lawrencetown Stream
- Cloonescragh River

It may interfere with the following Natural Heritage Areas:

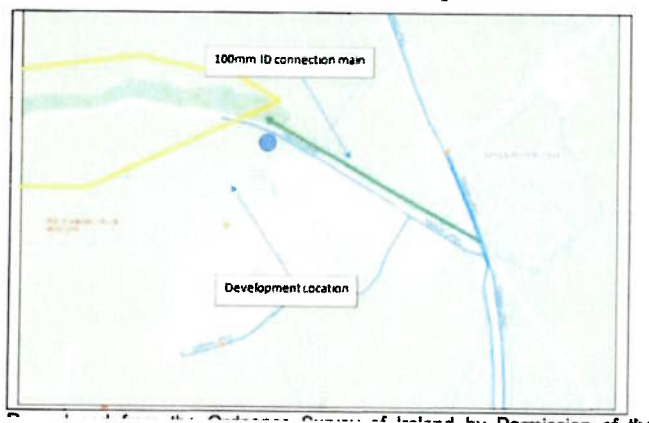
- Suck River Callows (NHA Code 000222)
- Killure Bog (NHA Code 001283)
- Ballinasloe Esker (NHA Code 001779)
- Capira/Derrew Bog (NHA Code 001240)
- Moorfield Bog (NHA 001303)
- Cloonoolish Bog (NHA Code 000249)
- Eskerboy Bog (NHA Code 001264)

The impact of this gas main will be substantial and cannot be simply swept aside in the AA or NIS by stating that GNI are going to look at it separately.

Project Watermain

As part of the latest EIAR submission, the developer has submitted attachment D which relates to a proposed watermain connection joining an existing main on the N65 to the site. The drawing provided in attachment D is shown below.

Proposed 100mm ID watermain connection shown green below



The works associated with the watermain connection have not been included in the EIAR assessment, the AA screening report or the NIS. The omission of these works is unacceptable as it will entail the following:

- Watermain connection on the N65 resulting in extensive traffic management on the N65.
- Laying of a new 100mm watermain on the L8763 for 250m. The L8763 is built upon an Esker. The proposed watermain will require excavation of this esker. The proposed watermain pass multiple residential properties and utility services on this proposed route.
- The route of the watermain within the site is not detailed. There are no details on how the main will navigate the multiple watercourses within the site that feed to Lough Derg, River Shannon etc.

Further to this, the Uisce Eireann letter attached in Attachment D refers to the existing Portumna water treatment plant which would potentially feed the site. That plant is currently at full capacity. Upgrade works are required to that plant to enable capacity to supply the site.

The environmental impact of these works has not been accounted for in the developer's submission. The cumulative impact of those works has been overlooked.