

Submission to An Coimisiún Pleanála

Coolpowra OCGT (A07.320095), BESS (ABP-320916-24) and GIS (A07.320094), Co. Galway

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I make this submission as someone who grew up, and farms within 1km of this proposed development, including lands adjacent to it. This proposed development would be in full view of everywhere I farm. As noted in my 2024 submission, I hope to build and continue my life here full time and start a family. However, this very much depends on the planner's decision. To say the least, it has been a frustrating 2 years with this dark cloud hanging over everyone.

The Commission will naturally be aware of many communities across the country voicing concerns in terms of renewable energy projects. The scale and nature of this developer's proposal is not comparable with those cases. I hope the Commission can keep this in mind in terms of the locality's worries.

My principal concern is the effect this development would have on the locality. I am particularly vulnerable to noise and raised significant flaws in their noise assessment previously and was disappointed to not see this addressed in the FI request. I farm adjacent to the applicant's lands. These are low lying wet lands with hydrological connectivity to sensitive waters and European sites. I also worry about their stream diversions and impermeable surfaces their projects would bring, and the effects these would have on my lands drainage which already struggle with the water levels (as does the applicants site). Another worry is the bias throughout the EIAR indicates to me that the developer would not admit to such shortcomings within the site.

If needed, I would request that ACP seek verification on all aspects of the applicant's EIAR. It doesn't hold to scrutiny in literally any chapter I could read in the short timeframe I had. The visual impact goes without saying. I will also add my personal experiences to the end of this submission.

For purposes of this submission, Coolpowra Flex Gen, Castlelost Flex Gen, Red Admiral DC etc. are all considered as subsidiaries / related to parent company Lumcloon Energy, who seem to have north of 30 subsidiaries / related entities per SoloCheck.ie.

False Project Rationale Presented

The developer, per response to CRU LEU consultation in 2025¹, **primarily seeks to support data centres with this Coolpowra project together with its previous Castlelost project;**

"With the intention of supporting the data centre industry

....

The construction and operation will provide direct support in providing either on site, or proximate, generation to data centres along with potential upgrades to support the authority and

¹ <https://consult.cru.ie/en/submission/cru-c38-19>

SOs, such as, long duration energy storage, synchronous condensers, and Solar PV on nearby lands.”

Please see the Irish Independent article below and note the largest recipient of capacity payments;



*“Household electricity bills are effectively subsidising data centres by hundreds of millions of euro a year ... **The largest recipient is Lumcloon Energy, which built a 275MW gas power station, for which it was awarded €364m in such payments ... In December it submitted plans to build a €1bn 250MW data centre nearby, with on-site fuel cells, solar and battery power, which would also be eligible for subsidies**”*

<https://www.independent.ie/irish-news/consumers-energy-bills-set-to-rise-further-as-more-data-centres-will-add-to-costs/a/132138868.html>

There is precedent for Coolpowra. The developer's 275MW Castlelost Gas Plant represents a similar grouping of energy assets to what the same developer proposes here at Coolpowra i.e. gas plant, BESS, synchronous condenser and GIS substation. In 2021 that proposal was put forward to Westmeath CC under the guise of security of supply and renewables support, receiving planning permission as a result. Now, 5 years on, before the project has produced a single MW to the grid, the same developer seeks to situate a 250MW data centre (Red Admiral DC) beside it, openly admitting in the FI response on that their **BESS – originally consented for Grid support in 2021 – is now repurposed to serve the Data Centre (DC)**. Even the Gas Plant will ultimately serve the DC also due to being at the same node (proximate support via location and demand at same node, as acknowledged in their EIAR; *“It is also located adjacent to the existing Castlelost Flexgen project in anticipation of CRU large energy user (LEU) policy decision”*). I ask the planning inspector to consider this precedent. In the Coolpowra EIAR, the developer talks about national need for BESS on the grid (in an unzoned, unserved area), yet at the same time they're repurposing their previously consented BESS from grid support to private large energy users². The information on this issue is outlined in greater detail within the East Galway Gas Plant Concern Group submission.

² <https://www.eplanning.ie/WestmeathCC/AppFileRefDetails/2660145/0>

BESS

This project is split from the overall development, it is not an SID and has already been refused by GCC on grounds of European Sites, roads and project splitting. Yet throughout the EIAR, the need case, alternatives etc. seem dominated by the Gas / GIS substation components. As per the FI request (FI Item 1: b: iv), this BESS warrants an EIAR consideration in its own right across all aspects (not just noise etc.), yet the developer did not do this. It hitches the BESS onto an SID application throughout the EIAR.

The developer appeal to the refusal was ambitious. On junction works they claim that they only needed landowner permission at the time of the application, and that it should stand despite the landowners withdrawing permission (as they allegedly weren't told it was for a gas plant etc., but a small solar farm). If a developer is willing to allegedly withhold information / instruct incorrect information to third parties in order to obtain consent as required for a planning application, I have to question what other shortcuts may be hidden within EIAR.

It reminds me of 2024 when the developer launched the application having conducted zero public meetings. This situation provided the community with less than 5 weeks to learn what an OCGT and BESS was, and to gain enough knowledge to submit concerns. All while living their daily lives (working, etc).

Our local TD at the time, Anne Rabbitte said at a meeting of over 400 people that she was similarly only told of a solar farm by the developer, and after she invited the developer numerous times to come and meet the community³ to no avail, she said; *"if a developer cannot come into a room to answer questions; I have to question what have they to hide"*. **To say the community are concerned about this developer, would be an understatement.**

Inconsistent BESS Description throughout

The developer went to pre-planning meetings in 2024 with the Commission discussing a 200MW BESS, the Commission decided that it did not constitute SID status and should therefore go through the local planning authority. The developer then submitted a 400MW BESS proposal to the Galway County Council, **over twice the size of the application presented to the Commission** as part of the formal pre-planning process. They did not present the correct project.

Fast forward to 2026, in the analysis of the developer's appeal of their refusal, the Commission requested an **FRMP** including combination analysis with the other proposals i.e. OCGT, Diesel tanks etc. The developer provided an in-house **FRA**. Not only did it not analysis the potential for combined effect with the other proposals – **it didn't even analyse their own BESS proposal.**

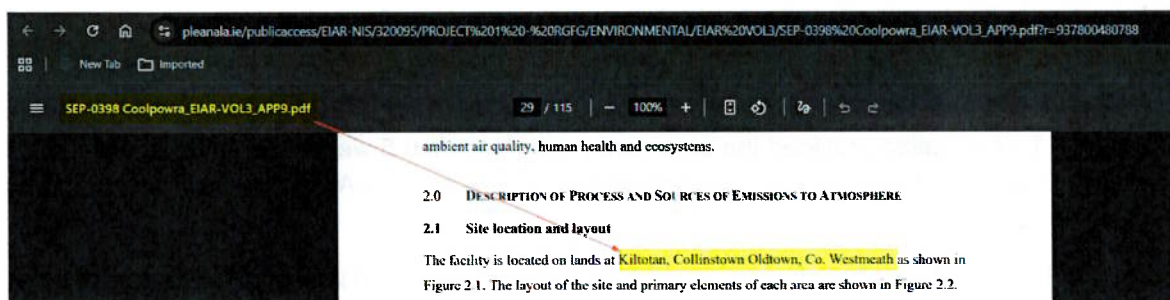
The 400MW BESS, per EIAR, consists of *"an open area battery energy storage system containing 168no. single storey battery enclosures and 56no. single storey medium voltage power station (MVPS) enclosures"*.

³ <https://www.galwaybayfm.ie/galway-bay-fm-news-desk/junior-minister-rabbitte-pushes-for-company-behind-portumna-power-generator-to-reschedule-public-consultation-167748>

The FRA assesses *"One hundred and thirty-eight (138) battery storage containers arranged in a configured layout. One hundred and thirty-eight (138) Medium Voltage Power Stations (MVPS) serving as the grid interface units."*

This misrepresentation has significant implications on the project. The Commission asked for significant FI which affects human and environmental safety, and not only was the answer incomplete, but it appears to assess an incorrect project.

I must further note, considering that I have seen copy and pasted material throughout the 2024 Coolpowra EIAR from previous Lumcloon Energy projects (e.g. Commission's website - Coolpowra EIAR-VOL3_APP9: 2.1 (site location) **refers to their previous Castlelost project, not Coolpowra**). I wonder to myself if the qualitative FRA is original, or an altered version from a project elsewhere.



Site

As a local farmer, with lands adjoining the applicant, I was shocked when I saw the scale of the application for lands that are barely suited to a house. I'm lucky if I can get into these particular lands from November to March, such is the level of flooding and poor ground, as seen below;



The surrounding areas of the applicant's lands indicate no different, as photos show below across Coolpowra, Ballynaheskeragh (where the BESS is proposed to situate) and Gortlusk;



Coolpowra (west of site)



Ballynaheskeragh and Gortlusk lands (including flooded BESS location).

To me, as a neighbouring landowner, it is madness to think an EIAR might conclude that this site is remotely suitable on environmental grounds alone. Even more so considering that no alternative sites were analysed. It seems to be a case where the developer has started with an answer (i.e. acquire lands near Oldstreet substation) and sought to fixate a narrative around it. The developer's site serves a drainage basin for 600-700 acres of the surrounding areas (Figure 8.1 in EIAR).

"Oldstreet" substation, constructed in 2001, also wasn't intended to situate here. The planning inspector might note that no such Oldstreet townland exists on these maps – only in the name carried forward by the substation. Oldstreet is further along the 400kV line to the northeast, but a Ballynaheskeragh landowner offered his land at a cheaper rate to ESB at the time and the destination subsequently changed. The remains of that landowner's house were demolished by an EirGrid project last year.

The applicant should be refused on hydrological concerns alone, including European sites (screened out against advice of hydrologists and planning authorities) and flooding. The idea that the developer also seeks to divert the Treananearla stream is of significant concern to myself and the other surrounding landowners. This diversion, together with the scale and increase of impermeable surfaces in Gortlusk/Coolpowra would render our fields untravellable for even longer periods than currently experienced.

Roads

The roads are also of particular concern. Structurally, I can't see the N65 holding the scale and frequency of traffic required, it is literally already broken 1km north of the proposed new site entrance, but the developer seems to have omitted this in the addendum.

In terms of safety grounds alone, the project is a non-runner. The local stretch of the N65 already has frequent road traffic collisions. The developer had no record of collisions in their assessment. The thoughts of an extra 500-600 peak hour vehicles joining at this point of the n65 for 6-7 years (in reality, longer) seems unimaginable and irresponsible by the developer who does not know of the history here. Then we'd see the follow up projects as seen in Castlelost. The proposed developments are impermissible in terms of the safety of road users and road structure. There is ample history of planning refusals along this N65 due to potential of creating new turning movements – even houses, not to mind the scale of proposed – and TII and Galway Roads Department have already given their verdict on this application. I request ACP to follow suit in the name of safety.

In terms of the road safety audit⁴, this page my eye;

Appendix A – TII Approval of Road Safety Audit team

From: TII Systems Notification
Sent: 05/27/2024 16:46 +00:00
To: xxxxxx@halston.ie
Subject: TII Email Agent - Coolpowra Development, N65/L8763 junction Stage 1 - Audit team & briefs approved
Importance: High

Audit team & briefs for Coolpowra Development, N65/L8763 junction Stage 1 have been approved.

⁴[https://www.pleanala.ie/publicaccess/EIAR-NIS/320095/PROJECT%201%20-%20RGFG/ENVIRONMENTAL/EIAR%20VOL3/SEP-0398%20Coolpowra EIAR-VOL3_APP13.pdf?r=506641869311](https://www.pleanala.ie/publicaccess/EIAR-NIS/320095/PROJECT%201%20-%20RGFG/ENVIRONMENTAL/EIAR%20VOL3/SEP-0398%20Coolpowra%20EIAR-VOL3_APP13.pdf?r=506641869311) (p93/95: Appendix A – TII Approval of Road Safety Audit team)

This TII approval email is reproduced in the EIAR not as a screenshot of the original with the recipient line redacted, but as retyped text with the recipient as xxxxxx@halston.ie. It seemed unusual to retype a statutory body's email for the purpose of a redaction.

The community had requested Freedom of Information for "Any and all correspondence ... between the TII and ... Halston ... between 1/1/2023 and 30/1/2026" in relation to these projects. Although that request was made primarily in connection with other roads matters, its terms would have captured the message above i.e. a communication from TII to Halston about this project within the stated period. However, it did not appear among the TII records in response.

I am not questioning the legitimacy of the road audit team, I have no reason to doubt their credentials.

I only note the apparent rush of the developer's at the time together with this email not appearing on TII's records. That absence may be no more than an oversight, or may reflect that an automated system notification was not retained among the correspondence searched. But if I were redacting a statutory body's email, I would do it in the normal way; the point seemed worth drawing to the Commission's attention.

My Own Experiences

As said in the outset, I am local to this proposed site. And extremely worried for my future. I see what is going on in Castlelost. It seems formulaic. And could well be the precedent.

I have great sympathy for you, the planning inspector, or inspectors if there are three of you, that have to read through Halston's material. And if it's any consolation, at least you don't have to do it for free like I do. I get asked most days how's the situation going with the gas plant, and it's hard to provide them with legitimate context considering the mirage of an EIAR we've been provided with twice now, when every action by the developer outside of it points towards ulterior motives.

Locally I see the developer buying all the land from people who happen to live more than an hour away, while local landowners stand strong. It gives a vulnerable, helpless feeling to those who live locally, none of which want this developer near them. Yet the developer defends the land-take in the addendum, somehow specifying that this project is site specific. On a site that literally cannot accommodate their project either technically or physically. This case is a prime example of why developers should adhere to plan-led development, Lumcloon Energy have amassed north of 270 acres while every roads policy says they cannot build here. That's before environment and need case. I hope for other communities that some regulation to prevent this happening can be brought in in future.

I see the bias throughout the EIAR, written by Nigel Ream's business associate; Colm Staunton.

I see plenty of deferrals throughout the document, as well as FI responses that are based on analyses taken before the FI was asked.

I see FI responses claiming a required contact didn't pick up the phone yet the response was submitted five months ahead of schedule.

I see material omissions in terms of HGV numbers, road investigations, the technicalities of the project delivery as set out by EirGrid, hydrological connections, AA and NIS screening.

They're all discussed in the group FI submission I have read. And I encourage the planning inspectors to pay careful attention to it as in many cases it has more knowledge about the local environment than the developer seems to. One technical expert I was talking to said that the EIAR was the worst they had ever come across – and they've seen a lot of them. I should be confident in that case, but then I don't know how the planning system really works.

I see the EIAR claiming that the visual impact will be significant "but localised" – as if that makes it ok.

I see the EIAR claiming that this project **is beneficial to the climate** as it emits 900,000 T CO₂e/yr (~30% of the 2030 electricity sectoral limit) over me for the next 25-30 years.

I see glaringly obvious, undealt with, favourable portrayals of the project. To my knowledge the gas plant has not developed chameleon technology since the original EIAR;

2024 EIAR Cover (& Visual Impact Assessments);



2026 Addendum Cover;



What I didn't see across the thousands of pages within the EIAR were things like;

- Transport plans and road structure assessments for the 550-Tonne GIS transformer in the EIAR, deemed "undeliverable by Irish roads" by a senior ESB engineer.
- Plans to traverse Killimor village with HGVs
- Plans to traverse the N65 and L8763. They actually seem to be suggesting both options are doable, yet can't seem to settle on one.
- The actual HGV total numbers
- Confirmation whether the construction access road is temporary
- How the developer will cope with the 1,000MW limit on Oldstreet substation, hence EirGrid's rejection of them in the SEM.
- An email to the Galway County Council fire department

- An AA & NIS as requested by ACP
- Alternative site analysis
- Complete COMAH
- The gas pipeline's (a) new route and (b) its EIAR assessment and (c) its planning application
- The AIS – GIS connection

What has gone on in Coolpowra is difficult to comprehend. **We are talking about a developer who defended their proposal's noise to a local by saying "you won't hear it if you're inside". Also "if we damage your well, we'll fix up with you".**

The developer was in the high court taking on EirGrid and the CRU in late 2024. One of the issues was the gas pipeline cannot be constructed within a 4-year timeframe. A few months later, the locality get notice that **GNI** is hosting a public consultation in Kiltormer Community Hall in May of 2025. Kiltormer is not near Coolpowra. And it's also not near the pipeline route shown in the 2024 EIAR, but it is now because the route has changed from New Inn to Ballinasloe. **Yet it's not in the addendum.**

It was a consultation with plenty of GNI stations. And one Lumcloon Energy station down the back with two staff. They weren't advertised, but it was the first time some of the locality got the opportunity to see some of them, one year after they submitted the project and refused to engage with us. I talked to them for most of the night. Everything was cordial at both ends. My observations are below;

Firstly I asked why here, why now, one year after the application. The representative was surprisingly open. He said **GNI wanted nothing to do this project. That they had to pay them to conduct the study / routes. And that they (GNI) put a condition that Lumcloon Energy must be in attendance for any GNI public consultation events.**

So in essence, Lumcloon Energy were only there because GNI made them.

Everyone that came up to them asking why, the answer was 2GW. I asked what's the progress on this target. They said zero. I asked about your own Castelost 275MW plant in this context, they went silent. An awkward, eternal silence until the next question would break it. I asked about the other plants in the planning pipeline and EirGrid's adequacy assessments, they went silent again. I just took it that the answer to this question wasn't rehearsed, and moved on. Yet when anyone else came over to ask why a massive gas plant in East Galway, the answer remained *"2GW / the country won't be able to put the kettle on"*. Literally after ignoring that there could be other projects in the pipeline, including their own.

Any time anyone put some knowledge to them, they laughed. I asked about Vitol Energy being the majority shareholder of their Castleost Flex Gen project, and potentially this one. They just laughed and said *"someone's been reading up on us"*. Another person asked what is the plan if

they got permission for the gas plant, and if it is data centres – the developer representative laughed and said “*one thing at a time*”.

One of them said they saw a submission claiming they could see the plant from a significant distance away, so he pinpointed the map, worked out the trajectories and technicalities and eventually determined that they could not see it. Looking back, it's funny that they would undertake a trivial solo task such as that, yet fail to contact someone ACP specifically requested as they didn't answer the phone.

The developer talks in the EIAR about their project bringing people to the local area. There was a house for sale recently in the Coolpowra locality. Someone from a different county bought it for north of EUR 300,000. They got in contact with the locality about the gas plant, as they only heard about it after going “sale agreed”. One month later the house was back on the market for EUR 270,000. I know people here who had planned on either building or buying, one of which literally works in the energy industry, and now will not situate here due to the potential of living under Lumcloon Energy's shadow.

Near the end of the evening, one of the developer representatives, a senior figure, was speaking with me and a neighbour, and made what was, to my mind, the most significant information of the night. He said “*look, it's a speculative project, we'll just see what happens*”. And therein lies my frustration when I see the Alternative Sites FI request. I know the truth. The developer knows the truth. Going by the question I think the Commission knows the truth. Alas it's all allegations on paper.

This project would decimate the community in the long run. There is no other way of putting it. No one here wants this. The need case has dwindled. The developer is writing to CRU about supporting data centres. And **I know** that it's a speculative project straight from the developer's mouth, yet have to read thousands of pages written to the Commission trying to pretend that it's not.

On a final note. I believe the developer sued the country's TSO and Energy Regulator in the time since the original application went in;

<https://www.businesspost.ie/news/energy-firms-sue-eirgrid-and-energy-regulator-after-projects-worth-e1bn-locked-out-of-auction/>

It isn't the first time it's crossed the mind either;

<https://www.irishtimes.com/business/energy-and-resources/developer-lumcloon-threatens-legal-action-against-eirgrid-1.1506518>

Incidentally, the developer never built that gas plant, I wonder why the applicant didn't consider retrying where they already had permission for a gas plant.