

An Coimisiún Pleanála- Case reference: BESS/Battery Energy Storage System PL07.320916

Observation Submitted By: Shane and Sinead Madden

Observers Address: Coolpowra, Portumna, Ballinasloe,
Co. Galway. H53KV91

Date: June 2026

We wish to formally object to the planning application file reference number PL07.320916, we live less than 300m from the proposed site and strongly object to this development. The grounds of objection are summarised below.

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:

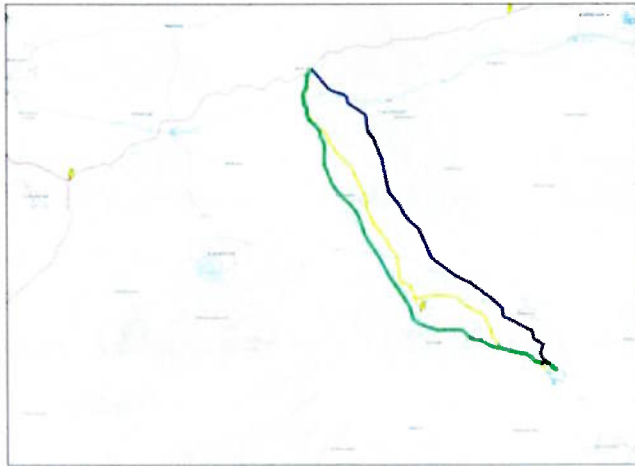
- **An underground gas pipeline, designed to operate at pressures of 16bar or higher, will be established by Gas Networks Ireland (GNI) through a separate planning application.**
- **This pipeline will be directed to the proposed AGI at the development site from the nearest connection point on the gas 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 Pleanála* [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 below¹. The indicative route suggested a gas supply from the existing main in New Inn.

Figure 1.3 Indicative Gas Pipelines Routes



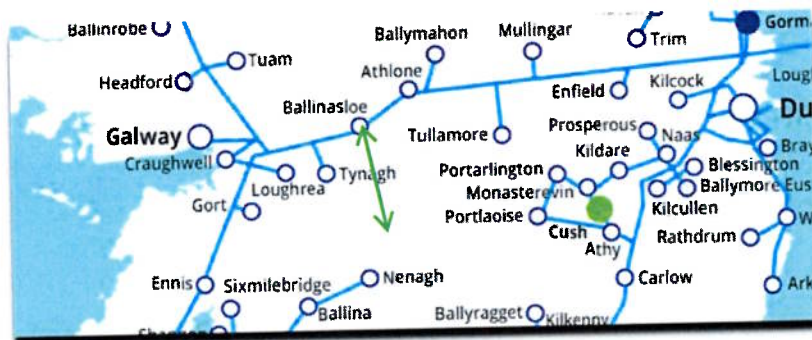
Section 7.1.1.1 of the 2024 EIAR stated the following:

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.

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.

¹ Figure 1.3 in the 2024 EIAR Submission



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

- Ardgrigue 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

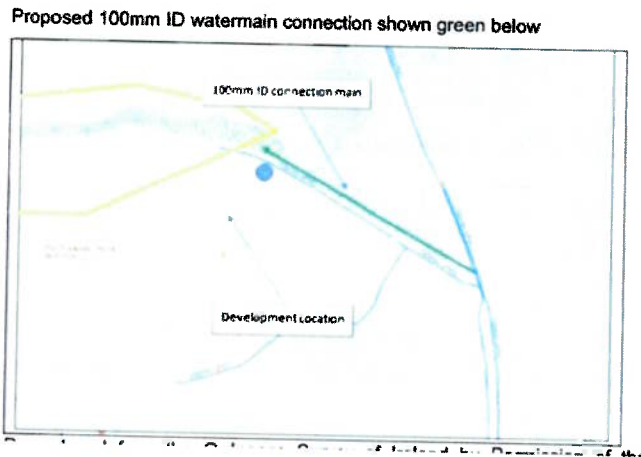
It may interfere with the following Natural Heritage Areas:

- 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.



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.

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.

Road Network

As per refusal by Galway County Council planning reference number 24/60845 July 2024, stated the following:

"Having regard to National Policy and the existing local public road network intended to serve the proposed development, whilst including considerations of public road capacity, width and alignment, the surface or structural condition of the pavement, and future maintenance requirements, and in the absence of complete and sufficient details pertaining to the same including relevant third party agreements and consents, that would render the network, or any part of it, unsuitable to carry the additional road traffic. It is considered, the proposed development would endanger public safety by reason of traffic hazard 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. It is further considered the scale of remedial works required to provide public road widening and acquired sightlines from the proposed entrance of the development site onto the L-8763 and as proposed from the N65 Junction, would constitute significant roadside intervention on National and Local routes in contravention of DM Standard 28, DM standard 33a and Policy Objective NR 1, NNR 2 of the Galway County Development Plan 2022 – 2028, which seeks to safeguard national, regional and local roads. It is therefore considered that the proposed development would be at variance with National Roads Policy in relation to control of development on/affecting national roads and would interfere with the safety and free flow of traffic and endanger public safety by reason of traffic hazard, obstruction of road users or otherwise and therefore would be contrary to the proper planning and sustainable development of the area"

We are in complete agreement with above refusal reason and are not satisfied that additional information submitted by the applicant mitigates against the refusal reasons given.

Environmental Concerns:

As per refusal by Galway County Council planning reference number 24/60845 July 2024, stated the following:

"Based on the information received with the planning application, and noting the project characteristics, site topography and direct hydrological link to the Lough Derg, North-East Shore SAC (Site Code: 002241) and Lough Derg (Shannon) SPA (Site Code: 004058), and with particular concern in relation to drainage and surface water it is considered that the development has, in the absence of satisfactory evidence to the contrary, the potential to adversely affect the qualifying interests and conservation objectives of the Lough Derg, North-East Shore SAC (Site Code: 002241) and Lough Derg (Shannon) SPA (Site Code: 004058) and would therefore materially contravene Policy Objective NHB 1 Natural Heritage and Biodiversity of Designated Sites, Habitats and Species, Policy Objective NHB 2 European Sites and Appropriate Assessment, and Policy Objective WR 1 Water Resources, and DM Standard 50 Environmental Assessments of the Galway County Development Plan 2022-2028 and would therefore be contrary to the proper planning and sustainable development of the area. Therefore, the Planning Authority cannot be certain that the project will not adversely affect the integrity of the Lough Derg, North-East Shore SAC and Lough Derg (Shannon) SPA, in light of its conservation objectives which would contravene materially policy objectives and a development

management standard contained in the Galway County Development Plan 2022-2028 and would be contrary to the proper planning and sustainable development of the area."

With all of the inaccuracies that we as lay people can find within this amended EIAR, considering that we have no expertise in this area, it raises great concern with us that proper environmental practices will be adhered to should this project get the go ahead as one of the closest receptors to this site.

We are dependant on you as An Coimisiún Pleanála, on examination of same to reject this project in its entirety.

Kind Regards,

Shane and Sinead Madden