

+353 (0)49 555 5050

Clondargan, Stradone, Cavan, H12 NV06, Ireland

www.galetechenergyservices.com



An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

29 May 2026
Our Ref: 277GLE
Your Ref: ACP-323401-25

Dear Sir/Madam,

Location: Curraduff, Glenlara, Newmarket, County Cork.

Re: A 10-year planning permission and a 35-year operational life for an energy storage facility comprising (i) energy storage containers installed on concrete plinths; (ii) electrical inverters and transformers; (iii) underground electrical and communications cabling; (iv) the upgrade of an existing agricultural entrance accessed via an existing shared access point from the L5039; (v) on-site access track; (vi) security fencing and security gates; (vii) pole-mounted security cameras; and (viii) all associated and ancillary site development, landscaping and reinstatement works. This planning application is accompanied by a Natura Impact Statement

1.0 INTRODUCTION

We refer to your notifications dated 3 February 2026 and 16 April 2026 pursuant to An Coimisiún Pleanála Reference ABP-323401-25 and Section 132 of the *Planning and Development Act 2000 (as amended)*. On behalf of Neoen Renewables Ireland Limited ('the Applicant'), please find below responses to the matters raised therein.

As set out in the Planning & Environmental Report (P&ER; Section 2.2.4) which accompanied the planning application for the proposed development, the specific manufacturer of the energy storage system (ESS) has not yet been chosen and the selected manufacturer will be subject to a post-consent competitive procurement process. Accordingly, it is not possible to confirm precise details of the ESS infrastructure and related safety procedures. However, in order to enable a robust and site-specific assessment of the matters raised by the Commission, the Applicant has selected ESS infrastructure manufactured by Huawei as 'candidate infrastructure' which may be installed at the proposed development site. Technical specifications; including battery module composition and relevant certification; of the candidate infrastructure is enclosed at **Annex 1**.

Accordingly, the layout of ESS infrastructure within the compound has been revised to account for the candidate infrastructure and a set of revised plans are enclosed at **Annex 2**. The revised layout provides for:-

- 1) A reduction in the number of ESS containers from seventy-two (72) to forty-eight (48);
- 2) The redesign of ESS containers from 2.9m (height), 6.1m (length) and 2.5m (width) to 2.9m (height), 6.1m (length) and 2.4m (width);

- 3) A reduction in the height of the concrete plinth upon which ESS containers are installed from 0.8m to 0.4m;
- 4) The redesign of the power conversion system to a containerised system with containers (sixteen (16)) measuring 2.9m (height), 6.1m (length) and 2.4m (width);
- 5) The installation of an above-ground holding tank for firefighting water with a diameter of 12m and a height of 2.4m;
- 6) The installation of two (2) fire hydrants; and,
- 7) The redesign of the surface water detention basin to ensure appropriate retention of any contaminated firewater runoff.

The drawings enclosed at **Annex 2** provide for updates to the Site Location Map (Figure 2), Site Layout Map Drawing Key (Figure 3) and Site Layout Map 2 of 2 (Figure 4.02) of the planning application drawings submitted to Cork County Council; while Figure 5.04 of **Annex 2** supersedes Figure 5.04 and Figure 5.05 of the original planning application drawings. All other drawings submitted to Cork County Council remain valid and should therefore be read in conjunction with **Annex 2**.

It should be noted that further immaterial deviations to the precise layout of infrastructure may arise through the detailed design and procurement processes; however, any deviations to the layout and infrastructure to be installed must, as a minimum, comply with the mitigations measures, environmental standards and fire safety requirements set out within the P&ER, Natural Impact Statement (NIS) and the assessments annexed hereto.

2.0 ITEM 1

Further detail is required in the form of a Fire Risk Management Plan (FRMP). The FRMP should be prepared by a suitably qualified technical expert / advisor and set out preventative measures for potential causes of fire hazard and evaluate the associated risk of same. It should also include specific measures to reduce the risk of a fire occurring onsite including, for example, the safe storage and maintenance of flammable substances and materials, the intended method(s) of extinguishment, and the installation of fire safety equipment and apparatus (fire alarms, detection systems, methods of suppression, etc.). The FRMP should explicitly demonstrate how the potential risk of a fire occurring on the site would be addressed and minimised.

A Fire Risk Management Plan (FRMP) has been prepared by Gexcon and is enclosed at **Annex 3**. It should be noted that the FRMP has been prepared in outline format and is a live document which will be further developed following the detailed design process and prior to the commencement of construction.

The FRMP sets out *inter alia* the likely causes of a fire incident at the proposed development site, safety objectives, relevant design standards, design measures, and fire detection and suppression measures. With the implementation of the measures set out within the FRMP, it is assessed that the likelihood of a fire event or incident will be significantly reduced; while, should an event occur, appropriate response strategies are provided for therein and the accompanying Emergency Response Plan (see below).

3.0 ITEM 2

Further detail is required in the form of an Emergency Response Plan (ERP). The ERP

should be prepared by a suitably qualified technical expert / advisor. It should outline a reactive strategy with clear procedures to follow in the event of a fire, detailing the specific actions the facility operator must take to respond quickly and effectively in the event of fire or similar emergency.

An Emergency Response Plan (ERP) has been prepared by Gexcon and is enclosed at **Annex 4**. The ERP sets out *inter alia* emergency measures inherent to the project design; emergency response procedures; roles and responsibilities in the event of an emergency; key personnel contact details; and contingency plans for fire, chemical and oil spills, severe weather and unauthorised access.

It should be noted that the ERP is a live document and will be updated by the Facility Manager (the Applicant), the Remote Systems Operator and the Site Incident Controller prior to the commencement of operations. The ERP will also be regularly reviewed and updated to ensure that emergency response procedures and key personnel contact details remain current and correct.

4.0 ITEM 3

(a) (i) Details of the quantity and confirmation of how firefighting water will be sourced and/or retained within the proposed development site. This should be to the UK National Fire Chief's Council (NFCC) Grid Scale Battery Energy Storage System Planning - Guidance for the FRS (Fire & Rescue Services), which states that provision should be made for BESS units to provide 1,900 litres of water for 2 hours, as a minimum unless it can be demonstrated that another amount is appropriate. Revised drawings and necessary agreements be provided to demonstrate feasibility of same.

In accordance with the UK National Fire Chiefs Council (NFCC) *Grid Scale Battery Energy Storage System Planning - Guidance for the FRS (Fire & Rescue Services)*, a firefighting water holding tank has been incorporated into the design of the proposed development and its location is illustrated at **Annex 2**. The holding tank has a capacity of 271m³ and will supply two (2) fire hydrants to be installed within the ESS compound.

The tank has been designed to ensure sufficient capacity is available for two (2) hydrants to be operated at a time and it can be confirmed that a minimum provision of 1,900-litres of water for 2-hours is available. The proposed development will, therefore, be supported by a dedicated stored on-site water supply which complies in full with the requirements of the NFCC; and the proposed development is not dependent on an external water supply in the event of a fire or emergency incident.

The holding tank is proposed to be supplied by either a supply from the public water network or an on-site private groundwater abstraction (i.e. a bored well). A pre-connection enquiry has been submitted to Uisce Éireann to establish the feasibility of a connection to the public water supply. Subject to confirmation of availability, a connection to the public network is the preferred method of supplying the firefighting water holding tank. In the event that a connection is not available, it is proposed to establish a private borewell within the proposed development site. A groundwater abstraction feasibility assessment has been undertaken (Appendix E of **Annex 5**) and concludes that the abstraction of water from the underlying aquifer is likely to be viable and would represent an appropriate means of supplying and replenishing the firefighting water holding tank. The precise means of supplying firefighting water to the proposed development site will be confirmed as part of the detailed design process to be undertaken prior to the commencement of development.

Further details of the water supply proposals are provided at **Annex 5**.

(b) (i) The applicant shall submit a detailed methodology for fire water storage management along with any proposed mitigation measures (e.g. Drainage systems, interceptors, bunded lagoons, etc). Such measures shall be included in the ERP, as referred to in Item 3.

Details of the firewater containment measures are provided at Section 4.3 of **Annex 5** and we refer the Commission to same.

In summary, in the event of a fire incident within the ESS compound, contaminated firewater will be directed to filter drains installed within the compound which will direct runoff to the attenuation/detention basin. An impermeable liner will be installed beneath the compound thus ensuring that contaminants cannot infiltrate into the underlying soils. The attenuation/detention basin will, similarly, be lined with an impermeable membrane which will prevent infiltration of any contaminated runoff to ground or to the natural drainage network. A pollution control shut-off valve will be installed at the outfall of the attenuation/detention basin and will activate (close) should a fire incident occur thus ensuring that no contaminated runoff discharges from the proposed development site.

The available containment volume within the ESS compound sub-base and attenuation/detention basin; each of which, as above, will be lined to retain all firewater; exceeds the firewater retention requirements thereby ensuring that firewater can be fully retained and subsequently removed from site by an appropriate licensed contractor.

Finally, we can confirm that the surface water/drainage measures set out at **Annex 5** have been incorporated, in full, within the ERP at **Annex 4**.

(ii) Having regard to the need for large quantities of water in the event of a fire, the potential impacts and effects of contaminated fire water run-off on ground and surface water bodies requires full consideration in both the planning and environmental assessment, and in the AA Screening and, if determined to be required a Natura Impact Statement (NIS).

A revised Natura Impact Statement (NIS) has been prepared taking into account the revised project design as described above and the revisions to the surface water/drainage management system. The NIS, enclosed at **Annex 6**, concludes that the proposed development, either alone or in combination with other plans or projects, will not undermine the conservation objectives of any Natura 2000 site or have an adverse effect on the integrity of any Natura 2000 site.

Having regard to the revised project design and revised surface water/drainage proposals, the following sections address the environmental topics assessed as being influenced by the revised design proposals. The following sections are supplementary to the P&ER submitted with the planning applications and the Applicant's response to the request for further information (RFI) and should be read in conjunction with the aforementioned assessments and reports.

Population & Human Health

Construction Phase

Notwithstanding the revised design proposals; construction methods and techniques will remain almost identical to those described in the P&ER and no significant effects

are assessed as likely.

Operation Phase

The revised project design is not assessed as likely to give rise to any significant effects on population and human health during the operation phase. In the first instance, the procedures and protocols set out in the FRMP and ERP will ensure the appropriate management of any incidents which may occur at the proposed development site thus avoiding significant risks to the safety of on-site personnel and the wider community. Moreover, the revised surface water and drainage management proposals will ensure that any contaminants arising in the event of an incident will be fully detained on-site and do not pose a risk to ground or surface waters.

It is further assessed that the revised project design will have no effect on the assessment conducted within the P&ER in respect of adherence to health & safety standards, electromagnetic emissions, relevance of the SEVESO III Directive (2012/18/EU) and the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations (S.I. No. 209 of 2015), and establishment of a community benefit fund.

Decommissioning Phase

The revised project design and drainage management proposals do not affect the assessment undertaken in respect of the decommissioning phase. However, it should be noted that the drainage management proposals set out at **Annex 5** will continue to operate during the decommissioning phase thus ensuring that any runoff from the ESS compound will be appropriately attenuated and treated prior to discharge (or removal, as required).

Cumulative Effects

The project design and drainage management proposals are not assessed as giving rise to likely cumulative effects with other existing, permitted or proposed developments.

Biodiversity

Construction Phase

Notwithstanding the revised design proposals; the footprint of the proposed development is largely unchanged and construction methods and techniques will remain almost identical to those described in the P&ER. It is proposed to increase the size of the attenuation/detention basin which will result in an increased loss of habitats; however, given that the affected lands currently comprise improved agricultural grassland, significant effects are not assessed as likely. As a consequence, it is assessed that there is no likelihood of significant effects on habitats, birds, bats, mammals and aquatic species.

Operation Phase

During operations, the revised drainage management proposals will increase the level of protection afforded to downstream ecological receptors and, particularly, designated nature conservation sites and aquatic species. These design proposals; together with the mitigation measures set out in the P&ER, will ensure that there is no risk of a deterioration of water quality in downstream waters. Accordingly, significant

effects are not assessed as likely.

Decommissioning Phase

The revised project design and drainage management proposals do not affect the assessment undertaken in the P&ER. However, it should be noted that the drainage management proposals will continue to operate during the decommissioning phase thus ensuring that any runoff from the ESS compound will be appropriately attenuated and treated prior to discharge (or removal, as required). Therefore, significant effects on land and soil during this phase are not assessed as likely.

Cumulative Effects

The project design and drainage management proposals are not assessed as giving rise to likely cumulative effects with other existing, permitted or proposed developments.

Land & Soil

Construction Phase

Notwithstanding the revised design proposals; the footprint of the proposed development is largely unchanged and construction methods and techniques will remain almost identical to those described in the P&ER. It should be noted that the size of the attenuation/detention pond has been increased, to ensure appropriate storage of potentially contaminated firewater runoff, which will result in increased excavations and an increase in the generation of excavated material. However, with the implementation of all mitigation measures set out in the P&ER (Section 4.3.4 thereof), it is assessed that there is no likelihood of significant effects on land and soil.

Operation Phase

During operations, the revised drainage management proposals will increase the level of protection afforded to the geological environment. As described above, an impermeable liner will be installed beneath the ESS compound (i.e. below the compacted aggregates) such that all incidental rainfall, surface water runoff and potentially contaminated firewater is contained within the site and directed towards the attenuation/detention basin which will be similarly lined. As a consequence, there will be no infiltration of ground of any untreated runoff. Accordingly, significant effects are not assessed as likely.

Decommissioning Phase

The revised project design and drainage management proposals do not affect the assessment undertaken in the P&ER. However, it should be noted that the drainage management proposals will continue to operate during the decommissioning phase thus ensuring that any runoff from the ESS compound will be appropriately attenuated and treated prior to discharge (or removal, as required). Therefore, significant effects on land and soil during this phase are not assessed as likely.

Cumulative Effects

It is assessed that the project design and drainage management proposals provide an increased level of protection to land and soils and further reduce the likelihood of cumulative effects with other existing, permitted or proposed developments. Overall, significant cumulative effects are not assessed as likely.

Water

A revised Hydrological/Hydrogeological Review & Drainage Impact Assessment has been prepared (refer to **Annex 7**) and assesses the revised project design, incorporates the revised drainage proposals and includes a Water Framework Directive Compliance Assessment. The assessment should also be read in conjunction with the Drainage Strategy at **Annex 5**. In summary, it is assessed that the proposed development will not result in a likely significant effect on water or the hydrological/hydrogeological environment; will not result in a deterioration of the status of any water body; and will not jeopardise the attainment of a 'Good' status by any water body, in accordance with the requirements of the Water Framework Directive (2000/60/EC).

Air Quality & Climate

Construction Phase

Notwithstanding the revised design proposals; construction methods and techniques and the requirement for imported construction materials will remain largely unaltered to those described in the P&ER. As a consequence, it is assessed that there is no likelihood of significant effects on air quality or climate.

Operation Phase

Similarly, the revised proposals will have no effect on the likelihood of effects during the operation phase.

Decommissioning Phase

The revised project design proposals do not affect the assessment undertaken in the P&ER.

Cumulative Effects

The revised project design proposals do not affect the assessment undertaken in the P&ER.

Landscape

Construction Phase

Notwithstanding the revised design proposals; the footprint of the proposed development is largely unchanged and construction methods and techniques will remain almost identical to those described in the P&ER. While the proposed increased size of the attenuation/detention basin will result in additional effects on the landscape (i.e. excavations); the effects will be extremely localised and are not likely to be perceptible beyond the proposed development site. As a consequence, it is assessed that there is no likelihood of significant effects on the landscape.

Operation Phase

The revised project design; particularly in respect of the reduced number of ESS containers and the revised design of the ESS containers and inverter/transformer containers; is not assessed as likely to have a significant effect on the landscape. It should be reiterated that the revised design does not alter the size or siting of the ESS compound which is cut into the existing terrain and, as illustrated in the photomontages submitted with the P&ER and in response to the Applicant's RFI

response, is largely imperceptible from viewpoints in the surrounding landscape.

Given the extremely minor nature of the revised design proposals and the nature of the proposed development site, it is assessed that the assessment conducted in the P&ER and RFI response remains valid and correct, and significant effects are not likely.

Decommissioning Phase

The revised project design proposals do not affect the assessment undertaken in the P&ER.

Cumulative Effects

The project design and drainage management proposals are not assessed as giving rise to likely cumulative effects with other existing, permitted or proposed developments.

Cultural Heritage

Construction Phase

Notwithstanding the revised design proposals; the footprint of the proposed development is largely unchanged and construction methods and techniques will remain almost identical to those described in the P&ER. It should be noted that the size of the attenuation/detention pond has been increased to ensure appropriate storage of potentially contaminated firewater runoff. However, with the implementation of all mitigation measures set out in the P&ER (Section 4.8 and Annex 7 thereof), it is assessed that there is no likelihood of significant effects on cultural heritage.

Operation Phase

During operations, significant effects on cultural heritage are not assessed as likely.

Decommissioning Phase

The revised project design proposals do not affect the assessment undertaken in the P&ER.

Cumulative Effects

The project design and drainage management proposals are not assessed as giving rise to likely cumulative effects with other existing, permitted or proposed developments.

Noise & Vibration

Construction Phase

Notwithstanding the revised design proposals; construction methods and techniques will be identical to those described in the P&ER. Accordingly, the assessment undertaken at Section 4.8 (and Annex 8) of the P&ER remains valid and significant effects are not likely to be experienced at any receptor.

Operation Phase

As described above, candidate infrastructure has been selected as the basis for the revised project design and for the assessment of fire safety protocols. Sound power

data for this candidate infrastructure has also been assessed in the context of the noise assessments carried out in the P&ER and Applicant's RFI response; and the following should be read in conjunction with those assessments.

The assessments in the P&ER and RFI response were undertaken having regard to the implementation of appropriate noise limits adopted from the World Health Organisation's (WHO) *Guidelines on community noise (1999)* and the Environmental Protection Agency's (EPA) *NG4 Guidance note for noise: licence applications, surveys and assessments in relation to scheduled activities (2016)*. The assessments concluded that, during operations, noise emissions arising from the proposed development would "comfortably comply with EPA criteria at surrounding dwellings" and that "noise levels will be entirely satisfactory with respect to guidance issued by the EPA and the WHO...".

The revised project design provides for a reduction in the number of ESS containers; from seventy-two (72) to forty-eight (48); and an increase in the number of inverter/transformer structures; from six (6) power conversion systems to sixteen (16) inverter/transformer containers. It is also noted that the sound power data of the candidate infrastructure indicates that noise emissions from this equipment is louder than that utilised in the assessment in the P&ER and RFI response. However, following assessment; and confirmation that the infrastructure will operate at 60% load during daytime hours and 30% during nighttime hours as set out in the RFI response; it is assessed that noise levels will remain below the EPA noise criteria/limits, as set out at Table 2 of Annex 8 of the P&ER, and the WHO guidance.

Accordingly, it is assessed that the proposed development will not result in any likely significant effects at residential dwellings or other receptors.

Decommissioning Phase

The revised project design proposals do not affect the assessment undertaken in the P&ER.

Cumulative Effects

It is assessed that noise levels arising from the proposed development and other existing, permitted and proposed developments; including the future connection to the national electricity network; will comply with the EPA noise criteria/limits and that significant effects are not likely to be experienced at any residential dwelling or other receptor.

Material Assets

Traffic & Transport

Construction Phase

The revised project design will reduce the number of ESS containers (from seventy-two (72) to forty-eight (48)) resulting in a reduced number of consequential heavy-good vehicle (HGV) deliveries. The design changes arising from the alteration from power conversion systems to containerised inverters/transformers will result in a marginal reduction of four (4) HGV deliveries. The project design is not assessed as resulting in any other notable alteration to traffic generation during the construction phase and, accordingly, it is assessed that the assessment of the P&ER remains valid and that there will be no likely significant effects on transport and access during construction.

Operation Phase

The revised project design is not assessed as likely to have any effect on traffic and transport during the operation phase.

Decommissioning Phase

Similar to the construction phase, the revised project design is likely to marginally reduce the volume of HGV movements during the decommissioning phase; however, significant effects continue to be assessed as unlikely.

Cumulative Effects

The revised project design is not assessed as likely to result in cumulative effects with other existing, permitted or proposed developments.

Agriculture

Construction Phase

Notwithstanding the revised design proposals; the footprint of the proposed development is largely unchanged and construction methods and techniques will remain almost identical to those described in the P&ER. While the size of the attenuation/detention pond has been increased, which will result in a marginal increase in the footprint of the proposed development, this area was proposed to be fenced off from the remainder of the landholding and the increased footprint will not further increase the loss of land to agricultural activities.

Operation Phase

The revised design proposals will have no effect on agriculture during the operation phase.

Decommissioning Phase

The revised design proposals will have no effect on agriculture during the operation phase.

Cumulative Effects

The revised project design is not assessed as likely to result in cumulative effects with other existing, permitted or proposed developments.

Summary

The assessments undertaken in the P&ER, RFI response and above each confirm that the proposed development is not likely to give rise to any likely significant effect; including in respect of population, human health, biodiversity, water, landscape and noise. Notwithstanding this, a comprehensive set of mitigation measures have been proposed in order to ensure that environmental effects arising from the proposed development are avoided or mitigated to the greatest possible extent; and the Applicant is committed to employing these measures in full, including those set out herein in respect of fire safety protocols and firewater/drainage management.

5.0 ITEM 4

Drainage proposals designed to manage rainfall runoff and fire water runoff, with

associated calculations to be informed by the anticipated fire water requirements from the proposed development. Drainage proposals shall include details to demonstrate that suitable catchment, containment and on-site treatment measures would be in place for firewater runoff and other potential firefighting substances (such as foam) and also details of any mitigation necessary to ensure that there will be no contamination of surface or groundwater, and that consideration has been given to potential downstream impacts.

Revised drainage proposals to ensure the appropriate management of rainfall runoff and firewater runoff are provided at **Annex 5** (Section 4.3 and Appendix B) and we refer the Commission to same.

In summary, rainfall and firewater runoff will percolate through the surface of the ESS compound and will enter a series of filter drains which will direct runoff to the attenuation/detention basin. Under normal operating conditions, rainfall runoff will be attenuated within the basin, allowing any silt/sediment to settle, before being discharged (controlled by a hydrobrake to mimic greenfield rates) to the natural drainage network via a headwall to be installed at the outfall to prevent erosion. In the event of an emergency, the ESS management system will automatically close a pollution control valve to be installed at the outfall of the basin thus ensuring that contaminated runoff is detained within the basin. The pollution control valve can also be closed manually in the unlikely event of a failure of the ESS management system.

As a consequence of these measures, the proposed development is not assessed as likely to result in a significant effect on, or contamination of, groundwater or surface water under normal operations or during an emergency.

6.0 ITEM 5

The applicant is also invited to submit any other plans, assessments and reports that may be related to, or associated with, the drainage proposals prepared in response to Item 4, for example, but not limited to, a Construction and Environmental Management Plan.

As set out above, in response to Item 3(b)(ii), further environmental assessments have been provided to account for the revised project design and provision of revised surface water drainage measures. In addition, a revised Hydrological/Hydrogeological Review and Drainage Impact Assessment (including a Water Framework Directive Compliance Assessment) and revised Construction & Environmental Management Plan have been prepared and are enclosed at **Annex 7** and **Annex 8** respectively.

7.0 CONCLUSION

We trust that the above satisfactorily addresses each of the matters raised by the Commission. The measures to be implemented as part of the Fire Risk Management Plan, Emergency Response Plan, Drainage Strategy and through the P&ER will provide an extremely high level of environmental protection throughout the operational phase of the proposed development. The measures will ensure, in the event of a fire or emergency incident, that there is no likelihood of significant effects on local residents, human health, ground waters, surface waters, or on any European-designated nature conservation site.

Accordingly, it is assessed that the proposed development would be in accordance with the proper planning and sustainable development of the area and we

respectfully request the Commission to uphold the decision of Cork County Council and to grant planning permission for the proposed development.

Yours Sincerely,

Galetech Energy Services

Galetech Energy Services

ANNEX 1 – BATTERY ENERGY STORAGE SYSTEM TECHNICAL SPECIFICATIONS



ANNEX 2 – REVISED PLANS



ANNEX 3 – FIRE RISK MANAGEMENT PLAN



ANNEX 4 – EMERGENCY RESPONSE PLAN



ANNEX 5 – DRAINAGE STRATEGY



ANNEX 6 – NATURA IMPACT STATEMENT



ANNEX 7 – HYDROLOGICAL/HYDROGEOLOGICAL REVIEW AND DRAINAGE IMPACT ASSESSMENT



ANNEX 8 – CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

