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POWERSTOWN BIOENERGY

Response to Carlow County Council Submission

Prepared for:

Greengate Biogas 001 Ltd.

Greengate Biogas

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Abstract: Fehily Timoney and Company is pleased to submit this response to a submission made by Carlow County Council to An Coimisiún Pleanála (ACP) fin respect of planning application ACP Ref. No. 324426-26.

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TABLE OF CONTENTS

1. INTRODUCTION 1
2. CARLOW COUNTY COUNCIL, PLANNING AUTHORITY 2

2.1 Elected members 2

2.1.1 Applicant Response 2

2.2 Municipal District Engineers Report 2

2.2.1 Response 2

2.3 Transportation Engineers Report 3

2.3.1 Dirt and debris 3

2.3.2 Parking and queuing on the public road 4

2.3.3 Road opening licence 4

2.4 Executive Engineer- Environmental Report 4

2.4.1 Carlow County Council SuDS Policy 4

2.4.2 Surface water systems 4

2.5 Senior Assistant Chief Fire Officer- Fire Authority 4

2.5.1 Fire water supply 4

2.5.2 Deluge system 5

2.6 Planning Authority's Assessment and Views 5

2.7 Conclusion 5

1. INTRODUCTION

Greengate Biogas 001 Ltd. applied for development consent to an Coimisiún Pleanála (ACP) for Powerstown Bioenergy (strategic infrastructure development) on 2 July 2026. The application was validated by ACP on 17 August 2026.

Under the planning process, prescribed bodies and the public were invited to make submissions to ACP on the strategic development application case. Thirteen submissions were submitted to ACP:

- Twelve submissions were made by members of the public and prescribed bodies. ACP invited the applicant to respond to those submissions on 3 September 2026. The Applicant submitted a report titled 'Response to Third Party Submissions' to ACP on 2 October 2026.
- Carlow County Council, Planning Authority submitted a report to ACP setting out their views of the effects of the proposed development on the environment and the proper planning and sustainable development of the area. ACP invited the application to respond to the submission on 6 October 2026. This report has been prepared in response.

Fehily Timoney and Company (FT) was engaged by Greengate Biogas 001 Ltd, to make a response to the submission received by ACP.

The Applicant is grateful for the submission made by Carlow County Council and a response is provided where deemed relevant.

2. CARLOW COUNTY COUNCIL, PLANNING AUTHORITY

Carlow County Council submitted a report from the Chief Executive which was presented to the members of Carlow County Council in September 2026. The views of elected members and relevant local authority Departments are presented below with commentary.

2.1 Elected members

Elected Members of Carlow County Council Submitted one composite addendum to the application to ACP for " a report be prepared on an annual basis in relation to air, odour and water quality and such report be made available to the public".

2.1.1 Applicant Response

As stated in the application, the proposed development shall require an Industrial Emissions licence from the EPA to operate. The licence will include monitoring and reporting conditions for air, odour and water quality. The EPA publishes these reports online at www.leap.ie. The Applicant can also make the reports available to the public by including a link to the EPA licence and LEAP system on their website.

2.2 Municipal District Engineers Report

The Municipal District Engineer raised no objections to the proposed development subject to 10 no. conditions.

2.2.1 Response

Of the 10 no. conditions raised, the Applicant agrees with 1, 2, 4, 5, 6 and 9. Remarks on conditions follow:

- Condition 3 Widening of access junction to be in accordance with TII standard details and agreed with CCC prior to commencing.

  It is assumed that the term 'access junction' means entrances as there is no proposal to upgrade any road junctions.

  The Applicant is not aware of a TII standard for facility entrances onto a local road.

  The existing entrance to be upgraded is 100 m from the R448 and therefore is in compliance with DN-GEO-03060 Geometric Design of Junctions (TII, 2023) which states "The provision of new priority junctions or direct accesses shall not be permitted within 90m of a roundabout or priority junction on National Roads. This may be reduced to 50m as a relaxation when the road is a Regional / Local Road".

  Drawing No. P24188-FT-XX-XX-DR-CE-1803 Site Entrance Sightlines demonstrates a 90 m sightlines on each side of both entrances. This is the requirement for a road with a 60 kph speed limit (TII, 2023).

- Condition 7 all access gates to be set back 10 m from the road edge.

  Drawing Numbers P24188-FT-XX-XX-DR-CE-0110 Proposed Site Layout, P24188-FT-XX-XX-DR-CE-0310 Site Entrance: Plans and Elevations HGV Entrance and P24188-FT-XX-XX-DR-CE-1803 Site Entrance Sightlines show the proposed design of the two entrance gates, the southerly HGV gate and northerly LGV gate. The HGV gate is set back 9.75m from edge of the road carriageway excluding the footpath. The LGV gate is set back 7.5m from edge of the road carriageway. The LGV entrance is for cars and commercial vans only. HGVs will not access the development through the LGV gate. Gates will be open during operational hours. Refer also to Section 2.3.2 of this report.

- Condition 8 Site compound shows carparking for 48 vehicles. In the event all drivers seek to leave site at the same time -an access/egress plan considering alternative routes and or a staggered time for leaving site should be considered to min the local delay.

  The Applicant acknowledges observations made by CCC regarding the access/egress plan for vehicles leaving the site at the same time. Section 6.7.3.5 of Chapter 6 and Table 6-14 of the EIAR which demonstrates that staff arrivals and departures are staggered throughout the day and that a scenario whereby all personnel leave the site simultaneously is not anticipated. The 12 lorry drivers arrive before the commencement of operations at 07:00 and depart on scheduled routes at staggered intervals. Likewise, HGV driver finishing times vary depending on daily logistics requirements, with departures occurring throughout the day rather than at a single time. Operational staff (14 personnel) work standard hours of 09:00-17:00, while site staff operate two staggered shifts between 07:00 and 19:00, with seven staff on each shift. Consequently, staff and vehicle movements are dispersed over the day, with only limited overlap occurring during shift changeovers. The traffic assessment adopts a conservative approach by assuming all drivers depart during the evening peak period; however, in practice departures will be staggered, thereby minimising potential local traffic delays. As such, the proposed operation already incorporates a staggered arrival and departure regime and no significant access or egress issues are anticipated.

- Condition 10 Nature based surface water management should be considered for the proposed development.

- The Applicant acknowledges the recommendation of the use of nature based surface water management for the proposed development. However, as outlined in Section 13.5.3 of the EIAR, the proposed development is designed such that all rainwater and stormwater collected on site is retained and reused within the process, with the facility operating as a net consumer of water.

2.3 Transportation Engineers Report

Carlow County Council made observations through the Transportation Engineers Report pertaining site debris on the public road, the queuing of vehicles on the public road, and the requirement of a road opening licence.

2.3.1 Dirt and debris

The Applicant acknowledges the concern regarding dirt or debris from the site on the public road either during construction or operation of the development. The Applicant is in agreement that dirt or debris from the site is not permitted on the public road.

2.3.2 Parking and queuing on the public road

The Applicant is in agreement that parking or queuing of vehicles including HGV's on the public road is not permitted. Section 6.7.5 of Chapter 6, Volume 3 of the EIAR confirms that the circulation yard will have space to accommodate vehicle queuing in the unlikely event of wait times to enter the reception building during peak delivery times, bearing in mind the fleet size of 12 no. HGV vehicles.

2.3.3 Road opening licence

The Applicant acknowledges the requirement to obtain a road opening licence for any excavation or works on public roads, footpaths, grass margins, public car parks or public areas, as is mandatory for construction projects, utility works, or any activity that involves breaking open a public road, grass verge, public area or footpath. Chapter 3, Section 3.3.20.1 of Volume 2 the EIAR states that GNI will be responsible for securing all necessary approvals, including any Road Opening Licence from Carlow County Council for proposed works on L3037.

2.4 Executive Engineer- Environmental Report

Carlow County Council made observations through the Executive Engineer- Environmental Report pertaining Carlow County Council SuDS policy, and the indication of surface water systems.

2.4.1 Carlow County Council SuDS Policy

The Executive Engineer report states that the site must be designed to comply with Carlow County Council SuDS policy.

Chapter 13, Section 13.3.1.2 of Volume 2 of the EIAR notes the drainage strategy which incorporates a range of SuDS, including vegetated swales, check dams, filter drains and a stormwater lagoon, together with a fully separated drainage system for roof water, plant drainage and interceptor drainage.

2.4.2 Surface water systems

The Applicant notes the comment from Carlow County Council that all the proposed surface water systems must be indicated: manholes, swales, pipelines, hydrocarbon interceptors, surface water gullies, tree pits etc. It is assumed that this means they should be marked on site following construction and in as-built drawings.

2.5 Senior Assistant Chief Fire Officer- Fire Authority

Carlow County Council made observations through the Senior Assistant Chief Fire Officer pertaining the supply of fire water and the deluge system.

2.5.1 Fire water supply

The Applicant acknowledges the criteria for fire water supply. As noted in Section 3.3.19.2 of the EIAR, fire water will be supplied from the Process Water Tanks, which will maintain a minimum reserve volume of 240 m^3 at all times and will supply the site's fire hydrant network.

2.5.2 Deluge system

The Applicant acknowledges the recommendation regarding the inclusion of a water monitor or deluge system within the heating centres biomass storage bunker. Appendix 3.2 of Volume 3 of the EIAR includes the Firewater Risk Assessment Report, which includes the outcomes of consultation with Carlow County Fire and Rescue Service (CCFRS). The Firewater Risk Assessment records that a water monitor or deluge system is required within the biomass storage bunker at the Heating Centre. This requirement will be incorporated into the detailed fire protection and mitigation measures for the facility. The consultation with Carlow County Fire Service is documented in Chapter 5 of the EIAR.

2.6 Planning Authority's Assessment and Views

The planning authority has listed a number of conditions for the consideration of ACP. The Applicant includes remarks herein in relation to some of those conditions:

- Condition for consideration - Access gates 10 m setback as previous
- Condition for consideration - Widening of access junction as previous
- Condition for consideration - Measure to mitigate impact on residential amenities during construction including operational hours, noise, dust and vibration control measures.

  Response - Section 3.5.1.1. in Chapter 3 proposes construction hours. Chapter 7 Human Health and Population concluded that there is no potential for significant effects on residential amenity during the construction phase and therefore no mitigation measures are proposed. There are general good practice measures for management of noise in Section 10.10.2 of Chapter 10 Noise and Vibration. Noise monitoring during construction phase is proposed. Table 8-46 in Chapter 8 Air Quality lists mitigation for potential dust impacts. Daily inspections are required.

2.7 Conclusion

The Applicant and the application submitted agrees with the majority of conditions recommended by Carlow County Council. It is proposed that the entrance designs as included in the application are fit for purpose.

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