Appendix IV

Screening for EIA Report (EIAR) – Prepared by Entrust Ltd.

PROPOSED DEVELOPMENT

LAND AT

GREAT ISLAND, KILMOKEA, CO. WEXFORD

ENVIRONMENTAL IMPACT ASSESSMENT SCREENING

Prepared by

Entrust Limited

DECEMBER 2023

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1. Introduction

This EIA Screening report has been prepared to accompany a full planning application under Section 182A of the Planning & Development Regulations 2001-2023 (as amended) made by Kilmannock Battery Storage Limited to An Bord Pleanála and further to a pre-application meeting on November 6th, 2023.

The planning application is for proposed development generally described as a 110kV tail-fed substation and a 110kV Underground Grid Connection (UGC) on lands at Great Island, Kilmokea, Co. Wexford "the Site". A full description for validation purposes has been provided in other supporting documentation.

The EIA Directive 2011/92/EU on the assessment of the effect of certain public and private projects on the environment (codification), as amended by EIA Directive 2014/52/EU (the EIA Directive), sets out the process by which the anticipated effects of a project on the environment are assessed. The relevant requirements of the EIA Directive have been transposed into Irish law pursuant to the provisions of, inter alia, the Planning and Development Regulations 2001-2023 (as amended), hereafter referred to as "the Regulations".

The provisions of Schedule 5 of the Regulations, identify the requirement of EIA for different project types. The determination of whether or not an EIA is required for a particular project may be carried out through a case-by-case examination or by setting thresholds and/or criteria.

Part 1 of Schedule 5 identifies projects of a class that will always have the potential for significant environmental effects and therefore will require an EIA. Part 2 of Schedule 5 identifies projects that may have an environmental impact and, therefore, thresholds or criteria have been set by EU member states for the requirements of EIA.

However, in addition to these thresholds, Schedule 7 to the Regulations specifies the criteria to be considered in determining whether a development would or would not be likely to have significant effects on the environment.

This EIA Screening document takes due notice of the following legislation and guidance documents:

- Planning and Development Act 2000 (as amended);
- Planning and Development Regulations 2001 (the 2001 Regulations, as amended);
- EU Directive 2011/92/EU, as amended by Directive 2014/52/EU (the EIA Directive);
- Department of Housing, Planning and Local Government (August 2018) Guidelines for Planning Authorities and An Bord Pleanála on Carrying out EIA (the 2018 Guidelines);
- Environmental Protection Agency (Draft - August 2017) Revised Guidelines on the Information to be contained in Environmental Impact Assessment

Reports (the Draft EPA Guidelines); and

- European Commission (2017) Environmental Impact assessment of Projects, Guidance on Screening (the EC 2017 Guidance).

2. Site Description and Development Overview

Site Description

As provided in other documents submitted with this application, the Site, which approximately measures 2.58Ha. in overall area, is situated approximately **12.60** kilometres (kms) south of New Ross Town and lies wholly within the townland of Great Island, being located directly east of Great Island Power Station. The Site is a greenfield site located immediately north of Greenlink Interconnector converter station that is currently undergoing construction. Access to the Site is off the L4033 local road, on a branch access road from the Greelink Interconnector Convertor Station access road. The Site slopes south-north, where the existing highest level of 22m ASL is in the south-west of the Site and lowest level of 5m ASL in the north-east of site (Refer to Dwgs. 05951-DR-100 - Topographic Site Survey and 05951-DR-101 Topographic Site Survey Sections Appendix I – Planning Drawings). The Site is characterised as rough grassland with encroachment of brambles and scrub, bounded by hedgerows on northern and eastern boundaries; Greenlink Interconnector on southern boundary; access to Site on western boundary. Great Island Power Station is immediately to the west. Access to Site from L4033 (entrance road to Great Island Power Station) shared with Greenlink Interconnector, past the Siemens temporary construction compound.

The nearest watercourse to the application is the Newtown Stream (EPA Ref. Newtown 14), approximately 18.00m east of the site boundary at the nearest point, and separated from the Site by a hard-surface track running beneath the railway bridge north of the Site. The stream drains farmland to the north of the railway line and farmland and forestry south of the railway line with no connectivity to the proposed development areas. The River Barrow, River Suir and Campile River are located 253m, 255m and 914m beyond the western, western and southern site boundaries respectively. Area within the Site excluding the Underground Grid Connection is shown as falling within an area designated as ‘Land Commission Benefited Lands’.

Due to its proximity to Great Island Power Station, the Site comes Seveso 2022 designation (Major Accidents Directive). Further to pre-application consultation with the HSA (see Covering Letter), a Seveso Site Screening Report has been submitted as part of this application.

A previous planning permission (Ref. 20180506) was granted by Wexford County Council June 08, 2018 for similar facility as that proposed, albeit on a smaller

scale. Under Section 42 of the Planning and Development Act 2000 (as amended), the permission was granted an extension of time, with the final date of the permission altered from July 10th 2023 to October 19th 2023.

Development Overview

In summary, the proposed development consists of:

- 110kV tail-fed substation compound;
- Underground Grid Connection from proposed 110kV tail-fed substation to existing 110kV substation at SSE Great Island Power Station measuring 838.00m in overall length.

A separate application on lands forming the Site was submitted to Wexford County Council for electrical installation consisting of a 38kV system comprising a 38kV substation, Battery Energy Storage System consisting of 16no. battery units and a 38kV Underground Grid Connection (UGC) to an existing ESB 38kV substation. The application made to Wexford County Council was validated on October 26th (20231294). The application included all ecological and environmental considerations submitted under this application and was supported by an EIA screening report also. The application was referenced by the Applicant in the statutory pre-submission meeting with An Bord Pleanála.

3. Regulatory Context

The European Union EIA Directive lists in Annex I developments for which EIA is mandatory. Annex II lists projects which require a determination on their likely significant effects. These annexes are broadly transposed into Irish legislation by way of the Regulations in Schedule 5, Part 1 and Part 2, with the addition of national thresholds to several Part 2 classes of development[1]. EIA is mandatory for Part 1 developments where thresholds are met or exceeded, but also for Part 2 developments where the national thresholds are met or exceeded. A screening determination is required for sub-threshold developments for both Part 1, where not covered by Part 2, and for Part 2 developments.

The criteria to determine whether a sub-threshold development should be subject to an EIA are set out in Annex III of the EIA Directive and transposed into Irish law through Schedule 7 of the Regulations. Schedule 7A of the Regulations lists information to be provided for the purpose of screening for sub-threshold development for EIA. The planning authority can, under Article 103 of the Regulations, request the submission of an EIA Report, if it is of the view the sub-threshold development would be likely to result in significant effects on the environment.

The 2014 EIA Directive states that in order to ensure a high level of protection of the environment and human health, screening procedures should take account of the impact of the whole project in question, including where relevant, its subsurface and underground elements, during the construction, operational and where relevant demolition phase. When determining whether significant effects on the environment are likely to be caused by a development, the competent authorities should identify the most relevant criteria to be considered and should take into account information that could be available following other assessments required by European Union legislation in order to apply the screening procedure effectively and transparently.

The following sections provide a review of the proposed development against the thresholds and criteria set out in Schedule 5 to determine if the proposed development is sub-threshold, followed by a case-by-case screening against the criteria of Annex III of the EIA Directive.

[1] Environmental Impact Assessment of Projects Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU), European Union 2017

4. Schedule 5 Determination

This section provides a review of the proposed development against the thresholds and criteria of Schedule 5 of the Regulations, to determined whether an EIAR is required as per Section 10 of the Regulations.

As set out above, the proposed development is an electrical installation consisting a 110kV substation a and 110kV underground grid connection to connect the proposed substation to an existing 110kV substation at SSE Great Island Power Station. The proposed development does not meet or exceed Schedule 5, Part 1 and Part 2 thresholds and criteria, and as such, EIA is not mandatory.

Specifically, for Part 1, Section 20 *Construction of overhead electrical power lines with a voltage of 220 kilovolts or more and a length of more than 15 kilometres* does not apply to the proposed development.

Specifically, for Part 2, Section 3a *Industrial installations for the production of electricity, steam and hot water not included in Part 1 of this Schedule with a heat output of 300 megawatts or more* and 3b *Industrial installations for carrying gas, steam and hot water with a potential heat output of 300 megawatts or more, or transmission of electrical energy by overhead cables not included in Part 1 of this Schedule, where the voltage would be 200 kilovolts or more* does not apply to the proposed development.

A consideration of sub-threshold criteria has been carried out and as per the ruling of the European Court[1], it is recognised that the EIA Directive has a *"wide scope and a broad purpose"* when determining if EIA is required.

Part 2, Energy Industry, lists a number of projects relating to energy production, but there is no threshold pertaining to energy production by means of solar PV. Paragraph 3(b) of Part 2 of Schedule 5 does include for "*industrial installations for the production of electricity, steam and hot water not included in Part 1 of this Schedule with a heat output of 300 megawatts or more*". The proposed development will generate electricity, but not electricity and steam and hot water combined, and as such, this development type does not apply on the applicability of Schedule 5.

Other classes noted under Part 2 of Schedule 5 include Infrastructure Projects under paragraph 10(dd) *"all private roads which would exceed 2000 meters in length".* Access tracks installed for the purpose of the proposed development are materially different from the definition of a road under the Roads Act 1993, as the purpose of the track is primarily for the purpose of construction and maintenance and not for the conveyance of people and vehicles.

[1] Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018

Paragraph 13(a) of Part 2 of Schedule 5 refers to:

"(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:

(i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and
(ii) result in an increase in size greater than –

- *25 per cent, or*
- *an amount equal to 50 per cent of the appropriate threshold, whichever is the greater."*

This proposal is for a new development and not a change or extension of an existing or consented project, so Paragraph 13(a) of Part 2 of Schedule 5 is not applicable here.

Paragraph 13(c) of Part 2 of Schedule 5 refers to:

"Any change or extension of development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, which would result in the demolition of structures, the demolition of which had not previously been authorised, and where such demolition would be likely to have significant effects on the environment, having regard to the criteria set out under Schedule 7."

This proposal is for a new development and does not include any demolition, so Paragraph 13(c) of Part 2 of Schedule 5 is not applicable here.

As detailed in Section 5 below, having regard to the criteria set out in Schedule 7, there is no real likelihood of significant effects on the environment arising from the proposed electrical installation, therefore Paragraph 13(a) and (c) does not apply to the proposed development.

In July 2023, amendments to Schedule 5 of the 2001 Regulations were made under Statutory Instrument 383 of 2023, which read as follows:

(a) Projects for the restructuring of rural land holdings, undertaken as part of a wider proposed development, and not as an agricultural activity that must comply with the European Communities (Environmental Impact Assessment) (Agriculture) Regulations 2011, where the length of field boundary to be removed is above 4 kilometres, or where re-contouring is above 5 hectares, or where the area of lands to be restructured by removal of field boundaries is above 50 hectares.

In a letter from the Department of Housing, Local Government and Heritage to the Director of Planning for all local authorities. Under a heading entitled Background to why these amendments are required, the letter stated, *inter-alia*:

Ireland's response to this judgment, in addition to making a number of amendments to Schedule 5 of the Regulations, included the establishment of a

new EIA consent regime operated by the Department of Agriculture, Food and the Marine (DAFM) for the project types covered by the judgement. That consent regime continues to operate for on-farm agricultural type activities, however, a more recent court judgement identified that it is possible for a proposed development moving through the planning system to include an element of removal of field boundaries or re-contouring a field, which amounts to restructuring a rural land holding, but not be an agricultural project. This element of the project would need to be screened for EIA but prior to this Regulation being made neither planning authorities nor An Bord Pleanála had jurisdiction to request that screening.

In guidelines entitled *Environmental Impact Assessment (Agriculture) Regulations – Guide for Farmers* prepared by the Department of Agriculture, restructuring by removal of field boundaries is defined as:

Restructuring by removal of field boundaries covers the removal of lengths of field boundaries such as hedgerows, hedgerows on clay banks, stone walls, boundaries consisting of clay banks and stone-lined clay banks. Maintenance work on existing structures, such as repairing stone walls, maintenance of hedgerows (e.g. maintenance of hedgerows as required by Good Agricultural and Environmental Condition in the context of cross compliance for the purposes of the Single Payment Scheme) is not covered by the Regulations. Removal of post and wire fencing (barbed wire or electrified wire) is also exempt from the requirements of the Regulations.

In the same guidance restructuring by recontouring is defined as:

Restructuring by re-contouring (within farm-holding) covers the re-contouring of land, for example by levelling off hills or by infilling of hollows (by removing or shifting earth or rocks). For the purposes of the Regulations the area will be regarded as the area impacted by the works, rather than the total area of the field in which works are to take place. The quantity of material being shifted may be great or relatively small. Normal tillage operations are excluded from the requirements of the Regulations.

In view of the judicial review case, Judicial Review Case 2021/1009 – Treascon and Clondoolusk, that led to the amendments to the 2011 Regulations, it is considered that the proposed development does not amount to restructuring or re-contouring of rural lands. It is understood the amendments carry three tests in relation to restructuring of rural land holdings. The first test is in relation to overall length of field boundaries removed; the second where significant relevelling of lands within the application site and thirdly where there is removal of field boundaries and the overall area of lands is more than 50 hectares.

With regard to the first and third tests, it is confirmed by submitted plans that no field boundaries are to be removed as part of the proposed development. Existing hedgerows on the northern boundary would be retained as they exist. These tests are therefore passed. With regard to the second test, recontouring as defined by the Department of Agriculture guidelines will occur on site as a result of works included under the application to Wexford County Council. As set out in the EIA

Screening Report for this application, the total area subject to recontouring, as submitted in proposed plans, consisting of reprofiling of the Site, does not exceed 5Ha. The second test is, therefore, also passed.

5. Conclusion

On the basis of the analysis set out above, it is submitted that the proposed development is **not** required to be subjected as an Environmental Impact Assessment under either the EIA Directive or Schedule 5 of the Planning and Development Regulations, having regard, in particular, to two recent High Court judgments, referred in Section 7 herein. Nevertheless, and entirely without prejudice to this position, the applicable Schedule 7 criteria has been provided in the following section.

6. EIA Screening

This section provides an EIA Screening against the appropriate criteria as established by the EIA Directive Annex III and as transposed into Irish law, Schedule 7 of the Regulations.

It should be noted that under the EIA Directive, the EIA Screening process balances two objectives, in determining if a project listed in Annex II is likely to have significant effects on the environment and, therefore, be made subject to an assessment of its effects on the environment; and it should ensure that EIA is only carried out for those projects which is thought that a significant impact on the environments is possible[3]

Table 1 overleaf screens the proposed development against the Schedule 7 criteria. Information pertaining to Schedule 7A of the 2001 Regulations, as amended, is provided herein, but is further supplemented by the Planning Statement incorporating Environmental Considerations, the associated environmental reports and planning application drawings.

The review in Table 1, and considering the nature of the development, its size and location, it can be concluded that the proposed development does not trigger the need for an EIA as there is no real likelihood of significant effects on the environment arising from the proposed development. It should be noted that due regard has been had to appropriate mitigations and applicable studies as per the EIA Directive, but that these in themselves have been applied to further reduce non-significant effects.

[3] Environmental Impact Assessment of Projects Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU), European Union 2017

Table 1 Screening against Schedule 7 Criteria, Planning and Development Regulations 2001-2023 (as amended)

Screening against Schedule 7 Criteria	
1. Characteristics of projects	**Consideration of the proposed development**
The characteristics of projects must be considered, with particular regard to: a) the size and design of the whole project; b) cumulation with other existing and/or approved projects; c) the use of natural resources, in particular land, soil, water, and biodiversity; d) the production of waste; e) pollution and nuisances; f) the risk of major accidents and/ or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;	a) The site area for the proposed electrical installation development is 2.6hectares/6.42acres at lands within the townland of Great Island, Kilmokea, Co. Wexford. The installation comprises in the main a 110kV substation compound and and Underground Grid Connection from proposed 110kV tail-fed substation to existing 110kV substation at Great Island measuring 838.00m in overall length. b) A previous planning permission (Ref. 20180506) was granted June 08, 2018 for similar facility as that proposed, albeit on a smaller scale. Under Section 42 of the Planning and Development Act 2000 (as amended), the permission was granted an extension of time, with the final date of the permission altered from July 10th 2023 to October 19th 2023. As the permission exists on the same footprint as the proposed development and the expiration of the permission is imminent, both developments cannot co-exist. c) Land and soil: The use of land comprising a greenfield site of relatively low ecological potential and value. The Site slopes south-north, where the existing highest level of 22m ASL is in the south-west of the Site and lowest level of 5m ASL in the north-east of site (Refer to Dwgs. 05951-DR-100- Topographic Site Survey and 05951-DR-101 Topographic Site Survey Sections Appendix I – Planning Drawings). Earthworks comprising cut and fill engineering to create 2no. platforms at 16.00mASL and 12.00mASL comprised part of the proposed development. The preliminary design currently has 15000m^3 cut from the southern portion of the Site and 18000m^3 fill in the northern portion. Material would temporarily stored in the eastern portion of the Site at the lower level. All cut material would be re-used on site with the difference in cut and fill imported onto site. Water: The construction and operation of the scheme will not use such a quantity of water to cause concern in relation to significant effects on the environment. During construction of the scheme, water will be required for offices and welfare facilities, this will be provided by by tanker. There is no proposed extraction of groundwater at the Site during the operational

	phase. Biodiversity: An assessment of baseline biodiversity conditions and effects of the proposed development, individually and in combination with other developments, has been undertaken as part of the Screening for Appropriate Assessment and Ecological Impact Assessment submitted with this application. Habitats were surveyed on the 27th of July 2023 by conducting a study area walkover covering the main ecological areas identified in the desktop assessment. The EcIA established the following habitats on the Site: Improved Agricultural Grassland (GA1) and a thin strip of Recolonising Bare Ground (ED3) along the northern boundary where earth has been disturbed in the past year. d) Waste would be produced during the construction and decommissioning phases (if applicable) of the proposed development. Mitigation against waste during the construction and decommissioning phases of the development, in the form of construction waste, has been addressed in the Construction Methodology Statement (TLI) Construction and Environmental Management Plan (IE Consulting Ltd.). All waste products (general waste plastic, timber, etc.) arising during the construction phase will be managed and disposed of in accordance with the provisions of the Waste Management Act 1996 and associated amendments and Kilmannock 38 kV Grid Connection, Substation and BESS regulations and a Waste Management Plan will be prepared by the contractor prior to the commencement of construction. All waste material will be disposed of at a fully licensed facility. e) Potential sources of pollution are identified in the Air Quality Assessment and Construction and Environmental Management Plan. The Air Quality Assessment states that *the main source of air quality impacts will be as a result of fugitive dust emissions from site activities during the construction stage. Dust emissions will primarily occur as a result of site preparation works, earthworks and the movement of trucks on site and exiting the site. Construction stage traffic also has the potential to impact air quality through vehicle exhaust emissions.* Major dust generating activities are identified as Demolition; Earthworks; Construction; and Trackout (transport of dust and dirt from the construction site onto the public road network). It was found that there are no designated sites within 50 m of the site boundary or 500 m from site access roads, therefore no assessment of dust impacts to ecology was required. Dust generation is considered negligible on days where rainfall is greater than 0.2 mm. A review of historical 30 year average data for Johnstown Castle meteorological station indicates that on average 200 days per year have rainfall over 0.2 mm (Met Eireann, 2023) and therefore it can be determined that 55% of the time dust generation will be reduced. The dust emission magnitude for the proposed construction activities can be classified as small as a worst-case as the total building volume will be less

than 12,000 m3. The dust emission magnitude for the proposed trackout can be classified as small, as at worst-case peak periods there will be less than 20 outward HGV movements per day. This results in an overall negligible risk of dust soiling impacts and human health impacts as a result of the proposed trackout activities. The construction stage traffic has been reviewed and a detailed air quality assessment has been scoped out as none of the road links impacted by the Proposed Development satisfy the TII scoping assessment criteria. It can therefore be determined that the construction stage traffic will have an imperceptible, direct, neutral and short-term impact on air quality.

f) A COMAH Screening Report has been prepared by AWN Consulting Ltd. As stated in the Executive Summary, large scale BESS units are not currently regarded by the HSA under COMAH Regulations 2015. The report concludes that the proposed development is not a type of development to which the provisions of the COMAH Regulations 2015 apply. The proposed development does not fall within the types of development for which the Centra Competent Authority (the HSA) shall provide technical in response to a notice sent by a planning authority (under Part 11 of the Planning and development Regulations 2001) requesting technical advice on the effects of a proposed development on the risk or consequence of a major accident (transport route, location of public use or residential area in the vicinity of establishments). The proposed development will not be the source of or increase the risk or consequence of a major accident. At operational stage the proposed development will be an unmanned site with operations controlled remotely. A Climate Assessment Report has been submitted with the application. The report provides a description of the baseline climate environment and identification of the sensitivity of the surrounding environment. It then goes on to identify and assess the potential climate impacts associated with the construction and operational phases of the proposed development, based on net impact of the proposed development over its lifetime, which can be positive, negative or negligible. In accordance with guidance in relation to climate impac assessments *LA 114 Climate* (UK Highways Agency, 2019), a detailed assessment of traffic related carbon dioxide (CO_2) emissions was not conducted, based on the following:

A change of more than 10% in AADT;
A change of more than 10% to the number of heavy duty vehicles; and
A change in daily average speed of more than 20 km/hr.

In relation to emissions during the construction phase of the proposed development, the report found is the potential for greenhouse gas emissions to atmosphere. Using the TII Carbon Tool, the proposed development is estimated to result in total construction phase GHG emissions of 3,598 tonnes embodied CO_2, equivalent to 0.002% of the 2030 Industrial sector budget or 0.0002% of Ireland's total national 2022 GHG emissions (excluding

	LULUCF) when annualised over the project lifespan (assumed 25 years). It has been calculated that the BESS will be capable of storing a maximum 263 GW of renewable electricity annually. In reality, the batteries will not store energy 24 hours per day, 365 days per year, therefore storage has been assumed to occur for two thirds of the year (5,840 hours). The report states that the storage of renewable electricity will result in total GHG emissions savings of 54,393 tonnes CO_2e each year over the lifespan of the development based on the 2022 electricity generation capacity factor of 331 gCO_2/kWh and once initial emissions from the construction of the development are offset. This GHG saving equates to 0.09% of Ireland's total 2022 GHG emissions of 60.76 Mt CO_2e or 1.8% of the 2030 Electricity sector carbon budget of 3 Mt CO_2e. The savings in CO_2 emissions arising from the storage of electricity from renewable sources were compared against CO_2 emissions from electricity production using non-renewable sources. The calculations were carried out using SEAI published emission rates from non-renewable energy sources (SEAI, 2023). This total CO_2 saving annually and over the lifespan of the project relative to CO_2 emissions from power generation was determined.

2. The Location of Projects	Consideration of the proposed development
The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to: a) the existing and approved land use; b) the relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground; c) the absorption capacity of the natural environment, paying particular attention to the following areas: i. wetlands, riparian areas, river mouths; ii. coastal zones and the marine environment; iii. mountain and forest areas; iv. nature reserves and parks; v. areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC; vi. areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; vii. densely populated areas; viii. landscapes and sites of historical, cultural, or archaeological significance.	**a)** The environmental sensitivity of the Site has been assessed in the Screening for Appropriate Assessment and Ecological Impact Assessment; Air Quality Assessment; Climate Assessment If granted planning permission it is calculated that the BESS will be capable of storing a maximum 263 GW of renewable electricity annually. In reality, the batteries will not store energy 24 hours per day, 365 days per year, therefore storage has been assumed to occur for two thirds of the year (5,840 hours). The report states that the storage of renewable electricity will result in total GHG emissions savings of 54,393 tonnes CO2e each year over the lifespan of the development, based on the 2022 electricity generation capacity factor of 331 gCO2/kWh and once initial emissions from the construction of the development are offset. **b)** Land and soil: The use of this greenfield site is not considered significant in the context of Ireland available land area. The proposed development will require the excavation and disturbance of soils and stone materials for the purposes of levelling, excavation for foundations, landscaping, access and services. There will be a requirement for deliveries of imported engineering fill, and other construction materials. Other construction activities will include site storage of cement and concrete materials, fuels for construction vehicles. Water: The construction and operation of the scheme will not use such a quantity of water to cause concern in relation to significant effects on the environment. During construction of the scheme, water will be required for offices and welfare facilities, this will be provided by by tanker. There is no proposed extraction of groundwater at the Site during the operational phase. Biodiversity: An assessment of baseline biodiversity conditions and effects of the proposed development, individually and in combination with other developments, has been undertaken as part of the Screening for Appropriate Assessment and Ecological Impact Assessment submitted with this application. Habitats were surveyed on the 27th of July

	2023 by conducting a study area walkover covering the main ecological areas identified in the desktop assessment. The EcIA established the following habitats on the Site: Improved Agricultural Grassland (GA1) and a thin strip of Recolonising Bare Ground (ED3) along the northern boundary where earth has been disturbed in the past year. **c)** The Site is not within the vicinity of mountain and/or forest areas; nature reserves and/or parks; areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; densely populated areas; landscapes and sites of historical, cultural, or archaeological significance. It has been demonstrated in the ecology reports submitted that the Site, of low ecological value and potential in its own right, bears no connectivity, either hydrologically or otherwise, to ecologically-designated sites in its vicinity. The absorption capacity of the greenfield Site itself is assessed in the specialist reports submitted. Where necessary, relevant mitigation measures have been suggested in these reports.

3. Type and characteristics of the potential impact	Consideration of the proposed development
The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account: a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); b) the nature of the impact; c) the transboundary nature of the impact; d) the intensity and complexity of the impact; e) the probability of the impact; f) the expected onset, duration, frequency, and reversibility of the impact; g) the cumulation of the impact	Table 1 (3), this table, should be read along with all the supporting documents that form part of this application (Appendices I to XVI), has considered the nature of the development, its size and location, it can be concluded that there is no real likelihood of significant effects on the environment arising from the proposed development. It should be noted that due regard has been had to appropriate mitigations and applicable studies as per the EIA Directive, but that these in themselves have been applied to further reduce non-significant effects. a) The spatial extent of the impact of construction of the proposed development is limited to the Site. The submitted Screening for Appropriate Assessment establishes that there is no hydrological connectivity, or any other type of connectivity, to ecologically-designated Sites in the vicinity of the Site. The proposal is for the storage of electrical energy that can be supplied to the National Grid. The benefits of the proposal are therefore national in scale; b) The nature of the impact will be the loss of an existing greenfield site for the purposes of siting an electrical installation capable of storing a maximum of 263GW of renewable electricity annually (Climate Report, AWN Consulting Ltd. – Appendix XII) – see Point D below for further information; The potential for ecological impacts arising is addressed in the submitted Screening for Appropriate Assessment and Ecological Impact Assessment. The submitted Screening for Appropriate Assessment established that there is no hydrological connectivity, or other type of connectivity, to ecologically- designated Sites in the surrounding area. The Assessment objectively concluded that the proposed development is not directly connected with, or necessary to the conservation management of the European sites considered in this

with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and h) the possibility of effectively reducing the impact.	assessment; The proposed development is not likely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment; The proposed development, either alone or in combination with other plans or projects, is not likely to have significant effects on a European site It is possible to conclude that significant effects can be excluded at the screening stage. The potential for environmental health impacts is addressed in the submitted Environmental Noise Assessment; Landscape and Visual Impact Assessment; Traffic Management Plan The potential impact is limited to the Site, with the exception of visual impact, which is addressed in the Landscape and Visual Impact Assessment, Landscaping Plan and accompanying Landscape Report; c) No transboundary impacts would arise as a result of the proposed development. d) The submitted Climate Reports states that it has been calculated that the BESS will be capable of storing a maximum 263 GW of renewable electricity annually. In reality, the batteries will not store energy 24 hours per day, 365 days per year, therefore storage has been assumed to occur for two thirds of the year (5,840 hours). The report states that the storage of renewable electricity will result in total GHG emissions savings of 54,393 tonnes CO_2e each year over the lifespan of the development, based on the 2022 electricity generation capacity factor of 331 gCO_2/kWh and once initial emissions from the construction of the development are offset. This GHG saving equates to 0.09% of Ireland's total 2022 GHG emissions of 60.76 Mt CO_2e or 1.8% of the 2030 Electricity sector carbon budget of 3 Mt CO_2e. The savings in CO_2 emissions arising from the storage of electricity from renewable sources were compared against CO_2 emissions from electricity production using non-renewable sources. e) The probability of the impact is high. If the proposed development would provide the electricity storage capacity outlined above. f) The majority of the adverse effects that may arise from the proposed development are associated with the construction stage and these effects will be temporary,

reversible and 'once-off'. The ecology reports submitted highlighted that the potential loss of habitat due to the development would be irreversible and permanent, where the Site is of low ecological value.

g) Cumulative impacts of the proposed development are provided in the Screening for Appropriate Assessment and Ecological Impact Assessment with no impacts arising cumulatively from an assessment of 3no. projects.

h) Construction for the proposed development will be undertaken in accordance with the guidelines and relevant best practice as well as the Council's mitigation requirements outlined in the Construction Methodology Statement and Construction & Environmental Management Plan. This will effectively reduce the scale of all adverse effects as described herein.

7. Conclusion

It is submitted that the proposed development is not required to be subjected to an Environmental Impact Assessment. Nevertheless, a screening assessment against the applicable Schedule 7 criteria has been provided, without prejudice to this position. In the above regard, the information specified in Schedule 7A and sub-article (1A) of article 103 of the Planning and Development Regulations 2001, as amended, has been submitted, and will enable the planning authority to carry out an examination of, at the least, the nature, size, or location of the development for the purposes of a screening determination in accordance with Article 103 of the Planning and Development Regulations 2001, as amended. It is respectfully submitted that the competent authority is in a position to determine that there is no real likelihood of significant effects on the environment arising from the proposed development and as such an EIA is not required in respect of same.