



An
Bord
Pleanála

Record of 2nd Meeting ABP-304007-19

Development	Proposed alteration to Shannon LNG regasification terminal at Ballylongford, Co. Kerry.		
Location	Cathal Brugha Room		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	2 nd		
Date	22/01/20	Time	11a.m. – 12p.m.

Attendees		
Representing An Bord Pleanála		
Anne Marie O'Connor, Assistant Director of Planning (Chair)		
Una Crosse, Senior Planning Inspector		
Maeve Flynn, Ecologist		
Josephine Hayes, Senior Executive Officer		
Kieran Somers, Executive Officer	k.somers@pleanala.ie	01-8737250
Representing the Prospective Applicant		
Alap Shah, Senior Vice-President – Solutions Group		
Simon Duncan, Senior Vice-President – Head of Marine Operations		
Martin Ahern, Project Manager, NFE Ireland		

Barry Sheridan, Technical Director, AECOM
Aiden O' Neill, Director, Coakley O'Neill Town Planning

Introduction

The Board referred to the previous meeting held with the prospective applicant on the 21st May 2019 and the record of this meeting. The Board enquired as to whether the prospective applicant had any comments it wished to make on the record of this meeting. The prospective applicant replied that it had no comments or corrections to make in relation to this.

Presentation by the prospective applicant

Update on the project:

- The prospective applicant said that design work and surveys have been on-going since the previous meeting with the Board. The prospective applicant provided the Board with an update on the principal aspects of the proposed development; these will include the LNG Jetty and Access Trestle, the floating storage unit, LNG vaporisation process equipment, proposed substation and civil works. The prospective applicant outlined the national policy context including the Climate Action Plan within which it considered the project was in compliance including security of supply.
- The prospective applicant informed the Board that it is proposed to prepare a masterplan for the overall landholding which would outline other proposed uses including a data centre campus. The planning application to be lodged in respect of the instant development will not include the data centre campus, but other permitted and proposed uses would be considered in the cumulative assessment presented in the EIAR. In response to the Board's query on the matter, the prospective applicant said that power will be generated on-site by means of a 10-megawatt generator which will be principally fuelled by LNG; this element will also be included in the planning application and comprises an auto-producing power plant.

- In response to the Board's query on the matter, the prospective applicant confirmed that the overall development of the lands would be developed on a phased basis and referenced its current intention to develop the permitted 500MW CHP plant subject to the applicant's internal processes. Noting this, the Board's representatives emphasised the need for the planning application and accompanying EIAR to explore all possibilities/scenarios with regard to power usage.
- **Application documentation:** The prospective applicant set out the main documents which it is proposed to submit with the planning application; these will include the Overall Masterplan Layout, an EIAR and an NIS. With respect to relevant assessments, the prospective applicant said that these are underway and have yet to be worked up.
- **Permits, licence or authorisation required:** The prospective applicant provided an outline of statutory consents which will be required to carry out the proposed development. These will include licences from the Commission for Regulation of Utilities (CRU) and an IED licence from the EPA. With respect to the Foreshore Licence required, the Board's representatives reminded the prospective applicant of the Marine Planning and Development Management Bill which is to be adopted into legislation in due course.

Comparison between permitted development and proposed development:

Emphasising the reduced scale of the current proposal, the prospective applicant provided a comparison between the permitted development and the proposed development as follows:

- **LNG Jetty and Access Trestle** – There are no material changes proposed to these elements. The LNG unloading platform will comprise of six mooring dolphins and four breasting dolphins. The jetty will be capable of receiving one LNG ship berthed at a time.
- **LNG Storage Tanks and Final Send-Out Capacity** – The previously consented four on-shore LNG tanks are now omitted and will not be pursued as part of the proposal. Storage of LNG will now be facilitated by means of a Floating Storage Unit (FSU). In response to the Board's question in relation to this element, the prospective applicant said that the FSU would be an

ocean-going vessel which for planning purposes would be permanently moored but which if adverse weather conditions or technical considerations arose would move to other locations, although there would be no nominated locations in this regard. The prospective applicant said that the FSU will be included within the red boundary line of the subject site. Noting this point, the Board's representatives said that the matter would have to be addressed in the EIAR in terms of an indirect effect. The Board outlined that the proposal outlined had the potential to create a number of indirect effects and that it was essential that same were addressed in detail. In response to the Board's question, the prospective applicant said that the potential impacts from the FSU on the noise environment would be addressed. The prospective applicant said that the FSU would essentially comprise a floating storage tank as opposed to the previously consented onshore storage tanks. In response to the Board's query as to the rationale for this, the prospective applicant said that this particular element of the project would require less construction time and would be more efficient from an operational perspective. It also noted that the visual impact from the previously permitted storage tanks would be reduced and noted a greater benefit in terms of safety.

In relation to the final send-out capacity of natural gas per day, the prospective applicant noted a reduction in this regard (up to 22.6 million standard cubic metres of natural gas per day).

- **LNG Vaporisation Process Equipment** – The prospective applicant noted no material changes to this element of the proposed development vis-à-vis the development previously permitted. It said that equipment location and layouts will change somewhat and that some minor process equipment will no longer be required.
- **Civil Works and Administration and Other Buildings** – The prospective applicant noted for the record that significantly less earthworks will now be required as part of the instant proposal and that smaller scale buildings will be required. The pond and embankment will no longer be required, damming of the river will no longer be required and the river crossing will remain as previously permitted.

Discussion

- The Board's representatives emphasised that the legislative context from a planning and environmental perspective has altered significantly since the previous SID application with respect to matters such as the EIA Directive, the Habitats Directive and the Climate Action Plan. The Board emphasised that the prospective applicant should not seek to rely on elements that were previously permitted if they were now proposed as part of any future application. All elements proposed would be subject to planning and environmental assessment as part of any future application.
- From an Appropriate Assessment point of view, the Board reminded the prospective applicant of the fact that the subject site is located in a very sensitive area and a critical area for the dolphin qualifying interest and that there is a much higher bar in relation to AA. With respect to construction of the proposed LNG jetty, the Board noted that this would involve the loss of some habitat and that such an element of the project would have to be robustly justified. The status of the Shannon Estuary was also outlined. With regard to the FSU in particular, the Board also noted that the direct and indirect effects arising from the potential for the storage unit to travel and relocate out to sea under certain circumstances would also need to be addressed in a thorough manner.
- The Board's representatives suggested that at least one further meeting should take place in the pre-app process to address EIA and AA matters in more detail when survey work is at a more advanced stage. The Board also said that it would be useful at that time if the prospective applicant could provide it with an understanding of the extent of consultations with the National Parks and Wildlife Service (NPWS) and other relevant stakeholders such as the Irish Whale and Dolphin Group. The Board also recommended engagement with the Health and Safety Authority.
- The prospective applicant noted for the record that EIAR and AA surveys and assessments have yet to be concluded, as well as the finalisation of planning drawings. With respect to public consultations, the prospective applicant

noted on-going engagements with the local community and said that open evenings are planned circa early March 2020. The Board reminded the prospective applicant of the need for robust consultations in this regard and also of the evolution and complexity of community gain conditions which the Board attaches to permissions for proposed strategic infrastructure developments compared to at the time of the previous application.

- The prospective applicant indicated its current intention to lodge a planning application circa March 2020. In response to the Board's query on the matter, the prospective applicant said that the project is not a PCI project.

Conclusion

The record of the meeting will issue to the prospective applicant and it will then be a matter for the prospective applicant to submit any comments on this if it wishes to do so or at the time of a further meeting. It will be a matter for the prospective applicant to revert to the Board with regard to this further meeting which will focus on EIA and AA issues pertinent to the proposed development. The prospective applicant said that it would likely request such a further meeting towards the end of February or early March 2020.

Anne Marie O'Connor

Assistant Director of Planning