



An
Bord
Pleanála

Record of 1st Meeting ABP-316229-23

Case Reference / Description	ABP-316229-23 - Proposed 350MW Low Carbon Open Cycle Gas Turbine (OCGT) fuelled by hydrotreated vegetable oil, administration building and workshop, and ancillary plant and infrastructure. Tarbert Power Station, Tarbert, Co. Kerry.		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1 st		
Date	28/08/2023	Start Time	11:00 a.m.
Location	Virtually	End Time	12:00 p.m.

Representing An Bord Pleanála

Staff Members

Stephen Kay, Assistant Director of Planning (Chair)

Kevin Moore, Senior Planning Inspector

Niamh Hickey, Executive Officer

Representing the Prospective Applicant

Ed Barrett, Gravis Planning

Sean Breslin, Gravis Planning

Peter O'Connor, AECOM

Rachel Devine, AECOM

Paul Ferry, SSE

Nick Norris, SSE

Introduction

The Board referred to the letter received from the prospective applicant on the 11th April 2023, requesting pre-application consultations under section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

Presentation made by the prospective applicant:

The prospective applicant gave a brief overview of the applicant's company SSE and its role in creating new thermal assets to address security supply in Ireland. The prospective applicant provided an image of the site location and gave a summary of the background into the proposed development. There is an existing 626MW Heavy Fuel Oil (HFO) power plant at Tarbert since the 1960's which is due to close by the end of 2023. A previous application for a 450MW Combined Cycle Gas Turbine was permitted in 2010 but never implemented. The prospective applicant stated that the proposed development is similar to this application. A 10-year permission was granted to SSE in 2018 for a battery storage facility. The Emergency Generation development was approved in early 2023 under An Bord Pleanála Reference Number ABP-315838-23. The prospective applicant provided drawings of these applications.

The prospective applicant stated that the proposed development will consist of a 350MW OCGT to be run on Hydrotreated Vegetable Oil (HVO) biofuel. It will connect to the existing on-site substation. The proposed site will have fuel and water tanks, a water treatment plant, an administration building, fuel pipework and flood defences. The prospective applicant pointed out these features on the image provided.

The prospective applicant detailed how HVO is a hydrocarbon-based biofuel produced from vegetable oils and fats that is free from aromatics and sulphur and produces lower emissions compared to traditional diesel and biodiesel. It ignites faster than other fuels and it has more efficient combustion, reduces emissions and noise and allows for a faster startup of an engine. It is less likely to coagulate and easier to store for longer periods of time. The prospective applicant also provided an overview into the sources and processes of HVO.

The prospective applicant demonstrated the different elements of the proposed development on the submitted drawings.

The prospective applicant briefly talked about the need for the proposed development. National and regional level policies and guidance of relevance to the proposed development were set out.

The prospective applicant stated that the application will only seek permission for the development on land. In this regard it was clarified that while the original proposal submitted as part of the pre application consultations included works to the pipework on the existing jetty which is within the nearshore area, these are now omitted from the proposed development and will be the subject of a separate application. It was clarified however that the jetty upgrade will be fully assessed in the Environmental Impact Assessment Report (EIAR).

The prospective applicant set out the proposed layout of the EIAR and stated that an Appropriate Assessment (AA) and Natura Impact Statement (NIS) will also be prepared for the application. It has also requested meetings with the Environmental Protection Agency (EPA).

The prospective applicant stated that it has advertised in the local media and held online consultations on its website which has allowed members of the public to submit comments. It met with Kerry County Council in July 2023. In person events were held at Tarbert and Listowel and the prospective applicant stated the feedback was positive.

The prospective applicant stated that it intends to submit an application in October 2023.

The prospective applicant gave their opinion that the proposed development would likely constitute a strategic infrastructure development.

Discussion:

- In response to a question from the Board's representatives, the prospective applicant confirmed there will be no work in the nearshore included in this application. It stated that there is an existing lease in place and that the consent of the Minister would be required to proceed with the nearshore application. A Maritime Area Consent (MAC) may also be required.
- With regard to the proposed omission of works on the jetty and the intention to submit a separate application for these works, the Boards representatives

stated that they considered that issues of project splitting for the purposes of EIA would not arise as long as the environmental impacts of these works were fully assessed in any EIA submitted. The Boards representatives did however highlight that the prospective applicant would need to consider how the application could be presented so as to avoid any interpretation that the project was being split for procedural purposes.

- In response to a question on the source of fuel for the proposed development, the prospective applicant stated that the proposed development is not reliant on the jetty and could operate with road-based delivery which would likely come from County Cork. The prospective applicant stated both options will be fully addressed in the EIAR.
- The prospective applicant confirmed the existing plant will close by the end of 2023. It intends to use the existing plant as office accommodation.
- The prospective applicant confirmed the Emergency Generation project is currently under construction and it intends to have it fully operational by September 2024.
- The Board's representatives acknowledged that this is a peaking plant.
- The Board's representatives queried the source of the fuel and noted that the proposed development would be import dependent from global markets. While the fuel would be sourced from a depot in County Cork, the wider origin of this fuel could be from UK and EU sources.
- The Board's representatives highlighted the issue of sustainability and the issue of fuel sources which would be a significant issue in the assessment of any application. Reference was made to the sourcing of fuels, transport emission impacts, impacts by way of the inadvertent fuelling of tropical deforestation, the need for traceability controls, and potential for the capping of HVO usage. The prospective applicant stated that it will address concerns regarding fuel in their application.

- In response to a query the prospective applicant confirmed that it will be utilising an existing discharge pipe for water. The licence for this is through the EPA.
- The prospective applicant stated that the flood defence measures are proposed to be a wall with various flood gates. It was clarified that no part of these flood defences would be located in the nearshore area.
- The prospective applicant confirmed that the stack is proposed to be 55m in height.
- The prospective applicant stated that it is not aware of any constraints regarding water supply.
- The Board's representatives highlighted the importance of consulting with prescribed bodies, in particular the National Parks and Wildlife Service (NPWS), Development Applications Unit (DAU) and An Taisce.
- The Board's representatives gave their preliminary view that the proposed development may be considered strategic infrastructure development but noted that the final decision would be a matter for the Board.
- In response to a direct question, the prospective applicant confirmed to the Board representatives that in the event of the proposed development being determined to constitute strategic infrastructure by the Board the application that would be submitted to the Board would comprise an OCGT plant solely served by HVO delivered to the site by road, and that it will not be an application to include for delivery by sea using the existing jetty facility.

Conclusion:

The Board's representatives advised that the onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.



Stephen Kay
Assistant Director of Planning

