

An
Bord
Pleanála

Record of Meeting
ABP-317184-23
1st meeting

Case Reference / Description	ABP-317184-23 - Proposed transition and conversion of the existing 900MW electricity generating station from coal to heavy fuel oil and associated ancillary development located at Moneypoint Generating Station, Moneypoint, Co. Clare.		
Case Type	Pre-application Consultation		
1st / 2nd / 3rd Meeting	1 st		
Date	11/08/2023	Start Time	11:00am
Location	Virtually by Microsoft Teams	End Time	12:15pm

Representing An Bord Pleanála
Stephen Kay – Assistant Director of Planning (Chair)
Susan Clarke – Senior Planning Inspector
Evan McGuigan – Executive Officer

Representing the Prospective Applicant
Brendan Allen – ESB
Mihai Diac – ESB
Brian McAleer – ESB
Janette McDonald – ESB
Glenn Pope – ESB
Grainne Reid – Mott MacDonald

Introduction:

The meeting commenced at 11:00am.

The Board referred to the letter received from the prospective applicant on the 24th May 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 by the prospective applicant:

The prospective applicant began the presentation with an introduction to the project team in relation to the proposed development, as well as the rationale behind the project. The proposed development involves the transition and conversion of the ESB owned Moneypoint Generating Station from coal to Heavy Fuel Oil (HFO) with limited run hours from 2024 until late 2029, primarily for the purposes of security of electricity supply. The prospective applicant submitted that this proposal is being advanced for the purposes of security of electricity supply and because the Commission for Regulation of Utilities (CRU) and EirGrid have identified a need for continued capacity at Moneypoint station beyond 2025 – it was also submitted that a service agreement is imminent outlining the required power from the generation facility up to 2030.

The prospective applicant stated that the future of Moneypoint station post 2030 is currently being considered and that there is another consultation currently ongoing with An Bord Pleanála related to the Green Atlantic Hub (ABP-312734-22) as a separate long-term project. Drawings showcasing the site location and existing site layout of Moneypoint station were presented, with the existing 3 no. 300MW currently coal fired units located to the south of the N67 and an ash storage area of c.50ha. located to the north of the N67. There is also a synchronous compensator on the site. The prospective applicant submitted that the site is licenced by the Environmental Protection Agency (EPA) under an existing industrial emissions licence – Reference: P0605-04. It is also an upper tier site under the Control of Major Accident Hazards (COMAH) Regulations.

The prospective applicant provided further information regarding the rationale behind the proposed development – it stated that EirGrid have identified a projected capacity shortfall in its All Island Generation Capacity Statement 2021-2030. It also stated that the CRU Security of Electricity Supply paper of September 2021 and the Department of Environment, Climate and Communications policy statement of November 2021 had identified a 750 – 1,000MW deficit in generating capacity from 2026 onwards and hence a the medium-term need for the extended operation of older generators (such as the Moneypoint station) in order to ensure the security of electricity supply.

The prospective applicant submitted that, with power generated from offshore unlikely to be available until after 2030, HFO would provide flexibility and diversity (in comparison to coal) to allow Moneypoint station to supply electricity in times of a capacity shortfall. The prospective applicant submitted that this operation would experience limited running hours of approximately 9,000 hours per year over the 3 units (3,000 hours per year each) and would therefore be a significant reduction on the existing total run time of 26,280 hours per year.

According to the prospective applicant, the proposed development would consist of five elements – firstly, the conversion of primary fuel to HFO. The prospective applicant stated that Moneypoint station was originally designed for 100% HFO capacity and that the capability is already there for using oil on site. Secondly, two existing tanks would be replaced with two new HFO tanks which would double the current HFO capacity on site to 100,000 tonnes. The third element would involve the construction of two new auxiliary boilers to supply steam for start-up and HFO heating.

The fourth element would involve changes to previously permitted Flue Gas Desulphurisation (FGD) by-product and ash landfilling arrangements to utilise spare capacity in the existing ash storage area (ASA) when the existing FGD by-product landfill reaches capacity. This process would also include limited ash reclamation. The fifth element would consist of the partial demolition of coal handling equipment. The prospective applicant presented a proposed site layout, showcasing the main elements of this proposed development.

Regarding fuel conversion and storage, the prospective applicant submitted that HFO would be better suited than coal for intermittent operation at Moneypoint station as it is more flexible (quicker ramp up, less bulk materials) and reliable (less erosion and less weather dependent). It also pointed to several other factors, including more favourable start-up times, reductions in greenhouse gas emissions and the production of less ash. In terms of capacity, the 2 new HFO tanks would double capacity to 100,000 tonnes. The maximum HFO use per day is projected to be 5,000 tonnes. The prospective applicant stated that the maximum storage for HFO would cover 20 days while the maximum storage for coal covers 13 weeks.

Regarding the two new auxiliary boilers, the prospective applicant stated that one would be a distillate fired 16MW boiler and the other an electrical boiler. It submitted that the electrical boiler would help to lower greenhouse gas emissions, as well as allowing for increased plant flexibility and facilitating a cold standby state. It also submitted that the new auxiliary boiler house would be located to the west of Unit 3 in order to be close to existing distillate storage and other services.

Regarding the FGD by-product and ASA, the prospective applicant stated that FGD by-product would be landfilled in Area A (on the east of the site) but would reach capacity in the fourth quarter of 2024. It submitted that the ASA would have spare capacity due to reduced ash production and that this spare capacity could be utilised for the FGD by-product. It also submitted that the FGD/ash capping thickness would be increased and that a small quantum of the ash from the ASA would be reclaimed for use in onsite and FGD processes.

Regarding the demolition of coal handling equipment, the prospective applicant stated that it intends to cease coal firing at Moneypoint station by December 2025. It stated its intention to eventually demolish the rising conveyor belt that feeds coal to the bunker bay and the reclaimers within the coal yard. It also stated that there would be a need to keep several structures in this area, primarily HFO unloading equipment.

The prospective applicant submitted its belief that the proposed development falls within the 7th Schedule thresholds (such as energy infrastructure and environmental infrastructure) related to Section 37A of the Planning and Development Act 2000, as amended, and would, therefore, constitute a Strategic Infrastructure Development (SID) case. The prospective applicant stated that the proposed development appears to be of strategic importance to the State and would have significant effects on the area of more than one planning authority. It also stated that following the outcome of the consultation process, a full application would provide more detail on the proposed development.

The prospective applicant submitted that work had been done in terms of Environmental Impact Assessment (EIA) screening and outlined its rationale as to why this work had been carried out. It stated that EIA screening conclusions would also include work done regarding non-mandatory thresholds (outlined in Schedule 5

of the Act) and all work would be summarised in a future Environmental Impact Assessment Report (EIAR).

The prospective applicant submitted that EIA scoping had also been undertaken in line with EIA, Environmental Protection Agency (EPA) and European Commission guidance and directives. It outlined a wide variety of chapters, all of which would take into account the construction and operation of the proposed development as well as (to a limited degree) the demolition and final decommissioning phases. The prospective applicant stated that it intended to begin public consultation in September and would begin consultations with Clare County Council soon. It also stated that it had been in contact with the EPA regarding the industrial emissions licence.

The prospective applicant stated that it had undertaken work in connection with appropriate assessment screening and a Natura Impact Statement (NIS). As part of this, it stated that it was modelling the impact of the proposed auxiliary boilers on the River Shannon and River Fergus estuaries (both classified as a Special Protection Area), as well as the Lower River Shannon (classified as a Special Area of Conservation). The prospective applicant also provided several alternative scenarios that had been considered and investigated as part of work undertaken for EIA scoping.

The prospective applicant provided a projected timeline for the proposed development from now until the end of the project and confirmed that its target is to submit a planning application in November 2023, and would seek to close out consultations with the Board before then. It ended the presentation by reiterating the engagements that had taken place with EirGrid, restating the security of supply issues underpinning the rationale for the proposed development, and providing context in terms of other similar projects being planned around the country.

Discussion:

- The Board's representatives advised the prospective applicant that it would be important to provide context and other examples regarding security of electricity supply issues in a full application.
- In response to a query from the Board's representatives, the prospective applicant confirmed that the red line boundary for the proposed development would not include the loading jetty or impact on the high-water mark (i.e. no foreshore works are proposed).
- The Board's representatives stated that based on the presentation from the prospective applicant, it is likely that the proposed development would constitute a SID case – but ultimately a final decision on this would be made by the Board.
- The Board's representatives advised the prospective applicant that it would need to provide a strong, detailed and robust justification for the proposed development in any potential application, in particular regarding the choice of fuel (HFO).
- The Board's representatives referenced the case of ABP-305028-19, a similar case which was refused permission by the Board and advised the prospective applicant to review the issues arising in this case.
- In response to a query from the Board's representatives, the prospective applicant stated that there were no major issues concerning the industrial licence. It confirmed that there were some noise complaints a few years ago which were dealt with. It also stated that it had held discussions with the EPA regarding the licence, and that the EPA had indicated that a licence review may not be required – but this is yet to be confirmed.
- In response to a query from the Board's representatives, the prospective applicant submitted that it had not yet engaged in any consultation with the planning authority or any prescribed bodies regarding the proposed development.
- The prospective applicant confirmed that work on a habitat survey, foreshore survey, bird data and a bat assessment had been carried out. It also submitted that work regarding the monitoring of emissions was carried out. The Board's representatives stated that this would be an important report in any future

application. In addition, the Board's representatives advised the prospective applicant to look at issues such as the cement used for capping, a carbon calculation and what other alternatives were considered in detail.


- In response to a query from the Board's representatives, the prospective applicant stated that air surveys had not yet been carried out – but that modelling was ready to commence very soon. It submitted that the auxiliary boilers would be the main change in terms of air. The Board's representatives advised that any work done regarding air (and particularly any interactions regarding air and human health) should be as robust as possible.
- The Board's representatives asked the prospective applicant if it would object to potential conditions that limited operating hours of the proposed development being attached to any potential future decision. The prospective applicant stated that it would be guided by EirGrid and the service agreement on this issue.
- In response to a query from the Board's representatives, the prospective applicant submitted that the proposed development would have no significant impact in terms of traffic.
- The Board's representatives advised the prospective applicant to ensure that cumulative effects are investigated thoroughly, particularly in terms of other projects on site such as the Green Atlantic Hub. The prospective applicant stated that the Green Atlantic Hub project would succeed the proposed development and not be on the same timeline, but that it would nevertheless be referenced in the application.
- The Board's representatives advised the prospective applicant that its work regarding landscape, visuals, photomontages, appropriate assessment and risk assessment are all robust. They also raised the issue of indirect and secondary impacts from the use of HFO and advised the prospective applicant to take note of the recent *Coyne v An Bord Pleanála* case at the High Court in this respect.
- In response to a query from the Board's representatives, the prospective applicant submitted that the water quality would likely remain the same and that the volume and frequency of discharge would likely be reduced under the operation of the proposed development.

- The prospective applicant stated that it would request a meeting from Clare County Council next week regarding the proposed development.
- In response to a query from the Board's representatives, the prospective applicant stated that they did not envisage any changes to the number of shipments on site under the operation of the proposed development (i.e. circa 24 No. per annum), however the size of these shipments would be smaller than currently the case.
- The prospective applicant reiterated its intention to submit a planning application for the proposed development in November 2023.
- The Board's representatives asked the prospective applicant if there is agreement with EirGrid over the running hours involved in the proposed development. The prospective applicant stated that it anticipated that the details of the service agreement would be outlined in the coming weeks and that there have been extensive discussions held with EirGrid regarding the proposed development over an extended period of time.
- The prospective applicant stated that it would wait until a meeting is held with Clare County Council or until further engagement is held with EirGrid before taking a decision regarding the closing off or consultations, or whether a further meeting is required. The Board's representatives stated that it is the prospective applicant's choice as to whether it required a second meeting or not and it was agreed to proceed on this basis.

Conclusion:

The record of the meeting will issue in due course and 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. The onus is on the prospective applicant to either request a further meeting or formal closure of the pre-application consultation process.

The meeting concluded at 12:15pm.



Stephen Kay

Assistant Director of Planning