

Record of 1st Meeting ABP-319073-24

Case Reference / Description	ABP-319073-24 - Reserve Gas-Fired Power Generator, GIS Electrical Substation, Energy Storage System (ESS) and associated site development works. Coolpowra, Ballynaheskeragh, Coolnageeragh and Gortlusky, Co.			
	Galway.			
Case Type	Pre-application consultation			
1 st / 2 nd / 3 rd / 4 th Meeting	1 st			
Date	07/03/2024	Start Time	11:00 a.m.	
Location	Virtually	End Time	12:30 p.m.	

Representing An Bord Pleanála	
Staff Members	
Stephen Kay, Assistant Director of Planning (Chair)	
Jimmy Green, Senior Planning Inspector	
Niamh Hickey, Executive Officer	

Representing the Prospective Applicant		
Colm Staunton, Halston		
Stephen Kelly, Halston		
Paul Collins, Lumcloon Energy/Coolpowra Flex Gen Limited.		
Jake Bracken, Lumcloon Energy/Coolpowra Flex Gen Limited.		
lan Douglas, Advisor to Halston		

John Tierney, Advisor to Lumcloon Energy /Coolpowra Flex Gen Limited.

Nigel Reams, Lumcloon Energy /Coolpowra Flex Gen Limited.

Introduction

The Board referred to the letter received from the prospective applicant on the 16th February 2024, 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.

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Presentation made by the prospective applicant:

The prospective applicant gave an overview of the proposed development which consists of three components:

- 1. The reserve gas fired generator will consist of three 375MW open cycle gas-fired generators (OCGT) providing total electrical capacity of 1,125MW and will use natural gas as the primary fuel source. There will also be 19,000 tonnes of gas oil stored on site as secondary fuel. An underground gas pipeline will be brought to the site also (which is proposed to be subject to a separate consenting process) and an above ground installation (AGI) compound which will receive natural gas from the gas network and provide for its combustion in the OCGTs.
- The second component is a 400kV Gas Insulated Switchgear (GIS)
 Substation. The proposed GIS substation will upgrade and replace the existing air insulated switchgear (AIS) Oldstreet substation located to the immediate north of the proposed development.
- The third component is a 200MW energy storage system which includes a long duration energy storage (LDES) battery compound which will comprise a total of 224 modular single storey battery enclosures and a synchronous condenser.

The prospective applicant presented the proposed site location and site layout and discussed the overall site context. The proposed site was chosen following a review of a range of sites along the two 400 kV electricity transmission lines running from Moneypoint to the east of the country. The Oldstreet substation is the only intermediate substation that exists along the 400kV line between Moneypoint and Woodlawn. The Kilcrow River is to the west of the proposed site. The landscape is rural and not considered distinctive at a national or regional level and is classified as a landscape of low sensitivity in the Galway County Development Plan. There are a limited number of residential properties around the proposed site and no protected

sites or monuments near the proposed site location. There will be a new access road going into the proposed site from the local county road.

The prospective applicant then presented the three routes being considered to bring the gas pipeline to the proposed site. All constraints are being considered and consultations with Gas Networks Ireland (GNI) remain ongoing in this regard. The Prospective Applicant noted that they would be preparing a EIAR for the proposed development and that its assessments would include the relevant gas pipeline route options.

The prospective applicant gave their opinion that the proposed development would constitute a strategic infrastructure development under the scope of 37B but sought the Board's opinion in this regard.

The prospective applicant discussed the context of the project at European, National, Regional and Local level and noted that there is support for the proposed development across all relevant energy policies and plans.

The prospective applicant noted that it is preparing the Environmental Impact Assessment Report currently. The prospective applicant also noted the proposed development's hydrological connectivity to downstream European Sites and explained a Natura Impact Statement (NIS) will be prepared as part of any future application.

The prospective applicant concluded the presentation by giving an overview of the proposed development, explaining its importance, and talking through the layout of the proposed site and the locations of the various project components.

Discussion:

- The Board's representatives gave their preliminary view that the OCGT
 component of the proposed development may be considered strategic
 infrastructure development but noted that the final decision would be a matter
 for the Board.
- The Board's representatives queried if the Prospective Applicant had considered whether the various components of the project (the reserve gas fired generator, the transmission/grid connection/GIS works, and battery energy storage system) should be considered as distinct components that should be brought forward under separate planning applications, i.e. Section 37B, Section 182A and Section 34 of the Planning and Development Act, 2000 (as amended) ('the Act') respectively). The prospective applicant stated that while they noted that the battery storage element and the synchronous condenser could be brought forward as a Section 34 application to the local authority that it is their preference that the thermal generator and GIS substation would form one application to the Board. The Board's representative advised that if the prospective applicant proposes to submit a single application to the Board, it must be clearly shown that the grid connection and GIS component is an essential element which would solely serve the reserve gas-fired power generator.
- Furthermore, the prospective applicant was advised to consider the provisions of Section 182A and 182B of the Act and consider their applicability in relation to the electrical transmission components (GIS and cabling). The Boards representatives also advised that if the prospective applicant were to submit two applications, one under section 37E and the other under section 182A then a separate pre-application consultation process would be necessitated for the electrical transmission components under section 182A and 182E of the Act.

The Board's representatives agreed that on the basis of information provided that their preliminary view was that the battery storage and synchronous condenser elements should be brought forward as a section 34 application to the Local Authority.

- The prospective applicant stated that the GIS substation is to replace the AIS substation that currently neighbours the proposed site to the north and that the existing AIS compound will remain in place albeit modernised plant and equipment will be required as it will effectively become an interface compound accessing the national grid. It is planning to use underground cables to connect between the proposed GIS and existing AIS compounds but needs to verify this with Eirgrid (the Boards representatives noted that none of the drawings supplied showed how this was to occur and that the red line boundary on the layout did not seem to provide for such connections. To minimise the disturbance to the grid the prospective applicant is proposing to leave the existing overhead lines into, and out of, the AIS compound as is.
- The Board's representative advised that if the prospective applicant was considering any design flexibility in respect of the substation and cabling, a separate pre-application and application must be submitted.
- The prospective applicant stated that while there are currently three proposed gas pipeline routes back to the national network consultations are still ongoing with GNI. The route will most likely be in excess of 20km in length, and while options can be assessed within the EIAR for the proposed development the final call on the actual route will be with Gas Networks Ireland (GNI) who will progress that application through the relevant process. The on-site Above Ground Installation (AGI) will be provided as the connection point for the reserve gas fired power generator and it is not considered that its location will have to be altered. It is intended that this will be proposed as infrastructure in

the proposed development and handed over to GNI as an asset afterwards. The Boards representatives advised the prospective applicant to engage fully with GNI in this regard and satisfy itself as to which future application/consent process the AGI should be included under.

- The Board's representative queried if there will be any noise effects from the synchronous condenser, the prospective applicant clarified that it has cooling fans and while noting that there are no proximate dwellings in the vicinity that any noise impacts arising from the project will be fully assessed within the EIAR.
- The Board's representatives queried the scale of the secondary fuel (gas oil) storage proposed and whether the COMAH regulations were relevant. The prospective applicant stated that the CRU requires the secondary fuel to provide for 72 hours of continuous operation but the likelihood of operation on gas fuel will be very low. The infrastructure will be installed under the relevant guidance and testing will be carried out on an annual basis, but it would not run down the volume of the fuel tanks and accordingly significant or continuous fuel tanker deliveries will not be required to the site. A truck may need to refill the tank about three times a year. All loading and unloading measures will be incorporated in the design and the project will constitute a lower tier 2 COMAH site and so an environmental risk assessment will be carried out and all relevant consultations held as part of the application process.
- The applicant company has an option to purchase the subject lands from two
 private landowners and it is proposed that the existing house on the site and its
 associated outbuildings will be demolished the details of which will be set out in
 any future application.

- The prospective applicant has requested a meeting with Galway County Council, but this has not yet been carried out.
- The prospective applicant has spoken to locals in the area and stated that there
 are no objections so far. This will be managed as a part of the stakeholder
 management plan.
- The prospective applicant stated that the plant will be designed to be able to run on blended hydrogen from the national network should it become available.
- The prospective applicant stated that the proposed plant is a peaking plant, and
 it will only activate when there is a requirement for it, it will therefore provide
 significant back-up to the national grid to allow it to cope with the fluctuating
 nature of renewable energy sources.
- The Board's representatives advised that the site is located in an unzoned and unserviced rural area and accordingly it would be important for any future planning application to provide significant justification in terms of site selection for the project, to include consideration of environmental grounds. In response to a query from the Boards representatives the prospective applicant stated that it aims to lodge a planning application in June 2024 in order to satisfy CRU requirements.
- The Board's representatives advised the prospective applicant that should an additional meeting be required this can be facilitated. However, should the prospective applicant satisfy themselves of the approach they wish to take in terms of the application process(es) to be undertaken to facilitate the proposed development then it is open to them to request the Board to close the preapplication consultation process and issue a determination in relation to the SID status or otherwise of the project (or its component parts). In this regard the

Boards representatives advised that any request to close the process should provide clarity on what elements are being proposed for a Section 37A determination in the context of Schedule 7 of the Act. The applicant was also advised to ensure that the layout plans and red line extents of the future application incorporate all the relevant elements of infrastructure proposed.

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

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